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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH	
In the Matter of the Petition of Q Link Wireless, LLC for Designation as an Eligible Telecommunications Carrier	UTAH RURAL TELECOM ASSOCIATION’S PETITION TO INTERVENE  DOCKET NO. 18-2549-02

The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members All West Communications, Inc., Bear Lake Communications, Inc., Beehive Telephone Company, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, LLC, Emery Telephone, Gunnison Telephone Company, Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc. and Union Telephone Company (“Members” or “URTA Members”) hereby Petitions the Utah Public Service Commission (“Commission”) for intervention in the above referenced docket.

**PROCEDURAL HISTORY**

On May 23, 2018 Q Link Wireless, LLC (“Q Link”) filed a petition with the Utah Public Service Commission (“Commission”) to amend its designation as an eligible telecommunications carrier (“ETC”) to participate in the Utah Universal Public Telecommunications Service Fund (“UUSF”) support for Lifeline service within the state of Utah. On June 6, 2018, the Commission issued a Scheduling Order that required Q Link to file its direct testimony on or before June 22, 2018 and set the intervention deadline on July 16, 2018. On June 22, 2018, Q Link filed the Direct Testimony of Issa Asad in support of its Petition Amend its Designation as an Eligible Telecommunications Carrier to Receive Utah Universal Service Fund Support for Lifeline Service (“Petition for State Lifeline”).

## **REQUEST FOR INTERVENTION**

1. URTA is a Utah non-profit corporation. The URTA members are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity (“CPCN”) issued by the Commission. URTA members are also ETCs, and pursuant to Utah Code Section 54-8b-15 and Utah Administrative Code R746-8-200, URTA’s members are rate-of-return regulated carriers of last resort who provide access lines and connections in the State of Utah. As such, URTA’s members are both contributors to the UUSF, under Utah Code Section 54-8b-15(8); and recipients of funds from the UUSF under Utah Code Section 54-8b-15(4).

2. On January 25, 2012, in Docket 12-2549-01, Q Link Petitioned the State of Utah for designation as an ETC in Utah for the purpose of providing public Lifeline telecommunication service in the State of Utah including wire centers in URTA members’ service territories (“Q Link ETC Petition”). The Q Link ETC Petition was not limited to federal only Lifeline support.

3. URTA petitioned for intervention in the Q Link ETC Docket on the grounds that URTA members had a significant interest in the matter. The Commission granted URTA’s intervention and URTA fully participated in the docket.

4. On December 14, 2012, the Commission issued an Order approving a Stipulation and granting Q Link ETC status for the purpose of receiving federal Lifeline support. Q Link was required to seek Commission approval in the event Q Link wanted to receive state Lifeline support.

5. In Q Link’s Petition for State Lifeline, Q Link seeks the Commission’s authorization to receive support from the UUSF for Lifeline service to eligible low-income consumers throughout the State of Utah (including wire centers in URTA members’ service territories) pursuant to Utah Code Section 54-8b-15 (2017) and Utah Administrative Code R746-8-403.

6. If Q Link’s Petition for State Lifeline is approved by the Commission, Q Link will be able to receive State Lifeline subsidies for eligible residents of Utah who elect to receive Lifeline service from Q Link.

7. As a result, the legal rights and economic interests of URTA's members are substantially affected by this proceeding.

8. Additionally, as the Commission is aware, Q Link's Petition for State Lifeline support is one of the first in a group of applications of this kind to be determined by the Commission. Under Commission Rule R746-8-403, the Commission is required to make a specific finding of public interest prior to awarding an ongoing distribution from the UUSF for ongoing participation in the State Lifeline program. In addition to URTA's members having an economic interest in the UUSF, URTA and its members can offer the rural wireline carrier of last resort perspective on public interest.

9. As a result, pursuant to Utah Admin. Rule R746-1-108, and in compliance with Utah Code Section 63G-4-207, URTA seeks to intervene in this proceeding for the purpose of protecting its members' interests, as they may appear, as contributors to, and recipients of, the UUSF, and as rural providers of wireline Lifeline service.

10. The interests of justice and the orderly and prompt consideration of this proceeding will not be materially impaired by allowing URTA to intervene. URTA has filed this petition within the deadline set by the Commission and its intervention will not delay the proceedings.

11. URTA requests that copies of all notices, pleadings, filings, correspondence and discovery requests and responses in this docket be served on:

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NOW THEREFORE, URTA respectfully requests that the Commission enter an Order granting URTA's Petition to Intervene in this docket, allowing URTA to participate to the fullest extent allowed by law.

DATED this 16<sup>th</sup> day of July, 2018.

BLACKBURN & STOLL, LC



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Kira M. Slawson  
Attorneys for Utah Rural Telecom Association

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of URTA's Petition for Intervention, Docket 18-2549-02, was served the 16<sup>th</sup> day of July, 2018 as follows:

DIVISION OF PUBLIC UTILITIES (by email)

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