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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH	
Petition of Assist Wireless, LLC for Designation as an Eligible Telecommunications Carrier for the Purpose of Offering Lifeline Service on a Wireless Basis	UTAH RURAL TELECOM ASSOCIATION'S PETITION TO INTERVENE DOCKET NO. 18-2597-01

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 7, 2018, Assist Wireless, LLC (“Assist”) filed a petition with the Utah Public Service Commission (“Commission”) to amend its designation as an eligible telecommunications carrier (“ETC”) to include authorization to receive Utah Universal Public Telecommunications Service Fund (“UUSF”) support for Lifeline service within the state of Utah. On May 22, 2018, the Commission issued a Scheduling Order that required Assist to file its direct testimony on or before June 21, 2018, and set the intervention deadline on July 16, 2018. On June 21, 2018, Assist filed the Direct Testimony of Byron Young in support of its Petition to Amend its Designation as an ETC.

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 May 18, 2017 Assist filed a Petition for Designation as ETC in Docket 17-2597-01 (the “Assist ETC Docket”). In the Assist ETC Docket, Assist sought ETC designation for the purpose of receiving federal Lifeline support for its Utah customer, and also sought UUSF Lifeline funding. Comments were due in the Assist ETC Docket on June 19, 2017. However, the Commission issued an Order Bifurcating Proceedings on June 13, 2017 to give the Commission time to promulgate rules governing wireless providers’ eligibility for state Lifeline support. As a result of the bifurcation, URTA did not seek intervention in the Assist ETC Docket.

3. On December 21, 2017, the Commission issued an Order designating Assist as an ETC in the Assist ETC Docket for the purpose of receiving federal universal service Lifeline support for providing public Lifeline telecommunications service in the State of Utah including wire centers in in URTA members’ service territories.

4. In this instant docket, Assist filed a Petition seeking the Commission’s authorization to obtain UUSF funds so that it may provide an enhanced Lifeline service to qualifying low-income Utah households (the “Assist Petition”).

5. If the Assist Petition is approved by the Commission, Assist will be able to receive state Lifeline subsidies for eligible residents of Utah who elect to receive Lifeline service from Assist.

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

7. Additionally, as the Commission is aware, Assist's application for UUSF Lifeline support is one of the first 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 can offer the rural wireline carrier of last resort perspective on public interest.

8. As a result, pursuant to Utah Admin. Rule R846-1-108, 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.

9. 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.

10. 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 16th day of July, 2018.

BLACKBURN & STOLL, LC



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 18-2597-01, was served the 16th day of July, 2018 as follows:

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