

Kira M. Slawson (7081)  
BLACKBURN & STOLL, LC  
257 East 200 South, Suite 800  
Salt Lake City, Utah 84111  
Telephone (801) 521-7900  
[kslawson@blackburn-stoll.com](mailto:kslawson@blackburn-stoll.com)

Attorneys for Utah Rural Telecom Association

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH	
In the Matter of the Petition of Commnet Four Corners, LLC for Designation as an Eligible Telecommunications Carrier for purposes of Receiving CAF Phase II Support	UTAH RURAL TELECOM ASSOCIATION'S PETITION TO INTERVENE  DOCKET NO. 18-2609-01

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 September 24, 2018, Commnet Four Corners, LLC (“Commnet”) filed a petition with the Utah Public Service Commission (“Commission”) for designation as an eligible telecommunications carrier (“ETC”) in Utah. On October 3, 2018, the Commission issued a Scheduling Order that required Commnet to file its direct testimony on or before October 10, 2018 and set the intervention deadline on October 31, 2018. On October 10, 2018 Commnet filed the Direct Testimony of Rohan Ranaraja in support of its Petition for Designation as an Eligible Telecommunications Carrier (“Petition”).

## 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 Utah Universal Service Fund (“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. Commnet’s Petition seeks designation as an ETC for the purpose of receiving high cost universal service support from the Connect America Fund Phase II.

3. It is unclear from Commnet’s Petition and Testimony whether Commnet will seek State Lifeline Funds pursuant to Utah Code Section 54-8b-15. URTA seeks intervention for the purpose of determining whether Commnet will seek State Lifeline funds; and therefore, whether the legal rights and economic interests of URTA’s members are substantially affected by this proceeding.

4. 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.

5. 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.

6. The interests of justice and the orderly and prompt consideration of this proceeding will not be materially impaired by allowing URТА to intervene. URТА is filing this petition after business hours on October 31, 2018, but its intervention will not delay the proceedings.

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

Kira M. Slawson  
Blackburn & Stoll, LC  
257 East 200 South, Suite 800  
Salt Lake City, UT 84105  
Telephone: 801.578.3578  
[Kslawson@blackburn-stoll.com](mailto:Kslawson@blackburn-stoll.com)

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

DATED this 31<sup>st</sup> day of October, 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 18-2609-01, was served the 31<sup>st</sup> day of October, 2018 as follows:

DIVISION OF PUBLIC UTILITIES (by email)

Patricia Schmid  
[pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Justin Jetter  
[jjetter@agutah.gov](mailto:jjetter@agutah.gov)

Chris Parker  
[chrisparker@utah.gov](mailto:chrisparker@utah.gov)

Bill Duncan  
[wduncan@utah.gov](mailto:wduncan@utah.gov)

Casey Coleman  
[ccoleman@utah.gov](mailto:ccoleman@utah.gov)

OFFICE OF CONSUMER SERVICES (by email)

Robert Moore  
[rmoore@agutah.gov](mailto:rmoore@agutah.gov)

Michele Beck  
[mbeck@utah.gov](mailto:mbeck@utah.gov)

Cheryl Murray  
[cmurray@utah.gov](mailto:cmurray@utah.gov)

Commnet Four Corners, LLC (by email and regular mail)

Gary Dodge  
Phillip Russell  
Hatch, James & Dodge, P.C.  
10 West Broadway, Suite 400  
Salt Lake City, UT 84101  
[gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)  
[prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)



---

Kira M. Slawson