

**Lance J.M. Steinhart, P.C.**  
Attorneys At Law  
1725 Windward Concourse  
Suite 150  
Alpharetta, Georgia 30005

Also Admitted in New York  
Email: info@telecomcounsel.com

Telephone: (770) 232-9200  
Facsimile: (770) 232-9208

September 16, 2019

**VIA ELECTRONIC DELIVERY**

Utah Public Service Commission  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111

Re: Global Connection Inc. of America d/b/a STAND UP WIRELESS  
Docket No. 19-2432-01; Motion to Amend Schedule

To Whom It May Concern:

Attached please find for filing in the above-referenced docket Global Connection Inc. of America d/b/a STAND UP WIRELESS' Motion to Amend Schedule, requesting an advanced hearing date of September 24, 2019.

I hereby certify that a true and correct copy of the above referenced Motion was filed upon the Commission via e-mail on September 16, 2019.

If you have any questions, or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-9200 or hkirby@telecomcounsel.com. Thank you for your attention to this matter.

Respectfully submitted,

*s/ Heather Kirby*

Heather Kirby  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.

*Attorneys for Global Connection Inc. of America  
d/b/a STAND UP WIRELESS*

Attachments

## CERTIFICATE OF SERVICE

I CERTIFY that on September 16, 2019, a true and correct copy of the following Motion to Amend Schedule was served on the service list for Docket No. 19-2432-01 as indicated below:

By Electronic-Mail:

Patricia Schmid (pschmid@agutah.gov)  
Justin Jetter (jjetter@agutah.gov)  
Steven Snarr (stevensnarr@agutah.gov)  
Robert Moore (rmoore@agutah.gov)  
Assistant Utah Attorneys General

dpudatarequest@utah.gov  
Division of Public Utilities

Cheryl Murray (cmurray@utah.gov)  
Office of Consumer Services

*s/ Heather Kirby*

---

Heather Kirby  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

---

Petition of Global Connection Inc. of America	)	
d/b/a STAND UP WIRELESS to Amend its	)	Docket No. 19-2432-01
Designation as an Eligible Telecommunications	)	
Carrier in the State of Utah to Participate in the	)	
Utah Universal Service Fund	)	

---

**MOTION TO AMEND SCHEDULE**

Pursuant to Utah Admin. Code r.746-1, Global Connection Inc. of America d/b/a STAND UP WIRELESS (“Stand Up Wireless” or “Company”) hereby submits this Motion to Amend the Schedule (“Motion”) established by the Utah Public Service Commission’s (“Commission”) June 17, 2019 Order Granting Motion to Modify Schedule, Amended Scheduling Order, and Notice of Hearing (“Amended Scheduling Order”). Stand Up Wireless is authorized to represent that the Utah Division of Public Utilities ("DPU") and the Utah Office of Consumer Services ("OCS") (together with Stand Up Wireless, the "Parties") support this Motion.

The Parties have entered into a Stipulation and Settlement Agreement ("Stipulation"), which is being filed concurrently herewith, regarding the Petition filed by Stand Up Wireless in this docket. There have been no intervenors in this docket and the Parties have completed their discovery. The Stipulation will be presented at the hearing for approval by the Commission and the Parties expect said hearing to be brief, given that all Parties support the Stipulation and there are no other issues to be addressed. Therefore, Stand Up Wireless requests that the Commission advance the hearing date from October 15, 2019 to the morning of September 24, 2019, with the Witness and exhibit list (if needed) to be filed by September 20, 2019, and suspend any other deadlines set forth in the Amended Scheduling Order as necessary.

Due to the approaching proposed amended hearing date of September 24, 2019, the Company respectfully requests that the Commission expedite its consideration of this Motion.

Respectfully Submitted,

*s/ Lance J.M. Steinhart*

---

Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Ste 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
Email: lsteinhart@telecomcounsel.com

*Counsel for Global Connection Inc. of  
America dba STAND UP WIRELESS*

September 16, 2019