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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Applications of E Fiber Moab, LLC)	
and E Fiber San Juan, LLC for Certificates)	
of Public Convenience and Necessity)	Docket No. 20-2618-01
to Provide Facilities-Based Local)	
Exchange Service and Be Designated as Carriers)	
Of Last Resort in Certain Rural Exchanges)	

**UTAH RURAL TELECOM ASSOCIATION’S RESPONSE TO FRONTIER’S MOTION
FOR PARTIAL SUMMARY JUDGMENT AND JOINDER IN APPLICANTS’
MEMORANDUM IN OPPOSITION**

On July 28, 2020, Citizens Telecommunications Company of Utah d/b/a Frontier Communications (“Frontier”) filed a Motion for Partial Summary Judgment (the “Motion”) asking the Commission to dismiss the Applications for Certificate of Public Convenience and Necessity filed by E Fiber Moab, LLC (“E Fiber Moab”) and E Fiber San Juan, LLC (“E Fiber San Juan”)(E Fiber Moab and E Fiber San Juan are collectively referred to as the “Applicants” or “E Fiber”). The Utah Rural Telecom Association (“URTA”) hereby opposes Frontier’s Motion and joins in the opposition filed by the Applicants. URTA has reviewed the Applications, Testimony, Data Request Responses, and the Declaration of Brock Johansen, and agrees and hereby joins in the legal analysis of the Applicants contained in the Memorandum in Opposition submitted by the Applicants, as if fully set forth herein.

While URTA’s analysis of whether the Applications are in the public interest may ultimately differ from the Applicants in some respects, that issue was not raised in Frontier’s

Motion and is, therefore, not properly before the Commission. URTA agrees that the Commission should deny the Motion for Partial Summary Judgment as set forth in the Applicants' Memorandum in Opposition.

Respectfully submitted this 25th day of August, 2020.

BLACKBURN & STOLL, LC



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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2020, I served a true and correct copy of URTA'S MEMORANDUM IN OPPOSITION TO FRONTIER'S MOTION FOR PARTIAL SUMMARY JUDGMENT AND JOINDER IN THE APPLICANTS' MEMORNADUM IN OPPOSITION via e-mail transmission to following persons at the e-mail addresses listed below:

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