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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Consolidated Matter of:</p> <p>The Applications of E Fiber Moab, LLC and E Fiber San Juan, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Service and Be Designated as a Carrier of Last Resort in Certain Rural Exchanges</p>	<p>Docket No. 20-2618-01</p>
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UNOPPOSED MOTION FOR LEAVE TO SUBMIT LATE-FILED EXHIBITS

Citizens Telecommunications Company of Utah d/b/a Frontier Communications (“Frontier”) hereby submits this Motion for leave to submit late-filed exhibits.

On September 25, 2020, Frontier timely filed the Direct Testimony of John H. Hansen. Mr. Hansen’s testimony makes reference to five Exhibits, labeled Exhibit A through Exhibit E. Unfortunately, due to a clerical error, those exhibits were not attached to the testimony and were not filed or served with Mr. Hansen’s testimony as had been intended.

Each of the exhibits contain the Applicants’ resposnes to data requests and have previously been served on all parties. Each of the Exhibits is identified below:

- Exhibit A is the Applicants’ response to Frontier’s second set of data requests;
- Exhibit B is a document created by Applicants and provided with Applicants’ response to Frontier’s data request 2.6;
- Exhibit C is the Applicants’ response to the second set of data requests submitted by the Office of Consumer Services (“OCS”);
- Exhibit D is the Applicants’ response to the first set of data requests submitted by the Division of Public Utilities (“DPU”);¹
- Exhibit E is a document created by Applicants and provided with Applicants’ response to DPU data request 1.7.

As noted above, each of Exhibits A through E are E Fiber’s responses to data requests submitted by various parties in this docket and each have previously been served on each of the parties during the conduct of discovery. As such, no party will suffer any prejudice from the timing of the filing of the exhibits.

Prior to filing this motion, counsel for Frontier reached out to counsel for all other parties and all have indicated that they do not object to the Motion or to the timing of the filing of the Exhibits. Frontier requests that the Commission grant this unopposed Motion and accept the attached Exhibits as being filed in connection with the Direct Testimony of John H. Hansen.

JAMES DODGE RUSSELL & STEPHENS, P.C.



Phillip J. Russell
Attorneys for Frontier Communications

¹ Exhibit D was misidentified in Mr. Hansen’s testimony as the Applicants’ response to the second set of data requests submitted by the DPU. Mr. Hansen intended to refer instead to the Applicants’ response to the first set of data requests submitted by the DPU and that reference will be corrected at the hearing.

Certificate of Service

Docket No. 20-2618-01

I hereby certify that a true and correct copy of the foregoing was served by email this 1st day of October, 2020, on the following:

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/s/ Phillip J. Russell