

Kira M. Slawson  
Blackburn & Stoll, LC  
257 East 200 South, Suite 800  
Salt Lake City, Utah 84111  
(801) 521-7900 (Phone)  
E-Mail: [kslawson@blackburn-stoll.com](mailto:kslawson@blackburn-stoll.com)

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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**In the Matter of the Petition of Uintah Basin  
Electronic Telecommunications, L.L.C. for  
Designation as an Eligible  
Telecommunications Carrier in the State of  
Utah for the Purpose of Offering Lifeline  
Service on a Wireless Basis**

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**Docket No. 20-\_\_\_\_-01**

**PETITION OF UINTAH BASIN ELECTRONIC TELECOMMUNICATIONS, L.L.C.  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF UTAH FOR THE PURPOSE OF  
OFFERING LIFELINE SERVICE ON A WIRELESS BASIS AND TO PARTICIPATE IN  
THE UTAH UNIVERSAL SERVICE FUND FOR LIFELINE PURPOSES**

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**I. INTRODUCTION**

Uintah Basin Electronic Telecommunications, L.L.C., (the “Petitioner” or the “Company”), pursuant to 47 U.S.C. §214(e)(2) and 47 C.F.R. §54.101 through §54.207, and §54.401 through §54.422, hereby submits this Petition to the Utah Public Service Commission (“Commission”) for designation as a wireless Eligible Telecommunications Carrier (“ETC”) in Utah for the purpose of receiving (1) federal universal service Lifeline support for qualifying Utah customers; (2) federal tribal universal service Lifeline support for qualifying Utah customers; and (3) Utah State Lifeline support from the Universal Public Telecommunications

Service Support Fund (“UUSF”) for qualifying customers. The Company does not request ETC status for the purpose of receiving any other type of state or federal universal support.

As demonstrated in detail below, the Company meets the statutory and regulatory requirement for designation as an ETC for both Federal and State Lifeline support. The Company is able and prepared to offer Lifeline-supported services throughout the Company Service Territory in Utah. As demonstrated more fully below, granting ETC status to the Company will benefit the public interest by making the Company’s services available to a broad range of low-income customers. In support of this Petition, the Company states the following:

## **II. BACKGROUND**

### **A. Company Overview.**

The legal name, address and telephone number of Petitioner, Uintah Basin Electronic Telecommunications, L.L.C. and its designated contact person is as follows:

Uintah Basin Electronic Telecommunications, L.L.C.  
211 E. 200 N  
P.O. Box 398  
Roosevelt, UT 84066  
Attn: Bruce H. Todd  
Phone: 435-646-2782

The Company provides affordable commercial mobile radio service (“CMRS”) throughout Utah and the surrounding states, including voice calling, text messaging, and mobile and fixed broadband Internet access to its customers using its own wireless network and facilities. The Company manages all aspects of the customer experience, including network and facilities operation, service pricing, handset selection, marketing materials, and live customer service. The Company’s unlimited prepaid Lifeline wireless plan is affordable and easy to use

making it attractive to low-income and lower volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with family and friends and for contacting prospective employers, all of which are critical in this time of global pandemic.

**B. Proposed Effective Date.**

The proposed effective date of the designation of eligibility to receive federal and state universal support is immediately upon the Commission's issuance of an Order approving this Petition.

**C. Identification of Service Area.**

The Company provides CMRS throughout the state of Utah as well as in adjoining states within the region. Therefore, the Company requests designation as an ETC that is statewide in scope ("Company Service Territory"), subject to the existence of its facilities and the facilities of its underlying carriers with whom the Company has robust roaming agreements. The rate centers of the Company Service Territory are identified in Exhibit 1. The Company understands that the Company Service Territory may overlap with rural carriers in Utah, but maintains that the public interest factors described below justify its designation in these service areas consistent with Commission precedence, especially because the Company seeks ETC designation solely to utilize state and federal USF funding to provide Lifeline service to qualified low-income consumers.

**D. Compliance with Applicable Service Requirements.**

The Company has access to the spectrum necessary to satisfy the applicable performance requirements established by the FCC. The Company currently holds the licenses for radio services identified in Exhibit 2. Additionally, the Company provides service by reselling service which it obtains from other underlying facilities-based providers.

**E. The Commission Has Jurisdiction to Act.**

The Commission is vested with authority to act on the Company's Petition pursuant to Section 214(e) of the Communications Act of 1934 (the "Act"). Section 214(e)(2) of the Act gives State commissions authority to designate common carriers that meets certain requirements as an "eligible telecommunications carrier" ("ETC") for a service area designated by the State commission. Under the Act, a state public utilities commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1).

Additionally Section 54-8b-15 of the Utah Code and Utah Administrative Code R746-8-403 set out various statutory and regulatory elements related to the State's UUSF. As demonstrated below, the Company meets the requirements for ETC designation under both state and federal law.

**F. Proposed Lifeline Offering.**

The Company has the ability to provide all services and functionalities supported by the universal service program as detailed in 47 C.F.R. 54.101(a) of the Federal Communications Commission ("FCC") rules. Upon designation as an ETC, the Company will provide Lifeline

service to qualifying low-income households requesting these services in Utah in accordance with 47 C.F.R. 54.202(a)(1). As demonstrated herein, the Company meets all of the statutory and regulatory requirements for designation as an ETC and for participation in the federal Lifeline program and for reimbursement from the Utah UUSF.

1. The Company Lifeline Plan. The Company initially plans to offer a prepaid unlimited nationwide talk, text, and data plan to Lifeline customers at the rate of \$26.99 per month.<sup>1</sup> The Company's plan meets the FCC and state minimum standards for voice minutes and data. The Company wireless Lifeline plan will include the following:

- a. Caller ID
- b. Call Waiting
- c. Call Forwarding
- d. 3-Way Calling
- e. Voicemail

There will be no activation fee for Utah Lifeline customers. There is no additional charge for toll calls. Calls to 911 are free. Calls to customer service using 611 are free. The Company will offer a discounted handset that is compliant with the FCC's handset requirements. A copy of the proposed advertised Lifeline service offering is attached as Exhibit 3.

2. Plan Enrollment. Customers interested in the Company Lifeline program will be able to call the Company for information or visit the Company's website which will contain information on the Company's Lifeline service plan including a detailed description of the program and eligibility requirements. Customers will be required to apply for Lifeline, using the National Verifier application. This can be accessed by Customers online at

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<sup>1</sup> The Company's managed network practices apply.

<https://nationalverifier.servicenowservices.com/lifeline>, or customers may submit a paper application. The Company will provide a link to the paper application, or will mail one to the customers on request. The National Verifier will recertify the Lifeline subscribers annually.

### **III. THE COMPANY SATISFIES THE FEDERAL REQUIREMENTS FOR DESIGNATION AS AN ETC.**

Section 254 of the Act provides that only an ETC designated under Section 214(e) of the Act shall be eligible to receive specific Federal universal service support. Section 214(e)(2) of the Act gives State commissions authority to designate common carriers that meets certain requirements as an ETC for a service area designated by the State commission. The criteria for designation as an ETC are set forth in 47 U.S.C. Section 214(e)(1). Specifically, an applicant must: (i) be a common carrier that (ii) offer services that are supported by Federal Universal Service Support mechanisms either through its own facilities, or a combination of its own facilities and resale of another carrier's services; (iii) advertise the availability of such services is eligible for designation as an ETC; (iv) make Lifeline service available to qualifying low income consumers; (v) comply with service requirements; (vi) remain functional in emergency situations; (vii) satisfy consumer protection and service quality standards; (viii) be financially and technically qualified; (ix) take steps to protect against fraud, waste and abuse of the federal USF; (x) comply with FCC requirements on Lifeline certification and verification; and (xi) comply with FCC requirements for deposits, fees and reports. As demonstrated below, the Company satisfies each of the above-listed requirements for ETC status.

The Company provides CMRS in the the Company Service Territory, and is seeking designation as an ETC provider in the the Company Service Territory. Section 214(e)(2) provides that in the case of an area served by a rural telecommunications carrier, a Commission

may designate more than one common carrier as an ETC for a service area so long as the Commission finds that the designation is in the public interest. Some of the counties in the Company Service Territory are served by rural telephone companies, thus the Commission must find that the designation of the Company as an ETC in the rural service areas would serve the public interest. The FCC has previously determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”<sup>2</sup> Additionally, as the Commission is aware, the Commission has granted several wireless ETCs with statewide ETC designation for Lifeline purposes. Therefore, it is consistent with Commission precedent to grant the Company ETC status in the Company Service Territory provided it meets the criteria for ETC designation.

**A. The Company is a Common Carrier.**

The Company is a common carrier as defined by 47 U.S.C. §153(10). 47 U.S.C. §153(10) provides that “common carrier” means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy...” The Company provides CMRS within the Company Service Territory. The Company’s CMRS is provided over facilities owned by the Company and includes roaming on facilities of other rural and national carriers.

Federal Statutes provide, and the FCC has determined that CMRS providers are treated as common carriers for regulatory purposes<sup>3</sup>. Thus, the Company is a common carrier.

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<sup>2</sup> See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

<sup>3</sup> Mobile services providers are common carriers. 47 U.S.C. §332(c)(1)(A).

**B. The Company Provides the Requisite Services in the Company Service Territory.**

47 USC § 214 (e) of the Act and 47 C.F.R. §54.101 provide that a common carrier seeking ETC designation must provide the services that are supported by Federal universal service support.

Eligible voice telephony services must provide: 1) voice grade access to the public switched network or its functional equivalent; 2) minutes of use for local service provided at no additional charge to end users; 3) access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or E911 systems; and 4) toll limitation for qualifying low-income consumers.<sup>4</sup>

Eligible broadband services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints.

As demonstrated below the Company offers each of those services in Utah by utilizing its own facilities, including its own cellular and personal communications services ("PCS") antennas, towers and mobile switching offices, in accordance with 47 USC §214(e)(2), and by utilizing facilities owned by other rural and national carriers through contractual arrangements.

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<sup>4</sup> In its Lifeline Reform Order, the FCC stated that toll limitation would no longer be deemed a supported service. *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket 11-42, WC Docket 03-109, CC Docket 96-45, WC Docket 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("Lifeline Reform Order") at ¶367.



1. Voice Grade Access to the Public Switched Network. The Company provides voice grade access to the public switched telephone network (“PSTN”) through its network facilities.

2. Minutes of Use for Local Service. As part of the voice grade access to the PSTN, an ETC must provide local usage to its customers. Local usage means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users. The Company’s proposed lifeline plan offers unlimited nationwide voice calling at no additional cost to the customer beyond the monthly service charge.

3. Access to 911 and E911 Emergency Service. The Company provides 911 and E911 access for all its customers to the extent local government in its service area has implemented 911 or E911 systems. The Company complies with the FCC requirements governing the deployment and availability of E911 handsets. Calls to 911 emergency services will always be free and will be available regardless of service activation or availability of minutes. Additionally, the Company has the ability to remain functional in emergency situations, including access to back up power, rerouting of traffic around damaged facilities, and managing traffic spikes resulting from emergencies.

4. Toll Limitation for Qualifying Low-Income Customers. In its Lifeline Reform Order, the FCC stated that toll limitation would no longer be deemed a supported service.<sup>5</sup> “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”<sup>6</sup> The

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<sup>5</sup> Lifeline Reform Order at ¶367.

<sup>6</sup> Lifeline Reform Order at ¶49.

Company will not provide toll limitation service, but like most wireless carriers, the Company does not differentiate domestic long distance from local usage.

5. Broadband Services. The Company will provide its Lifeline customers with broadband access that has the capability to transmit data to and receive data from all or substantially all of the Internet endpoints. The Company's unlimited data plan meets and exceeds the FCC's minimum broadband data offerings.

47 U.S.C Section 214(e)(1)(a) requires that a carrier must use its own facilities or a combination of its own facilities and resale of another carrier's facilities in order to provide universal service supported services. The Company does NOT seek forbearance from the "own facilities" requirement as the Company for the most part utilizes its own facilities to provide its CMRS. This network will be used for all calls to and from the Company's Lifeline customers in Utah.

### **C. The Company Will Advertise the Availability of Supported Services**

The Company currently offers and advertises its wireless services to both residential and business customers in Duchesne, Uintah, Daggett, and Wasatch Counties, Utah using media of general distribution such as billboard, radio, newspaper, television, direct mail, and Internet advertising. The Company also has a website that provides information regarding the wireless services. Upon designation as an ETC, the Company will continue to broadly advertise the availability and rates for the services described above using media of general distribution as required by Section 54.201(d)(2) of the Commission's regulations.<sup>7</sup> The Company will expand its

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<sup>7</sup> See 47 C.F.R. § 54.201.

advertising efforts if needed to ensure that Lifeline-eligible customers are aware of the service offerings.

In addition, the Company will comply with the FCC's revised rules regarding information to be included in marketing materials.<sup>8</sup> Specifically, the Company's marketing materials will state, in easily understood language, that: (1) the service is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; (5) documentation is required for enrollment and on-going eligibility; (6) the program is limited to one discount per household; and (7) the Company is the provider of the service.

**D. The Company Will Make Lifeline Service Available to Qualifying Low-Income Consumers.**

Upon designation of an ETC, the Company will make available to qualified low-income consumers in the Company Service Territory, a discounted service offering that meets all applicable Lifeline requirements. The Lifeline service offering will include unlimited access to broadband services.

**E. Service Requirements**

Pursuant to 47 CFR §54.202(a)(1)(i), the Company provides telecommunications services to all its customers within the Company Service Territory by utilizing its own facilities, including its own cellular and PCS antennas, towers and mobile switching offices, and roaming on facilities of other rural and national carriers pursuant to robust roaming agreements, and certifies that it will comply with the service requirements applicable to the support it receives consistent with 47 CFR

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<sup>8</sup> See 47 C.F.R. §54.405

§54.202(a)(1)(i).

**F. The Company Will Remain Functional in an Emergency Situation**

The Company will be able to remain functional in an emergency situation in its service territory because its network is designed with sufficient battery back-up power and utilization of generators to ensure functionality if its primary or external power supply is unavailable. In addition, the Company maintains 3 portable generators that can be moved to cell sites as needed. Additionally, the Company's switch connectivity to the PSTN is based on redundant rings enabling traffic to continue if a particular route is damaged.

**G. Commitment to Consumer Protection and Service Quality**

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.<sup>9</sup> The Company in general commits to satisfying the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service and the applicable Utah rules on consumer protection and service quality.

The Company's customers will be able to call customer service by dialing 611 from their Company handset and no minutes will be used or documented for the call.

**H. The Company is Financially and Technically Capable of Providing Lifeline Services in Compliance with FCC Rules.**

The FCC rules require ETC petitioners to demonstrate financial and technical capability to comply with the FCC's Lifeline service requirements.<sup>10</sup> The factors to be considered are: (1) a

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<sup>9</sup> See 47 C.F.R § 54.202(a)(3).

<sup>10</sup> *Lifeline Reform Order*, ¶¶ 387-388.

carrier's prior offering of service to non-Lifeline subscribers; (2) the length of time the carrier has been in business; (3) whether the carrier relies exclusively on Lifeline reimbursement to operate; (4) whether the carrier receives revenues from other sources; and (5) whether the carrier has been subject to enforcement action or ETC revocation proceedings in any state.<sup>11</sup>

The Company has provided CMRS to customers since 1989 without any Lifeline support. Historically, the Company has relied, and will continue to rely, on revenues generated from non-Lifeline customers to support its business. The Company has not, and will not, rely solely on Lifeline reimbursement to operate. Rather, being certified as an ETC will merely allow the Company to offer low-income customers a local choice for reliable mobile service, thereby increasing its customer base.

The Company management team has substantial experience in both wireless and wireline networks and through an affiliated incumbent local exchange carrier, has been providing wireline service for over 65 years (including Lifeline service). The Company's management team is very familiar with the Lifeline service requirements, the National Verifier Lifeline enrollment and eligibility requirements, as well as the procedures for de-enrollment. Neither the Company, nor its affiliated incumbent local exchange carrier has been subject to a Lifeline enforcement action or an ETC revocation in any state.

#### **I. Protections Against Fraud, Waste and Abuse**

The Company will take all steps necessary to prevent fraud, waste and abuse, and will comply with all applicable Lifeline requirements adopted by the FCC for purposes of preventing

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<sup>11</sup> *Id.*

fraud, waste and abuse, including the enrollment procedures and de-enrollment procedures outlined by the FCC in 47 C.F.R. §54.401 through §54.422.

**J. Compliance with Subscriber Eligibility Determination and Certification.**

The Company shall utilize the National Verifier consistent with USAC's policies and procedures. The Company's management team has extensive experience with the Lifeline National Verifier and eligibility and certification rules.

**K. Compliance with FCC Rules on Deposits, Fees, and Reports.**

The Company does not offer any wireless Lifeline plan that charge additional fees for toll calls. In compliance with 47 C.F.R. Section 401(c), the Company will not collect a deposit in order to initiate service for its Lifeline service plan. Additionally, in compliance with 47 C.F.R. § 401(e) the Company will not charge Lifeline customer a monthly number-portability charge. The Company will comply with the FCC's annual reporting requirements for ETCs as set forth in 47 C.F.R. § 54.422.

**IV. THE COMPANY SATISFIES THE STATE REQUIREMENTS FOR RECEIVING STATE LIFELINE SUPPORT FROM THE UUSF.**

The Utah Public Service Commission has also adopted requirements for Lifeline support which are outlined in Utah Admin Code R746-8-403. The Commission's rules provide that state Lifeline support may not exceed \$3.50 per Lifeline subscriber per month of subscription to a service that meets FCC broadband requirements as set forth in 47 C.F.R. 54.408; and for wireless Lifeline, allows, at no charge beyond the basic monthly fee, unlimited texting and at least 1000

voice minutes per month.<sup>12</sup> The rules also state that the ETC will be eligible for ongoing Lifeline distribution if the company is an ongoing participant in an approved Lifeline program and if the Commission finds it is in the public interest.<sup>13</sup>

As discussed herein, the Company Lifeline offering will include unlimited voice services, texting, and data to access wireless broadband internet service. The Company proposed offering plainly meets (and exceeds) the requirements as outlined by the Commission to be eligible for UUSF Lifeline support. The Company's offering also complies with the minimum FCC service standards and will enable Lifeline customers to receive the full value of their Lifeline subsidy. As discussed in Section V. below, the Company's Network's request for ETC designation, including state Lifeline support from the UUSF is in the public interest.

Additionally, the Company hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. Upon Commission request, the Company shall be prepared to answer questions or present additional testimony or other evidence about its services within the state.

## **V. DESIGNATION OF THE COMPANY AS AN ETC AND APPROVING THE RECEIPT OF STATE LIFELINE SUPPORT WILL SERVE THE PUBLIC INTEREST**

As stated above, under 47 U.S.C. Section 214(e)(2), “[u]pon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more

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<sup>12</sup> R746-8-403(2)(a)(i)

<sup>13</sup> R746-8-403(1)

than one common carrier as an eligible telecommunications carrier” for a designated service area, so long as the requesting carrier meets the requirements of Section 214(e)(1).<sup>14</sup> Section 214(e)(2) further states: “[b]efore designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.”

Designation of the Company as an ETC statewide is in the public interest. The FCC has stated that “the best way to [increase competition and innovation] is to increase the number of service providers offering Lifeline services.”<sup>15</sup> Designation of the Company as an ETC in the Company Service Territory will further the public interest by providing consumers with lower prices and higher quality services. Designation of the Company as an ETC will enable the Company to offer wireless rates from a local company in the Company Service Territory that are affordable for low-income consumers.

The designation of the Company as an ETC and allowing it to receive reimbursement from the UUSF for state Lifeline will not have a negative impact on the UUSF. In the case of Lifeline support, an ETC only receives Lifeline support for the customers it obtains. Therefore, if the Company’ offerings do not provide consumer benefits, then customers will not elect Lifeline service from the Company and the Company will receive no support from the UUSF. In that case, no consumer or party is harmed and the UUSF is not impacted. On the contrary, if customers do choose the Company’ wireless Lifeline service, there will be an impact to the UUSF, but other competitors will likely respond by improving their service offerings in order to retain or attract

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<sup>14</sup> 47 U.S.C. § 214(e)(1).

<sup>15</sup> *In the Matter of Lifeline and Link Up Reform and Modernization et. al.*, WC Docket 11-42, Proposed Rule, FCC 15-71 (FCC rel. June 22, 2015) at ¶121.



customers, and ultimately customers will benefit. Further, to the extent the Company “wins” the customer from another Lifeline provider, the net result to the UUSF is the same.

## **VI. CONCLUSION**

Based on the foregoing, designation of the Company as an ETC in the State of Utah for state and federal Lifeline purposes is consistent with the requirements of 47 U.S.C. Section 214(e)(2), Utah Code Section 54-8b-15, the state and federal rules, and is in the public interest.

WHEREFORE, for the reasons set forth herein the Company respectfully requests that the Commission promptly designate the Company as an ETC in the Company Service Territory in the State of Utah for the purpose of receiving federal support and State Lifeline support from the UUSF for the provision of low-income communications services on a wireless basis to qualified low-income customers.

Dated this 10<sup>th</sup> day of June, 2020.

**BLACKBURN & STOLL, LC**



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**Kira M. Slawson**  
**Attorneys for Uintah Basin Electronic**  
**Telecommunications, L.L.C.**

**Verification**

I, Bruce H. Todd, CEO/GM of Uintah Basin Electronic Telecommunications, L.L.C., have read the foregoing Petition for Designation as an Eligible Telecommunications Carrier, which was prepared under my direction and supervision. I hereby affirm that the statements contained in the Petition are true and correct to the best of my knowledge, information and belief.

Executed this 9 day of June, 2020.

Bruce H. Todd

County of Duchesne )  
                                  :SS  
State of Utah         )

Subscribed and sworn to before me this 9 day of June, 2020.

Marcia Hanberg

Notary Public

My Commission Expires:  
January 11, 2021



## CERTIFICATE OF SERVICE

I hereby certify that on the 10<sup>th</sup> day of June, 2020, I served a true and correct copy of Uintah Basin Electronic Telecommunications, L.L.C.'s Petition for Designation as an Eligible Telecommunications Carrier in the State of Utah for the Purpose of Offering Lifeline Service on a Wireless Basis via e-mail transmission to following persons at the e-mail addresses listed below:

Utah Public Service Commission

[PSC@Utah.gov](mailto:PSC@Utah.gov)

Division of Public Utilities

[DPUDatarequest@utah.gov](mailto:DPUDatarequest@utah.gov)

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

Brenda Salter [bsalter@utah.gov](mailto:bsalter@utah.gov)

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

Office of Consumer Services

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

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



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Kira M. Slawson



## EXHIBIT 2

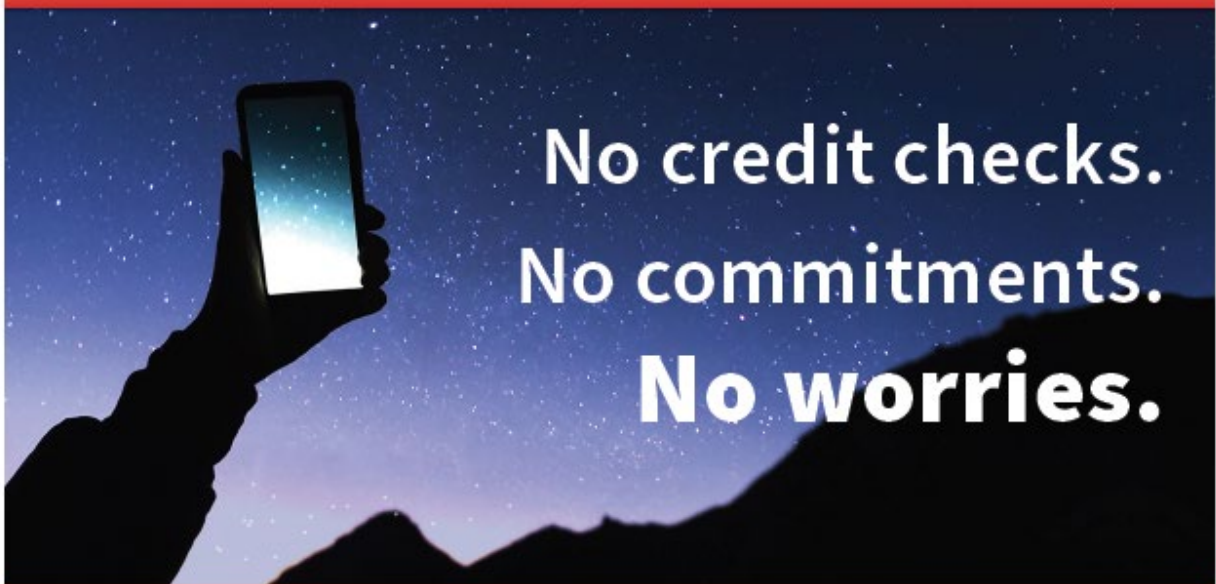
### RADIO LICENSES of Uintah Basin Electronic Telecommunications

RADIO SERVICE	CALL SIGN	MARKET
AW	WQNK604	CMA674 – UTAH 2 – MORGAN
CL	KNKN236	CMA677 – UTAH 5 – CARBON
CW	L000023469	MTA036 – SALT LAKE CITY
CW	L000017928	BTA399 – SALT LAKE CITY – OGDEN, UT
CW	WPSZ758	BTA399 – SALT LAKE CITY – OGDEN, UT
WU	L000009717	REA005 – CENTRAL
WU	L000009718	REA006 – WEST
WU	L000017927	REA005 – CENTRAL

## EXHIBIT 3

### Proposed Advertisement of Lifeline Offering

Through the Lifeline program, customers may qualify to get  
**UNLIMITED TALK, TEXT, & DATA**  
**for just \$26.99/mo.**  
on Unlimited Prepaid.



No credit checks.  
No commitments.  
No worries.

### Here's how it works:

- 1 Go to [stratanetworks.com/lifeline](http://stratanetworks.com/lifeline) to apply.
- 2 Bring in your own device or buy one outright from us.
- 3 Get unlimited talk, text, and data for \$26.99/mo.
- 4 Pay as you go and cancel whenever you want.

\*All local data speeds will be capped at 10 Mbps and reduced to 1.5 Mbps upon reaching 10 GB of data usage within a single billing period. All roaming data speeds will be restricted to 1.5 Mbps and reduced to 512 Kbps upon reaching 5 GB of data usage within a single billing period. Once usage thresholds have been met, customers may experience slower than normal data speeds. Tethered data will be restricted to the same policy. Restrictions apply; see store for details.

\*Lifeline is a government assistance program and the service is non-transferable. Only eligible consumers may enroll in the program; documentation is required for enrollment and on-going eligibility. Limited to one discount per household.



211 E 200 N, Roosevelt | 2085 W HWY 40, Vernal | [stratanetworks.com/lifeline](http://stratanetworks.com/lifeline) | 435.622.5007