



State of Utah

Department of Commerce
Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Brenda Salter, Utility Technical Consultant Supervisor

Shauna Benvegna-Springer, Utility Technical Consultant

Date: June 9, 2021

Re: **Docket No. 21-043-T01**, Gunnison Telephone Company Proposed Tariff Revisions.

Recommendation (Approve Tariff Sheets)

The Division of Public Utilities (Division) has reviewed Gunnison Telephone Company's ("Company") proposed tariff revisions filed on June 1, 2021, to comply with Federal Communications Commission's (FCC) 8YY Access Charge Reform Order¹. The Division has no objection to the tariff revisions and recommends that the Public Service Commission (Commission) approve the Company's' revised tariff sheets. The Division recommends the Company's' revised tariff sheets become effective on July 1, 2021, as requested.

Issue

On June 1, 2021, the Company submitted to the Commission proposed tariff revisions to implement the FCC's 8YY Access Charge Reform Order. On June 1, 2021, the Commission

¹ FCC Order WC Docket No. 21-148 dated April 16, 2021, Annual Access Charge Tariff Filings, Section II, A) 5)
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requested the Division to investigate and provide analysis, evaluation results, and the basis for conclusions and recommendations regarding the Company's proposal by June 11, 2021.

Background

The FCC Access Charge Reform Order² requires Local Exchange Carriers (LEC) conform and define originating 8YY rates in Local Switching, Transport and Query Charge.

Local Switching

The FCC order requires LECs to transition their interstate and intrastate toll free (or 8YY) originating end office access service rates over a three-year period. Beginning July 1, 2021, carriers are required to tariff separate rate elements for toll free and non-toll-free interstate and intrastate originating end office access service. The intrastate toll-free originating end office access service rates must be reduced to interstate levels if intrastate rates exceed comparable interstate rates.

Transport

Incumbent LECs are required to tariff rate elements for interstate and intrastate non-toll-free originating transport service between an end office and tandem switch and remove toll free originating traffic rate elements, and tariff a new single rate element of no more than \$0.001 per minute for joint tandem switched transport access service for toll free calls. No additional transport rate element adjustments were ordered to occur in subsequent years.

Query Charge

Incumbent LECs are required to reduce the intrastate and interstate toll-free database query charges in their tariffs to no more than \$0.004248 per query. Further reductions will be made to the query rate in 2022 and 2023.

This memorandum represents the Division's response to the Commission's Action Request.

² Ibid

Discussion

The Division has reviewed the proposed tariff sheets, and compared the FCC's 8YY Access Charge Reform Order³. The Company's tariff revisions provides no rate reduction for the local switching rate, exclusion of toll fee minutes, and implements the glide path for the data base query rate. Currently, the Company's local switching rate is lower than the FCC rate and does not require a change. The Division has determined the tariff sheets are in compliance with the FCC order⁴ and the Commission's Rule 746-405-5, Format and Construction of Tariffs.

Conclusion

Based on the Division's review, the Division has no objections to the proposed tariff revisions and recommends the Commission approve the Company's' revised tariff sheets. The Division believes that the revised tariff is consistent with the FCC's 8YY Annual Access Charge Reform Order⁵.

cc: Howard James Sanders, Manager, Gunnison Telephone Company
Natalie Gleave, CFO, Gunnison Telephone Company
Michele Beck, Director, Office of Consumer Services
Tym Rutkowski, Senior Manager, Moss Adams LLP

³ Ibid.

⁴ Ibid.

⁵ Ibid.