

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

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Docket No. 22-053-02

**In the Matter of the Petition of UBTA-UBET
Inc. dba Strata Networks for Restructuring of
Extended Area Service Rates**

**PETITION OF UBTA-UBET COMMUNICATIONS INC. DBA STRATA NETWORKS
FOR RESTRUCTURING OF EXTENDED AREA SERVICE RATES**

I. INTRODUCTION

UBTA-UBET Communications Inc. dba Strata Networks (“Strata” or “Petitioner”) is telephone cooperative as defined under Utah Code §54-2-1(30). Strata is a rate of return regulated carrier of last resort authorized to provide public telecommunications services within its certificated area pursuant to a Certificate of Public Convenience and Necessity issued by the Utah Public Service Commission (“Commission”), as set forth in Utah Code §54-8b-2. As a telephone cooperative, Strata is entitled to set its rates in the manner set forth in Utah Code §54-7-12(7). Specifically, Strata’s board of directors can set the rates for Strata by filing updated tariff sheets setting forth the new rates provided Strata’s board of directors approves the rates after a public meeting, properly noticed, for all Strata’s customers and members.

II. RATE CHANGES

A. Residential, Business, and Extended Area Service Rates

On or about October 28, 2021, the Board of Directors of Strata voted to combine the R1 Rate and the Federal Subscriber Line Charge (“SLC”) into one R1 and B1 Rate element. After a public meeting held on November 15, 2021 and a filing with the Commission on November 16, 2021 these rates went into effect on December 16, 2021 in Docket 21-053-T02. Strata’s residential (R1) rates, including the SLC, together with extended area service rates, are contained in Table 1 below:

Table 1

Exchange	Residential (R1)	Extended Area Service	Total
Duchesne	\$25.50	\$3.25	\$28.75
Roosevelt	\$26.50	\$2.25	\$28.75
Vernal	\$26.95	\$1.80	\$28.75
All others	\$23.00	\$5.75	\$28.75

Strata’s business (B1) rates, including the SLC, together with extended area service rates, as presently in effect are contained in Table 2 below:

Table 2

Exchange	Business (B1) ¹	Extended Area Service	Total
Duchesne	\$34.25	\$3.25	\$37.50
Roosevelt	\$35.25	\$2.25	\$37.50
Vernal	\$35.70	\$1.80	\$37.50
All others	\$31.75	\$5.75	\$37.50

¹ These are the multi-line business rates currently in place. However, in Docket 22-053-T03, Strata has approved a \$1.00 decrease in each B1 rate to accommodate the Access Recovery Charge increase that its multi-line business customers will be charged. The rate decrease sought in Docket 22-053-T03 has not yet been approved by the Commission.

In an effort to further streamline the Strata Tariff and the customer's bill, at a meeting on May 26, 2022, Strata's board of directors approved a significant tariff restructuring to eliminate blank pages, obsolete information, etc. At the same time, the Board of Directors approved combining the EAS Rate element with the R1 and B1 Rates to maintain the total subscriber revenue of \$28.75 (Residential) and \$37.50 (Business) while maintaining unlimited service between the exchanges. A public meeting was properly noticed by Strata and held on June 22, 2022, providing customers with notice of the tariff changes and the EAS rate element change. On July 8, 2022, Strata presented the tariff changes to the Commission with a requested effective date of August 16, 2022.

The elimination of the EAS rate element, though approved by the Board in May of 2022 and presented to the members/customers at the June 22, 2022 meeting, was not included with the tariff changes to be effective August 16, 2022. This is because although Strata is a cooperative and is authorized to set its rates and rate elements without Commission approval, after consultation with the Division of Public Utilities and the Office of Consumer Services, Strata believes that since the EAS Rate Elements and Rates were previously approved by the Commission in Orders in 2002 and 2005 pursuant to R746-347, a Petition to the Commission pursuant to R746-347-7, and a resulting order approving the elimination of the EAS rate element would be beneficial to the record. Thus, Strata is filing this Petition out of an abundance of caution rather than just filing the tariff sheets eliminating the EAS rate element which are attached hereto as Exhibit A.²

² On August 15, 2022, Strata submitted another Tariff Change and Advice Letter in Docket 22-053-T03 that includes a \$1 reduction in its B1 rates to accommodate the increase in Access Recovery Charge, and to maintain the same overall rate paid by the multi-line business customers consistent with Strata's Board approval. In Docket No. 22-053-T03, the Division has

B. There Are No Longer Incremental Costs Associated with Providing EAS.

Strata's board has determined that as a result of technological advances in switching, there are no material incremental costs associated with providing EAS service across Strata's exchanges. Strata believes that eliminating the EAS rate element, while materially maintaining the overall rate paid by the customers is in Strata's best interest. Strata retains the same revenue per customer, rates are simplified and consistent amongst all the Strata exchanges, and the customers' bills are simplified.

C. Public Interest

R746-347-7 specifically provides that "each incumbent telephone corporation providing EAS pursuant to tariff may petition the Commission for approval of a restructuring of the EAS to simplify EAS prices or to reduce the number of EAS areas. . . The Commission may grant or deny the petition in the public interest." Because of technological changes in the method of switching, Strata cannot identify any material incremental costs associated with providing EAS throughout its exchanges. As a result, since Strata's proposed rate element changes will not result in a change to Strata's customers or to its subscriber revenues, and there will be no increased disbursement to Strata from the Utah Public Telecommunications Service Support Fund as of

recommended approval, but as of the date of this filing, the \$1.00 reduction in the B1 rate has not yet been approved by the Commission. Because we anticipate approval of the revised B1 rate by the Commission in Docket 22-053-T03 during the pendency of this Petition, Strata has included the rate change in the Strata B1 rates from Docket 22-053-T03 in the Proposed Tariff Sheets attached as Exhibit A. If the rate change requested in Docket No. 22-053-T03 is not approved, Strata will revise the proposed tariff sheets included as Exhibit A hereto to reflect the appropriate rates.

result of this change. Based on the foregoing, Strata believes it is in the public interest for the Commission to approve the elimination of the EAS rate element as permitted by R746-347-7.

III. CONCLUSION

As demonstrated above, the elimination of the EAS rate element in conjunction with the increase in the R1 and B1 rates will not result in any subscriber revenue loss for Strata, or any rate increase for Strata's customers, and since there is no incremental cost associated with providing EAS, Strata asks that its Petition be granted. Strata hereby requests that the Commission approve restructuring of Strata's EAS to eliminate the separate mandatory EAS rate element for R1 and B1 service and the Tariff Sheets attached as Exhibit A be approved. Strata requests that such approval be effective on or before October 16, 2022.

Respectfully submitted this 26th day of August, 2022.

BLACKBURN & STOLL, LC



Kira M. Slawson
Attorneys for UBTA-UBET Communications
Inc. dba Strata Networks

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of August, 2022, I served a true and correct copy of UBTA-UBET Communications Inc.'s Petition for Restructuring of EAS Rate Elements via e-mail transmission to following persons at the e-mail addresses listed below:

Utah Public Service Commission
PSC@Utah.gov

Division of Public Utilities
DPUDatarequest@utah.gov
Chris Parker chrisparker@utah.gov
Patricia Schmid pschmid@ag.utah.gov

Office of Consumer Services
Michele Beck mbeck@utah.gov
Alyson Anderson aanderson@utah.gov
Robert Moore rmoore@ag.utah.gov



Kira M. Slawson

Exhibit A

Proposed Tariff Sheets

NETWORK ACCESS LINE SERVICE

RATES

Service (Exchange)	Residential (R1)	Business (B1)
One-Party Service		
Duchesne	\$28.75	\$36.50
Roosevelt	\$28.75	\$36.50
Vernal	\$28.75	\$36.50
All Others	\$28.75	\$36.50
PBX Trunk		\$50.50
PBX Outward Only		\$36.50
Remote Call Forward		\$18.25

CONDITIONS

The above rates apply to the provision of network access lines which, when connected to a suitable instrument provides access to the telecommunications network and are billed on a per line per month basis.

Instruments must be provided by the subscriber, subject to the conditions described in the Connection with Customer Provided Equipment portion of this tariff.

Additional instruments may be attached to network access lines. The Company reserves the right to limit the number of instruments connected to an access line if they cause interference with the normal operation of the line.

PBX Outward Only allows only outgoing calls from the customer's PBX or Key System. It provides access to 911, dial tone, operator services, and long-distance services, but does not allow incoming calls.

Remote Call Forwarding allows a subscriber to have incoming calls forwarded to another number. This service is not programmable by the subscriber, it is a fixed feature. Applicable Service Order Fees and Central Office Line Connection Charge will apply when adding or modifying this feature.

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 P.S.C. UTAH NO. 1
 Sheet No. 20

~~3rd 2nd~~ Revised Sheet

Cancels ~~2nd Revised 1st Revised~~

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NETWORK ACCESS LINE SERVICE

RATES

Service (Exchange)	Residential (R1)	Business (B1)	Extended Area Service (EAS)
One-Party Service			
Duchesne	\$28.7525.50	\$36.5033.35	\$3.25
Roosevelt	\$28.7526.50	\$36.5034.25	\$2.25
Vernal	\$28.7526.95	\$36.5034.70	\$1.80
All Others	\$28.7523.00	\$36.5030.75	\$5.75
PBX Trunk		\$50.50	
PBX Outward Only		\$36.50	
Remote Call Forward		\$18.25	

CONDITIONS

The above rates apply to the provision of network access lines which, when connected to a suitable instrument provides access to the telecommunications network and are billed on a per line per month basis.

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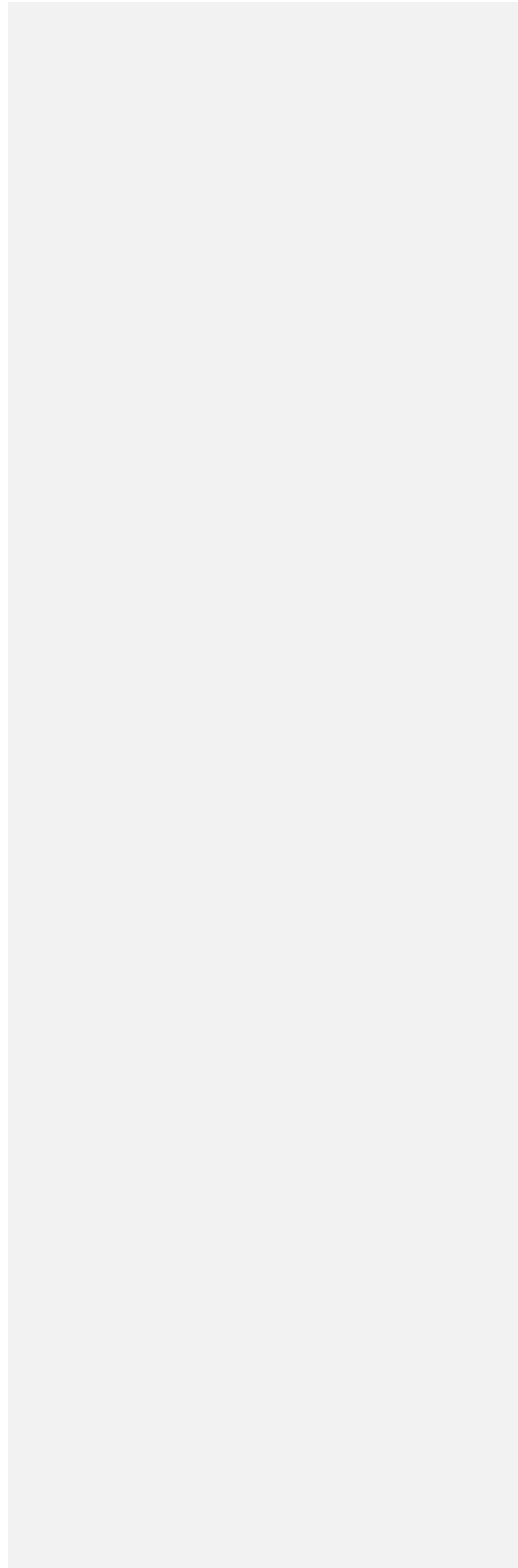
Issued Date: ~~8/26/2022~~

Bruce H. Todd

~~9/16/2022~~ Advice/Docket No. 22-053-T041

Effective Date: ~~10/16/2022~~

General Manager/CEO



INTEGRATED SERVICES DIGITAL NETWORK (ISDN)

RATES

Primary Rate Interface (PRI)	Installation Charge	Monthly Rate
Stand Alone T1 facility per 24 channel facility [1]	\$960.00	\$144.00
Service Configuration		
23B+D	\$984.00	\$384.00
24B	\$984.00	\$384.00
23B+Back-up D	\$984.00	\$384.00
DID Termination per B-Channel		
Each Trunk Circuit Termination (One-Way or Two-Way)	Applicable Nonrecurring Charges	\$48.20
DID Trunk Setup (Per Trunk)	\$54.00	
Circuit-Switched Data Connection per T1 facility		
23B data only channels	\$1215.00	\$560.00
24B data only channels	\$1287.00	\$584.00
Optional Features per T1 facility		
2B Channel Transfer	\$96.00	\$24.00
ISDN Calling Name Delivery	\$168.00	\$20.00
ISDN Redirecting Number Delivery	\$53.00	\$7.00
All miscellaneous changes or rearrangements of facilities, per facility	\$48.00	
Move existing DS1 to DS3 on vacant channels	\$312.00	
Moving current customer T1 facility		
Within same central office	\$480.00	
Outside current central office	\$960.00	

[1] One Service Configuration is required for each T1 facility.

UBTA-UBET Communications, Inc.
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INTEGRATED SERVICES DIGITAL NETWORK (ISDN)

RATES

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DID Termination per B-Channel [2]		
Each Trunk Circuit Termination (One-Way or Two-Way)	Applicable Nonrecurring Charges	\$48.20
DID Trunk Setup (Per Trunk)	\$54.00	
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All miscellaneous changes or rearrangements of facilities, per facility	\$48.00	
Move existing DS1 to DS3 on vacant channels	\$312.00	
Moving current customer T1 facility		
Within same central office	\$480.00	
Outside current central office	\$960.00	

[1] One Service Configuration is required for each T1 facility.

~~[2] EAS charges also apply.~~

Issued Date: ~~8/26/22~~ 8/26/22

Bruce H. Todd

Effective Date: 10/16/22
General Manager/CEO

~~9/16/2022~~ Advice/Docket No. 22-053-T043

