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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Brenda Salter, Assistant Director

Abdinasir Abdulle, Utility Technical Consultant Supervisor

Shauna Benvegnu-Springer, Utility Technical Consultant

Date: June 3, 2025

Re: **Docket No. 25-043-T01**, TARIFF Gunnison Telephone Company. Proposed Tariff Revisions

Recommendation (Approve Tariff Sheets)

The Division of Public Utilities ("DPU" or "Division") has reviewed the tariff filing and recommends the Public Service Commission ("PSC" or "Commission") approve Gunnison Telephone Company's ("Gunnison" or "Company") proposed revisions to its tariff rates to comply with the Federal Communications Commission's ("FCC") intercarrier compensation rules. The Division recommends the tariff changes be approved with an effective date of July 1, 2025.

Issue

On May 20, 2025, Gunnison submitted revised tariff sheets, which follow the current FCC rules governing intercarrier compensation. The Commission issued an Action Request on May 20, 2025, for the Division to investigate the proposed changes and report its findings and recommendations by June 3, 2025. This memorandum represents the Division's response to the Commission's Action Request.



Background

Issuing carriers must match terminating access by July 1, 2025, by decreasing specific capped interstate switched access rates.¹ It is expected that the FCC will approve the National Exchange Carrier Association's (NECA) proposed rate change filing, effective July 1, 2025. The rates are based on an 18.4483% rate decrease, as announced by NECA on April 10, 2025.

Discussion

The Division reviewed the redlined version and final versions of the tariff sheets submitted with the Company's filing. The proposed rates have been adjusted by the announced NECA rate proposal dated April 10, 2025. Gunnison is requesting a decrease in 21 Local Transport rates, with the rate difference per month as follows:

- Entrance Facility: Voice Grade Two Wire - \$4.02
- Entrance Facility: Voice Grade Four Wire - \$6.44
- Entrance Facility: High Capacity DS1 - \$19.68
- Entrance Facility: High Capacity DS3 - \$179.29
- Entrance Facility: Optical OC3 - \$182.72
- Entrance Facility: Optical Channel OC12 - \$195.07
- Direct Trunked Transport Direct Trunked Facility: Voice Grade - \$.29
- Direct Trunked Transport Direct Trunked Facility: High Capacity DS1 - \$1.04
- Direct Trunked Transport Direct Trunked Facility: High Capacity DS3 - \$11.71
- Direct Trunked Transport Direct Trunked Facility: Optical Channel OC3 - \$12.53
- Direct Trunked Transport Direct Trunked Facility: Optical Channel OC12 - \$15.75
- Direct Trunked Termination: Voice Grade - \$2.88
- Direct Trunked Termination: High Capacity DS1 - \$6.98
- Direct Trunked Termination: High Capacity DS3 - \$44.80
- Direct Trunked Termination: Optical OC3 - \$46.64
- Direct Trunked Termination: Optical OC12 - \$101.54
- Multiplexing: DS3 to DS1 - \$40.86
- Multiplexing: DS1 to Voice - \$15.78
- Tandem Switch Transport: Terminating - \$0.0000281
- Tandem Switch Termination: Terminating - \$0.000144
- Tandem Switch Originating - \$0.00192

¹ See *In the Matter of Connect America Fund, et al.*, WC Docket No. 10-90 *et al.*, Order DA 13-564 (rel. March 27, 2013).

Gunnison is requesting to cancel 14 Local Transport rates with the rate difference as follows:

800 Series Database Access Service Queries		
Per Query	\$0.0035	CANCELLED
Vertical Feature	\$0.002024	CANCELLED
Non-Mileage Services Reserved for future Use		
Terminating	\$0.0175	CANCELLED
Originating	\$0.0175	CANCELLED
800 Series Database Access Service Queries For Future Use		
Per Query	\$0.0035	CANCELLED
Basic	\$0.002024	CANCELLED
Vertical Feature	\$0.0002	CANCELLED
Local Switching for Future Use		
Terminating	\$0.000000	CANCELLED
Originating	\$0.000000	CANCELLED
Information Surcharge for Future Use		
Terminating	\$0.000000	CANCELLED
Originating	\$0.000000	CANCELLED
Local Switching Toll-Free for Future Use		
Originating	\$0.0175	CANCELLED
Transitional Rate LTR		
Intrastate		
Terminating	\$0.000000	CANCELLED
Originating	\$0.000000	CANCELLED

Gunnison is requesting to add a new Local Transport rate for an Originating Tandem Switch Access with a rate of \$0.000888 per minute per month.

The Division discussed the rate changes with Company representative, Courtney Spears, and confirmed the information using the NECA database on June 3, 2025. This was done to ensure that the new rates for intrastate compensation are in parity with the interstate rate compensation, effective July 1, 2025. The rates are decreased by a lesser percentage than the 18.4483% because the Company's rates were lower than the proposed rates in prior years and were not required to be increased.

The Division reviewed and analyzed the impact on revenue due to the rate changes. Gunnison is not using 30 of 35 rates unless necessary. The Company uses five of these

rates, namely High Capacity DS1, Direct Trunk Transport High Capacity DS1, Direct Trunk Termination High Capacity DS1, Tandem Switch Terminating 1, and Tandem Switch Terminating 2. The revenue lost is forecasted to be under \$900.00. Therefore, the revenue is immaterial and has no significant impact.

Conclusion

The Division reviewed Gunnison's filing and had no concerns with the proposed revisions. The Division recommends the Commission approve the filing as submitted, effective July 1, 2025, as requested.

cc: Natalie Gleave, Gunnison Telephone Company