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May 22, 2009

Public Service Commission
Sandy Mooy
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Re: Docket No. 09-999-08

Dear Commissioners and Sandy:

The Utah Rural Telecom Association ("URTA") requests that the Commission consider Utah Code Ann. § 54-7-12(8) as it devises new rules for rate case filings in Docket No. 09-999-08. S.B. 75 did not change this provision except for altering the section number from (7) to (8). The legislature intended that telephone corporations with fewer than 30,000 access lines be regulated on a streamlined, less burdensome basis. Utah Admin. Code § R746-344 already governs filings for telephone corporations with fewer than 5,000 access lines and attempts to reduce the expense of rate cases.

URTA is concerned that the Division of Public Utilities' May 18, 2009 recommendations in this docket for filings in telecommunications rate case may not adequately reflect the current statutory approach for companies of their size. URTA recommends that the Commission draft rules that lighten the burden and reduce the expense of a rate case for all companies and do not increase the filing requirements.

Sincerely

Callister Nebeker & McCullough



Stephen F. Mecham

cc: Parties