

**STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD**

In re: Review of Assessments Rules [199 IAC 17]	Docket No. RMU-2016-0025
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COMMENTS OF THE IOWA COMMUNICATIONS ALLIANCE

The Iowa Communications Alliance¹ (the “Alliance”) files these comments in response to the Board’s April 19, 2019 “Order Commencing Rulemaking.”

The Alliance generally supports the proposed rule changes and believe these changes improve the fairness of, and increase transparency of, IUB assessments and billings. We also applaud the Board for incorporating many of the suggestions made by commenters (including the Alliance) during the Stakeholder Comment portion of this docket. The Alliance offers limited comments on two items to supplement and clarify our overall support of this rulemaking.

Discount for Less Regulation. The Alliance re-affirms the statements in our Stakeholder Comments supporting the Board’s revised and more transparent mechanism for dividing costs between “direct assessments,” “industry direct assessments” and “remainder assessments.”

We also renew our request that the Board recognize the significant impact of recent deregulatory actions on the Board’s activities relating to oversight of

¹ The Alliance is the voice of Iowa’s rural communications industry representing more than 125 providers that offer voice service via landline, wireless, TDM, VoIP and other technologies. As the premier leader in education, advocacy and training for Iowa’s rural communications industry, the Alliance represents nearly all certificated incumbent, rate-of-return local exchange carriers in Iowa.

telecommunications service providers. We now suggest the Board should equitably reduce the amount of remainder expenses attributable to telecommunications providers.

In proposed rule 17.2(9), the Board provides a 50% discount in “industry direct” and “remainder” assessments for those gas and electric utilities that are exempt from rate regulation as compared to rate-regulated gas and electric utilities.

Likewise, given the significant deregulation for telecommunications resulting from recent Board Orders, HF 2446 and the rewrite in the current Chapter 22 rulemaking, the Board should also apply a 50% discount for telecommunications service providers when the Board calculates its remainder expenses.

Uncollected Assessments. In our Stakeholder Comments, the Alliance requested the Board identify effective mechanisms for collecting “uncollected” assessments from utilities to minimize or eliminate the amount of uncollected funds that would be rolled back and re-assessed to those utilities that do pay.

We believe the Board’s power to assess inherently includes the power to collect delinquent amounts. It appears that the Board’s recently implemented process to publicly disseminate and identify delinquent invoices during its monthly public Board meetings assists in notifying utilities of past due amounts and encourage payment. During the open Board Meeting on May 21st, Board staff discussed pending procedures to utilize the Department of Administrative Service’s “offset program” to recoup unpaid assessments from delinquent utilities. The Alliance supports the offset program and any other administratively and financially practicable steps the Board can take to improve the collection of assessments before writing amounts off as “uncollectible.”

Respectfully Submitted

IOWA COMMUNICATIONS ALLIANCE

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