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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION )  
OF BULLSEYE TELECOM, INC. FOR A ) CASE NO. BUL-T-04-1  
CERTIFICATE OF PUBLIC CONVENIENCE )  
AND NECESSITY TO PROVIDE )  
COMPETITIVE TELECOMMUNICATIONS ) COMMENTS OF THE  
SERVICES WITHIN THE STATE OF ) COMMISSION STAFF  
IDAHO. )**

**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Donovan E. Walker, Deputy Attorney General, in response to the Notice of Application, Notice of Modified Procedure and Notice of Comment/Protest Deadline issued in Order No. 29648 on December 1, 2004, and submits the following comments.

On October 15, 2004, BullsEye Telecom, Inc. filed an Application for a Certificate of Public Convenience and Necessity with the Commission seeking its review and approval.

**STAFF ANALYSIS**

BullsEye's Application proposes to provide basic resold and facilities-based local exchange services and resold interexchange services to both residential and business customers throughout Idaho. BullsEye plans to offer local exchange services primarily via an unbundled network platform. Interexchange services will be an adjunct to the local exchange services and

the Company intends to commence offering service immediately upon certification and approval of its interconnection agreement.

The company is incorporated in the State of Michigan and headquartered in Oak Ridge, Michigan. BullsEye is authorized to provide local exchange and interexchange services in 35 states. A Certificate of Authority to transact business as a foreign corporation from the Idaho Secretary of State was obtained on May 17, 2004.

BullsEye has provided financial sheets for quarters ending December 31, 2002 and 2003 as well as the appropriate contact information for its registered agent for service of process within Idaho.

#### **STAFF RECOMMENDATIONS**

Staff has reviewed the Application submitted by BullsEye Telecom, Inc., and believes the Company understands and agrees to comply with the Commission rules and requirements. Based on this review, the Company's filing fulfils the requirements of the Commission Rules and Procedural Order No. 26665. The Staff believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Therefore, the Staff recommends approval of the Application for a Certificate of Public Convenience and Necessity.

Respectfully submitted this 22nd day of December 2004.



Donovan E. Walker  
Deputy Attorney General

Technical Staff: Grace Seaman

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 22<sup>ND</sup> DAY OF DECEMBER 2004, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. BUL-T-04-1, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

MONIQUE BYRNES  
CONSULTANT  
TECHNOLOGIES MANAGEMENT INC  
PO BOX 200  
WINTER PARK FL 32789

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SECRETARY