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IDAHO PUBLIC
UTILITIES COMMISSION

July 16, 2013

Via Hand Delivery

Ms. Jean Jewell
Idaho Public Utilities Commission
P O Box 83720
Boise, ID 83720-0074

Re: Comments in Support of CenturyLink's Request for Partial Waiver of the Requirements of IPUC Order No. 29841 (Case Nos. QWE-T-13-03, CEN-T-13-03, and CGS-T-13-03)

Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven copies of Idaho Telecom Alliance's Comments in Support of CenturyLink's Request for Partial Waiver of the Requirements of IPUC Order No. 29841.

If you have any questions or require further information, please contact me at (208) 577-5747 or by e-mail at cam@camlawidaho.com.

Sincerely,



Cynthia A. Melillo

CAM

Enclosures

cc: Mary S. Hobson
Lisa A. Anderl
(all via electronic mail, w/ encl.)

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UTILITIES COMMISSION

Attorney for Idaho Telecom Alliance

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

)	CASE NOS.
)	
IN THE MATTER OF THE REQUEST FOR)	QWE-T-13-03
PARTIAL WAIVER OF THE)	CEN-T-13-03
REQUIREMENTS OF IPUC ORDER NO.)	CGS-T-13-03
29841)	
)	COMMENTS OF THE IDAHO
)	TELECOM ALLIANCE

The Idaho Telecom Alliance ("ITA"), by and through its attorney of record, Cynthia A. Melillo PLLC, hereby files these Comments in response to the Notice of Application and Notice of Modified Procedure in Case Nos. QWE-T-13-03, CEN-T-13-03 and CGS-T-13-03 issued on July 3, 2013. ITA is a state telephone association, and its members include both commercial companies and cooperatives. The fourteen (14) members of ITA provide advanced telecommunications and broadband services in rural Idaho. All of the members (or affiliates of the members) are designated Eligible Telecommunications Carriers ("ETC") in Idaho and claim a direct and substantial interest in this proceeding.

COMMENTS OF IDAHO TELECOM ALLIANCE - QWE-T-13-03, CEN-T-13-03 and CGS-T-13-03

On June 7, 2013, Qwest Corporation (dba CenturyLink QC), CenturyTel of Idaho, Inc., and CenturyTel of the Gem State, Inc., (dba CenturyLink) (hereinafter "Petitioners") filed a Petition for Partial Waiver of the Requirements of IPUC Order 20841, seeking a waiver of the requirement to file a two-year improvement plan as set forth in Order 20841.

On July 3, 2013, the Commission issued Order No. 32844, Notice of Application and Notice of Modified Procedure in Case Nos. QWE-T-13-03, CEN-T-13-03 and CGS-T-13-03, inviting comments on the use of Modified Procedure in this matter and inviting comments in support of or in opposition with the matters set forth in the Petition and/or Order No. 32844.

Petitioners very clearly present the position that the requirement to file a two-year network improvement plan in connection with the 2013 annual ETC recertification under Order 20841 would serve little purpose. The Federal Communications Commission ("FCC") has been revising its rules regarding ETC reporting requirements and in light of the fact that the rules are currently not finalized, the FCC has waived its requirement for the filing of a five-year network improvement plan for 2013. Because the two-year network improvement plan was intended by the Commission to take the place of the FCC's five year network improvement plan on the state level for state-certified ETCs, Petitioners argue that until the FCC requirements are clearly established, ETCs would not be able to produce a network improvement plan with any certainty and as such, such plans would be meaningless.

ITA is in agreement with Petitioners and if the Commission deems it appropriate to grant the waiver to Petitioners, ITA respectfully requests that the Commission grant such waiver to all ETCs so certified by the Commission, subject to all the same terms and conditions as the Commission would make applicable to Petitioners in connection with such waiver.

ITA believes the use of Modified Procedure to be appropriate in this matter. In the event the Commission elects to hold hearings in this matter, ITA reserves the right to file a Petition to Intervene.

Respectfully submitted this 16th day of July 2013.

By: 
Cynthia A. Melillo
CYNTHIA A. MELILLO PLLC
Attorney for Idaho Telecom Alliance

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July 2013, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Jean Jewell
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702
jean.jewell@puc.idaho.gov

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