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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
COMCAST PHONE OF IDAHO, LLC FOR)	CASE NO. CPI-T-18-02
REGISTRATION AS A WHOLESALE)	
TELECOMMUNICATIONS PROVIDER IN)	COMMENTS OF THE
IDAHO.)	COMMISSION STAFF
)	

STAFF OF the Idaho Public Utilities Commission, by and through its Attorney of record, Sean Costello, Deputy Attorney General, submits the following comments.

BACKGROUND

On January 19, 2018, Comcast Phone of Idaho, LLC ("Comcast Phone") filed an Application with the Commission, pursuant to Procedural Order No. 32277 and IDAPA 31.01.01.114, for registration as a wholesale provider of telecommunications service in Idaho. Application at 1.

STAFF ANALYSIS

Comcast Phone is a limited liability company organized in the State of Delaware and lists its principal place of business as Philadelphia, Pennsylvania. *Id.* In May 2016, Idaho's Secretary of State certified that Comcast Phone is authorized to transact business in Idaho as of May 24, 2016. *Id.*; Exhibit A. Comcast Phone lists CT Corporation Services, 921 S. Orchard St., Suite G, Boise, Idaho 83705, as its registered agent in Idaho. *Id.* at 2.

Comcast Phone is seeking authority to provide wholesale local telecommunications services within the State of Idaho. *Id.* at 1. Comcast Phone states that it has already negotiated an interconnection agreement with Qwest Corp. d/b/a CenturyLink, which was filed with this Commission on August 10, 2017, and approved on August 24, 2017. *See* Order No. 33855; Case No. QWE-T-17-02.

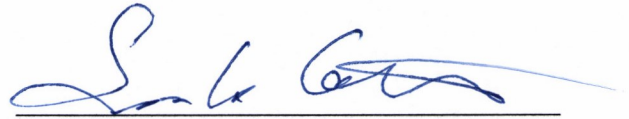
Comcast Phone states that it will comply with all applicable Idaho laws and Commission Rules applicable to competitive wholesale providers of local telecommunication services and, if it obtains numbering resources in Idaho, will be subject to all applicable numbering conservation measures. *Id.* at 3.

STAFF RECOMMENDATION

Staff has reviewed the Application by Comcast Phone for compliance with applicable legal requirements to be registered as a wholesale provider of telecommunications services in Idaho and believes the Company understands and agrees to comply with Commission Rules of Procedure 114 and Commission Order No. 32277. Staff believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Staff, therefore, recommends the Commission approve Comcast Phone as a registered wholesale communications provider subject to the following conditions:

1. Comcast Phone shall comply with number pooling and reporting requirements of the North American Numbering Plan Administrator, as set forth in Commission Order No. 30425;
2. Comcast Phone shall provide necessary reports and contribute as appropriate to the Idaho Universal Service Fund, Idaho Telecommunications Relay System, Idaho Telecommunications Service Assistance Program; and
3. Comcast Phone shall comply with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers.

Respectfully submitted this 23rd day of February 2018.



Sean Costello
Deputy Attorney General

Technical Staff: Daniel Klein


i:umisc:comments/cpit18.2scdk comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 23rd DAY OF FEBRUARY 2018, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. CPI-T-18-02, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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