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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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| IN THE MATTER OF THE APPLICATION OF CITIZENS TELECOMMUNICATIONS COMPANY OF IDAHO TO REDUCE ACCESS RATES AND REBALANCE OTHER RATES FOR TELECOMMUNICATIONS SERVICES.                                                                                      | )))))) | CASE NO.  CTC-T-98-3STAFF MOTION FOR EXTENSION OF TIME |

COMES  NOW  the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Cheri C. Copsey, Deputy Attorney General, in response to Order No. 27578, the Notice of Modified Procedure, Notice of Public Hearings and Order of Consolidation in Case No. CTC-T-98-3, issued June 19, 1998, moves for a twenty-one (21) day extension of time within which to file comments.  Comments were originally due July 10, 1998.  Pursuant to Idaho Public Utilities Commission Rule 256, all parties will be served with copy of this Motion.

MEMORANDUM

On May 15, 1998, Citizens Telecommunications Company of Idaho filed an Application to reduce access rates and rebalance other rates for telecommunications services pursuant to Idaho Public Utilities Commission Rule 121. IDAPA 31.01.01.121.  Citizens also proposed establishing extended area service (EAS) in the majority of its exchanges, thereby addressing pending EAS

petitions in Case Nos. GNR-T-96-2, GNR-T-96-8 and GNR-T-97-10.  It proposed to modify EAS for Aberdeen to Blackfoot and American Falls which was approved by the Commission in

GNR-T-96-7 and which is currently scheduled to become effective July 11, 1998. Order No. 27412.

During the June 19 decision meeting the Commission expressed interest in knowing the relationship between the costs for providing access and the proposed access rates.  Staff is working on reviewing that information.  However, as was suggested during the decision meeting, more time is clearly necessary.  Staff needs additional time to obtain and review that information before making its recommendation.  In addition, Staff has been contacted by U S WEST Communications, Inc. regarding the feasibility of providing EAS under some of the proposed optional plans.  U S WEST indicated it needed more time to evaluate those plans and their impact on U S WEST customers.  Therefore, Staff respectfully requests an additional twenty-one (21) days within which to file its comments and make a recommendation.  Staff recommends that the comment period be extended until July 31, 1998.  This should not disrupt this case because a public hearing is presently scheduled for August 4, 1998, in McCall, Idaho.

RESPECTFULLY submitted this                   day of July 1998.

Cheri C. Copsey

Deputy Attorney General

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