

MATT HUNTER
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0318
IDAHO BAR NO. 10655

RECEIVED
2019 SEP -4 PM 2:13
IDAHO PUBLIC
UTILITIES COMMISSION

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
ENVISION NETWORKS LLC FOR A CPCN TO)	CASE NO. ENL-T-19-01
PROVIDE LOCAL TELECOMMUNICATIONS)	
SERVICE IN IDAHO)	
)	COMMENTS OF THE
)	COMMISSION STAFF
)	

The Staff of the Idaho Public Utilities Commission comments as follows on Envision Networks LLC's Application.

BACKGROUND

On July 29, 2019, Envision Networks LLC ("Envision" or "Company") filed an Application requesting a Certificate of Public Convenience and Necessity ("CPCN") to provide local telecommunications service in Idaho¹ pursuant to IDAPA 31.01.01.114.

STAFF ANALYSIS

Envision is an Idaho limited liability company that is authorized to do business in Idaho. Exhibit A of Application. It seeks to provide facilities-based competitive telecommunications services, and plans to obtain an interconnection agreement with CenturyLink to support its

¹ Envision originally filed its Application on March 11, 2019. After consulting with Commission Staff, Envision filed an amended Application on July 29, 2019.

deployment of local exchange services. Application at 3. Envision's principle business address will be in Pocatello, and it plans to primarily offer residential telephone and internet service. *Id.* at 3-4. Its initial service territories will be Pocatello, Idaho Falls, Rexburg, and the surrounding areas where CenturyLink is the incumbent. *Id.* at 4.

The Company submitted sufficient financial data to establish it possesses adequate financial resources to provide the proposed services. *Id.* at 4-5. It provided a proposed tariff as part of its Application, setting forth rates, rules, terms, and regulations applicable to the contemplated service—as well as a customer contact. *Id.* at 5.

Finally, Envision states that it has reviewed all applicable Commission rules and agrees to comply with them. *Id.* at 6.

STAFF RECOMMENDATION

Staff has reviewed Envision's Application for a CPCN and believes the Company understands and agrees to comply with the Commission rules and requirements. Based on this review, Staff believes Envision's Application fulfills the requirements of the Commission Rules. Staff also believes Envision possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services.

Staff, therefore, recommends approval of the Application for a CPCN subject to the following conditions:

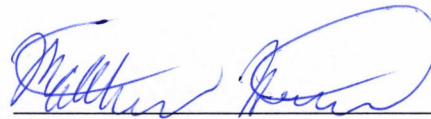
1. Envision shall comply with number pooling and reporting requirements of the North American Numbering Plan Administrator, as set forth in Commission Order No. 30425;
2. Envision shall comply with all reporting and contribution requirements as prescribed by the Idaho Universal Service Fund, Idaho Telecommunications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

4. Envision shall provide three reports to the Commission indicating the number of basic local exchange² customers it has and the services being offered. Those reports will be due as follows:

- a. January 15, 2020
- b. May 15, 2020
- c. September 15, 2020

If the Company fails to provide the three reports, the Company shall relinquish its CPCN and all telephone numbers it has been assigned.

Respectfully submitted this 4th day of September 2019.



Matt Hunter
Deputy Attorney General

Technical Staff: Carolee Hall

i:\misc\comments\enlt19.15mhch comments

² Idaho Code 62-603(1) states: “‘Basic local exchange service’ means the provision of access lines to residential and small business customers with the associated transmission of two-way interactive switched voice communication within a local exchange calling area.” See Order No. 34130 (discussing definition of “switched” communication).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 4TH DAY OF SEPTEMBER 2019, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. ENL-T-19-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

MICHAEL TAGUE
AMERICAN CLEC
PO BOX 4189
LOUISVILLE KY 40204-0189

LYSLE D BARTHLOME
ENVISION NETWORKS LLC
9950 PEPPER GRASS POINT
POCATELLO ID 83204-7299



SECRETARY

CERTIFICATE OF SERVICE