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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
EXTENET SYSTEMS, INC. FOR)	CASE NO. ENS-T-16-01
REGISTRATION AS A WHOLESALE)	
TELECOMMUNICATIONS PROVIDER IN)	COMMENTS OF THE
IDAHO)	COMMISSION STAFF
)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Brandon Karpen, Deputy Attorney General, submits the following comments.

BACKGROUND

On June 18, 2016, ExteNet Systems, Inc. filed an Application with the Commission for a Certificate of Public Convenience and Necessity for registration/certification as a wholesale provider of telecommunications service in Idaho. Application at 1.

STAFF ANALYSIS

ExteNet is a wholesale provider of telecommunications services incorporated in the State of Delaware, listing its principal place of business as Lisle, Illinois. *Id.* The Company is a wholly-owned subsidiary of Odyssey Acquisition LLC. *Id.* at 2. In March 2016, Idaho's Secretary of State certified that ExteNet is authorized to transact business in Idaho. *Id.*, Exh B. ExteNet claims in its Application that the Company plans to provide facilities-based local

exchange and interexchange services in Idaho. *Id.* at 3-4. ExteNet states it “primarily installs its own facilities,” or where not feasible, will negotiate interconnection agreements with incumbent local exchange carriers. *Id.* ExteNet does not maintain a place of business in Idaho and lists Corporation Services Company as its registered agent in Idaho. *Id.* at 2.

ExteNet provided a sworn verification that it will “comply with all Idaho laws and Commission rules and regulations, including rules regarding the conservation of telephone numbers.” *Id.*, Exh. B

RECOMMENDATION

Staff has reviewed ExteNet’s Application for compliance with applicable legal requirements for registration as a wholesale provider of telecommunications services in Idaho. The Company states that it understands and agrees to comply with the Commission Rule 114, and Commission Order No. 32277. Staff believes ExteNet possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services and is in compliance with applicable legal requirements. Staff, therefore, recommends that the Commission approve the Application, and accept ExteNet as a registered wholesale communications provider subject to the following conditions:

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

Respectfully submitted this 28th day of July 2016.



Brandon Karpén
Deputy Attorney General

Technical Staff: Grace Seaman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 28TH DAY OF JULY 2016,
SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN
CASE NO. ENS-T-16-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID,
TO THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE