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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
ENTELEGENT SOLUTIONS, INC. FOR A)	CASE NO. ENT-T-09-1
CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY TO PROVIDE LOCAL)	
EXCHANGE TELECOMMUNICATIONS)	COMMENTS OF THE
SERVICES WITHIN THE STATE OF IDAHO)	COMMISSION STAFF
)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Neil Price, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 30915 on October 8, 2009, in Case No. ENT-T-09-1, submits the following comments.

BACKGROUND

On July 2, 2009, Entelephant Solutions, Inc. ("Entelephant" or "Company") filed an Application for a Certificate of Public Convenience and Necessity to provide resold and facilities-based local exchange telecommunications services and intrastate interexchange (IXC) telecommunications services throughout the State of Idaho in geographic areas currently served by Qwest. Entelephant proposes to offer these telecommunications services to business customers.

As a UNE-P competitive local exchange carrier ("CLEC"), Enteleger will not construct any facilities within the State of Idaho or incur any additional capital expenditures in order to provide service within the state.

Enteleger asserts that it has reviewed the Commission rules applicable to CLECs and interexchange service providers operating in Idaho and agrees to comply with those rules.

STAFF REVIEW

Enteleger is incorporated in North Carolina and is registered in the State of Idaho as a foreign corporation. The Company identifies Corporation Service Company as its registered agent for service of process in Idaho.

In its Application, Enteleger states that it intends to offer service through UNE-P facilities and resale arrangements with incumbent local exchange carriers (ILEC). Enteleger states that it is a start-up company and has not yet initiated operations in any state. It is currently in the process of applying for local exchange authority in all states, except Alaska and in the District of Columbia. Enteleger has received authority for local and IXC or IXC only authority in 23 states.

The Company asserts it has the necessary managerial, technical and financial ability to provide local and interexchange telecommunications services. The Company provided a balance sheet statement as of June, 2009 and a profit and loss statement for May, 2009.

STAFF RECOMMENDATION

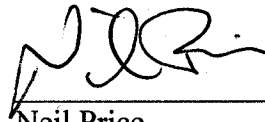
Staff has reviewed the Application for Enteleger and believes the Company understands and agrees to comply with Commission Rules of Procedure 111 (IDAPA 31.01.01.111) and Procedural Order No. 26665. Staff believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Staff, therefore, recommends Commission approval of the Application for a Certificate of Public Convenience and Necessity subject to the following conditions:

1. Compliance with the Number Pool Administration and Idaho Commission Order No. 30425 mandating number resource utilization forecast (NRUF) reporting requirements;
2. Contribution to the Idaho Universal Service Fund (USF), Idaho Telecommunications Relay Service (TRS), Idaho Telephone Service Assistance Program (ITSAP), and any

future reporting requirements deemed appropriate for competitive telecommunications providers;

3. Upon approval of this Application, Enteleger will issue a final price list under Case No. ENT-T-09-1, at which time a certificate will be issued; and
4. The Company agrees that it will relinquish its certificate and any telephone numbers if it is not doing business within one year of its issuance of a CPCN.

Respectfully submitted this 29th day of October 2009.



Neil Price
Deputy Attorney General

Technical Staff: Grace Seaman

i:\umisc:comments\entt09.1\ngps comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 29TH DAY OF OCTOBER 2009, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. ENT-T-09-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

CAREY ROESEL CONSULTANT
TECHNOLOGIES MGMNT INC
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MAITLAND FL 32751



SECRETARY

CERTIFICATE OF SERVICE