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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF FARMERS MUTUAL)	
TELECOM, INC'S APPLICATION FOR A)	CASE NO. FMU-T-15-01
CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY.)	COMMENTS OF THE
)	COMMISSION STAFF
)	
)	

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

BACKGROUND

On June 10, 2015, Farmers Mutual Telecom, Inc. ("Farmers" or "Company") applied to the Commission for a Certificate of Public Convenience and Necessity (CPCN) to provide basic local exchange service as a competitive local exchange carrier (CLEC) in Idaho pursuant to IDAPA 31.01.01.114 and Commission Order No. 26665.

STAFF REVIEW

Farmers is an Idaho corporation, a wholly-owned subsidiary of Farmers Mutual Telephone Company, and is authorized to do business in Idaho. Application at 1. Farmers provided it's Articles of Incorporation and Certificate of Good Standing from the Secretary of State, as well as financial information which it asserts is exempt from public disclosure pursuant to Rule 67. Exhibits 1-3; IDAPA 31.01.01.067. Farmers' principal business address is listed as 319 SW 3rd Street, P.O. Box 1030, Fruitland, ID 83619. *Id.* at 2. The Company also provided its registered agent for service in Idaho as Reece M. Hrizuk, 1511 N. Whitley Drive, Fruitland, ID 83619. *Id.*

Farmers is a full-service telecommunications company and proposes to offer "Dialtone, Local, and Long Distance calling service; ISP services; Hosted PBX, Fire and Security services; Special Access; [and] Computer Repair and Virus Cleanup services as a CLEC" throughout the State of Idaho. *Id.* at 1 and 3. With the Application, Farmers includes an illustrative tariff listing service rates and charges, as well as rules and regulations. Revised Exhibit 4.

Farmers seeks authority to provide basic local exchange service in competition with CenturyLink, in CenturyLink's service areas. *Id.* at 3. Farmers states it "has reviewed all of the Commission rules and agrees to comply with them, unless otherwise ordered." *Id.* at 4.

RECOMMENDATIONS

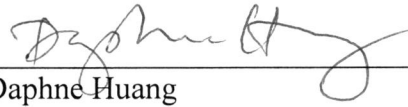
Staff has reviewed Farmers' Application for a CPCN and believes the Company understands and agrees to comply with the Commission rules and requirements. Based on this review, Staff believes Farmers' Application fulfills the requirements of the Commission Rules and Procedural Order No. 26664. Staff believes Farmers possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Thus, Staff recommends approval of the Application for a Certificate of Public Convenience and Necessity subject to the following conditions:

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

3. Prior to issuance of the Certificate, Farmers shall file a final price list outlining all its rates, terms and conditions with the Commission; and

4. Farmers will relinquish its Certificate and all telephone numbers if, within one year of issuance of a CPCN, the Company is not providing local exchange telecommunications services in Idaho.

Respectfully submitted this 12th day of August 2015.



Daphne Huang
Deputy Attorney General

Technical Staff: Grace Seaman

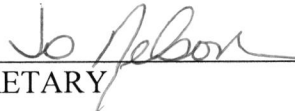
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 12TH DAY OF AUGUST 2015, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. FMU-T-15-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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