

WELDON B. STUTZMAN
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0318
IDAHO BAR NO. 3283

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UTILITIES COMMISSION

Street Address for Express Mail:
472 W WASHINGTON
BOISE ID 83702-5918

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF BLACKFOOT)
TELECOMMUNICATIONS GROUP'S) CASE NO. FRE-T-13-01
APPLICATION TO MODIFY ITS NUMBER)
RESERVE AND SEASONAL SERVICE)
TARIFFS.) COMMENTS OF THE
) COMMISSION STAFF
)
_____)**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 32902 on October 2, 2013, submits the following comments.

BACKGROUND AND STAFF ANALYSIS

Blackfoot Telecommunications Group (“BTG”), since acquiring Fremont Telecom (“Fremont”) from FairPoint Communications, is updating its tariffs and billing systems while transitioning customers to its upgraded services. The Company filed revised tariffs and seeks Commission approval to eliminate Number Reserve service, clarify its current seasonal service charges, and adjust the residential customer rate to comply with the FCC’s rate floor guidelines set forth in FCC 47 C.F.R. § 54.318. The Company is also asking the Commission to approve a \$25.00 non-recurring charge for the second and subsequent activations of seasonal service. The