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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
FRANCE TELECOM CORPORATE)	CASE NO. FRN-T-04-1
SOLUTIONS L.L.C. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	
PROVIDE RESOLD LOCAL EXCHANGE AND)	COMMENTS OF THE
INTEREXCHANGE SERVICES.)	COMMISSION STAFF
_____)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kira Dale Pfisterer, Deputy Attorney General, in response to Order No. 29693, the Notice of Application and Notice of Modified Procedure in Case No. FRN-T-04-1 issued on January 24, 2005, and submits the following comments.

BACKGROUND

On December 23, 2004, France Telecom Corporate Solutions L.L.C. (FTCS; Company) filed an Application for a Certificate of Public Convenience and Necessity with the Commission to provide local exchange and toll services throughout the State of Idaho. FTCS is a Delaware limited liability company with a corporate office in Herndon, Virginia. FTCS is majority-owned and controlled by France Telecom S.A., a publicly traded company on both the Paris Stock Exchange and the New York Stock Exchange. FTCS has a Certificate of Good Standing issued by

the Idaho Secretary of State on September 16, 2004 and although the Company does not maintain an office in Idaho, it does have a registered in-state agent.

STAFF ANALYSIS

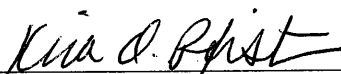
In the Application, FTCS proposes to provide all forms of resold local exchange and interexchange telecommunications services within the State of Idaho. Additionally, the Company intends to provide resold commercial mobile radio services. Applicant does not intend to own, operate, or construct any telecommunications facilities, but plans to enter into resale agreements with Qwest and Verizon within the next two years.

The Application also states that FTCS is a newly formed Company and does not have any audited financial statements. Demonstration of financial capabilities has been provided by two letters of credit by the parent company, France Telecom, SA. The Company has also provided France Telecom's financial filings with the Securities and Exchange Commission for the years 1999-2003.

STAFF RECOMMENDATION

Staff has reviewed the Application submitted by FTCS. Based on this review, Staff finds the Company's filing complies with the requirements of the Commission. *See* Procedural Order No. 26665; IDAPA 31.01.01.111. Staff believes that the Company understands and agrees to comply with the Commission rules and requirements. Staff further believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Therefore, Commission Staff recommends approval of the Application for a Certificate of Public Convenience and Necessity.

Respectfully submitted this *14th* day of February 2005.



Kira Dale Pfister
Deputy Attorney General

Technical Staff: Grace Seaman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 14TH DAY OF FEBRUARY 2005, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. FRN-T-04-1, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

WILLIAM K COULTER
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SECRETARY