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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
FIRST STEP INTERNET, LLC TO REGISTER)	CASE NO. FSI-T-12-01
AS A WHOLESALE TELECOMMUNICATIONS)	
PROVIDER IN IDAHO.)	
)	COMMENTS OF THE
)	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. 32699 on December 20, 2012, in Case No. FSI-T-12-01, submits the following comments.

BACKGROUND

On October 12, 2012, First Step Internet, LLC ("FSI" or "Company") filed an Application, pursuant to Commission Rule 114, IDAPA 31.01.01.114, as clarified in Procedural Order No. 32277 in Case No. GNR-T-11-01, for registration as a facilities-based provider of wholesale local telecommunications services within the State of Idaho. Application at 1.

FSI has not yet initiated interconnection negotiations with any incumbent local exchange carriers (ILECs). In the future, the Company intends to initiate negotiations with Frontier Communications and potentially other ILECs. *Id.* at 2.

STAFF ANALYSIS

FSI is an Idaho corporation and lists its principal place of business as Moscow, Idaho. *Id.* at 1. FSI owns cable facilities that the Company will use to provide voice over Internet protocol (VoIP) and Internet services.

FSI states that it has reviewed all of the Commission rules and agrees to comply with rules applicable to competitive wholesale providers of local telecommunications services. The Company has requested a waiver of rules not applicable to such service providers. *Id.* at 2.

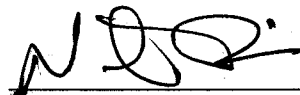
FSI acknowledges that, if the Company obtains numbering resources in Idaho, it will be subject to numbering conservation measures, including mandatory 1,000-block pooling, donation back to the pool of unused or underutilized 1,000 number blocks, and submission of applicable utilization/forecast reports at the one thousand block level for each rate center within its service territory. *Id.* at 3.

STAFF RECOMMENDATION

Staff has reviewed the Application submitted by FSI for compliance with applicable legal requirements to be registered as a wholesale provider of telecommunications services in Idaho and believes the Company understands and agrees to comply with Commission Rules of Procedure 114 and Commission Order No. 32277. Staff believes that FSI possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Staff, therefore, recommends that the Commission approve FSI as a registered wholesale communications provider subject to the following conditions:

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

Respectfully submitted this 10th day of January 2013.

A handwritten signature in black ink, appearing to read 'N. Price', written over a horizontal line.

Neil Price
Deputy Attorney General

Technical Staff: Grace Seaman

i:umisc:comments/fsit12.1npgs comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 10TH DAY OF JANUARY 2013, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. FSI-T-12-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY

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