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IDAHO PUBLIC
 UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
VCI COMPANY f/k/a STAN EFFERDING d/b/a)	CASE NO. GNR-T-03-21
VILAIRE FOR A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY TO)	
PROVIDE LOCAL EXCHANGE)	COMMENTS OF THE
TELECOMMUNICATIONS SERVICES.)	COMMISSION STAFF
)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Lisa D. Nordstrom, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 29550 on July 29, 2004, submits the following comments.

BACKGROUND

On June 3, 2003, VCI Company (“VCI” or “Company”) filed an Application for a Certificate of Public Convenience and Necessity as a sole proprietorship, Stan Efferding d/b/a/ Vilaire. To reflect the fact that VCI organized itself as a corporation under the laws of the State of Washington in November 2003, the Company filed an Amended Application with this Commission on July 15, 2004. VCI requests authority to provide facilities-based and resold local exchange, intraLATA interexchange and exchange access services primarily to residential customers throughout the State of Idaho under the corporate name VCI Company. VCI’s headquarters is in Lakewood, Washington.

VCI intends to provide local exchange services as well as intraLATA interexchange services within the territories of Qwest Corporation and Verizon. The Company plans to provide service mainly utilizing Unbundled Network Elements Platform (UNE-P) leased or purchased from Qwest or Verizon. The Company proposes to provide services primarily to residential customers.

VCI has obtained a Certificate of Authority to transact business as a foreign corporation from Idaho's Secretary of State. Although the Company does not maintain an office in Idaho, it does have a registered in-state agent. VCI has submitted its management profiles and financials for the period ending June 15, 2004. Staff has reviewed these documents and, based on those documents, believes the Company is solvent.

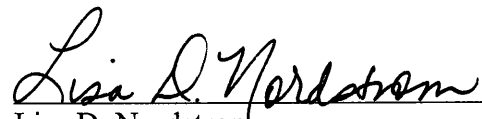
With this Application, VCI proposes to provide resold local exchange service, operator services, and directory assistance in Idaho's Qwest and Verizon service areas. At this time, the Company does not propose to collect separate deposits and has not obtained an interconnection agreement in Idaho.

VCI has been granted authority to provide local exchange service in several other states such as Oregon, Washington, and Wyoming. VCI also states that it has reviewed the rules of this Commission and affirms its commitment to abide by them.

STAFF RECOMMENDATION

Staff has reviewed the Application submitted by VCI and believes the Company understands and agrees to comply with the Commission's rules and requirements. Based on this review of VCI's Application, Staff believes that the Company's filing has satisfied all the requirements of the Commission's Rules and Procedural Order No. 26665. Therefore, Staff recommends approval of the Application for Certificate of Public Convenience and Necessity.

Respectfully submitted this ^{5th} day of August 2004.



Lisa D. Nordstrom
Deputy Attorney General

Technical Staff: Doug Cooley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 5TH DAY OF AUGUST 2004, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. GNR-T-03-21, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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VCI COMPANY
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STACY A KLINZMAN
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