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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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| IN THE MATTER OF THE APPLICATION OF STERLING INTERNATIONAL FUNDING, INC., DBA RECONEX, FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE LOCAL EXCHANGE CARRIER SERVICES WITHIN THE STATE OF IDAHO. | )  )  )  )  )  )  ) | CASE NO. GNR-T-97-18  COMMENTS OF THE  COMMISSION STAFF |

COMES  NOW  the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Brad Purdy, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued on November 14, 1997, submits the following comments.

Reconex has provided all the information required to comply with Order No. 26665 from Case No. GNR-T-96-4, the Commission order that sets out the filing and procedural requirements for approval of certificates of public convenience and necessity for telecommunications providers desiring to provide local service in Idaho.

Reconex has been cooperative with Staff in correcting its original application where necessary.  Several items were unclear to Staff and raised questions about the financial information provided.  When Staff detailed those concerns in writing, Reconex provided prompt and satisfactory answers.  Staff was aware of some concerns about the business conduct of Ameritel Pay Phones and inquired about any business connection between that company and Reconex.  Reconex is related to Ameritel Corporation, but there is no connection between Ameritel Corporation and Ameritel Pay Phones.

The proposed initial tariff filing was deficient in a small number of respects and failed to conform fully to IPUC requirements.  Reconex willingly supplied changes necessary, for instance, by adding required language to its exculpatory liability section.

Final resale agreements with USW and GTE are not yet available, but filings with the Commission are expected within a short time.  Reconex understands that it must provide such agreements for Commission approval before formally commencing service as allowed under the proposed certificate.

Staff recommends approval of the Reconex application for a certificate to provide competitive local exchange service.

Respectfully submitted this                  day of December 1997.

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Brad Purdy

Deputy Attorney General

Technical Staff:  Bill Eastlake

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