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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
INLAND CELLULAR LLC FOR CONDITIONAL) CASE NO. INC-T-13-01
EXPANSION OF ITS DESIGNATION AS AN)
ELIGIBLE TELECOMMUNICATIONS) COMMENTS OF THE
CARRIER.) COMMISSION STAFF
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_____)**

COMES NOW the Staff of the Idaho Public Utilities Commission (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. 32909 on October 17, 2013 in Case No. INC-T-13-01, submits the following comments.

BACKGROUND

On October 4, 2013, Inland Cellular LLC (“Inland” or “Company”), a subsidiary of Inland Cellular Telephone Corporation (“ICTC”), filed an Application for conditional expansion of its ETC status in Idaho. The Commission previously granted ETC status to ICTC in Order No. 30212. Inland requests that the Commission grant a conditional expansion of Inland’s ETC area to include areas outside its existing ETC area for the purposes of establishing eligibility to

participate in the Tribal Mobility Fund Phase I auction to be held by the Federal Communications Commission (“FCC”) on December 19, 2013 (“Auction 902”).¹

Overview of the Tribal Mobility Fund, Phase 1² (Auction 902)

On November 19, 2011, the Federal Communications Commission (FCC) released the *Report and Order and Further Notice of Proposed Rulemaking (USF/ICC Transformation Order)* that established the Tribal Mobility Fund to provide service to Tribal lands that have historically had less access than other segments of the population.³ The FCC defines Tribal lands as any federally recognized Indian tribe’s reservation, pueblo, or colony.⁴

On August 7, 2013, FCC issued DA 13-1672 to establish the procedures, terms, and conditions that will apply to the reverse auction that will award up to \$50 million in one-time Tribal Mobility Fund Phase 1 support (Auction 902). The Summary of Idaho’s Eligible Census Blocks for Auction 902 is provided below.

Census Block Information for Idaho⁵

Number of Eligible Blocks	334
Number of Tribal Lands with Eligible Blocks	4
Number of Counties with Eligible Blocks	8
Number of Bidding Areas	9
Total Population of Eligible Blocks	3,416
Total Area (square feet) of Eligible Blocks	320.40
Total Road Miles of Eligible Blocks	700.64

To participate in Auction 902 and receive monetary support, all Connect American Fund (CAF) recipients, including Tribal Mobility Fund Phase 1 recipients, must meet certain public interest obligations described below.

¹ Application at 1.

² Connect America Fund, WC Docket No. 10-90.

³ *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161, ¶479 and 481 (*USF/ICC Transformation Order*).

⁴ *Id.* p. 48, fn. 197.

⁵ Public Notice DA 13-1762, Attachment A-1, released August 7, 2013.