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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
MOBILITIE, LLC TO REGISTER AS A) CASE NO. MOB-T-14-01
WHOLESALE TELECOMMUNICATIONS)
PROVIDER IN IDAHO.) COMMENTS OF THE
) COMMISSION STAFF
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The Staff of the Idaho Public Utilities Commission, by and through its Attorney of Record, Daphne Huang, Deputy Attorney General, in response to the Notice of Application and Notice of Modified Procedure, issued on October 16, 2014, Order No. 33153, submits the following comments.

BACKGROUND

On September 26, 2014, Mobilitie, LLC (“Mobilitie” or “Company”) applied for a registration/certification as a wholesale provider of telecommunications service in the State of Idaho pursuant to Procedural Order No. 32277, IDAPA 31.01.01.114, and Title 62 of the *Idaho Code*. Application at 1.

STAFF ANALYSIS

Mobilitie is a Nevada limited liability company and lists its principal place of business as Newport Beach, California. *Id.* at 2. Mobilitie does not maintain a place of business in Idaho but lists CT Corporation System, 921 S. Orchard Street, Suite G, Boise, Idaho 83705, as its registered

agent in Idaho. *Id.* In June 2014, Idaho's Secretary of State certified that Mobilitie's authorization to transact business in Idaho, issued upon its August 2010 request, was still active. *Id.* at Exh. 2.

Mobilitie states it has not yet initiated interconnection negotiations but intends to do so as necessary and upon being granted authority by the Commission. The Company represents that it will seek Commission approval of any ensuing interconnection agreements. *Id.* at 3.

Mobilitie agrees to comply with all Idaho laws and Commission rules and regulations and is committed to numbering conservation measures including mandatory one thousand (1,000) block pooling. *Id.*

STAFF RECOMMENDATION

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

1. Mobilitie shall comply with number pooling and requirements of the North American Numbering Plan Administrator, as set forth in Commission Order No. 30425;
2. Mobilitie shall provide necessary reports, and contribute as appropriate to the Idaho Universal Service Fund, Idaho Telecommunications Relay System, and Idaho Telecommunications Service Assistance Program; and
3. Mobilitie shall comply with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers.

Respectfully submitted this 6th day of November 2014.


Daphne Huang
Deputy Attorney General

Technical Staff: Grace Seaman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 6TH DAY OF NOVEMBER 2014, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. MOB-T-14-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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