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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
NATIVE NETWORK, INC. TO REGISTER AS A)	CASE NO. NNI-T-17-01
WHOLESALE TELECOMMUNICATIONS)	
PROVIDER IN IDAHO)	COMMENTS OF THE
)	COMMISSION STAFF
)	

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 June 21, 2017, submits the following comments.

BACKGROUND

On March 2, 2017, Native Network, Inc. (“Native Network” 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 and IDAPA 31.01.01.114, and Title 62 of the Idaho Code. Application at 1.

STAFF ANALYSIS

Native Network is a corporation organized in the State of Washington and lists its main business address as Wenatchee, Washington. *Id.* Idaho’s Secretary of State certified that Native

is authorized to transact business in Idaho as of December 27, 2016. *Id.*, Exhibit A at 7. Native Network does not maintain a place of business in Idaho, but lists CT Corporation, 921 S. Orchard Street, Suite G, Boise, Idaho 83705, as its registered agent in Idaho. *Id.* at 2.

Native Network states that it “is in the process of negotiating an interconnection agreement [with] Frontier Communications.” *Id.* at 2.

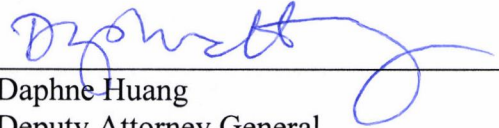
Native Network “agrees to comply with rules applicable to competitive wholesale providers of local telecommunications services.” *Id.* at 3. The Company also agrees that, “if it obtains numbering resources in Idaho, it will be subject to numbering conservation measures, including mandatory one thousand block pooling...” *Id.* at 3.

STAFF RECOMMENDATION

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

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

Respectfully submitted this 12th day of July 2017.



Daphne Huang
Deputy Attorney General

Technical Staff: Grace Seaman

i:umisc:comments/nnit16.1djhs comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 12TH DAY OF JULY 2017,
SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN
CASE NO. NNI-T-17-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO
THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE