

KARL T. KLEIN
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0312
IDAHO BAR NO. 5156

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UTILITIES COMMISSION

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF PRAXIS LIMITED CO.'S)	
APPLICATION FOR A CERTIFICATE OF)	CASE NO. PLC-T-12-01
PUBLIC CONVENIENCE AND NECESSITY TO)	
PROVIDE LOCAL EXCHANGE)	COMMENTS OF THE
TELECOMMUNICATIONS SERVICES.)	COMMISSION STAFF
)	

The Staff of the Idaho Public Utilities Commission comments as follows on Praxis Limited Co.'s Application.

BACKGROUND

On July 19, 2012, Praxis Limited Co. applied to the Commission for a Certificate of Public Convenience and Necessity (CPCN) authorizing the Company to provide resold and facilities-based competitive local exchange carrier (CLEC) telecommunications services to residential, commercial, and bulk customers in Idaho. The Company submitted a revised Application on October 25, 2012.¹

¹ The term "Application" in the remainder of these Comments refers to the October 25, 2012 revised Application.

In its Application, Praxis describes itself as an Idaho limited liability company that has been doing business as "A+ Satellite" since 2005². The Company lists a Meridian, Idaho business address. Application at 2-4. The Company proposes to begin providing CLEC services by the end of 2012. *Id.* at 4.

STAFF REVIEW

Following its review of the Application, on August 28, 2012, Staff prepared a letter that listed corrections needed before any further action could occur. Praxis called and scheduled a meeting with Staff for October 25, 2012, to review all the corrections needed to bring the Application and Illustrative tariff into compliance with Idaho Statutes and the Commission's Customer Relations rules. Following the meeting, the Company filed its replacement Application and Price List.

Praxis says it retails satellite television service, Internet, and phone services, and that it also builds and maintains private cable systems for commercial applications. *Id.* at 2. The Company says it will focus on serving the Treasure Valley during its first two years as a CLEC, and that its territory ultimately will include the parts of Idaho where CenturyLink serves as the incumbent local exchange carrier. *Id.* at 3-4. The Company says it will compete primarily with CenturyLink, and that it also will compete with other CLECs. *Id.* at 4.

Praxis says it initially will offer service on a resale basis. But the Company's interconnection agreement with CenturyLink ultimately will enable it to offer facilities-based services. *Id.* at 4. Thus, while Praxis says it does not own or plan to build any specific facilities for carrying local exchange service, it says it would be interested in building such facilities as its business expands. *Id.* at 3 and 5.

The Company says it has reviewed and will comply with Commission rules. *Id.* at 5.

STAFF RECOMMENDATION

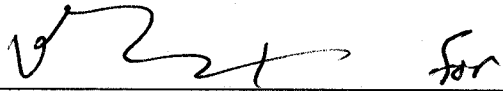
Staff has reviewed Praxis' revised Application and believes the Company understands and agrees to comply with the Commission's rules and requirements. Based on this review, Staff

² A business entity search on the Idaho Secretary of State's website found the assumed business name "A+ Satellite & Installation.", but not "A+ Satellite." It appears that Praxis's assumed business name is "A+ Satellite & Installation."

also believes that the Company possess the requisite financial, managerial, and technical qualifications necessary to provide telecommunications services. Therefore, Staff recommends that the Commission issue a CPCN to Praxis, subject to the following conditions:

1. The Company must comply with all number pooling and reporting requirements of the North American Number Plan Administrator. See Commission Order No. 30425;
2. The Company must comply with all reporting and contribution requirements as prescribed by the Idaho Universal Service Fund, Idaho Telecommunications Relay System, Idaho Telecommunications Service Assistance Program;
3. The Company must comply with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers;
4. The Company must file its final price list with rates before the CPCN is issued; and
5. The Company will relinquish its CPCN and all telephone numbers if it is not providing service within one year of its certificate issuance.

Respectfully submitted this 28th day of November 2012.


Karl T. Klein
Deputy Attorney General


Technical Staff: Carolee Hall

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 28TH DAY OF NOVEMBER 2012, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PLC-T-12-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

CALEB HANSEN
PRAXIS LIMITED CO
3163 E FAIRVIEW AVE
STE 150
MERIDIAN ID 83642



SECRETARY

CERTIFICATE OF SERVICE