



Idaho Telecom Alliance

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2014 FEB -4 AM 8:22

IDAHO PUBLIC UTILITIES COMMISSION

Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

RE: Comments regarding Application of Q-Link Wireless LLC for Designation
 as an Eligible Telecommunications Carrier
Case No. QLW-T-13-01

Dear Commissioners:

The Idaho Telecom Alliance ("ITA") submits these comments with regard to the above referenced matter. As you know, the ITA vigorously opposed the application of TracFone Wireless for designation as an eligible telecommunications carrier. The opposition to that application revolved around TracFone's refusal to contribute to the Emergency Communications Fee in support of Idaho counties' 9-1-1 systems or the Idaho Telephone Service Assistance Fund ("ITSAP").

Since that time, the majority of applicants for ETC status, whether facilities based or non-facilities based, and whether or not such carriers provide pre-paid service plans, have agreed to pay into such funds. The ITA further acknowledges that the payment process for prepaid wireless services was changed by an amendment to the Emergency Communications Act requiring collection of the fees at the point of sale. Nevertheless, nowhere in Q-Link Wireless' application does Q-Link Wireless commit to paying into either fund.

Unless and until Q-Link Wireless commits to paying both the Emergency Communications Fee and the ITSAP fees, the ITA objects to the granting of ETC status to Q-Link Wireless. Granting such status without the commitment to pay into the funds provides Q-Link Wireless a competitive business advantage over the companies represented by the ITA. These companies simply ask that all carriers asking for ETC designation in Idaho be subject to the same rules that the Idaho carriers are subject.

Accordingly, the ITA respectfully requests that the Commission deny the application unless Q-Link Wireless agrees to be bound by the same rules as other ETC's in the state of Idaho. The ITA appreciates the Commission's consideration of our members' concerns.

Sincerely,

Kate Creswell
Executive Director
Idaho Telecom Alliance