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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
VERIZON AVENUE CORP. FOR A) CASE NO. GNR-T-03-26
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO PROVIDE LOCAL)
EXCHANGE TELECOMMUNICATIONS) COMMENTS OF THE
SERVICES.) COMMISSION STAFF
 _____)

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, in response to Order No. 29454, the Notice of Application and Notice of Modified Procedure in Case No. GNR-T-03-26 issued on March 30, 2004, and submits the following comments.

On August 15, 2003, Verizon Avenue Corp. filed an Application for a Certificate of Public Convenience and Necessity to provide facilities-based and resold competitive local exchange and interexchange services throughout the State of Idaho. Verizon Avenue is owned by Verizon Investments, Inc., which in turn is owned by Verizon Communications Inc., making Verizon Avenue an indirect wholly owned subsidiary of Verizon Communications Inc. Verizon Avenue has filed a copy of its Certificate of Authority issued by the Idaho Secretary of State.

Verizon Avenue proposes to offer local, local toll, and interLATA toll services by resale in Idaho, outside of the Verizon Northwest Inc. service area. The Company also intends to provide Internet services, making high speed Internet available to residential customers within the State of

Idaho. Verizon Avenue intends to provide service via unbundled network elements and resold service of incumbent local exchange carriers (ILECs). The Company intends to obtain interconnection agreements with other local exchange carriers.

The Application states that Verizon Avenue has reviewed all Commission rules and agrees to comply with those rules. The Company does not intend to require deposits from its customers and therefore requests Commission approval without the requirement of establishing an escrow account as specified in Commission Order No. 26665.

STAFF ANALYSIS

Verizon Avenue filed its original Application and Illustrative Tariff on August 14, 2003. Staff and the Company have been working diligently to resolve various issues and to bring the tariff into compliance with the Commission's Rules and Idaho Statutes. In response to Staff and the Company's efforts, Verizon Avenue recently filed an updated Illustrative Tariff that satisfies all requirements set forth in Commission Order No. 26665.

STAFF RECOMMENDATION

Staff has reviewed all the filings and revisions and recommends approval of Verizon Avenue Corp.'s Application.

Respectively submitted this 20th day of April 2004.



Weldon B. Stutzman
Deputy Attorney General

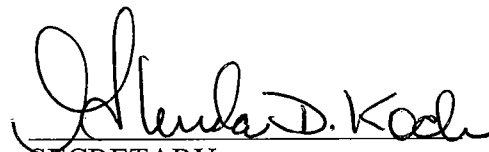
Technical Staff: Carolee Hall

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 20TH DAY OF APRIL 2004,
SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE
NO. GNR-T-03-26, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE
FOLLOWING:

RICHARD P KOLB
VP – LEGAL / REGULATORY
VERIZON AVENUE CORP.
150 FIELD DR, SUITE 300
LAKE FOREST, IL 60045


SECRETARY

CERTIFICATE OF SERVICE