

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER SMITH
COMMISSIONER HANSEN
COMMISSION SECRETARY
LEGAL
WORKING FILE**

FROM: DOUG COOLEY

DATE: NOVEMBER 26, 2004

**RE: RURAL TELEPHONE'S APPLICATION FOR AN EXTENSION OF ITS
LOCAL NUMBER PORTABILITY RESPONSIBILITIES.
CASE NO. RUR-T-04-02.**

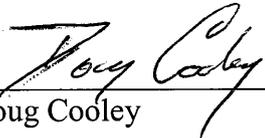
On November 22, 2004, Rural Telephone filed an Application asking to extend its current suspension of wireline-to-wireless local number portability (LNP). Section 251(f)(2) of the Telecommunications Act allows local exchange carriers with fewer than 2% of the nation's subscriber lines to petition a state commission for suspension or modification of the portability requirements, which was initially required to be implemented by May 24, 2004. Rural Telephone was one of sixteen Idaho Telephone Association (ITA) companies that was granted a six-month suspension of LNP responsibilities by this Commission in Order 29452. In that Order, Rural Telephone and other companies were given a suspension from implementing intermodal LNP from May 24, 2004 to November 24, 2004 and were directed to file progress reports regarding the status of implementing LNP. Staff received a progress report from the ITA on July 23, 2004, stating in part that "Rural Telephone Company has sought quotes on switch upgrades that it is in the process of evaluating." Rural's Application now requests a further 12-month suspension of LNP requirements in its Tipanuk exchange and a 36-month suspension in its Atlanta, Boise River, Prairie, Shoup, and Three Creek exchanges. The Application states that switches in these exchanges would require major upgrades at an estimated cost of \$740,012 to implement LNP, and that no customers have requested that their number be ported. Finally, Rural claims that only its Tipanuk exchange has any wireless service coverage while its Atlanta, Boise River, Prairie, Shoup and Three Creek exchanges are not served by the wireless carriers that have requested LNP.

STAFF ANALYSIS

Staff has reviewed the filing and recommends the case be processed by modified procedure. This will allow other companies an opportunity to comment and allow Staff time to investigate some of the points raised in Rural's Application and determine whether there is adequate reason to further suspend Rural's LNP responsibilities.

COMMISSION DECISION

Does the Commission wish to process Rural Telephone's Application by Modified Procedure?



Doug Cooley

udmemos/rural lnp memo