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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF TALK AMERICA )**  
**SERVICES, LLC'S APPLICATION FOR A )** **CASE NO. TAL-T-14-01**  
**CERTIFICATE OF PUBLIC CONVENIENCE )**  
**AND NECESSITY TO PROVIDE RESOLD )** **COMMENTS OF THE**  
**LOCAL EXCHANGE AND INTEREXCHANGE )** **COMMISSION STAFF**  
**SERVICES. )**  
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COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Daphne Huang, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 33268, submits the following comments.

**BACKGROUND**

On September 19, 2014, Talk America Services, LLC (Talk America) applied to the Commission for a Certificate of Public Convenience and Necessity (CPCN) authorizing it to provide resold local exchange and interexchange telecommunications services in Idaho. On April 8, 2014, the Commission issued Order No. 33268 seeking public input on the Application and ordered that the case be processed under the Commission's Rules of Modified Procedure.

Talk America is a Delaware limited liability company, authorized to do business in Idaho. Its principal place of business is in Little Rock, Arkansas. Talk America is a subsidiary