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IDAHO PUBLIC
UTILITIES COMMISSION

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27 March 2012

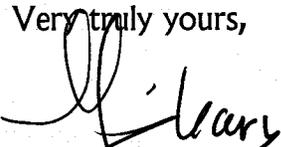
Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: CASE NO. TCS-T-11-01
REQUEST FOR RECONSIDERATION OR CHANGE OF ORIGINAL ORDER

Dear Ms. Jewell:

Enclosed please find the above referenced REQUEST FOR RECONSIDERATION OR CHANGE OF ORIGINAL ORDER for filing on behalf of TC Systems, Inc., in the above-referenced docket. We have enclosed an original and seven (7) copies, as well as an additional copy for you to stamp for our records.

Very truly yours,


Molly O'Leary
Richardson & O'Leary, PLLC

Encl.

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Attorneys for TC Systems, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. TCS-T-11-01
APPLICATION OF TC SYSTEMS,)	
INC. TO REGISTER AS A)	PETITION FOR RECONSIDERATION OR, IN THE
WHOLESALE PROVIDER OF)	ALTERNATIVE, REQUEST FOR CLARIFICATION
TELECOMMUNICATIONS)	OR STAY OF ORDER 32480
SERVICES WITHIN THE STATE)	
OF IDAHO)	

On November 22, 2011, TC Systems, Inc. ("TCS" or "Company") filed an Application, pursuant to modified Commission Rule 114, IDAPA 31.01.01.114, as clarified in Procedural Order No. 32277 in Case No. GNR-T-11-01, to be recognized by the Idaho Public Utilities Commission ("Commission") as a telecommunications company that does not intend to provide basic local exchange service.

On January 19, 2012, the Commission issued a Notice of Application and Notice of Modified Procedure establishing a 21-day comment period. *See* Order No. 32442. Commission Staff was the only party to submit written comments within the established comment period.

On March 6, 2012, the Commission approved TCS' Application for Certification as a Wholesale Telecommunication Provider in Idaho. Specifically, the Ordering paragraphs state the following:

PETITION FOR RECONSIDERATION,
CLARIFICATION, OR STAY OF ORDER NO. 32480

IT IS HEREBY ORDERED that the Application of TC Systems, Inc. for Certification as a Wholesale Telecommunications Provider in Idaho is approved.

IT IS FURTHER ORDERED that TCS' Certification shall be subject to the following conditions: (1) TCS shall comply with all number pooling and reporting requirements of the North American Numbering Plan Administrator, as set forth in Commission Order No. 30425; (2) TCS shall provide all necessary reports and contribute as appropriate to the Idaho Universal Service Fund, Idaho Telecommunications Relay System, and the Idaho Telecommunications Service Assistance Program; and (3) TCS shall comply with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers.

THIS IS A FINAL ORDER. Any person interested in the Order may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code § 61-626.*

On March 8, 2012, TCS submitted a request to the National Exchange Carrier Association ("NECA") to receive a Company Code. A Company Code is used to develop an OCN, which is required to receive numbers from either the North American Numbering Plan Administrator ("NANPA") or the Number Pooling Administrator ("PA").

On March 9, 2012, NECA rejected TCS's request stating that the "PUC approval from Idaho cannot be accepted. The authorization must be for the entity to provide competitive facilities-based local exchange telecommunications service." See Exhibit 1.

On March 27, 2012, TCS sent notice to NECA that it disagrees with its rejection of its request. Unfortunately, AT&T has been informed that the decision-maker at NECA will not be able to review AT&T's latest transmittal for a day or two.

Out of an abundance of caution, TCS is filing this request with the Commission to amend the Ordering Paragraphs in Order No. 32480, released March 6, 2012, to specify that

TCS will provide wholesale local exchange service in Idaho. In support of this request, TCS provides the following:

1. TCS will provide wholesale facilities based local exchange transport services to one of its affiliate, AT&T Corp., which will allow AT&T Corp. to provide business voice over internet protocol ("VoIP") service in Idaho.
2. TCS will provide wholesale local exchange transport service to its affiliate. In addition, TCS will provide telephone numbers, as well as both direct inward dialing service and direct outward dialing service which facilitates the connection of calls between the public switched telephone network and the between the public switched network and its affiliate.
3. TCS has no further changes to the Application that it submitted on November 22, 2011.

WHEREFORE, TC Systems, Inc., requests that the Commission amend the ordering paragraphs in Order No. 32480 to clarify that it will be registered as a wholesale provider of telecommunications service in Idaho pursuant to Commission Rule 114, IDAPA 3 1.01.01.114., as clarified in Procedural Order No. 32277 in Case No. GNR-T-11-01, and that it will offer facilities-based local exchange service or, in the alternative, stay its order pending clarification from NECA regarding its interpretation of the Commission's order.

RESPECTFULLY SUBMITTED this 27th day of March, 2012.

By: _____

Molly O'Leary
Richardson & O'Leary, PLLC

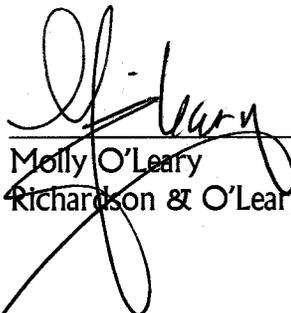
For TC Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of March, 2012, I caused a true and correct copy of the foregoing to be hand delivered upon the following individual(s) :

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington Street
Boise, ID 83702-5918

Neil Price
Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington Street
Boise, ID 83702-5918



Molly O'Leary
Richardson & O'Leary, PLLC

EXHIBIT 1

ONO, JANICE L

From: Cooper, Alfreda [acooper@neca.org]
Sent: Friday, March 09, 2012 10:22 AM
To: LOPER, LISA A
Subject: RE: TC Systems, INC. - ID --- OCN Request

Lisa,

This PUC approval from Idaho cannot be accepted. The authorization must be for the entity to provide competitive facilities-based local exchange telecommunications service.

Alfreda

-----Original Message-----

From: LOPER, LISA A [mailto:ll2382@att.com]
Sent: Thursday, March 08, 2012 12:59 PM
To: Cooper, Alfreda
Subject: TC Systems, INC. - ID --- OCN Request

Alfreda,

Attached is the supporting documentation for my new OCN request.

I did not receive a receipt/return email from the system.

Could you possibly please send me one.

If you have any questions, comments or concerns, please contact me.

Lisa Loper
Code Administration
Network Methods & Support - LFO

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One AT&T Way - 3D142C
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(908) 234-7622 (voice)
(908) 234-8044 (fax)
lloper@att.com