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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
TELCENTREX LLC FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
PROVIDE LOCAL EXCHANGE SERVICES IN)
THE STATE OF IDAHO.)
)
)
)**

**CASE NO. TCX-T-06-1

COMMENTS OF THE
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. 30218, the Notice of Application and Notice of Modified Procedure in Case No. TCX-T-06-1 issued on January 4, 2007, and submits the following comments.

BACKGROUND

On December 21, 2006, Telcentrex LLC filed an Application for a Certificate of Public Convenience and Necessity (CPCN) to provide local exchange telecommunications services within the State of Idaho. The Application states Telcentrex was formed and has its headquarters in the State of Georgia and is authorized to do business as a foreign limited liability company in the State of Idaho.

Telcentrex intends to provide resold and facilities-based local exchange service utilizing the UNE platform purchased from incumbent local exchange carriers. Telcentrex currently has no

plans to install facilities in Idaho but may do so in the future. It intends to provide resold local exchange services and to purchase unbundled network elements from Qwest and Verizon. The Company provided an illustrative tariff with its Application; it also avers that it will provide service according to the laws, rules and regulations of the Commission. Telcentrex does not intend to require advance payments or deposits from customers.

STAFF REVIEW

Staff reviewed Telcentrex's Application and believes that it complies with the Commission's requirements. Staff reviews all requests for a CPCN certificate pursuant to Idaho Code §§ 61-526 through -528, IDAPA 31.01.01.111 and 112 (Rules 111 and 112), and Procedural Order No. 26665. In order to be issued a CPCN, a telephone company must provide the Commission with the following information: (1) name, address, and form of business; (2) the date on which the applicant proposes to begin construction or anticipates that it will provide service, including a written description of customer classes and services proposed to be offered; (3) the proposed service territory; (4) certain financial information; (5) maps regarding the proposed service area; (6) a proposed initial tariff and price sheets; (7) contact information; (8) interconnection agreements if any; (9) an agreement to comply with the Commission's Rules; and (10) an escrow account with a bonded escrow agent if the company requires advanced deposits from its customers. Order 26665.


Telcentrex's Application includes all of the required information. Staff believes that the Company understands and agrees to comply with the Commission rules and requirements. Specifically, the Company explicitly sets out IDAPA language as it pertains to interruption allowances for service and facility failures. The Company also addresses the 911 call routing and responsibility of the Company. Staff further believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. The Company has terms and conditions in place to facilitate intra and inter LATA presubscription changes as well as local calling areas that are reflective of Qwest's EAS routes.

Telcentrex states that it does not anticipate collecting deposits, and therefore requests a waiver of that portion of Commission Order No. 26665 that requires an Escrow Account be established.

RECOMMENDATION

Staff's review indicates that the Company's Application and price list meets the requirements of the Commissions Rules and Order No. 26665. Staff therefore, recommends that the Commission approve the CPCN Application and waive the escrow account requirement until the Company begins to collect deposits.

Respectfully submitted this 24th day of January 2007.



Weldon B. Stutzman
Deputy Attorney General

Technical Staff: Carolee Hall

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 24TH DAY OF JANUARY 2007, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. TCX-T-06-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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