

TWCIS is a competitive telecommunications company that intends to offer intrastate telecommunications services for commercial and wholesale customers statewide. Such services may include point-to-point, private line, access and transport services.

On August 27, 2010, the Commission issued Order No. 32059 in Case No. TIM-T-08-01. The Order denied a request by TWCIS for a Certificate of Public Convenience and Necessity (CPCN) that would authorize it to provide telecommunications service in Idaho because the Company was not planning to offer "basic local exchange service" as defined in Title 61, Idaho Code. The Commission stated in the Order that it no longer issues CPCNs to telephone corporation under *Idaho Code* § 61-526, and instead it "registers" new competitive local exchange carriers (CLECs) by issuing a "Certificate" under Commission Rule 114, IDAPA 31.01.01.114. Order No. 32059, p. 7. The Commission further stated that it "is taking appropriate steps to verify that Title 62 Certificates are issued to carriers providing basic local exchange service," and that the Commission intends to investigate all holders of Title 62 CPCNs to ensure they are providing basic local exchange service." Order No. 32059, p.12. This investigation resulted in the issuance of Commission Order No. 32277 that states telecommunications companies that do not intend to provide basic local exchange service and who complete the application process as required in Commission Rule of Procedure 114, Section 1 and Sections 5 through 8, will be recognized by the Commission as having successfully registered as a wholesale provider of telecommunications service in Idaho. IDAPA 31.01.01.114.

STAFF ANALYSIS

TWCIS is wholly owned by TWC Digital Phone, LLC, a subsidiary of Time Warner Cable Inc., a Delaware corporation located in New York, New York.

With the Application, TWCIS provided a copy of the Delaware Secretary of State's Certificate of Good Standing, Idaho Secretary of State's Registration of Foreign Limited Liability Company, and a Certificate of Assumed Business Name to do business as Time Warner Cable. The Company's registered agent for service in Idaho is CT Corporation System.

The Company has an interconnection agreement with Frontier Communications Northwest, Inc. TWCIS affirms it has reviewed all of the Commission's rules and agrees to comply with these rules. Further, the Company acknowledges that non-paging telecommunications carriers with telephone numbering resources in Idaho shall be subject to

numbering conservation measures, including mandatory one thousand (1,000) block pooling pursuant to Commission Rule of Procedure 114.08 and Commission Order No. 30425.

STAFF RECOMMENDATION

Staff has reviewed the Application by TWCIS for compliance with applicable legal requirements to be registered as a wholesale provider of telecommunications services in Idaho and believes the Company understands and agrees to comply with Commission Rules of Procedure 114 and Commission Order No. 32277. Staff believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Staff, therefore, recommends Commission approval that TWCIS has successfully registered as a Wholesale communications provider subject to the following conditions:

1. The Company complies with number pooling and reporting requirements of the North American Numbering Plan Administrator, as set forth in Commission Order No. 30425; and
2. Time Warner provides necessary reports and contributes as appropriate to the Idaho Universal Service Fund, Idaho Telecommunications Relay System, Idaho Telecommunications Service Assistance Program, and complies with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers.

Respectfully submitted this 30th day of November 2011.



Neil Price
Deputy Attorney General

Technical Staff: Grace Seaman

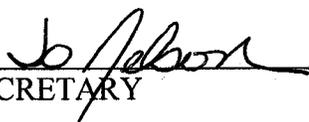
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 30TH DAY OF NOVEMBER 2011, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. TIM-T-11-01, BY EMAILING AND MAILING A COPY THEREOF, TO THE FOLLOWING:

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