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Attorney for the Commission Staff

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF TIME CLOCK	)	
SOLUTIONS, LLC'S APPLICATION FOR A	)	CASE NO. TME-T-17-01
CERTIFICATE OF PUBLIC CONVENIENCE	)	
AND NECESSITY	)	COMMENTS OF THE
	)	COMMISSION STAFF

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**STAFF OF** the Idaho Public Utilities Commission, by and through its Attorney of record, Sean Costello, Deputy Attorney General, submits the following comments.

### BACKGROUND

On November 2, 2017, Time Clock Solutions, LLC ("Time Clock") applied to the Commission for a Certificate of Public Convenience and Necessity ("Application")("CPCN") authorizing it to provide local and long distance telecommunications service in Idaho pursuant to IDAPA 31.01.01.114 and Commission Order No. 26665.

### STAFF ANALYSIS

Time Clock is a Florida corporation, authorized to do business in Florida and is located at 8725 SW 52<sup>nd</sup> Avenue, Miami, Florida 33143. Time Clock is registered to do business in Idaho with the Idaho Secretary of State. Its Foreign Certificate of Registration is attached to the Application as Exhibit 2.

Time Clock proposes, and requests authority, to "provide resold local exchange services and to purchase unbundled network elements provided by existing [local exchange carriers]

LECs,” including CenturyLink and Frontier Communications. *See* Application at 3; Tariff P.S.C. No. 2 at 33. Time Clock proposes to offer a variety of interexchange (switched and dedicated services) and local exchange services. Application at 4.

Time Clock provided its Articles of Organization, local exchange tariff, and certain financial information which it asserts is exempt from public disclosure pursuant to Rule 67. *See* Exh. 3; IDAPA 31.01.01.067.

Finally, Time Clock agrees to comply with all applicable Commission rules. Application at 5.

### **STAFF RECOMMENDATION**

Staff has reviewed Time Clock’s Application for a CPCN and believes the Company understands and agrees to comply with the Commission’s rules and requirements. Based on this review, Staff believes Time Clock’s Application fulfills the requirements of the Commission Rules and Procedural Order No. 26665. Staff also believes Time Clock possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services.

Staff, therefore, recommends approval of the Application for a Certificate of Public Convenience and Necessity subject to the following conditions:

1. Time Clock must comply with the number pooling and reporting requirements of the North American Numbering Plan Administrator;<sup>1</sup>
2. Time Clock must provide necessary reports and contribute, as appropriate, to the Idaho Universal Service Fund,<sup>2</sup> Idaho Telecommunications Relay System,<sup>3</sup> Idaho Telecommunications Service Assistance Program,<sup>4</sup> and comply with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers; and
3. Prior to issuance of the Certificate, Time Clock must file a final price list outlining all its rates, terms and conditions with the Commission.<sup>5</sup>

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<sup>1</sup> *See* Commission Order No. 30425.

<sup>2</sup> *See* Commission Order No. 32637.

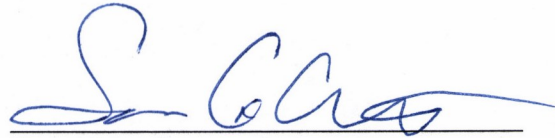
<sup>3</sup> *See* Commission Order No. 32524.

<sup>4</sup> *See* Commission Order No. 32526.

<sup>5</sup> *See* Birch Application Second Supplement; IDAPA 31.01.01.133 and Order No. 26665 at 10.

4. Time Clock will relinquish its Certificate and all telephone numbers if, within one year of issuance of a CPCN, the Company is not providing local and long distance telecommunications services in Idaho.

Respectfully submitted this 8<sup>th</sup> day of February 2018.



Sean Costello  
Deputy Attorney General

Technical Staff: Daniel Klein

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 8<sup>TH</sup> DAY OF FEBRUARY 2018, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. TME-T-17-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE