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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
TANAGER TELECOMMUNICATIONS, LLC) **CASE NO. TTL-T-09-01**
FOR A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO)
PROVIDE LOCAL EXCHANGE) **COMMENTS OF THE**
TELECOMMUNICATIONS SERVICES.) **COMMISSION STAFF**
)

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 30855 on July 10, 2009, in Case No. TTL-T-09-01, submits the following comments.

BACKGROUND

On June 4, 2009, Tanager Telecommunications, LLC (Tanager) filed an Application for a Certificate of Public Convenience and Necessity (CPCN) to provide basic local exchange telecommunications services in the State of Idaho. The Application states that the Company intends to provide resold local exchange services in the areas served by Qwest, Verizon and other competitive local exchange carriers (CLECs).

Tanager is a limited liability company organized under the laws of Washington and its principal business address is located in Stevenson, Washington. The Company is registered in the

State of Idaho as a foreign limited liability company. The Company identifies National Registered Agents, Inc., as its registered agent for service of process.

STAFF ANALYSIS

In its Application, Tanager states that it intends to provide service to commercial entities, governmental agencies, as well as to the public (both residential and small business). The Application further states that with its sister company, Sawtooth Technologies, LLC, Tanager has designed and managed the conversion of nine Veterans Affairs (VA) facilities in Idaho, Oregon, and Washington from traditional TDM network to new fiber optic based Ethernet service. Tanager maintains a small amount of equipment in Idaho, as required, to provide services to the VA. Tanager anticipates installing additional equipment and facilities as needed to meet the requirements of new customers in Idaho.

Tanager has interconnection agreements with Qwest in other states and is actively pursuing resale arrangements with Qwest for Idaho. Tanager is currently certified as a CLEC in Washington and Oregon.

Tanager affirms it has reviewed the Commission's rules governing local exchange telecommunications services in Idaho and will provide services in accordance with Idaho's laws, rules and regulations.

With its Application, the Company provided detailed balance sheets, including income and profit and loss statements reflecting current and prior year balances for calendar year 2008 and January through April 2009.

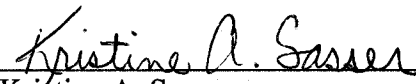
STAFF RECOMMENDATION

Staff has reviewed the Application by Tanager and believes the Company understands and agrees to comply with Commission Rules of Procedure 111 (IDAPA 31.01.01.111) and Procedural Order No. 26665. 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 of the Application for a Certificate of Public Convenience and Necessity subject to the following conditions:

1. Compliance with the Number Pool Administration and Idaho Commission Order No. 30425 mandating number resource utilization forecast (NRUF) reporting requirements;

2. Contribution to the Idaho Universal Service Fund (USF), Idaho Telecommunications Relay Service (TRS), Idaho Telephone Service Assistance Program (ITSAP), and any future reporting requirements deemed appropriate for competitive telecommunications providers;
3. Upon approval of this Application, Tanager will issue a final price list under Case No. TTL-T-09-01, at which time a certificate will be issued; and
4. The Company agrees that it will relinquish its certificate and any telephone numbers if it is not doing business within one year of its issuance of a CPCN.

Respectfully submitted this 31ST day of July 2009.



Kristine A. Sasser
Deputy Attorney General

Technical Staff: Grace Seaman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 31ST DAY OF JULY 2009,
SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN
CASE NO. TTL-T-09-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID,
TO THE FOLLOWING:

BRIAN J ADAMS
TANAGER TELECOMMUNICATION LLC
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SECRETARY