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BEFORE  THE  IDAHO  PUBLIC  UTILITIES  COMMISSION

IN THE MATTER OF THE PETITIONS FROM)

CITIZENS IN PRESTON, IDAHO AND MONT-)CASE  NO.  USW-T-96-13

PELIER, IDAHO REQUESTING EXTENDED )

AREA SERVICE (EAS) BETWEEN THEIR)

COMMUNITIES AND POCATELLO AND)SUPPLEMENTAL

IDAHO FALLS.)COMMENTS OF THE

 )COMMISSION STAFF

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COMES  NOW  the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, and submits the following Supplemental Comments of the Commission Staff.  These Supplemental Comments expand upon the Comments filed by Staff on December 2, 1996.

Staff, in reviewing its initial comments believes that it may have slighted the positive aspects of the letters and petitions received by the Commission in this case.  Although Staff believes that the conclusion it reached is correct, it believes that credit should be given where due and therefore files these supplemental comments.

While Staff concentrated its comments on the community of interest factors between Preston and Montpelier and Pocatello, Staff also recognizes that a significant community of interest exists between Preston and Montpelier and their surrounding exchanges.  As with all neighboring exchanges, there are overlaps of county lines and school districts.  For example, the

Preston exchange includes a small part of Bannock as well as Oneida county.  Conversely, part of Franklin county is in the Grace exchange.  This results in some county residents incurring toll charges to call their county seat.  Similar situations exist for school districts.

Staff also is aware that Preston generally has a greater community of interest with Logan than does Montpelier.  In fact, this would be reflected in the calling data of these exchanges to Pocatello.

Staff also must point to the number of letters received from these exchanges.  The 330 letters received in such a short period of time represents a significant show of interest for communities of this size.  Additionally, the tone of these letters shows both a strong desire for EAS as well as a willingness to pay for the service.

Staff’s comments in this proceeding reflected its analysis of what it believes to be the requisite criteria for approval of an exchange into an EAS region, that is, a community of interest with its hub exchange.  While Staff stands by that analysis and its conclusions, it believes these supplemental comments provide some of the positive aspects considered by the Staff in its analysis.

DATED  at Boise, Idaho, this            day of December, 1996.

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Weldon B. Stutzman

Deputy Attorney General

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Joseph W. Cusick

Telecommunications Section Supervisor

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