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BEFORE THE
PUBLIC UTILITY COMMISSION OF IDAHO 04 SEP 13 AM 8:31

IDAHO PUBLIC
UTILITIES COMMISSION

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| In the Matter of the Petition of VCI COMPANY for Designation as an Eligible Telecommunications Carrier |))) | Docket No. |
| Providing Service to Customers under the IDAHO Telephone Assistance Plan |)) | VCI-T-04-01 |

Petition for Designation
As An Eligible Telecommunications Carrier

VCI Company ("Petitioner"), a registered IDAHO competitive telecommunications provider providing wireline services primarily through the leasing of Unbundled Network Elements (UNE's), petitions the IDAHO Public Utilities Commission ("Commission") for an Order designating it this Petition for Designation as an Eligible Telecommunications Carrier ("Petition") for purposes of providing local exchange service to IDAHO residents qualifying for the IDAHO Telephone Assistance Plan ("ITAP"). Petitioner provides the following information in support of its Petition:

1. Petitioner's Service and Contact Information

The name and address of the Petitioner is VCI Company, 3875 Steilacoom Blvd SW #A, Lakewood, WA. 98499. Petitioner is a registered competitive carrier in the State of IDAHO.

Petitioner's registration as a competitive local exchange carrier in Washington was approved in Docket No. UT-021524 on December 10, 2002. Petitioner's application for Eligible Telecommunications Carrier Status in Washington was approved in Docket No. UT-033014 on April 23, 2003. Also approved as an ETC in Wyoming and Oregon.

2. Services to be Provided

(a) Petitioner provides the following services supported by the Universal Service Fund under 47 CFR §54.101, as adopted by the Federal Communications Commission ("FCC") on May 8, 1997, in CC Docket 96-45:

- (1) Voice grade access to the public switched network;

- (2) Local usage;
- (3) Dual tone multi-frequency signaling or its functional equivalent;
- (4) Single-party service or its functional equivalent;
- (5) Access to emergency services;
- (6) Access to operator services;
- (7) Access to interexchange service;
- (8) Access to directory assistance; and

Petitioner does not provide toll limitation for qualifying low-income consumers as its underlying carrier and UNE-P provider, Qwest Communications, does not have the technological capability for providing toll-limitation service. Thus, Petitioner hereby applies for an exemption from the requirement that it provide toll limitation to qualifying low-income customers, until such time as its underlying carrier and UNE-P provider obtains the technical ability to provide this service as allowed under 47 CFR § 54.101(c). Petitioner does provide toll-blocking service.

- (b) Petitioner provides these services using its own facilities or a combination of its own facilities and resale of another carrier's service.

3. Service Area

VCI Company will service all Qwest Corporation exchanges in IDAHO.

4. FCC Compliance

VCI Company is currently an ETC in the state of Washington, Oregon and Wyoming and complies with all FCC rules including federal high cost support and currently provides lifeline and linkup support to residents of tribal lands in areas approved for ETC status in Washington, Oregon and Wyoming. The following specific FCC rules and a detail of how VCI Company intends to comply is described below:

47 CFR 54.5 – terms and conditions.

47 CFR 54.7 - Sec. 54.7 Intended use of federal universal service support.

A carrier that receives federal universal service support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Should VCI Company receive any federal universal service support, those monies would be used as intended by 47 CFR 54.7

47 CFR 54.101

VCI Company currently complies with all requirements of 47 CFR 54.101 in the state of Washington, Oregon and Wyoming as described above and was obliged to prove compliance in order to be approved as a CLEC in the state of IDAHO.

47 CFR 54.201

VCI Company complies with the definition of an ETC as required by 47 CFR 54.201 d(1) by servicing customers through the use of unbundled network elements. D(2) advertising in a media of general distribution as described in detail in this petition under 'advertising of services provided.'

47 CFR 54.203 - does not apply since VCI Company only services areas that are served by Qwest Corporation and therefore cannot be unserved areas.

47 CFR 54.205 - does not apply since VCI Company is not requesting to relinquish it's ETC designation in areas served by more than one carrier.

47 CFR 54.207 - VCI Company will service all areas serviceable by Qwest Corporation Service Exchanges in IDAHO.

47 CFR 54.307 - Should VCI Company receive any high cost support from USAC, Vilaire would submit requests for support as required by 47 CFR 54.307.

47 CFR 54.313 - does not apply since it is a requirement of the state, not VCI Company.

47 CFR 54.400 - terms and definitions

47 CFR 54.401 - VCI Company already complies with these Federal Rules for service currently being provided in Washington, Oregon and Wyoming and will continue to do so in IDAHO. Specifically, VCI Company will offer reduced charges to qualifying low income customers and provide toll limitation service and not charge deposits

4. Advertising of Services Provided [OAR 860-003-005(7)(b)]

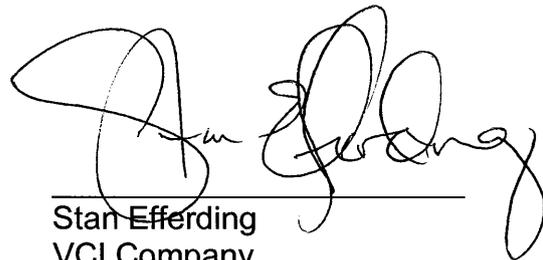
Petitioner advertises the availability of the above listed services throughout its service area in Washington, Oregon and Wyoming using a medium of general distribution and will do so in IDAHO upon ETC approval.

5. Public Interest Statement

By granting ETC designation to Petitioner , this Commission will greatly benefit the people of IDAHO who qualify by lowering their telephone bills and allowing more money for other needs of these citizens and their families.

Wherefore, Petitioner respectfully requests that the Commission enter an Order designating Petitioner an Eligible Telecommunications Carrier for the State of IDAHO for provision of local exchange service to Customers eligible for the ITAP.

Dated this th 9 day of September, 2004.



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