

KRISTINE A. SASSER
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0357
BAR NO. 6618

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Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5983

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
VELOCITY THE GREATEST PHONE)	CASE NO. VGP-T-09-01
COMPANY EVER, INC. 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. 30854 on July 10, 2009, in Case No. VGP-T-09-01, submits the following comments.

BACKGROUND

On June 4, 2009, Velocity The Greatest Phone Company Ever, Inc. (Velocity) filed an Application for a Certificate of Public Convenience and Necessity (CPCN) to provide resold local exchange telecommunications services in the State of Idaho. The Application states that the Company proposes to provide resold local exchange services throughout the areas served by Qwest North, Qwest South, and Verizon. The Company currently has no plans to install facilities in Idaho.

Velocity is incorporated in Delaware, with authorization from the Secretary of State to transact business in the State of Idaho. Although the Company does not have an office located in Idaho, its registered agent for service of process is listed as TCS Corporate Services, Inc. in Boise.

STAFF ANALYSIS

In its Application, Velocity states that it intends to provide all forms of intrastate and interexchange telecommunications services including local exchange services, interexchange switched and dedicated services, 1+ and 101XXXX outbound dialing, calling cards, directory assistance, frame relay, and other data services.

Velocity seeks authority to resell local exchange services to residential and business customers throughout the State of Idaho using facilities provided by incumbent LECs (Qwest North, Qwest South, and Verizon).

With its Application, Velocity provided copies of profit and loss statements and balance sheets for 2006, 2007 and 2008.

The Company affirms that it has reviewed the rules and regulations governing local exchange telecommunications services in Idaho and will comply with all Commission laws, rules, and regulations to the extent they are not preempted by the Federal Act. Application at 7.

Velocity states it has not yet initiated resale negotiations.

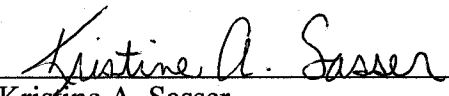
STAFF RECOMMENDATION

Staff has reviewed the Application by Velocity 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, Velocity will issue a final price list under Case No. VGP-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. VGP-T-09-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID,
TO THE FOLLOWING:

LANCE J M STEINHART PC
ATTORNEY
1720 WINDWARD CONCOURSE
STE 115
ALPHARETTA GA 30005



SECRETARY

CERTIFICATE OF SERVICE