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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
WANRACK LLC FOR A CPCN TO PROVIDE)	CASE NO. WAN-T-19-01
LOCAL AND LONG DISTANCE)	
TELECOMMUNICATIONS SERVICE IN)	COMMENTS OF THE
IDAHO)	COMMISSION STAFF
)	
)	

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

BACKGROUND

On February 7, 2019, WANRack, LLC (“WANRack” or “Company”) filed an Application requesting a Certificate of Public Convenience and Necessity (“CPCN”) to provide local and long distance telecommunications service throughout Idaho.

The Company is seeking a CPCN to provide facilities-based and resold competitive local exchange telecommunications and interexchange telecommunications services throughout the entire state of Idaho.

STAFF ANALYSIS

The Company states it will offer a full range of communications services, including data, local exchange voice services, and interexchange/long distance to institutional customers such as public schools, business customers, and other telecommunications carriers for transit or resale.

The Company is a Delaware Corporation and is principally located in Lenexa, Kansas. Application at 1. The Company states that it is authorized by the Idaho Secretary of State to conduct business in Idaho.

The Company states that it has reviewed the Commission's rules applicable to local exchange service providers in Idaho and agrees to provide service in accordance with all laws, rules and Orders to the extent they are not preempted by the federal Telecommunications Act. Rule 114.07, IDAPA 31.01.01.114.07. Further, the Company states that it does not require advance deposits by its customers.

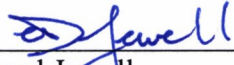
WANRack asserts that it possesses the experience and financial ability to provide local and long-distance services within Idaho.

STAFF RECOMMENDATION

Staff has reviewed WANRack's Application and believes the Company understands the Commission's rules and requirements related to the provision of telecommunication services in Idaho. Staff believes that WANRack possesses the requisite financial, managerial, and technical qualifications necessary to provide telecommunications services. Therefore, Staff recommends the Commission issue a CPCN to WANRack, subject to the following conditions:

1. The Company must comply with all number pooling and reporting requirements of the North American Number Plan Administrator. See Commission Order No. 30425;
2. The Company must comply with all reporting and contribution requirements as prescribed by the Idaho Universal Service Fund, Idaho Telecommunications Relay System, Idaho Telecommunications Service Assistance Program;
3. The Company must comply with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers; and
4. The Company shall relinquish its CPCN and all telephone numbers if, within one year of issuance of a CPCN, the Company is not providing local exchange telecommunications services in Idaho.

Respectfully submitted this ^{3rd} day of April 2019.



Edward Jewell
Deputy Attorney General

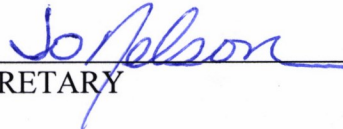
Technical Staff: Carolee Hall

i:umisc/comments/want19.1ejch comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 3RD DAY OF APRIL 2019,
SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN
CASE NO. WAN-T-19-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID,
TO THE FOLLOWING:

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SECRETARY