

STAFF ANALYSIS

The Application submitted by 360networks (USA) inc. proposes to provide basic local exchange services and exchange access and transport services in the Idaho Qwest and Verizon exchanges. The Company currently maintains facilities in Idaho that are part of its northern network and used exclusively for wholesale purposes. The Company anticipates beginning construction of facilities within 12 months of a grant of Certificate of Public Convenience and Necessity to provide local exchange services, primarily through interconnection with Qwest's network.

The Company is incorporated in the State of Nevada and headquartered in Louisville, Colorado. A Certificate of Authority to transact business as a foreign corporation from the Idaho Secretary of State was obtained on May 10, 2000. The Application states the Company has authority to provide interexchange telecommunications services in 34 states, including Idaho, and has authority to provide competitive local exchange carrier services in 33 states.

The Application included confidential financial statements for periods ending in December 31, 2003, and 2004, and the appropriate contact information for its registered agent for service of process within Idaho.

RECOMMENDATION

Staff has reviewed the Application submitted by 360networks (USA) inc. and believes the Company understands and agrees to comply with the Commission rules and requirements. Based on this review, the Company's filing fulfils the requirements of the Commission's Procedural Order No. 26665. Staff also believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Therefore, Staff recommends approval of the Application for a Certificate of Public Convenience and Necessity.

Respectfully submitted this 8th day of November 2005.



Donovan E. Walker
Deputy Attorney General

Technical Staff: Grace Seaman

i:umisc:comments/wfnt05.1dwgs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 8TH DAY OF NOVEMBER 2005, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. WFN-T-05-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

ANDREW O ISAR
MILLER ISAR INC
7901 SKANSIE AVE STE 240
GIG HARBOR WA 98335

PATRICK SUMMERS
VICE PRESIDENT & GEN. COUNSEL
360NETWORKS (USA) INC.
867 COAL CREEK CR STE 160
LOUISVILLE CO 80027



SECRETARY