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 IDAHO PUBLIC  
 UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC SERVICE COMMISSION**

<p><b>IN THE MATTER OF THE APPLICATION OF          WWC HOLDING CO., INC. DBA CELLULAR-          ONE® SEEKING DESIGNATION AS AN          ELIGIBLE TELECOMMUNICATIONS          CARRIER THAT MAY RECEIVE FEDERAL          UNIVERSAL SERVICE SUPORT</b></p>	<p>) CASE NO. WST-T-05-1          )          )          ) COMMENTS OF POTLATCH          ) TELEPHONE COMPANY          ) dba TDS TELECOM</p>
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Comes now Potlatch Telephone Company dba TDS Telecom, by and through its undersigned attorney, and in response to IPUC Order No. 29791, Notice of Request for Additional Public Comment, recommends that the Idaho PUC adopt the FCC rules regarding ETC designation and the public interest analysis at a minimum. In addition, the PUC should adopt the Idaho specific criteria discussed below. In support of this position, TDS Telecom states as follows:

**The PUC Should Adopt the Conditions Established by the FCC at a Minimum**

TDS Telecom concurs in the comments filed by CenturyTel and Frontier previously in this Docket. The FCC developed a complete record and performed an in-depth analysis prior to issuing the final rules in Docket No. 96-45 (FCC 05-46). In that order the FCC encouraged state commissions that exercise jurisdiction over ETC s to, at a minimum, adopt the additional requirements when deciding whether to designate a carrier as an ETC in order to allow for a more predictable ETC designation process and improve the long-term sustainability of the universal service fund.

## **The PUC Should Adopt Additional Criteria in Areas Served by Rural Carriers**

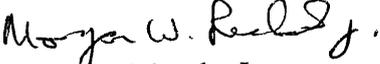
- A. All ETCs should be required to take on the same Carrier of Last Resort (COLR) obligations. ETCs must be able and willing to serve the entire service area within one year of receiving ETC designation. All ETCs must comply with universal service reporting requirements applicable to COLRs.
- B. All ETCs should be held to the same service and consumer protection standards (or comparable if a different technology is used such as wireless). All universal service recipients should be held to certain standards relating to voice quality, network reliability, repair standards, held service orders, emergency back-up (8 hour minimum), disconnection, deposits, late fees, consumer complaints, billing requirements and lifeline participation.
- C. The PUC should consider whether or not it is in the public interest to designate more than one ETC in rural company serving areas. Rural areas may not be able to support more than one ETC due to the high cost nature of the serving area. If the PUC does determine it is in the public interest to designate more than one ETC, it should consider limiting the number of ETCs designated in rural company serving areas to no more than one wireline and one wireless provider in order to prevent undue pressure on the growth of the USF fund. USF funds should be utilized to promote the provisioning of universal telecommunications service, not wireless competition.
- D. ETCs receiving support based on the cost of the ILEC should be required to submit to the PUC as a part of the annual certification process, reports demonstrating how the USF funds have been and will be spent in the serving areas to which the receipt of those funds relate.

### **Conclusion**

The FCC's order states that the conditions contained in its order should be used as minimum standards for ETC designation. TDS Telecom recommends the Commission

adopt those requirements in addition to the above requirements to ensure that ETC petitions in rural areas are in the public interest.

Respectfully submitted this 16th day of June, 2005.

  
Morgan W. Richards, Jr.

Attorneys for TDS Telecom

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16<sup>th</sup> day of June 2005, I caused to be served a true and correct copy of the foregoing document by mail addressed to the following:

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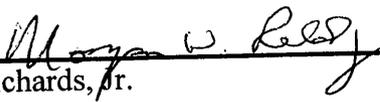
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