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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF CLEAR RATE )  
COMMUNICATIONS, INC.'S APPLICATION ) CASE NO. CRC-T-20-01  
FOR A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO )  
PROVIDE RESOLD AND NON-FACILITIES ) COMMENTS OF THE  
BASED LOCAL EXCHANGE SERVICES ) COMMISSION STAFF  
THROUGHOUT IDAHO )**

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

**BACKGROUND**

On October 14, 2020, Clear Rate Communications, Inc. (“CRC” or “Company”) applied for a Certificate of Public Convenience and Necessity (“CPCN”) to provide resold basic local exchange telecommunication services in Idaho pursuant to procedural Rule 114 (IDAPA 31.01.01.114) and Order No. 26665.

**STAFF ANALYSIS**

CRC is incorporated in the State of Michigan and is authorized to do business in Idaho. Its main corporate address is 2600 W. Big Beaver Rd., Suite 450, Troy, MI 48084. It is registered with the Idaho Secretary of State as a foreign business corporation. Application, Exhibit 2. CRC plans to offer service statewide.

CRC provided the names and addresses of its officers and owners, as well as relevant corporate financial information. CRC asserts it has reviewed the Commission's applicable rules and agrees to provide service in accordance with those rules.

## **STAFF RECOMMENDATION**

Staff has reviewed CRC's Application and believes CRC understands the Commission's rules and requirements related to the provision of telecommunication services in Idaho. Staff believes CRC's Application fulfills the requirements of the procedural Rule 114 and Order No. 26665. Staff also believes CRC possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services.

Therefore, Staff recommends approval of CRC's Application for a CPCN, subject to the following conditions:

1. CRC complies with number pooling and reporting requirements of the North American Numbering Plan Administrator, as set forth in Commission Order No. 30425;
2. CRC provides necessary reports and contributions as appropriate to the Idaho Universal Service Fund, Idaho Telecommunications Relay Services, Idaho Telecommunications Service Assistance Program, and complies with all future reporting requirements deemed appropriate by the Commission for competitive telecommunications providers;
3. Prior to issuance of the CPCN, CRC files a final price list outlining all its rates, terms, and conditions with the Commission; and
4. CRC provides three reports to the Commission indicating the number of basic local exchange customers it has and the services being offered. Those reports will be due as follows:
  - a. April 10, 2021
  - b. August 16, 2021
  - c. December 13, 2021

If the Company fails to provide the three reports, CRC shall relinquish its CPCN and all telephone numbers it has been assigned or the Commission will by its own order revoke the Company's CPCN.

5. If CRC is not providing basic local exchange service by the time the third report is due, the Commission by its own order will revoke the Company's CPCN.

Respectfully submitted this 15<sup>th</sup> day of December 2020.

A handwritten signature in blue ink, appearing to read "Matthew Hunter". The signature is fluid and cursive, with the first name "Matthew" and the last name "Hunter" clearly distinguishable.

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Matt Hunter  
Deputy Attorney General

Technical Staff: Daniel Klein

i:umisc/comments/crct20.1mhd comments

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15<sup>TH</sup> DAY OF DECEMBER 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. CRC-T-20-01, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

MARK LAMMERT  
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SECRETARY