

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER RAPER
COMMISSIONER ANDERSON
COMMISSION SECRETARY
LEGAL
WORKING FILE**

FROM: DANIEL KLEIN

DATE: APRIL 10, 2020

**RE: CITIZENS TELECOMMUNICATIONS COMPANY OF IDAHO'S
APPLICATION FOR APPROVAL OF A RESALE AGREEMENT WITH
BULLSEYE TELECOM, INC.; CASE NO. CTC-T-20-01.**

BACKGROUND

Under the provisions of the federal Telecommunications Act of 1996, resale agreements must be submitted to the Commission for approval. 47 U.S.C. § 252(e)(1). The Commission may reject an agreement adopted by negotiations only if it finds that the agreement: (1) discriminates against a telecommunications carrier not a party to the agreement; or (2) implementation of the agreement is not consistent with the public interest, convenience and necessity. 47 U.S.C. § 252(e)(2)(A).

THE APPLICATION

On March 20, 2020, Citizens Telecommunications Company of Idaho (Frontier) submitted an Application seeking Commission approval for a resale agreement with BullsEye Telecom, Inc. (BullsEye). This agreement sets out the terms and conditions related to the resale of Frontier's local services by BullsEye.

STAFF ANALYSIS

Staff has reviewed the Application and believes the agreement is consistent with the FCC orders and pro-competitive policies of this Commission, the Idaho Legislature, and the federal Telecommunications Act. Accordingly, Staff recommends Commission approval of the Application for an interconnection agreement.

COMMISSION DECISION

Does the Commission wish to approve this Application?

A handwritten signature in black ink, appearing to read "Daniel Klein", written over a horizontal line.

Daniel Klein

Udmemos/CTC-T-20-01 Resale Agreement