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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF RURAL TELEPHONE)	
COMPANY'S PETITION FOR APPROVAL OF)	CASE NO. RUR-T-20-01
LONG-DISTANCE TELECOMMUNICATIONS)	
SERVICES PRICE LIST)	
)	COMMENTS OF THE
)	COMMISSION STAFF
)	

The Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Dayn Hardie, Deputy Attorney General, submits the following comments.

BACKGROUND

On April 30, 2020, Rural Telephone Company dba RTI ("Company") petitioned the Commission for an order approving its long-distance price list. The Company requested that its Petition be processed under Modified Procedure and have an effective date of June 1, 2020.

The Company is a Commission-regulated Title 61 telephone corporation. The Company's Petition explains that "RTI intends to begin offering its customers resold intra-state and other long distance services on the rates, terms and conditions contained in RTI's Price List filed with the Commission contemporaneously with this Petition. These are new Title 62 services that will be offered by RTI in response to numerous requests from its existing local exchange customers"

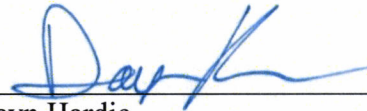
In its Petition, the Company seeks authority to begin offering its customers resold intra-state and other long-distance services pursuant to the long-distance price list, effective June 1, 2020.

Commission Staff subsequently asked the Company if the Company would consent to extending the proposed effective date beyond June 1, 2020. The Company agreed to Staff's request. *See* May 7, 2020 Decision Memorandum.

STAFF ANALYSIS AND RECOMMENDATION

Staff has reviewed the Petition along with the Affidavit of Mark Martell certifying "RTI will account all revenues, expenses, and net revenues attributable to its long-distance services to separate accounts apart from revenues and expenses attributable to its regulated services per the Uniform System of Accounts for Telecommunications Companies, 47CFR Part 32.7990." Staff recommends the Company be required to continue maintaining separate non-regulated accounts. Staff, therefore, recommends Commission approval for its long-distance price list.

Respectfully submitted this 5th day of June 2020.



Dayn Hardie
Deputy Attorney General

Technical Staff: Daniel Klein

i:umisc/comments/rurt20.1dhd comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 5th DAY OF JUNE 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. RUR-T-20-01, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

MARK MARTELL
RURAL TELEPHONE CO
892 W MADISON AVE
GLENN'S FERRY ID 83623
E-MAIL: mark@rtci.net

MICHAEL CREAMER
GIVENS PURSLEY
PO BOX 2720
BOISE ID 83701
E-MAIL: mcc@givenspursley.com

/s/ Reyna Quintero

SECRETARY

Agency : 900 Public Utilities Commission

Cash Receipt Report

Deposit No	Document Sfx	Group	Req Release Date	Batch Date	Batch Type	Batch No	Status	Total Amount
891	REC20085-		6/5/2020	J		842	Awaiting Receipt Distribution	\$100.00

TC R	Index	PCA	ExpSub-Dtl	RevSub-Dtl	Grant-Phs	Currency	Project-Phs	Coin	Warrant	Total Amount		
Desc		RefDoc-Sfx	Mod	BFY	GAAPSecA	Subs	Location	Facility	BU Task	Fund-Dtl MPC	Invoice # CI	PropNo-Cmp
101	1000	40000		1025 03				PCAB	0229 20	2020-101		
CK5940	DISCOUNT LONG DIST			2020			DLD-T					100.00
101	1000	40000		1025 03				PCAB	0229 20	2020-196		
CK4803	RCLEC, INC			2020			RCL-T					100.00

Deposit Detail	Amount	Number	Name	Voided	Create by
	50.00	5940	FROM DISCOUNT LONG DISTANCE	<input type="checkbox"/>	MAXINE CHRISTENSEN
	50.00	4803	FROM RCLEC INC	<input type="checkbox"/>	
	100.00			<input type="checkbox"/>	

Description Assessment Fee REC20085
 Void Reason