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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Idaho Telephone Association*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION  
OF SOUTHWESTERN BELL  
COMMUNICATIONS SERVICES, INC.  
DBA SBC LONG DISTANCE FOR A  
CERTIFICATE OF PUBLIC  
CONVENIENCE AND NECESSITY TO  
PROVIDE LOCAL EXCHANGE  
TELECOMMUNICATIONS SERVICES

Case No: SBC-T-04-1

**COMMENTS OF IDAHO TELEPHONE  
ASSOCIATION**

Idaho Telephone Association (“ITA”), through its attorneys Givens Pursley LLP, on behalf of its member independent local exchange carriers, and pursuant to IDAPA 31.01.01.203 and Commission Order 29449, hereby submits Comments on the above-captioned Application of Southwestern Bell Communications Services dba SBC Long Distance (“SBCS”).

**COMMENTS**

1. The independent local exchange carries on whose behalf ITA submits these Comments currently are the exclusive providers of basic local exchange service within their respective service areas pursuant to Certificates of Public Convenience and Necessity issued by the Idaho Public Utilities Commission (“Commission”).

2. SBCS’ Application seeks to provide resold and facilities based local exchange and exchange access service within the State of Idaho. SBCS proposes to provide competitive local exchange carrier services including, but not limited to, basic local service and custom

calling features, and data services to commercial and residential subscribers in Qwest Corporation and Verizon Northwest Inc. exchanges. SBCS also proposes to provide exchange access services to interconnecting carriers. SBCS also states it does not intend to offer alternative operator services to the transient public.

3. Each of ITA's member local exchange carriers meet the definitions of a "Common Carrier," "Telecommunications Carrier" and "Rural Telephone Carrier" under the Federal Telecommunications Act of 1996 ("1996 Act").

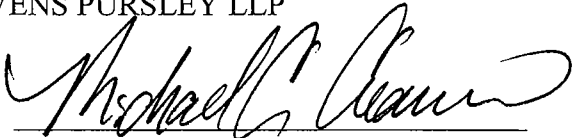
4. SBCS has not made a bona fide request to ITA's members for interconnection, services or network elements.

5. Any grant of certificate authority to SBCS should be made expressly subject to the exemption of ITA members from the obligations of incumbent local exchange carriers under section 251(c) of the 1996 Act, until such time as the requirements for lifting such exemption contained in section 251(f) of the 1996 Act have been met.

6. The Commission's Notice of Application was issued on March 22, 2004 and the comment deadline established by that notice was April 12, 2004. Through inadvertence, ITA's counsel has not submitted these Comments by the deadline set by the Commission. However, it does not appear that any party will be prejudiced, and it is respectfully requested that these late-filed Comments be accepted and considered by the Commission.

Respectfully submitted this 20<sup>th</sup> day of April 2004.

GIVENS PURSLEY LLP

By:   
Conley E. Ward  
Michael C. Creamer  
*Attorneys for Idaho Telephone  
Association*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of April 2004, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83720-5983

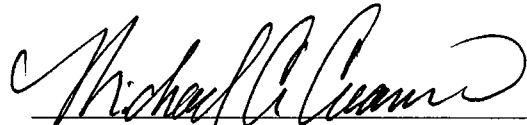
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