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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
TRANS NATIONAL COMMUNICATIONS) CASE NO. TIN-T-04-1
INTERNATIONAL, INC. FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY)
TO PROVIDE LOCAL EXCHANGE) COMMENTS OF THE
TELECOMMUNICATIONS SERVICES.) COMMISSION STAFF
_____)

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Lisa D. Nordstrom, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 29616 on October 19, 2004, submits the following comments.

BACKGROUND

On July 1, 2004, Trans National Communications International, Inc. (“Trans National” or “Company”) filed an Application for a Certificate of Public Convenience and Necessity to provide to basic local exchange telecommunications service throughout the State of Idaho in the areas in which Qwest Corporation is the incumbent local exchange carrier. The Company will provide service using resold facilities based unbundled network elements.

STAFF ANALYSIS

Trans National's Application proposes to provide non-licensed and unregulated telecommunications services on a competitive basis. The Company intends to provide various forms of local exchange services to business and residential customers in Idaho within six months of the date a license is granted by the Commission. These services include two-way local lines and trunks, Centrex, ISDN, and DSL services. The Company also intends to provide intraLATA and interLATA toll services.

Trans National was incorporated on August 1, 1995 as a Delaware corporation and is authorized to transact business in the State of Idaho as a foreign corporation. The Company is headquartered in Boston, Massachusetts.

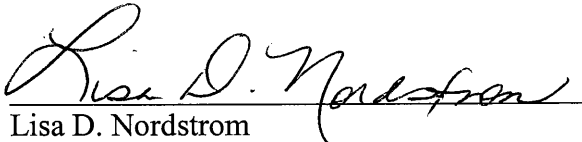
The Company currently provides resold interexchange services in the contiguous 48 states and Hawaii. The Company also has authority to provide local exchange services in 18 states, and is in the process of obtaining authority in 13 additional states.

Trans National has provided financial sheets for quarters ending December 31, 2002 and 2003 and appropriate contact information for its registered agent for service of process within Idaho.

STAFF RECOMMENDATION

Staff has reviewed the Application submitted by Trans National and believes the Company understands and agrees to comply with the Commission rules and requirements. Based on this review, the Company's filing fulfills the requirements of the Commission Rules and Procedural Order No. 26665. The Staff believes that the Company possesses the requisite financial, managerial, and technical qualifications necessary to operate as a provider of telecommunications services. Therefore, Staff recommends approval of the Application for a Certificate of Public Convenience and Necessity.

Respectfully submitted this *8th* day of November 2004.


Lisa D. Nordstrom
Deputy Attorney General


Technical Staff: Carolee Hall
Grace Seaman

LN:i:/umisc/comments/tint04.11nchgs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 8th DAY OF NOVEMBER 2004, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. TIN-T-04-1, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

ERICK ROBINSON
REGULATORY SPECIALIST
TRANSNATIONAL COMMUNICATION
INTERNATIONAL INC
2 CHARLESGATE WEST
BOSTON MA 02215



SECRETARY