



IDAHO PUBLIC UTILITIES COMMISSION

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Dirk Kempthorne, Governor

P.O. Box 83720, Boise, Idaho 83720-0074

MAR 08 2000
February 28, 2000
FCC MAIL ROOM
Federal Communications Commission
Office of the Secretary
Portals
445 Twelfth Street SW
Washington DC 20554

Dennis S. Hansen, President
Marsha H. Smith, Commissioner
Paul Kjellander, Commissioner

RE: GTE's Petition for Reconsideration, Docket Nos. CC 96-45 and CC 96-98

Dear Secretary:

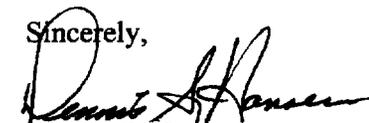
On May 7, 1999, the Federal Communications Commission ("Commission") stayed its earlier order requiring states to deaverage rates for unbundled network elements ("UNEs") pursuant to Section 251 of the Telecommunications Act of 1996, *See Deaveraged Rate Zones for Unbundled Network Elements*, CC Docket No. 96-98, Stay Order, 14 FCC Rcd. 8300, 8300-01 (1999). On November 2, 1999, the Commission lifted its stay in the *Federal-State Joint Board on Universal Service*, Ninth Report & Order and Eighteenth Order on Reconsideration, CC Docket No. 96-45, FCC 99-306 (rel. November 2, 1999) ("Methodology Order"). As a result of that order, rates for UNEs must be unbundled by May 1, 2000.

On January 3, 2000, GTE Florida Inc. petitioned the Commission to reconsider its Methodology Order and to permit the current stay remain in place until at least May 1, 2001. The Idaho Public Utilities Commission ("IPUC") supports reconsideration and leaving the current stay in place until at least May 1, 2001.

The IPUC supports competitive entry, including adoption of deaveraged UNEs. However, the IPUC believes that accomplishing that task on six (6) months notice while completing other proceedings creates significant challenges and difficulties that would compromise all other efforts to increase competition. The IPUC expresses no opinion about the substance of GTE's arguments in support of reconsideration. The IPUC does, however, support reconsideration of the Commission's decision to lift the stay and joins with GTE in requesting additional time to address deaveraging UNEs.

For these reasons, the IPUC supports GTE's Petition for Reconsideration and extension of the stay.

Sincerely,


Dennis S. Hansen
President


Marsha H. Smith
Commissioner


Paul Kjellander
Commissioner

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