insmore&Shohl

Edward T. Depp 502-540-2347 tip.depp@dinslaw.com

March 7, 2007

RECEIVED

MAR 08 2007

PUBLIC SERVICE COMMISSION

VIA FEDERAL EXPRESS

Hon. Beth O'Donnell **Executive Director Public Service Commission** 211 Sower Blvd. P. O. Box 615 Frankfort, KY 40601

> In the matter of: Petition of Mountain Rural Telephone Cooperative Corporation, Re: Inc., for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, Case No. 2006-00296

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original affidavit of Shayne Ison. Please substitute the original for the copy that was filed on Monday, March 5, 2007.

Thank you, and if you have any questions, please call me.

Sincerely

Edward T. Depp

ETD/lb Enclosures

Philip R. Schenkenberg, Esq. cc:

> 1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202 502.540.2300 502.585.2207 fax www.dinslaw.com

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION ECENTED

In the Matter of:		MAR 0 8 2007	
	Petition of Mountain Rural Telephone Cooperative Corporation, Inc., for Arbitration of Certain Terms)	PUBLIC SERVICE COMMISSION
	and Conditions of Proposed Interconnection)	
	Agreement with Cellco Partnership d/b/a Verizon)	
	Wireless, GTE Wireless of the Midwest)	Case No.2006-00296
	Incorporated d/b/a Verizon Wireless, and Kentucky)	
	RSA No. 1 Partnership d/b/a Verizon Wireless,)	
	Pursuant to the Communications Act of 1934,)	
	as Amended by the Telecommunications)	
	Act of 1996)	

AFFIDAVIT OF SHAYNE ISON

Affiant, Shayne Ison, having been duly sworn, hereby states as follows.

- 1. I am Director of Finance/Regulatory for Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain").
- 2. As Director of Finance/Regulatory, I have personal knowledge of the matters stated herein.
 - 3. Mountain has a tandem located in the Louisville MTA.
- 4. All traffic exchanged between T-Mobile USA, Inc. ("T-Mobile") and Mountain has previously been (and will continue to be) exchanged through that tandem.
- 5. Notwithstanding these facts, Mountain's service territory spans portions of both the Cincinnati-Dayton and Louisville MTA's.
- 6. Mountain customers located in its Sandy Hook exchange (NPA-NXX: 606-738) reside in the Cincinnati-Dayton MTA, while all other Mountain customers reside in the Louisville MTA.

- 7. Thus, any T-Mobile traffic delivered to Mountain and destined for Mountain customers residing in the Sandy Hook exchange will necessarily cross an MTA boundary.
- 8. As of February 15, 2007, Mountain has a total of 15,805 customer lines in its service territory, and 2,981 of those lines are located within the Sandy Hook exchange lying outside of the Louisville MTA.
- 9. Thus, for 18.86% of Mountain's customer lines, Mountain must transport traffic across the MTA boundary in order to complete calls from T-Mobile customers.
- 10. Consistent with this fact, Mountain and Cingular previously recognized that 20% of the expected Cingular-to-Mountain traffic was interMTA in nature.
- 11. The volume of CMRS traffic appears to be increasing with time (rather than decreasing).
- 12. The Commission should, therefore, order that Mountain's interconnection agreement with T-Mobile contain an interMTA traffic factor of 20%.

FURTHER the Affiant saith naught.

COMMONWEALTH OF KENTUCKY

Subscribed and sworn to before me by Shayne Ison, to me known, on this the 5 day of March, 2007.

10/27/08

My commission expires:

104113v1