

The Commission's determination on Issue 15 clearly applies to all RLECs, including Mountain. The CMRS Providers demonstrated that due to the size of the applicable MTAs and the fact that calling patterns tend to be focused within communities of interest, the vast majority of traffic terminates within the MTA in which it originates. Brown Direct, pp. 19-20; Clampitt Direct, p. 12. The only testimony specific to Mountain was John Clampitt's testimony that based on Verizon Wireless' network configurations he would expect an interMTA percentage of approximately 3%. Clampitt Direct, p. 13. And, as Mr. Brown pointed out, in the recent Tennessee arbitration North Central agreed to a 3% interMTA factor even though its service territory is divided by an MTA boundary. Brown Rebuttal, pp. 32-33. Based on the record evidence, it was appropriate for the Commission to set Mountain's interMTA percentage at 3%.

The Commission cannot accept Mountain's proposal to set the percentage at 20% because there is no record evidence to support such a proposal. In fact, this is the first time Mountain has made this suggestion. An unsupported request for "clarification" should not lead the Commission to reach a result never previously suggested, nor supported by the evidence.³

Finally, Verizon Wireless and T-Mobile dispute Mountain's claim that this issue is worth "thousands of dollars in revenue per month." With regard to Verizon Wireless and T-Mobile, who are the only two carriers affected, monthly usage numbers are in the record within Petitions for Confidential Treatment and filed by each company in the above docket.⁴ The low usage numbers reflected on these filings show Mountain's claim is incorrect. While Mountain may

³ Nor should a request under KRS 278.400 open the door for Mountain to present evidence that may have existed at the time of hearing but that Mountain elected not to present at that hearing. *See, e.g., Louisville Gas and Electric Co.*, Case No. 96-524 (March. 11, 1999)(KRS 278.400 limits rehearing to new evidence not readily discoverable at the original hearing and "serves to prevent piecemeal litigation of issues.")

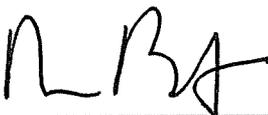
⁴ Each of these Petitions was dated September 7, 2006.

claim that Cingular has more traffic, or more interMTA traffic, than Verizon Wireless and T-Mobile, that is not a basis to change the result for the two carriers against whom Mountain filed for arbitration.

III. CONCLUSION

For the foregoing reasons, T-Mobile and Verizon Wireless respectfully request that the Commission deny Mountain's Motion.

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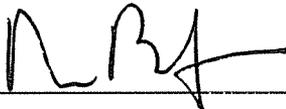
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CERTIFICATE OF SERVICE

This is to certify that a copy of **RESPONSE TO MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.'S MOTION FOR CLARIFICATION** was served on the parties listed below by electronic mail (as indicated) and by depositing in the United States mail, first class and postage prepaid, on the 22nd day of January, 2007.

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