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OCT 27 2006

PUBLIC SERVICE
COMMISSION

October 27, 2006

Via Hand Delivery

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

Re: In the Matter of the Application of NANPA, on behalf of the Kentucky Telecommunications Industry for Approval of NPA Relief Plan for the 270 NPA; Case No. 2006-00357

Dear Ms. O'Donnell:

Please find enclosed for filing, in the above-referenced case, the original and eleven (11) copies of the comments of Logan Telephone Cooperative Inc. Please file-stamp one of the enclosed copies and return it to our courier.

Thank you for your assistance, and please call us if you have any questions.

Sincerely,


Edward T. Depp

ETD/lb

Enclosures

cc: Greg Hale
John E. Selent, Esq.
Holly C. Wallace, Esq.

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 27 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF NANPA,)
ON BEHALF OF THE KENTUCKY)
TELECOMMUNICATIONS INDUSTRY)
FOR APPROVAL OF NPA RELIEF PLAN)
FOR THE 270 NPA)

CASE NO. 2006-00357

COMMENTS OF LOGAN TELEPHONE COOPERATIVE, INC.

Logan Telephone Cooperative, Inc. ("Logan"), pursuant to the September 27, 2006 ("Order") of the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this docket, hereby respectfully submits its written comments pertaining to the 270 NPA exhaustion relief options identified in NANPA's original filing ("NANPA Filing") with the Commission on July 25, 2001.

In the NANPA Filing, NANPA identified a number of options designed to address the future exhaustion of the 270 NPA. Among those options, NANPA identified two specific proposals as the industry-consensus first and second recommendations. The first recommendation was identified as "Alternative #5," also known as the "all-services distributed overlay plan." The second recommendation was identified as "Alternative #4A," which proposed a slightly-modified geographic split derived from the original Alternative #4 identified in the NANPA Filing.

Incidentally, there was a typographical mistake on page 4 of the NANPA Filing's description of Alternative #4A. On that page, NANPA states that "Alternative #4A is a modified version of Alternative #4. The rate centers of Bremen, Central City, Drakesboro, Elkton, Greenville, Guthrie, Sharon Grove and Trenton were moved to Area B..." *Id.* (emphasis added). Because – as the rate center maps in Attachment 2 to Exhibit A of the NANPA Filing illustrate – the Bremen, Central City, Drakesboro, Elkton, Greenville, Guthrie, Sharon Grove and Trenton rate centers would be

located in Area B of Alternative #4, the description in Alternative #4A should have described those rate centers as being “moved to Area A...” (See NANPA-proposed rate center map for Alternative #4, attached hereto as Exhibit 1.)

While Logan would not oppose Alternative #5, it does recognize the challenges that implementing an overlay plan in the 270 NPA will present. Therefore, if the commission decides not to implement Alternative #5 Logan asks the Commission to approve Alternative #4A as the best option for providing relief for the 270 NPA.

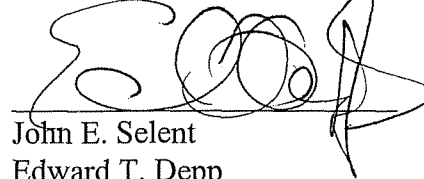
Alternative #4A, in particular, was proposed as a means of ensuring that seven-digit dialing could be preserved for local calling plans located within the 270 NPA. In Logan's case, Alternative #4A would preserve Logan’s optional seven-digit calling plan for all of its rate centers, thereby ensuring that Logan's members – who use that dialing plan to reach their county government offices, schools, friends, and other contacts within their individual communities of interest – could continue to dial an expanded geographic area by dialing only seven digits (rather than the ten digit dialing required by the Alternative #5 geographic overlay, for example). Any "geographic split" alternative other than Alternative #4A (which keeps Logan's rate centers grouped together) may upset the continued viability of this plan; moreover, any overlay plan will certainly do so, as ten-digit dialing would become mandatory under such a plan.

Finally, Logan requests that if the Commission does implement mandatory number pooling for the 270 NPA, it exempts rural carriers, like Logan, from the number pooling requirement. This exemption would prevent rural carriers from having to undertake the high-cost implementation of such a plan, all while having minimal impact on the 270 NPA as a result of the low line counts associated with the rural carriers' service territories.

Accordingly, if NANPA Alternative #5 is not implemented, Logan respectfully requests that

the Commission adopt NANPA's Alternative #4A as a means of ensuring relief for the 270 NPA. Moreover, if the Commission ultimately implements mandatory number pooling in the 270 NPA, Logan respectfully requests that the rural carriers (such as itself) be exempt from such requirement.

Respectfully submitted,



John E. Selent

Edward T. Depp

Holly C. Wallace

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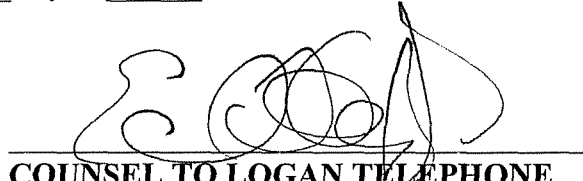
(502) 585-2207 (fax)

COUNSEL TO LOGAN

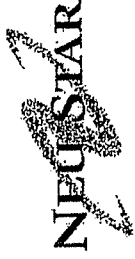
TELEPHONE COOPERATIVE, INC.

CERTIFICATE OF SERVICE

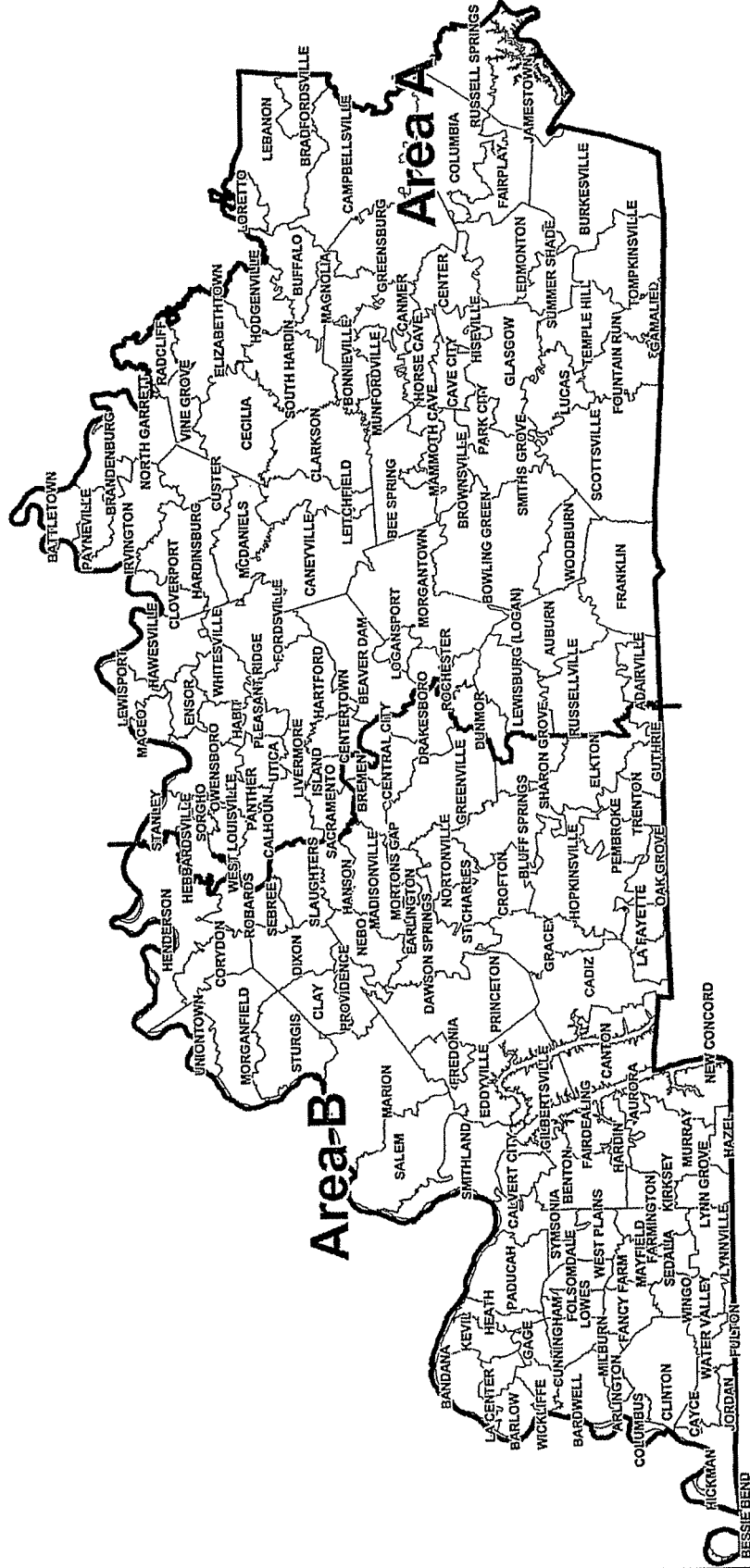
I hereby certify that a copy of the foregoing was served by first class United States mail, postage prepaid to all parties of record on this 27th day of October 2006.



**COUNSEL TO LOGAN TELEPHONE
COOPERATIVE, INC.**



Alternative #4 Geographic Split



NPA 270 Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE #	PROJECTED LIVES
Area "A"	9 Years
Area "B"	10 Years

EXHIBIT

bbbles