

South Central RTC



South Central Rural Telephone

Cooperative Corporation, Inc.

Total

Communications

July 3, 2007

Beth O'Donnell, Executive Director
Public Service Commission of the Commonwealth of Kentucky
211 Sower Boulevard
Frankfort, KY 40602-0615

RECEIVED

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**PUBLIC SERVICE
COMMISSION**

RE: PSC Administrative Conservation Measures Case No. 2006-00357
South Central Rural Telephone Cooperative Corp. Filing for Exemption from the Mandatory Pooling Requirement

Dear Ms. O'Donnell:

On June 15, 2007, the Commission adopted an Order in the above-referenced proceeding ("Order") that seeks to conserve numbering resources in the 270 area code through the implementation of mandatory thousands block pooling. As requested in that Order, South Central Rural Telephone Cooperative Corp., Inc. (the "Company") offers comments on mandatory pooling and notifies the Commission that for the reasons described below the Company be allowed to continue to be exempt from mandatory pooling as implemented in the 270 NPA.

In regard to Part 1 of the order allowing further comment, SCRTC recognizes that the goal of the Commission to delay deployment of a second NPA may necessitate the mandatory pooling of thousand blocks throughout the 270 area code. SCRTC urges the Commission, however, to consider mandatory pooling on an individual case basis and to appropriately recognize that for many of the ITCs the migration to thousands block pooling may simply impose a cost for which there is little if any benefit.

Part 2 of the Order requests notification from any carrier claiming exemption from mandatory pooling requirements. The guidelines set by the FCC's national rollout allows carrier exemptions from thousand block pooling where rural telephone companies and Tier III Commercial Mobile Radio Service providers 1) had not received a specific request for the provision of Local Number Portability from another carrier, or 2) were those carriers are the only service provider receiving numbering resources in a given rate center.

Therefore, the Company provides the following list of each rate center(s) in the 270 NPA to remain exempt from the Mandatory pooling and a description of the specific qualification(s) met for each exemption.

Qualification(s) Met: The Company is the only service provider receiving numbering resources in this rate center.

Qualifying Exchanges: Buffalo (270/325), Cave City (270/773), Center (270/565), Fountain Run (270/434), Magnolia (270/324)

Please contact me with any questions at 270-678-2111.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Phipps', is written over a white background.

Max Phipps
General Manager
South Central Rural Telephone Cooperative