

Dinsmore & Shohl LLP
ATTORNEYS

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

March 5, 2007

VIA HAND DELIVERY

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

RECEIVED

MAR 05 2007

PUBLIC SERVICE
COMMISSION

Re: Petition of Mountain Rural Telephone Cooperative Corporation, 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

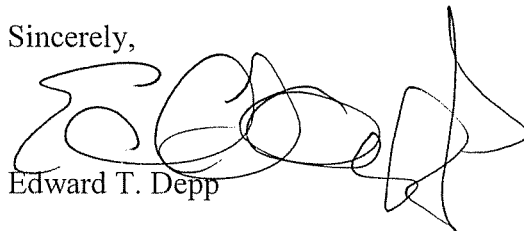
Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of Mountain Rural Telephone Cooperative Corporation, Inc.'s Evidentiary Filing re InterMTA Factor. Please file-stamp one copy and return it to me in the enclosed self-addressed stamped envelope.

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

Sincerely,

Edward T. Depp



ETD/lb
Enclosures
cc: Philip R. Schenkenberg, Esq.

Hon. Beth O'Donnell
March 5, 2007
Page 2

bcc: Eileen M. Bodamer (*via e-mail*)
W. A. Gillum (*via e-mail*)
Shane Ison (*via e-mail*)

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

MAR 05 2007

PUBLIC SERVICE
COMMISSION

Petition of Mountain Rural Telephone Cooperative)
Corporation, 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

ORIGINAL

EVIDENTIARY FILING REGARDING INTER-MTA FACTO

Petitioner Mountain Rural Telephone Cooperative Corporation, Inc. ("Mour
to the February 6 and February 28, 2007 orders of the Kentucky Public Service Commission (the
"Commission") hereby submits its evidence in support of an appropriate interMTA factor for its
interconnection agreement with T-Mobile USA, Inc. ("T-Mobile")¹ and states as follows.

Mountain has a tandem located in the Louisville MTA. (*See* Affidavit of Shayne Ison at
para. 3, attached hereto as Exhibit 1.) All traffic exchanged between T-Mobile and Mountain has
previously been (and will continue to be) exchanged through that tandem. (*See id.* at para. 4.)
Notwithstanding these facts, Mountain's service territory spans portions of both the Cincinnati-
Dayton and Louisville MTA's. (*See id.* at para. 5.) Specifically, 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. (*See id.* at para. 6.) Thus, any T-Mobile traffic

¹ Mountain and Verizon Wireless have successfully negotiated a resolution to the issue of an
appropriate interMTA factor for their respective interconnection agreement. Accordingly, this filing
does not address any issues specific to Verizon Wireless, and the Commission need not decide the
interMTA factor issue with respect to Verizon Wireless.

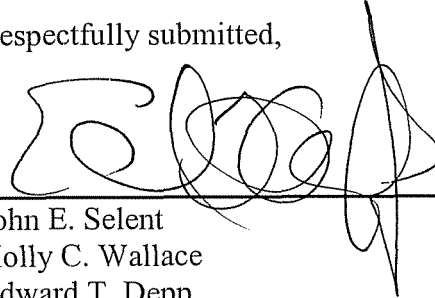
delivered to Mountain and destined for Mountain customers residing in the Sandy Hook exchange will necessarily cross an MTA boundary. (*See id.* at para. 7.)

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. (*See id.* at para. 8.) 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. (*See id.* at para. 9.) Consistent with this fact, Mountain and Cingular previously recognized that 20% of the expected Cingular-to-Mountain traffic was interMTA in nature. (*See id.* at para. 10; *see also* Interconnection Agreement between Mountain and Cingular, filed with the Commission on September 24, 2003.) Of course, considering that CMRS traffic appears to be increasing with time (rather than decreasing), (*see id.* at para. 11), even the 18.86% figure probably suggests only the bottom end of an appropriate interMTA factor for the coming two years of the parties' interconnection agreement.

A 20% interMTA factor is appropriate for the T-Mobile interconnection agreement. The Mountain-Cingular interconnection agreement contains that factor. Mountain has 18.86% of all customer lines in the Sandy Hook exchange. And, CMRS traffic is only increasing with time. Therefore, it is crucial that the Commission increase the 3% interMTA factor it previously approved for Mountain to a 20% interMTA traffic factor in order to ensure that: (i) Mountain does not lose substantial amounts of legitimate access charges; and (ii) other carriers may not adopt the resulting

Mountain - T-Mobile interconnection agreement in order to take advantage of an unrealistically low interMTA traffic factor.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John E. Selent", written over a horizontal line.

John E. Selent

Holly C. Wallace

Edward T. Depp

DINSMORE & SHOHL LLP

1400 PNC Plaza

500 West Jefferson Street

Louisville, Kentucky 40202

(502) 540-2300 (telephone)

(502) 585-2207 (fax)

**COUNSEL TO MOUNTAIN RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first-class United States mail and electronic mail on this 5th day of March, 2007, to the following individual(s):

Jeff Yost, Esq.
Mary Beth Naumann, Esq.
Jackson Kelly PLLC
175 East Main Street
Lexington, KY 40507
jyost@jacksonkelly.com
mnaumann@jacksonkelly.com

Counsel to Cingular

Mark R. Overstreet, Esq.
Stites & Harbison PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
moverstreet@stites.com

Counsel to AllTel

Phillip R. Schenkenberg, Esq.
Briggs & Morgan, P.A.
2200 IDS Center
Minneapolis, MN 55402
pschenkenberg@briggs.com

Counsel to T-Mobile and Verizon Wireless

John N. Hughes, Esq.
Attorney at Law
124 West Todd Street
Frankfort, Kentucky 40601
jnhughes@fewpb.net

Counsel to Sprint PCS

Bhogin M. Modi
ComScape Telecommunications, Inc.
1926 10th Avenue North
Suite 305
West Palm Beach, FL 33461

Tom Sams
NTCH-West, Inc.
1600 Ute Avenue, Suite 10
Grand Junction, Colorado 81501


**COUNSEL TO MOUNTAIN RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Petition of Mountain Rural Telephone Cooperative)
Corporation, Inc., for Arbitration of Certain Terms)
and Conditions of Proposed Interconnection)
Agreement with Celco 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

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.

Shayne Ison
Shayne Ison, Affiant

COMMONWEALTH OF KENTUCKY)
COUNTY OF Morgan) SS:

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

John Jay Ingram
NOTARY PUBLIC — State at Large

My commission expires: 10/27/08