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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Verizon Wireless (VAW) LLC, et al.,

Plaintiff,

vs.

Bob Sahr, et al.,

Defendants and Intervenors.

Civil Number 04-3014

**AFFIDAVIT OF
EDWARD A. HARROP**

STATE OF GEORGIA)
COUNTY OF FULTON) ss:

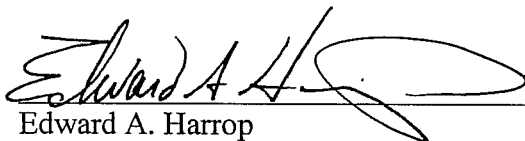
1. My name is Edward A. Harrop. I am the Manager – Network for Verizon Wireless. My job responsibilities include the negotiation of interconnection and reciprocal compensation agreements and the billing of reciprocal compensation per the terms of the negotiated agreement.

2. I make this Affidavit in support of Verizon Wireless' motion for summary judgment. These matters are within my personal knowledge based on my job responsibilities with Verizon Wireless, or are based on my review of company business records maintained in the ordinary course of business.

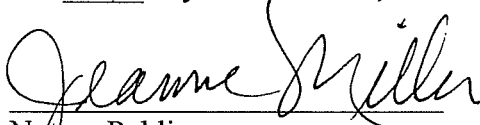
3. Verizon Wireless does not today have the capability to measure and bill calls for intercarrier compensation purposes. I am familiar with some billing systems and services that could be purchased to measure and bill such traffic, but, to the best of my knowledge, these systems are not designed to measure and bill based on the cell site the call originates or the cell site the terminates for determining whether the call is IntraMTA or InterMTA.

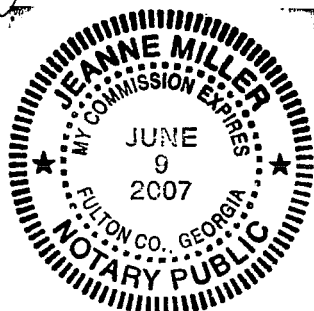
4. As a result, even if Verizon Wireless were to purchase a service or system that would allow it to measure and bill traffic for intercarrier compensation purposes, it would then need to build and maintain a database that would identify each originating cell by state and MTA (assuming it was proper to use the cell site as a proxy for the location of the originating caller).

5. Verizon Wireless would also need to obtain and maintain customized software that would compare the originating cell site location to the terminating telephone number and categorize the call as intraMTA, interMTA and interstate, or intrastate. The software would then need to separate calls by terminating LEC and transmit reports to each affected carrier. Verizon Wireless expects that it would be difficult and expensive to implement such changes to the Company's current procedures.


Edward A. Harrop

Subscribed and sworn to before me
this 11 day of November, 2005.


Notary Public



AFFIDAVIT OF SERVICE BY MAIL

STATE OF MINNESOTA)

)

ss.

Court File No. 04-3014

COUNTY OF HENNEPIN)

Sheryl M. O'Neill, being first duly sworn, deposes and states that on the 15th day of November, 2005, she served the attached AFFIDAVIT OF ED HARROP upon:

Darla Pollman Rogers
Ritter, Rogers, Wattier & Brown, LLP
319 South Coteau Street
P.O. Box 280
Pierre, South Dakota 57501-0280

Rolayne Ailts Wiest
South Dakota Public Utilities Commission
500 East Capitol
Pierre, South Dakota 57504-5070

(which is the last known address of said attorney) by depositing a true and correct copy thereof in the United States mail, postage prepaid.

Sheryl M O'Neill

Subscribed and sworn to before me this
15th day of November, 2005.

Sandra J. Cambronne
Notary Public

