

EXHIBIT C

PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF ALLIANCE)	
COMMUNICATIONS COOPERATIVE, INC., BERESFORD)	
MUNICIPAL TELEPHONE COMPANY, MCCOOK COOPERATIVE)	Docket Nos.
TELEPHONE COMPANY, SANTEL COMMUNICATIONS)	TC 07-111
COOPERATIVE, INC., AND WEST RIVER COOPERATIVE)	TC 07-112
TELEPHONE COMPANY FOR ARBITRATION PURSUANT TO THE)	TC 07-113
TELECOMMUNICATIONS ACT OF 1996 TO RESOLVE ISSUES)	TC 07-114
RELATING TO AN INTERCONNECTION AGREEMENT WITH)	TC 07-115
ALLTEL COMMUNICATIONS, LLC.)	TC 07-116

REBUTTAL TESTIMONY OF RON WILLIAMS

1 **Q: PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

2 A. My name is Ron Williams. I am the Vice President – Interconnection and Compliance
3 for Alltel Communications, LLC. My business address is 3650 131st Avenue S.E., Suite
4 600, Bellevue, Washington 98006.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A. I am testifying on behalf of Alltel Communications, LLC (“Alltel”).

7 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A: The purpose of this testimony is to respond to the direct testimony filed on behalf of
9 Petitioners by Larry Thompson and Dan Davis. I will comment on Thompson testimony
10 with respect to factors associated with Issue 2. I will comment on Davis testimony with
11 respect to rates and compensation methodology associated with Issue 2 as well as Issues
12 3, 5, and 7.

13 **Issue 2: What is the appropriate Percent of InterMTA Use Factor to be applied to**
14 **non-IntraMTA traffic exchanged between the parties?**

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16 **Sub Issue: Mobile-to-Land InterMTA Factor**

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18 **Q: HAVE YOU REVIEWED THE LARRY THOMPSON TESTIMONY ON BEHALF OF PETITIONERS**
19 **REGARDING INTERMTA TRAFFIC FACTOR DERIVATION?**

1 A: Yes I did. The testimony of Larry Thompson is based on a 2004 study and deals only
2 with traffic in the mobile-to-land direction (i.e., traffic originating from Alltel and
3 terminating to a Petitioner). While I do not agree that an NPANXX methodology
4 produces an accurate representation of interMTA traffic volume, I believe I understand
5 the methodology employed in producing the study.

6 **Q: WHY DON'T YOU BELIEVE AN NPANXX METHODOLOGY PRODUCES AN ACCURATE**
7 **DEPICTION OF INTERMTA TRAFFIC.**

8 A: The primary reason has to do with the mobility of wireless users. While an NPANXX
9 assigned for incumbent LEC users is, for the most part, fixed to a specific geographic
10 origination point, it is not the case with telephone numbers assigned to wireless users.

11 **Q: IN THOMPSON'S TESTIMONY AND EXHIBITS THE PETIONERS PROVIDED THEIR**
12 **CALCULATIONS OF MOBILE-TO-LAND INTERMTA FACTORS. DO YOU CONCUR IN THEIR**
13 **RESULTS?**

14 A: No. The Petitioners used data from 2004 and did not account for substantial changes in
15 the network and method that traffic is exchanged between Alltel and each of the
16 Petitioners. Since 2004 Alltel has:

- 17 • Divested operations in Minnesota to RCC Holdings which were
18 included in the study.
- 19 • Divested operations in Nebraska to US Cellular which were
20 included in the study.
- 21 • Modified routing translations in the Sioux Falls switch for traffic
22 terminating to Alliance, Beresford, and West River
- 23 • Modified routing translations in the Rapid City switch for traffic
24 terminating to Alliance, Beresford, Kennebec, McCook, Santel,
25 and Venture.

26 These changes affect both interMTA and intraMTA traffic classifications
27 used in the Petitioner study.

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Q: IS THERE ENOUGH DETAIL AVAILABLE IN THE PETITIONER STUDY TO MAKE ADJUSTMENTS THAT REFLECT CURRENT NETWORK CONDITIONS?

A: Yes. The data provided in the last page of Thompson’s interMTA exhibits¹ show the NPANXX of traffic originating from Alltel. By adjusting for traffic that is subject to network changes made since the time of the study, the study results will reflect the currently prevailing traffic exchange conditions using the traffic volumes from 2004.

Q: PLEASE DESCRIBE YOUR ADJUSTMENTS TO THE PETITIONER STUDIES?

A: The adjustments to Petitioner studies necessary to remove inconsistencies with current conditions are reflected in Exhibit RW5. The complete data from each Petitioner InterMTA Exhibit was replicated in my exhibit. A column was added to identify the line item volume of traffic adjustment and the revised value for that line item. Other columns were added to identify the wireless switch originating traffic and the routing associated with traffic from that switch to each Petitioner. Changes from 2004 conditions are highlighted. For example, traffic excluded from the study as a result of Alltel’s divestiture of certain Minnesota operations to RCC Holdings is highlighted showing ‘RCC’ as the switch and ‘N/A’ (not applicable), since traffic originating from RCC is not applicable to a study of Alltel traffic. A similar notation is made for certain Nebraska operations divested to USCellular (‘USCC’). A change in the ‘Current Routing’ column indicates whether the primary routing has changed from local to ‘IXC’ (interexchange carrier). In addition, a correction was made to the Alliance data set to remove duplicate data reported by Petitioner as interMTA traffic in two categories (‘DSnotinSD’ and ‘DENinSD’)

Q: CAN YOU SUMMARIZE THE ADJUSTED RESULTS OF THE PETITIONER STUDIES?

¹ Thompson narrative testimony is substantially the same for each Petitioner but the associated Exhibits for each Petitioner are numbered differently. Refer to the last page of Exhibit H for Beresford, Exhibit I for Santel, Exhibit J for Alliance, McCook, and West River, and Exhibit K for Kennebec.
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1 A: Yes, the table below shows, for each Petitioner, the original study result and the result
2 incorporating my adjustments.

Petitioner	Initial Result	Adjusted Result
Alliance Communications	7.76 %	2.7 %
Beresford Municipal	70.72 %	11.6 %
Kennebec Telephone	11.64 %	2.1 %
McCook Cooperative	5.2 %	3.2%
SanTel	9.3 %	5.2%
West River Cooperative	26.6 %	4.4%

3 **Q: DO YOU BELIEVE THE ADJUSTED RESULTS OF THE PETITIONER STUDIES REFLECT AN**
4 **ACCURATE FACTOR FOR INTERMTA COMPENSATION.**

5 A: No, but these results eliminate known inaccuracies in the Petitioner data and provide
6 guidance on a more accurate ceiling for a ratio of Alltel traffic terminating to Petitioners
7 that may be interMTA in nature.

8 **Issue 2: What is the appropriate Percent of InterMTA Use Factor to be applied to**
9 **non-IntraMTA traffic exchanged between the parties?**

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11 **Sub Issue: Compensation Rate Applicable to InterMTA Traffic**

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13 **Q: IN YOUR EXPERIENCE, HOW ARE INTERMTA COMPENSATION RATES NORMALLY**
14 **DEVELOPED?**

15 A: Rates applicable to interMTA traffic are negotiated. Sometimes the negotiations have
16 resulted in the rates being the same as reciprocal compensation rates for intraMTA traffic,
17 sometimes interMTA rates reflect a specified nominal rate that is identified in an
18 agreement, and sometimes the interMTA rate is established as a reference to other
19 existing rates, for example, interstate access rate elements.

20 **Q: ARE YOU AWARE OF LEC-CMRS INTERCONNECTION AGREEMENTS THAT SET**
21 **COMPENSATION FOR INTERMTA TRAFFIC BASED ON LEC ACCESS CHARGES?**

22 A: Yes, but such agreements are based on business negotiations and compromises rather
23 than a requirement or on FCC regulations or the Telecommunications Act. The FCC has
24 failed to specify how, or even if, compensation should be paid for interMTA traffic.

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**Alliance
InterMTA Factor
Based on Updates to Petitioner Study**

Exhibit RW5 - Alliance

IntraMTA Traffic						
Petitioner Classification	Calling Number	Minutes	Adjustment	Revised Minutes	Alltel Switch	Current Routing
MNinSD	605200	37		37	Sioux Falls	Local
MNinSD	605201	24,140		24,140	Sioux Falls	Local
MNinSD	605203	660		660	Sioux Falls	Local
MNinSD	605204	35		35	Sioux Falls	Local
MNinSD	605207	20		20	Sioux Falls	Local
MNinSD	605208	0		0	Sioux Falls	Local
MNinSD	605216	1,343		1,343	Sioux Falls	Local
MNinSD	605230	2		2	Sioux Falls	Local
MNinSD	605233	39		39	Sioux Falls	Local
MNinSD	605265	9		9	Sioux Falls	Local
MNinSD	605268	25		25	Sioux Falls	Local
MNinSD	605280	1,387		1,387	Rapid City	IXC
MNinSD	605295	31		31	Rapid City	IXC
MNinSD	605350	1,879		1,879	Sioux Falls	Local
MNinSD	605360	24,347		24,347	Sioux Falls	Local
MNinSD	605380	1,576		1,576	Sioux Falls	Local
MNinSD	605460	1,068		1,068	Sioux Falls	Local
MNinSD	605480	2,244		2,244	Sioux Falls	Local
MNinSD	605491	453		453	Sioux Falls	Local
MNinSD	605520	787		787	Sioux Falls	Local
MNinSD	605530	2,477		2,477	Sioux Falls	Local
MNinSD	605690	4,663		4,663	Sioux Falls	Local
MNinSD	605730	396		396	Sioux Falls	Local
MNinSD	605750	40		40	Sioux Falls	Local
MNinSD	605770	4,084		4,084	Sioux Falls	Local
MNinSD	605881	2,576		2,576	Sioux Falls	Local
MNinSD	605933	182		182	Sioux Falls	Local
MNinSD	605940	23,997		23,997	Sioux Falls	Local
MNinSD	605941	18,141		18,141	Sioux Falls	Local
MNinSD	605949	252		252	Sioux Falls	Local
MNinSD	605987	203		203	Sioux Falls	Local
		117,092		117,092		
MNnotinSD	218469	4		4	Fargo	Local
MNnotinSD	218686	85		85	Fargo	Local
MNnotinSD	218790	51		51	Fargo	Local
MNnotinSD	320220	48	48	0	RCC	N/A
MNnotinSD	320579	27	27	0	RCC	N/A
MNnotinSD	320699	34	34	0	RCC	N/A
MNnotinSD	320841	41	41	0	RCC	N/A
MNnotinSD	507221	164	164	0	RCC	N/A
MNnotinSD	507230	56	56	0	RCC	N/A
MNnotinSD	507240	4	4	0	RCC	N/A
MNnotinSD	507290	422	422	0	RCC	N/A
MNnotinSD	507339	39	39	0	RCC	N/A
MNnotinSD	507340	7	7	0	RCC	N/A
MNnotinSD	507370	478	478	0	RCC	N/A
MNnotinSD	507420	125	125	0	RCC	N/A
MNnotinSD	507530	1,274	1,274	0	RCC	N/A
MNnotinSD	507531	133	133	0	RCC	N/A
MNnotinSD	507760	33	33	0	RCC	N/A
MNnotinSD	507820	869	869	0	RCC	N/A
MNnotinSD	507830	115	115	0	RCC	N/A
MNnotinSD	507840	179	179	0	RCC	N/A
MNnotinSD	701218	3		3	Fargo	Local
MNnotinSD	701220	112		112	Fargo	Local
MNnotinSD	701290	16		16	Fargo	Local
MNnotinSD	701302	1		1	Fargo	Local
MNnotinSD	701308	17		17	Fargo	Local
MNnotinSD	701320	544		544	Fargo	Local
MNnotinSD	701351	63		63	Fargo	Local
MNnotinSD	701360	1		1	Fargo	Local
MNnotinSD	701391	76		76	Fargo	Local
MNnotinSD	701400	207		207	Fargo	Local
MNnotinSD	701527	30		30	Fargo	Local
MNnotinSD	701541	41		41	Fargo	Local
MNnotinSD	701652	6		6	Fargo	Local
MNnotinSD	701653	14		14	Fargo	Local
MNnotinSD	701710	78		78	Fargo	Local
MNnotinSD	701720	29		29	Fargo	Local
MNnotinSD	701721	107		107	Fargo	Local
MNnotinSD	701730	94		94	Fargo	Local
MNnotinSD	701739	11		11	Fargo	Local
MNnotinSD	701740	180		180	Fargo	Local
MNnotinSD	701741	167		167	Fargo	Local
MNnotinSD	701793	57		57	Fargo	Local
MNnotinSD	701799	221		221	Fargo	Local
MNnotinSD	701870	178		178	Fargo	Local
MNnotinSD	701899	134		134	Fargo	Local
		6,575		2,527		
Total IntraMTA		123,667		119,619		

InterMTA Traffic						
Petitioner Classification	Calling Number	Minutes	Adjustment	Revised Minutes	Alltel Switch	Current Routing
DSinSD	605202	258		258	Sioux Falls	Local
DSinSD	605205	15		15	Sioux Falls	Local
DSinSD	605661	2,339		2,339	Sioux Falls	Local
DSinSD	605677	692		692	Sioux Falls	Local
		3,304		3,304		
DSnotinSD	605206	43	43	0	Rapid City	Duplicate
DSnotinSD	605209	386	386	0	Rapid City	Duplicate
DSnotinSD	605210	69	69	0	Rapid City	Duplicate
DSnotinSD	605347	53	53	0	Rapid City	Duplicate
DSnotinSD	605381	635	635	0	Rapid City	Duplicate
DSnotinSD	605391	851	851	0	Rapid City	Duplicate
DSnotinSD	605440	87	87	0	Rapid City	Duplicate
DSnotinSD	605441	258	258	0	Rapid City	Duplicate
DSnotinSD	605641	523	523	0	Rapid City	Duplicate
DSnotinSD	605863	118	118	0	Rapid City	Duplicate
		3,023		0		
DENinSD	605206	43	43	0	Rapid City	IXC
DENinSD	605209	386	386	0	Rapid City	IXC
DENinSD	605210	69	69	0	Rapid City	IXC
DENinSD	605347	53	53	0	Rapid City	IXC
DENinSD	605381	635	635	0	Rapid City	IXC
DENinSD	605391	851	851	0	Rapid City	IXC
DENinSD	605440	87	87	0	Rapid City	IXC
DENinSD	605441	258	258	0	Rapid City	IXC
DENinSD	605641	523	523	0	Rapid City	IXC
DENinSD	605863	118	118	0	Rapid City	IXC
		3,023		0		
DENnotinSD	307267	0	0	0	Casper	IXC
DENnotinSD	307290	2	2	0	Casper	IXC
DENnotinSD	307660	27	27	0	Casper	IXC
		28		0		
OMnotinSD	308383	7	7	0	USCC	N/A
OMnotinSD	308571	10	10	0	USCC	N/A
OMnotinSD	402270	6	6	0	USCC	N/A
OMnotinSD	402300	7	7	0	USCC	N/A
OMnotinSD	402310	161	161	0	Omaha	IXC
OMnotinSD	402314	3	3	0	Omaha	IXC
OMnotinSD	402459	79	79	0	USCC	N/A
OMnotinSD	402560	24	24	0	Omaha	IXC
OMnotinSD	402580	133	133	0	Omaha	IXC
OMnotinSD	402640	205	205	0	USCC	N/A
OMnotinSD	402841	228	228	0	USCC	N/A
OMnotinSD	402890	168	168	0	USCC	N/A
		1,031		0		
Total InterMTA		10,410		3,304		
Total Traffic				122,924	100.0%	
IntraMTA Traffic				119,619	97.3%	
InterMTA Traffic				3,304	2.7%	