



South Dakota Telecommunications Association
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South Dakota Telecommunications Association

August 5, 2008

Ms. Patty Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 East Capitol Ave.
State Capitol Building
Pierre, SD 57501

RE: Dockets TC008-006 through TC08-027 (*In the Matter of the Petitions of LECs, for Suspension or Modification of 47 U.S.C. Section 251(b)(2) of the Communications Act of 1934, as Amended*)

Dear Ms. Van Gerpen:

Enclosed for filing in the above referenced dockets is an electronic original of the "Rebuttal Testimony" of SDTA witness, Larry Thompson.

As is evidenced by the Certificate of Service, also provided, service has been made to other parties in these Dockets.

Thank you for your assistance in filing this document.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard D. Coit", is written over a faint, larger signature.

Richard D. Coit
SDTA Executive Director and General Counsel

CC: Darla Pollman Rogers
Phillip Schenkenberg
Mary J. Sisak
Talbot Wieczorek
Stephen Rowell
Dennis Duncan
Rolayne Ailts Wiest

STATE OF SOUTH DAKOTA
PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITIONS)	Docket No. TC08-006
FOR SUSPENSION OR MODIFICATION)	Through
OF 47 U.S.C. SECTION 251(b)(2) OF THE)	Docket No. TC08-027
COMMUNICATIONS ACT OF 1934 AS)	
AMENDED)	
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REPLY TESTIMONY OF LARRY D THOMPSON
ON BEHALF OF
SOUTH DAKOTA TELECOMMUNICATIONS ASSOCIATION (SDTA)

- 1 **Q1: Please state your name, employer, business address and telephone number.**
2
3 A1: My name is Larry Thompson. I am the Chief Executive Officer of Vantage Point
4 Solutions, Inc. (“Vantage Point”). My business address is 2211 North Minnesota
5 Street, Mitchell, South Dakota, 57301.
- 6 **Q2: On whose behalf are you testifying?**
7
8 A2: I am testifying on behalf of South Dakota Telecommunications Association
9 (SDTA) as an intervening party on behalf of its member companies in Dockets
10 TC08-006 through TC08-027. The SDTA member companies’ dockets are as
11 follows:
- 12 1. TC08-006 - Alliance Communications Cooperative, Inc.(Alliance);
 - 13 Splitrock Properties, Inc.(Splitrock); and Hills Telephone Company (Hills)
 - 14 2. TC08-007 - Kennebec Telephone Company (Kennebec)

- 1 3. TC08-008 - Faith Municipal Telephone Company (Faith)
- 2 4. TC08-009 - Western Telephone Company (Western)
- 3 5. TC08-010 - Sioux Valley Telephone Company (Sioux Valley)
- 4 6. TC08-011 - Venture Communications Cooperative (Venture)
- 5 7. TC08-012 - RC Communications, Inc. (RC Communications)
- 6 8. TC08-013 - Beresford Municipal Telephone Company (Beresford)
- 7 9. TC08-014 - Golden West Telecommunications Cooperative, Inc. (GWTC)
- 8 10. TC08-015 - Vivian Telephone Company (Vivian)
- 9 11. TC08-016 - Kadoka Telephone Company (Kadoka)
- 10 12. TC08-017 - Brookings Municipal Utilities d/b/a Swiftel Communications
11 (Swiftel)
- 12 13. TC08-018 - Union Telephone Company (Union)
- 13 14. TC08-019 - Armour Independent Telephone Company (Armour)
- 14 15. TC08-020 - McCook Cooperative Telephone Company (McCook) and
15 Tri-County Telcom (Tri-County)
- 16 16. TC08-021 - Bridgewater-Canistota Independent Telephone Company
17 (Bridgewater)
- 18 17. TC08-022 - Valley Telecommunications Cooperative Association (Valley)
- 19 18. TC08-023 - Midstate Communications, Inc. (Midstate)
- 20 19. TC08-024 - Interstate Telecommunications Cooperative, Inc. (ITC)
- 21 20. TC08-025 - West River Cooperative Telephone Company (West River)
- 22 21. TC08-026 - Stockholm Strandburg Telephone Company (Stockholm)
- 23 22. TC08-027 - Santel Communications Cooperative, Inc. (Santel)

1 **Q3: Generally, what types of services does Vantage Point perform?**

2

3 A3: Vantage Point is a telecommunications engineering and consulting company
4 whose services include long range communication plans and feasibility studies,
5 emerging technology analysis and migration studies, telecommunications
6 electronic equipment engineering, outside plant engineering, field services
7 engineering and regulatory consulting.

8 **Q4: What are your duties and responsibilities at Vantage Point?**

9

10 A4: I am responsible for providing consulting and engineering services to clients in a
11 wide array of technical and regulatory areas associated with telecommunications.
12 Our client base consists of small Independent Telephone Companies such as the
13 members of SDTA. We have more than 80 fulltime employees on staff. I am
14 also responsible for the normal duties you would expect from the chief executive
15 officer for a company of our size.

16 **Q5: What is your educational background?**

17

18 A5: I have a Bachelor of Arts in Physics from William Jewell College in Liberty,
19 Missouri, and both Bachelors and Masters degrees in Electrical and Computer
20 Engineering from the University of Kansas in Lawrence, Kansas.

21 **Q6: Do you hold any professional engineering licenses?**

22

23 A6: Yes. I am a licensed professional engineer in Colorado, Georgia, Iowa, Idaho,
24 Indiana, Michigan, Minnesota, Missouri, Nebraska, New York, Ohio, South
25 Dakota, Tennessee, Utah, Washington, Wisconsin and Wyoming. I am also a
26 member of the National Council of Examiners for Engineering and Surveying
(NCEES).

1 **Q7: Do you have a resume of your experience?**

2 A7: Yes, it is attached to my testimony as Exhibit LT-R-1.

3 **Q8: Have you previously filed testimony in this case?**

4

5 A8: No, I have not. But I have testified numerous other times in various proceedings
6 before the South Dakota Public Utilities Commission (SDPUC) and have been
7 involved with Local Number Portability (LNP) since the regulations were first
8 passed by the Federal Communications Commission (FCC). I am also familiar
9 with the two prior LNP suspension proceedings before the SDPUC.

10 **Q9: What is the purpose of your reply testimony?**

11

12 A9: The purpose of my reply testimony is to provide technical and regulatory facts
13 relating to the Petitions¹ of the SDTA members referenced above. Specifically, I
14 will comment on the standards applicable to the Commission's review of the
15 above suspension or modification requests, and on issues I believe the
16 Commission should consider in that review.

17 **Q10: Are you familiar with the issues raised in the pre-filed direct testimony of the**
18 **SDTA member companies involved in these Petitions?**

19

20 A10: Yes, I am.

21 **Q11: Do you have any general comments regarding the direct testimonies before**
22 **you begin?**

23

24 A11: Yes, I and SDTA support all of the SDTA Member Petitions for the reasons stated
25 in their direct testimonies that have been filed by the SDTA member companies.
26 More specifically, the high costs of transport for Intermodal LNP (ILNP), the
27 nearly nonexistent demand for ILNP and other challenges that South Dakota

¹ In The Matter of the Petitions For Suspension of Modification of 47 U.S.C. Section 251(b)(2) of the Communications Act of 1934 As Amended (referred to herein as the "Petitions").

1 Rural Local Exchange Carriers (RLEC) face in implementing LNP, especially
2 ILNP, will be addressed in my testimony and supports the previously filed direct
3 testimonies of the SDTA members.

4 **Q12: Are there standards in Section 251(f)(2) of the Telecommunications Act of**
5 **1934 as amended (the Act) and SDCL 49-31-80 applicable for suspension and**
6 **modification of ILNP and LNP to VOIP providers (VLNP) that the**
7 **Commission should consider?**
8

9 A12: Yes, the Commission must consider whether the suspension or modification of
10 ILNP or VLNP is necessary to avoid a “significant adverse economic impact on
11 users of telecommunications services generally” or “to avoid imposing a
12 requirement that is unduly economically burdensome,” and, also, it must consider
13 whether granting the requested suspension or modification would be consistent
14 with the “public interest, convenience and necessity.”

15 **Q13: Why will the implementation of ILNP or VLNP have a significant adverse**
16 **economic impact on SDTA member end users and why is it “unduly**
17 **economically burdensome” to SDTA member companies?**
18

19 A13: When reviewing the Petitions and considering whether, based on economic
20 impacts, SDTA believes this Commission should consider the economic burden
21 of implementing ILNP and VLNP on all of the RLEC’s customers, including the
22 vast majority of RLEC customers who do not want LNP and grant the relief
23 requested by the petitioners. The SDPUC should also weigh and consider the
24 economic burdens of implementation against the expected benefits — considering
25 economic burdens relative to the corresponding consumer benefits. The FCC first
26 ordered ILNP in November of 2003, and while there was a court ordered stay for
27 some period of time, the demand for ILNP has been virtually non-existent in the
28 SDTA member company service areas and very low throughout the entire

1 country. Nationally and even more so in South Dakota, there has been minimal, if
2 any, demand for ILNP. According to a National Telecommunications
3 Cooperative Associations (NTCA) LNP Demand Survey² of its members,
4 approximately 65% of respondents did not have any requests for wireline-to-
5 wireless porting and an additional 10% only had one such request. Within the
6 rural areas of South Dakota served by SDTA member companies, the testimony
7 filed by the RLECs herein indicates no demand or a very minimal demand for
8 ILNP and, also, VLNP. In addition to this data indicating an almost non-existing
9 demand for ILNP and VLNP, the RLEC direct testimonies have outlined
10 significant costs associated with the implementation of LNP. Given the low to
11 nonexistent demand for the LNP services, and the identified cost of implementing
12 LNP, the RLECs have sufficiently demonstrated that the economic burden criteria
13 set forth in the Section 251(f)(2) provisions are met. As I noted earlier, all end
14 users or consumers of each of the RLECs should be considered and given that the
15 vast majority of RLEC consumers have no interest in ILNP or VLNP, the
16 suspensions or modifications requested are warranted to avoid imposing an undue
17 or unnecessary economic impact on these consumers.

18 **Q14: What are the “public interest” issues that should be considered by the**
19 **Commission in the granting of these Petitions?**

20
21 A14: The provisions of Section 251(f)(2) also mandate as an additional consideration in
22 reviewing the filed Petitions a look at the “public interest, convenience and
23 necessity.” In conducting this “public interest review,” SDTA would urge the

² National Telecommunications Cooperative Association (NTCA) Wireline-to-Wireless Local Number Portability Survey, January 2005.

1 Commission to carefully consider the universal service impacts that are likely to
2 flow from the imposition of any extraordinary transport obligations on the
3 petitioning RLECs and to also keep in mind the differences between the
4 petitioning RLECs and the non-rural carriers participating in these dockets.
5 Contrary to the impression that is often created by the large wireless carriers,
6 including Alltel Wireless and Verizon Wireless, the Telecommunications Act of
7 1996 did not have only one goal. While, certainly, bringing increased
8 competition for telecommunications service was a goal of the Act, another
9 important goal evidenced by many different provisions in the Act was to maintain
10 and advance universal service. The U.S. Congress with its passage of the 1996
11 Act communicated very clearly its desire that increasing competition should not
12 come at the expense of universal service. New provisions related to the federal
13 universal service fund mechanisms were made part of the Act and in addition
14 various provisions were included in the Act to recognize the unique status of and
15 special universal service concerns faced by rural telephone companies. Various
16 “rural safeguard” provisions were adopted as part of the 1996 Act, including the
17 provisions of 47 U.S.C. § 251(f)(2), and all of these provisions are focused around
18 addressing legitimate universal service concerns that are presented in rural areas.

19 **Q.15: Do you believe that the positions of the wireless carriers participating in these**
20 **dockets, related to transport obligation or cost issues, fairly take into account**
21 **universal service concerns?**
22

23 A.15: No, I do not. It is apparent to me that large wireless carriers, including Alltel
24 Wireless and Verizon Wireless, believe simply that rural carriers should be treated
25 exactly as any larger telecommunications carrier and they appear to take the

1 position that they should be able to insist on a particular point of interconnection
2 regardless of the extent of the RLEC network or scope of the RLEC's service
3 area. SDTA disagrees with this position and believes instead that the obligation
4 to originate and deliver local traffic to other competitive carriers is not without
5 limits. These limits are first clearly established by Section 251(c)(2) of the Act
6 which states that ILECs only have the "duty to provide, for the facilities and
7 equipment of any requesting telecommunications carrier, interconnection with the
8 local exchange carrier's network for the transmission and routing of telephone
9 exchange service and exchange access at any technical feasible point **within the**
10 **carrier's network**" (emphasis added). Also, in the FCC's rules, Section 51.305³,
11 it states "An incumbent LEC shall provide, for the facilities and equipment of any
12 requesting telecommunications carrier, interconnection with the incumbent LECs
13 network...at any technically feasible point within the incumbent LEC's
14 network...". Interconnection needs only to be provided, per this same FCC rule,
15 "at a level of quality that is equal to that which the incumbent LEC provides itself,
16 a subsidiary, an affiliate, or any other party."
17 Furthermore, it must be remembered that rural telephone companies hold a "rural
18 interconnection exemption" under Section 251(f)(1)(a) of the Act and pursuant to
19 this exemption most rural carriers are not subject to the interconnection
20 requirements or obligations found in 47 U.S.C. § Section 251(c). This exemption
21 would certainly appear to have some affect on the location or point of
22 interconnection to be established between carriers wanting to exchange

³ 47 U.S.C. §51(305)(a).

1 telecommunications traffic in as much as it exempts rural telephone companies
2 specifically from having to interconnect “at any technically feasible point.”
3 Based on the rural interconnection exemption language, SDTA believes that its
4 member companies, as exempt rural telephone companies, do not have the same
5 obligations with respect to “points of interconnection” than would other larger
6 non-rural carriers.

7 Moreover, this Commission has the authority to further limit the originating
8 transport obligations of small rural carriers through suspension and/or
9 modification proceedings presented under Section 251(f)(2).

10 **Q.16: Do you believe this Commission should take into account in these proceedings**
11 **all of the possible negative consequences of requiring rural telephone**
12 **companies to carry local traffic outside of their rural service areas?**
13

14 A.16: Yes, I do. Although with regard to ILNP implementation specifically, the only
15 traffic in contention is the wireline originated traffic to ported locally rated
16 wireless numbers, SDTA believes it is appropriate for this Commission, under the
17 public interest criteria set forth in Section 251(f)(2), to consider the broader,
18 longer term consequences of imposing extraordinary transport responsibilities on
19 small rural carriers. South Dakota is the 17th biggest state in the USA, with
20 77,121 square miles and has a population of only the 46th in the USA at only
21 754,844⁴ people. You can fit many other states inside South Dakota that are more
22 heavily populated. Exhibit LT-R-2 illustrates the size of South Dakota compared
23 to a few other states. The cost of transport in South Dakota at a distant POI would
24 be far greater when in comparison to a smaller state. Effectively, the carriers

⁴ US Census Bureau, United States Census 2000.

1 seeking interconnection that are attempting to impose greater originating transport
2 obligations on rural carriers (without regard to the actual network or service areas
3 of the RLEC) are asking this Commission to shift transport costs brought on by
4 their networking decisions to the RLEC end users. As this Commission is well
5 aware, the challenges of preserving universal service in high cost areas are
6 already substantial and should not be made more difficult by imposing excessive
7 transport obligations on RLECs related to the delivery of local
8 telecommunications traffic. Presently, all of the rural RLECs continue to invest
9 heavily in network facility upgrades to advance the level of broadband services
10 available in their service areas so the costs of serving the high cost rural areas in
11 South Dakota are increasing, not decreasing. And, furthermore, as this
12 Commission is well aware, there is substantial uncertainty surrounding the federal
13 universal service mechanisms and also the entire system of inter-carrier
14 compensation payments established by the federal and state jurisdictions. It is
15 also significant that currently no explicit state universal service funding
16 mechanism exists to provide assistance in offsetting the higher costs and keeping
17 retail rates affordable in rural areas of South Dakota (if the federal reform
18 proceedings related to the federal USF and inter-carrier compensation result in
19 substantial negative impacts on rural carriers).

20 Under these circumstances, I do not believe this Commission should impose any
21 new, extraordinary transport obligations on South Dakota's rural telephone
22 companies. Shifting additional costs to RLEC end users for the purpose of

1 transporting local calls to locations far removed from the existing rural service
2 areas would be contrary to good universal service policy.

3 **Q.17: Do you agree that the impacts of the Commission denying the requested**
4 **suspensions and/or modifications in these LNP dockets would be minimal?**

5
6 A.17: No, absolutely not. The carriers that push for RLECs to carry local traffic beyond

7 their service areas have suggested repeatedly in various proceedings that such an

8 obligation would only have minimal impacts. These arguments, however, never

9 seem to consider the originating transport issue in a broader context with an eye

10 as to how decisions on the issue could affect later cases involving similar, but not

11 identical traffic. In this case, we are dealing most directly with the routing and

12 delivery of local wireline-to-wireless telecommunications traffic that is destined

13 specifically to local numbers that are ported from a wireline to wireless phone. It

14 also, however, is reasonable to expect that wireless carriers will insist that RLECs

15 incur the obligation to deliver all wireline-to-wireless traffic to local NXXs or all

16 wireline originated IntraMTA telecommunications traffic to the same point of

17 interconnection that is established, or some similar point that is established

18 outside of the RLEC service area. Further, it is probably reasonable to expect that

19 carriers or service providers interested in providing wireline VOIP services will

20 make similar claims with respect to RLEC transport obligations. This, in fact,

21 already appears to be occurring in Dockets TC06-176 and TC07-007 pending

22 before this Commission⁵. A further probably result will be claims on the part of

⁵ See TC06-176 (*In the Matter of the Petition of Sprint Communications Company L.P. for Arbitration Pursuant to the Telecommunications Act of 1996 to Resolve Issues Relating to an Interconnection Agreement with Brookings Municipal Utilities d/b/a Swiftel Communications*) and TC07-007 (*In the Matter of the Petition of Brookings Municipal Utilities d/b/a Swiftel Communications for Suspension or*

1 certain interconnecting carriers for RLECs to deliver both local and toll
2 telecommunications traffic to the same point of interconnection established
3 outside the RLEC service area, and possibly over the same trunk facilities.
4 Claims for the establishment of “mixed use,” or multi-jurisdictional facilities have
5 also already been presented to this Commission in Dockets TC06-176 and TC07-
6 007.

7 When reviewing the Petitions filed in these proceedings and considering the
8 transport obligation concerns that are presented, the Commission should keep in
9 mind these other claims that either have already been raised or which are likely to
10 be raised in other proceedings. If carriers seeking interconnection services are
11 able to impose these sorts of extraordinary transport obligations on RLECs there
12 will be substantial and wide ranging negative impacts on rural carriers and
13 consumers.

14 In addition to the negative impacts of transport costs, there are potentially many
15 other issues to consider if the Commission decides to not grant this Petition. If
16 the RLEC is forced to transport local traffic to another carrier at a point beyond
17 the RLECs network, it is possible and maybe even likely that other carriers would
18 want similar treatment. As an example, if every RLEC was forced to provide
19 transport at their own expense to a POI outside of their service area for any
20 CMRS carrier, the RLEC may be required to provide free transport to other
21 carriers including interexchange carriers (IXCs) that currently have to pay to use
22 that same route for access traffic. The RLEC would likely have to recover the

Modification of Dialing Parity, Number Portability and Reciprocal Compensation Obligations, Docket No. TC07-007).

1 costs of this transport through either additional End User charges or through
2 charges that would be passed on to other carriers that pay for transport services.
3 With fewer carriers paying their fair share of the transport network, the cost of
4 transport to the remaining carriers would likely increase dramatically and
5 resulting in some carriers paying a disproportionate share of the network.
6 Implementation of ILNP could result in costs that are higher and could be
7 substantially higher than the costs calculated by many of the SDTA members.
8 For example if the landline customer ports to Verizon Wireless, then this same
9 customer ports to Alltel Wireless and then to T-Mobile, the RLEC would need to
10 have circuits with each of these wireless carrier for proper routing of the call.
11 Absent these circuits, the RLEC may be forced to deliver these calls to an IXC for
12 delivery to a wireless customer. This would likely result in additional End User
13 charges and customer confusion.

14 **Q18: Are there any other reasons you believe this Commission should grant the**
15 **requested suspensions and/or modifications?**

16
17 A18: Yes, the issue of who is responsible for transport outside a LEC service area for
18 ILEC to CMRS traffic is still pending before the FCC and FCC guidance is long
19 overdue. The 8th Circuit Court framed this issue well when it stated “that if and
20 when the FCC rules, we may be required to revisit the issue. At such time we
21 would be armed with better arguments and a better understanding of the issue
22 based upon the FCC’s expertise.”⁶ The Court left the door open and there
23 continues to be uncertainly on this issue with the lack of guidance by the FCC.
24 Under these circumstances and until the FCC rules further, it would be

⁶ *Id.*, at page 18.

1 appropriate for the SDPUC to review and modify or eliminate any transport cost
2 of ILNP or VLNP outside the RLEC service areas. The transport of RLEC to
3 CMRS/VOIP traffic is a costly issue for the RLECs in implanting ILNP and
4 VLNP requests. The SDPUC should not shift that cost onto the RLECs or their
5 customers. The more ports that take place, the more the cost would be driven up
6 for the RLECs and their customers that have not ported. This results in a situation
7 where the “cost causer” is not the “cost payer”. Granting the petitions would
8 be consistent with the Commission’s previous suspensions which recognized the
9 high transport costs of the RLECs and their customers and the unresolved
10 apportionment of transport obligations by the FCC. The Commission can
11 preserve the status quo and wait for the FCC to rule on the issue.

12 It should also be noted that the National Telecommunications Cooperative
13 Association (NTCA) has filed a federal court appeal with the D.C. Circuit Court
14 of Appeals from the FCC’s Order on Remand (FCC07-188) entered In the Matter
15 of Telephone Number Portability (FCC Docket No. WC07-243) on November 8,
16 2007.⁷ NTCA specifically is challenging the validity of the FCC’s Order on
17 grounds that the FCC did not properly consider the economic impacts to “small
18 entities” as it is required to do under the federal “Regulatory Flexibility Act.”

19 **Q.19: Does that conclude your reply testimony?**

20 A19: Yes. However, I wish to reserve the opportunity to supplement this testimony in
21 the future, if necessary.

⁷ NTCA v. FCC and U.S.A., Case no. 08-1071 (U.S. court of Appeals for the District of Columbia Circuit).

CERTIFICATE OF SERVICE

The undersigned, attorney for SDTA, hereby certifies that a true and correct Rebuttal Testimony of SDTA witness, Larry Thompson, as filed in SDPUC Dockets TC08-006 through TC08-027, was served electronically on this 5th day of August, 2008, upon:

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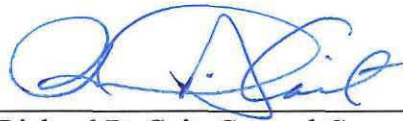
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Little Rock, AR 72202

Dated this 5th day of August, 2008.



Richard D. Coit, General Counsel
South Dakota Telecommunications Association
PO Box 57 – 320 East Capitol Avenue
Pierre, SD 57501-0057

Exhibit LT-R-1

Résumé

Of Larry D. Thompson

Currently

- I am a registered professional engineer in 17 states and Chief Executive Officer of Vantage Point Solutions.

Education

- Bachelor of Arts degree in Physics from William Jewell College (1983)
- Bachelor of Science in Electrical Engineering from the University of Kansas (1985)
- Master of Science degree in Electrical and Computer Engineering from the University of Kansas (1986)

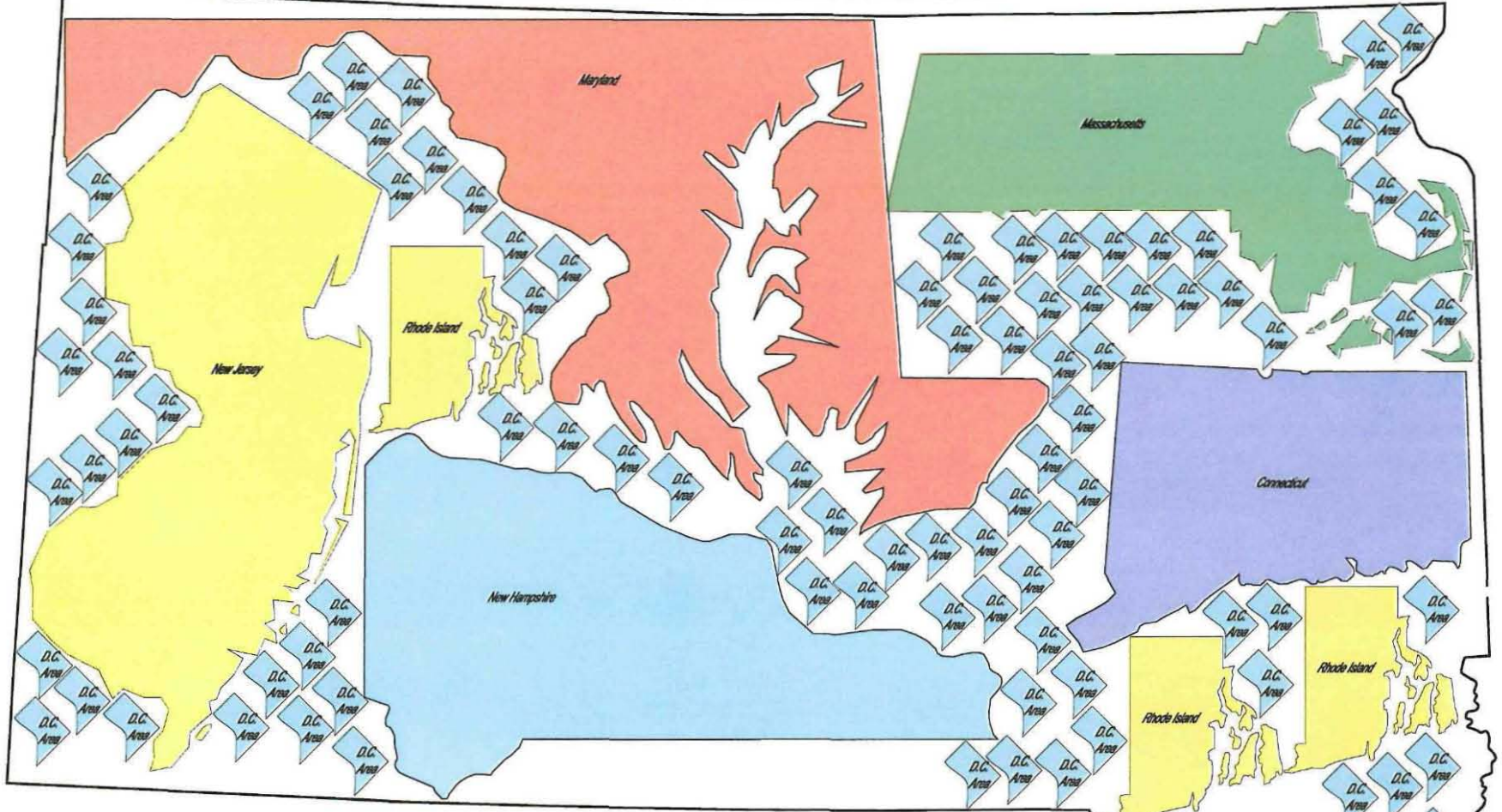
Employment History

- 1985-1991: Satellite Systems Engineer – TRW, Inc (Redondo Beach, CA)
 - Designed communication payloads of satellite systems.
- 1991-1996: Senior Engineer – CyberLink Corporation (Boulder, CO)
 - Communications consulting in a small telecommunications consulting firm.
- 1996-2000: Senior Engineer – Martin and Associates, Inc. (Mitchell, SD)
 - Provided engineering and consulting services to Rural LECs.
- 2000-2002: General Manager of TCE – Martin Group, Inc. (Mitchell, SD)
 - Managed a growing department of approximately 100 engineers and consultants
- 2002-Present: CEO – Vantage Point Solutions, Inc. (Mitchell, SD)
 - Provide engineering, consulting, and regulatory services to rural LECs in South Dakota and elsewhere.

Industry Activities

- Participated in Senate and FCC panels
- Participated on various NECA Task Forces
- Frequent speaker at state and national conferences
- Speaker at various FCC and US Senate events
- Associate Member of NECA Rate Development Task Force
- Published in various industry magazines and trade journals

State Of South Dakota



South Dakota Land Mass Consists Of:

- 1 - Connecticut Area
- 1 - Maryland Area
- 1 - Massachusetts Area
- 1 - New Hampshire Area
- 1 - New Jersey Area
- 3 - Rhode Island Areas
- 91 - Washington D.C. Areas

<ul style="list-style-type: none"> ■ - Connecticut Area - 5,544 Sq. Miles Pop. = 3,405,365 Pop. Density = 614 / Sq. Mi. ■ - Maryland Area - 12,407 Sq. Miles Pop. = 5,296,486 Pop. Density = 427 / Sq. Mi. ■ - Massachusetts Area - 10,555 Sq. Miles Pop. = 6,349,037 Pop. Density = 602 / Sq. Mi. 	<ul style="list-style-type: none"> ■ - New Hampshire Area - 9,351 Sq. Miles Pop. = 1,235,766 Pop. Density = 132 / Sq. Mi. ■ - New Jersey Area - 8,722 Sq. Miles Pop. = 8,414,350 Pop. Density = 965 / Sq. Mi. ■ - Rhode Island Area - 1545 Sq. Miles Pop. = 1,048,329 Pop. Density = 679 / Sq. Mi. 	<ul style="list-style-type: none"> ■ - Washington D.C. Area - 68.25 Sq. Miles Pop. = 572,059 Pop. Density = 8,382 / Sq. Mi. ■ - South Dakota Area - 77,121 Sq. Miles Pop. = 754,844 Pop. Density = 10 / Sq. Mi.
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All States Are
Drawn to Scale