PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA DOCKET NO. TC12-040

RESPONSIVE TESTIMONY OF LAWRENCE J. BAX

EXHIBIT LJB-2

REDACTED

DECEMBER 19, 2012

TABLE 1:

AT&T ANALYSIS							
Capped Intrastate Rate (LECA Consolidated Rate) \$ 0.125000							
	Restructured Intrastate Rate ¹	Transition Rate	Total Rate	Difference			
Brookings 1st View							
Brookings 2nd View							
Corrected View							

TABLE 2:

HISTORICAL LECA RATE ELEMENT ²	CATEGORY ³	LECA CONSOLIDATED ELEMENT⁴	
Carrier Common Line – Originating	Common Line		
Carrier Common Line – Terminating	Common Line		
Local Switching – Originating	End Office	LECA Consolidated Rate	
Local Switching – Terminating	End Office		
Local Transport	Transport		

TABLE 3:

HISTORICAL LECA RATE - WEIGHTING ANALYSIS							
Intrastate Terminating Rates by Element⁵							
Element	MOU Rate		Weight				
Carrier Common Line	\$	0.0788	54.4575%				
Local Switching		0.0274	18.9357%				
Transport	\$	0.0385	26.6068%				
Total	\$	0.1447	100%				

TABLE 3 NOTE: Using the most recent historical LECA rate (i.e., the rate in effect immediately before implementation of the \$0.125 consolidated rate) for the intrastate terminating rate elements, each rate element is weighted based on its proportion of the total rate.

TABLE 4:

LECA RATE & REVENUE ANALYSIS - TERMINATING				
LECA Consolidated Rate	\$	0.125000		
Transport-only LECA Consolidated Rate ⁶	\$	0.033258		
Total FY2011 Wireline MOUs				
Total FY2011 Wireless MOUs				
Total FY2011 Wireline Revenues				
Total FY2011 Wireless Revenues				
Total FY2011 Intrastate Sw. Acc. Revenues				

TABLE 4 NOTE: Applying the weights determed in the weighting analysis, the consolidated rate (i.e., \$0.125) is reduced to remove charges associated with end office and common line rate elements (i.e., producing a transport-only rate). The result is \$0.033 (i.e., \$0.125 * 27%). The full consolidated rate is applied to wireline MOUs; The transport-only consolidated rate is applied to wireless MOUs. The results are added to determine total FY2011 terminating switched access revenues.

¹The term "restuctured intrastate rate" refers to to intrastate demand cast across the interstate rate structure as shown in Line 7 through Line 38 of the Brookings Worksheet.

²Local Exchange Carrier Association, Inc. Tariff No. 1, 22nd Revised Page 17-1 and 22nd Revised Page 17-4 and. LECA and Brookings confirm these are the correct tariff pages. <u>See</u>, LECA Supplemental Responses to AT&T at number 11, attached as Bax Responsive Exhibit LJB-6. The referenced tariff pages are attached as Bax Responsive Exhibit LJB-5.

³The rate categories can be found in Local Exchange Carrier Association, Inc. Tariff No. 1, at Section 6.1.3.

⁴Local Exchange Carrier Association, Inc. Tariff No. 1, 23rd Revised Page 17-1 and 23rd Revised Page 17-4.

⁵Local Exchange Carrier Association, Inc. Tariff No. 1, 22nd Revised Page 17-1 and 22nd Revised Page 17-4 and. LECA and Brookings confirm these are the correct tariff pages. <u>See</u>, *LECA Supplemental Responses to AT&T* at number 11 attached as Bax Responsive Exhibit LJB-6. The referenced tariff pages are attached as Bax Responsive Exhibit LJB-5.

⁶LECA Tariff No. 1, Section 6.8.1(K), attached as Bax Responsive Exhibit LJB-8, states: "For FGD switched access service to a Mobile Telephone Switching Office (MTSO) directly interconnected to a Telephone Company access tandem office, the customer will be billed only the Local Transport element for the FGD usage." As such, the LECA tariff contemplates a *transport-only* consolidated rate.