

**STATE OF SOUTH DAKOTA
PUBLIC UTILITIES COMMISSION**

In the Matter of the Petition of Venture Communications Cooperative for Suspension or Modification of Dialing Parity, Number Portability and Reciprocal Compensation Obligations.)))))))	PUC 7-01
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**DIRECT TESTIMONY OF DAN DAVIS
ON BEHALF OF THE SOUTH DAKOTA TELECOMMUNICATIONS
ASSOCIATION**

JULY 23, 2007

1 **I. Background**

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3 **Q1. Please state your name, employer and business address.**

4

5 **A.** My name is Dan Davis. I am employed with Consortia Consulting (“Consortia”),
6 formerly known as TELECOM Consulting Resources, Inc. My business address is
7 233 South 13th Street, Suite 1225, Lincoln, Nebraska, 68508. Consortia is a
8 telecommunications management consulting company representing the interests
9 of independent rural telephone companies.

10 **Q2. On whose behalf are you testifying?**

11 **A.** I am testifying on behalf of the South Dakota Telecommunications Association
12 (“SDTA”).¹ SDTA represents the interests of numerous cooperative, independent
13 and municipal telephone companies operating throughout the State of South
14 Dakota.

15 **Q3. What is your current position?**

16 **A.** I am a Senior Consultant at Consortia.

17 **Q4. What are your duties and area of expertise at Consortia?**

18 **A.** My duties and areas of expertise at Consortia are interconnection rules and
19 regulations, negotiations with carriers for interconnection, and intercarrier

¹ SDTA member companies are: Alliance Communications Cooperative, Armour Independent Telephone Company, Beresford Municipal Telephone Company, Bridgewater-Canistota Independent Telephone, Cheyenne River Sioux Tribal Telephone Authority, Faith Municipal Telephone Company, Fort Randall Telephone Company, Golden West Telecommunications Cooperative, Hills Telephone Company, Interstate Telecommunications Cooperative, James Valley Telecommunications, Jefferson Telephone Company d.b.a. Long Lines, Kadoka Telephone Company, Kennebec Telephone Company, McCook Cooperative Telephone Company, Midstate Communications, Inc., Mount Rushmore Telephone Company, PrairieWave Community Telephone, RC Communications, Inc., Roberts County Telephone Cooperative, Santel Communications Cooperative, Inc., Sioux Valley Telephone Company, Splitrock Properties, Inc., Stockholm-Strandburg Telephone Company, Venture Communications, Tri-County Telecom, Inc., Union Telephone Company, Valley Telecommunications Cooperative, Venture Communications Cooperative, Vivian Telephone Company, West River Cooperative Telephone Company, West River Telecommunications Cooperative, and Western Telephone Company.

1 compensation. I have testified on behalf of Consortia clients in arbitration
2 proceedings and at hearings regarding wireless Local Number Portability
3 (“LNP”), wireless interconnection and compensation, eligible telecommunications
4 carrier (“ETC”) designation rules, and universal service rules. In addition, I write
5 and file comments with the Federal Communications Commission (“FCC”) and
6 state commissions on behalf of clients in the areas of interconnection, intercarrier
7 compensation, and universal service. I have also assisted in competitive local
8 exchange carrier (“CLEC”) implementation issues and financial modeling on
9 behalf of clients.

10 **Q5. What was your professional experience prior to your current position?**

11 **A.** I have worked in the telecommunications industry for 22 years, the last six of
12 which have been at Consortia. Prior to my position with Consortia, I worked at
13 ALLTEL (formerly known as Aliant Communications prior to merging with
14 ALLTEL) as the Regulatory/Financial manager of their Nebraska CLEC
15 operations. Prior to that position, I worked for Aliant Communications in the
16 areas of Regulatory Policy and Separations and Access.

17 **Q6. What is your educational background?**

18 **A.** I have a Master’s degree in Finance and a Bachelor’s degree in Business, both
19 from the University of Nebraska.

20 **II. Purpose of Testimony**

21
22 **Q7. Please generally describe the purpose of your testimony.**

23 **A.** The purpose of my testimony is to support Venture Communications
24 Cooperative’s (“Venture”) Petition for Suspension or Modification filing pursuant

1 to Section 251(f)(2) of the Telecommunications Act of 1934 as amended (the
2 “Act”) of local dialing parity requirements.² Alltel, with its interconnection
3 request to Venture, seeks an interconnection arrangement that would require
4 Venture to treat calls as though they are local calls³ when Venture subscribers call
5 certain Alltel subscribers, although such calls would be routed to a location
6 outside of the Venture local service area. In addition, Alltel’s request would
7 require Venture to pay to transport local calls to such distant location. Therefore,
8 Venture seeks modification or suspension of local dialing parity requirements in
9 those instances where it has been requested to pay for transport outside of its
10 service territory or beyond its wireline local service area.

11 This issue addressed in the Venture Petition relating to the scope of local dialing
12 parity is of critical importance to all rural telephone companies in South Dakota,
13 and accordingly, SDTA supports the Venture Petition and strongly believes the
14 modifications requested by Venture should be granted. In addition, as noted in
15 the SDTA Petition to Intervene, Alltel is seeking through its interconnection
16 request to press the Commission into action on certain call rating and routing
17 issues that are already pending before the FCC in various proceedings. See *In the*
18 *Matter of Sprint Petition for Declaratory Ruling Regarding the Routing and*

² See 47 C.F.R. § 51.207- For *local dialing parity*, the FCC requires all LECs to "...permit telephone exchange service customers within a local calling area to dial the same number of digits to make a local telephone call, notwithstanding the identity of the customer's or the called party's telecommunications service provider."

³ See *In the Matter of the Petition of Venture Communications Cooperative for Suspension or Modification of Local Dialing Parity and Reciprocal Compensation Obligations*, PUC 7-01, Direct Testimony of Larry Thompson on Behalf of Venture Communications Cooperative, June 12, 2007, (“Thompson Testimony”) at pp.9-13 where Mr. Thompson describes how calls are rated and billed to Venture’s customers. Determining whether a call is a local call or billed to the customer as a toll call is separate and distinct from determining which calls are subject to reciprocal compensation pursuant to 47 C.F.R. 51.701(b)(2).

1 *Rating of Traffic by ILECs*, CC Docket No. 01-92 (May 9, 2002) and See
2 *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92,
3 Further Notice of Proposed Rulemaking, FCC-05-33 (March, 3 2005). Venture
4 therefore requests and SDTA supports Venture’s request for a modification of
5 local dialing parity to the extent it requires Venture to transport calls outside of its
6 local service area.

7 **III. Testimony on Venture’s Request for Suspension or Modification of Local**
8 **Dialing Parity to Locations Outside of its Service Territory or Beyond its**
9 **Local Service Area.**
10

11 **Q8. With regard to dialing parity, what is your understanding of Alltel’s request**
12 **for which Venture is seeking a suspension and modification?**

13
14 A. In Alltel’s Response to Venture’s Petition for Arbitration, Alltel stated that “if
15 wireless customers are assigned numbers rated in Petitioner’s local or EAS calling
16 scope, then Petitioner must allow its end users to dial those local numbers to reach
17 wireless customers.”⁴ Alltel also stated that “local numbers assigned to a wireless
18 carrier can be routed through a third-party’s tandem.”⁵

19 I believe Alltel is requesting that Venture treat certain calls that are originated by
20 Venture subscribers as though they are local calls even if that means that Venture
21 must transport local calls to a distant tandem location, which may be far removed
22 from Venture’s local calling area and its facilities. Alltel therefore would dictate
23 that Venture treat certain calls as local calls when Venture’s end users make calls

⁴ See *In the Matter of the Petition of Venture Communications Cooperative for the Arbitration Pursuant to the Telecommunications Act of 1996 to Resolve Issues Relating to an Interconnection Agreement with Alltel Communications, Inc.*, Docket No. TC06-159, Response of Alltel Communications, Inc. to the Petition for Arbitration of Venture Communications Cooperative, October 25, 2006, at para. 28.

⁵ *Id.* at para. 29.

1 to Alltel subscribers that have been assigned certain telephone numbers. Alltel
2 would obtain telephone numbers from the North American Numbering
3 Administrator, assign those numbers to a specific rate center in the local exchange
4 routing guide (“LERG”),⁶ and by virtue of such assignment, dictate that Venture
5 must allow its subscribers in that rate center to call Alltel subscribers with those
6 assigned numbers as a local call, regardless of the fact that Venture must transport
7 the call to a distant location.⁷

8 **Q9. Is this issue similar to one which was decided by the Commission in an**
9 **earlier proceeding?**

10
11 **A.** Yes, it is. This issue is similar to the transport issue decided by the Commission in
12 the wireline-to-wireless LNP Suspension Proceedings. The proceeding specific to
13 Venture was TC04-060. This decision is attached as an exhibit. In the LNP
14 Suspension Proceedings, Venture and the other LEC Petitioners demonstrated that
15 the cost of transporting ported calls beyond the LEC's service territory would
16 increase the cost of LNP. The LECs also demonstrated that the issue of transport
17 is pending before the FCC in the Petition for Declaratory Ruling filed by Sprint
18 Corporation.⁸ The FCC solicited further comments on the Sprint Petition in the
19 Intercarrier Compensation Proceeding,⁹ however, the matter is still pending.¹⁰

⁶ See *In the Matter of the Petition of Venture Communications Cooperative for suspension or modification of local dialing parity and reciprocal compensation obligation*, Docket No. TC06-181, Petition for Suspension or Modification, (the “Venture Petition”), October 24, 2007, at p. 9. There, Venture describes this as “Alltel's efforts to unilaterally change the local exchange routing guide (LERG) so as to rate certain Alltel NPANXX's to Venture wireline local calling areas, even though the LERG dictates the routing of calls to those NPANXX's beyond Venture's wireline local calling area.”

⁷ See *Thompson Testimony* at p. 45, lns. 13-14. Mr. Thompson refers to this as “virtual NXX” or “split rating and routing” of calls. It has also been called “separate rating and routing” and “tandem routed local calling.”

⁸ See *Sprint Cor., Petition for Declaratory Ruling Regarding the Routing and Rating of Traffic by ILECs*, CC Docket No. 01-92, May 9, 2002.

1 In the LNP Suspension Proceedings, the Commission granted Venture and the
2 other LEC Petitioners' request for suspension and modifications in part due to the
3 significant uncertainties concerning the obligations and resulting costs to the
4 incumbent LECs ("ILECs") and their customers due to the unresolved
5 apportionment of interconnection and transport obligations of the ILEC and the
6 requesting wireless carrier.¹¹ Although the wireless carrier, Western Wireless,
7 stated at the hearing that it would pay for transport on an interim basis until the
8 final FCC decision on transport...the Commission found that this temporary
9 commitment could leave Venture with the burden of paying for transport outside
10 of its service area in the future.¹²

11 **Q10. Was the transport issue in the LNP Proceedings different than the transport**
12 **that Alltel is currently requesting?**

13
14 **A.** No, it was not. Both concern routing local calls to a location outside of the rural
15 ILEC local service area and the obligation of transport costs to that distant
16 location.

17 **Q11. Are you aware of an FCC rule which requires a rural ILEC such as Venture**
18 **to route local calls outside of its local service area and to pay for transport**
19 **outside of its ILEC service area?**
20

⁹ See *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Further Notice of Proposed Rulemaking, FCC-05-33, March 3, 2005.

¹⁰ As I will discuss later in my testimony, in interpreting the dialing parity requirement, the U.S. Court of Appeals for the Eighth Circuit acknowledged that the issue of transport is pending before the FCC and that the FCC's decision may require the Court to "revisit" the issue.

¹¹ See *In the Matter of the Petition of Venture Communications Cooperative for Suspension or Modification of 47 U.S.C. § 251(B)(2) of the Communications Act of 1934 as Amended*, TC04-060, Final Decision and Order; Notice of Entry, September 30, 2004, at para. 41.

¹² *Id.*, at para. 27.

1 A. No, I am not aware of a rule in Part 51 of the FCC rules, which pertains to
2 interconnection, which requires a rural ILEC to route local calls outside of its
3 ILEC service area and to pay for transport outside of its ILEC service area.

4
5 **Q12. If there is no FCC rule which requires a rural ILEC to route local traffic**
6 **outside of its local service area and pay for transport to a location outside of**
7 **its local service area, why is Venture seeking a suspension?**

8
9 A. As referenced in the Venture Petition, the U.S. Court of Appeals for the Eighth
10 Circuit heard a case regarding local dialing parity that is similar if not the same as
11 the dialing parity issue described in this proceeding.¹³

12 **Q13. Will you please explain your understanding of the Eighth Circuit’s decision**
13 **as it relates to Local Dialing Parity to Wireless Carriers?**

14
15 A. Yes, I will. The Eighth Circuit heard the issue after Western Wireless, a CMRS
16 carrier and Great Plains Communications, Inc (“Great Plains”), an ILEC, both
17 appealed a district court judgment affirming in part and reversing in part, two
18 rulings from the Nebraska Public Service Commission. One of the issues heard
19 by the Eighth Circuit was identified by the parties as tandem routing and local
20 dialing parity.

21 Western Wireless proposed that if it obtained numbers, and rated those numbers
22 to a Great Plains rate center where Western Wireless is licensed to provide
23 service, calls from that rate center to the Western Wireless number block must be
24 dialed as local calls and delivered to Western Wireless at a point of direct
25 connection (if applicable) or at the third-party tandem. With tandem routing, a call
26 from the Great Plains network to the Western Wireless customer would have to

¹³ See *United States Court of Appeal for the Eighth Circuit*, No. 05-1725, WWC License, Plaintiff-Appellee v. Great Plains Communications, Inc., Defendant-Appellant, (“Eighth Circuit”).

1 travel to a routing point at a third party carrier's tandem switch, a location
2 potentially far away from the edge of the Great Plains network and rating
3 location. The Parties referred to this divergence as the issue of separate rating and
4 routing points for numbers or separately rated and routed calls.¹⁴

5 The Court did not accept Great Plains argument that absent such an express
6 requirement in 47 USC § 251(b)(3) or in 47 CFR § 51.207 (The FCC rule on
7 Local Dialing Parity), that a local exchange carrier must deliver locally dialed
8 calls to a point outside the local exchange carrier's network, no such duty exists.¹⁵

9 The Court found that, "all else being equal," it was inclined to interpret a vague
10 provision in a manner that promotes competition. Through Alltel's request for
11 local dialing parity, and the Eighth Circuit's apparent interpretation of that
12 requirement, Venture has sought a suspension and modification from such
13 requirement.

14 **Q14 Did Great Plains seek a suspension pursuant to Section 251(f)(2) from**
15 **providing separate rating and routing?**

16
17 **A.** No, they did not. Although the Eighth Circuit recognized that such action would
18 have been a proper remedy¹⁶, until the Eighth Circuit decision, Great Plains did
19 not believe that separate rating and routing was a requirement in the Act,
20 therefore, they did not seek a suspension.

21 **Q15. Did both the Eighth Circuit and the Commission in its wireline-to-wireless**
22 **LNP proceedings recognize the cost of transport as a rationale for their**
23 **decisions?**
24

¹⁴ *Id.*, at p. 8, footnote 4.

¹⁵ *Id.*, at p. 15.

¹⁶ *Id.*, at p.4, footnote 2 and at p. 15.

1 A. Yes, they did. The Eighth Circuit stated, “We understand the issue of local
2 dialing parity and tandem routing to be an issue of cost apportionment.”¹⁷

3 Although the Eighth Circuit ruled for the wireless carrier due to concerns about its
4 ability to enter the market, it recognized that if the ILEC was required to extend
5 local dialing parity to those wireless customers who possess locally-rated
6 numbers, the ILEC could be required to bear the expense of transporting calls
7 outside its local exchange networks.¹⁸

8 The Commission, in the wireline-to-wireless LNP proceedings granted the ILECs’
9 request for suspension and modifications in part due to the significant
10 uncertainties concerning the obligations and resulting costs to the ILECs and their
11 customers due to the unresolved apportionment of interconnection and transport
12 obligations of the rural LEC (“RLEC”) and the requesting wireless carrier.¹⁹ The
13 Commission observed that a proceeding is pending before the FCC to address this
14 unresolved issue regarding the apportionment of transport costs for wireline-to-
15 wireless calls when the wireless carrier has no point of interconnection (“POI”)
16 within the RLEC’s local service area.²⁰ To date, the FCC has not resolved this
17 outstanding issue.²¹

¹⁷ *Id.* at p. 13.

¹⁸ *Ibid.*

¹⁹ *See In the Matter of the Petition of Venture Communications Cooperative for Suspension or Modification of 47 U.S.C. § 251(B)(2) of the Communications Act of 1934 as Amended*, TC04-060, Final Decision and Order; Notice of Entry, September 30, 2004, at para. 41.

²⁰ *See In the Matter of Sprint Corp., Petition for Declaratory Ruling Regarding the Routing and Rating of Traffic by ILECs*, CC Docket No. 01-92, Petition of Sprint, May 9, 2002.

²¹ It should also be noted that on March 11, 2005, the United States Court of Appeals for the District of Columbia Circuit remanded to the FCC the *Intermodal LNP Order*, 18 FCC Rcd 23697 (2003), concerning porting between wireline and wireless carriers. The Court determined that the FCC had failed to prepare a

1 **Q16. Did the Eighth Circuit recognize this issue is pending before the FCC?**

2
3 **A.** Yes, it did. Although it ruled in favor of Western Wireless, the Court recognized
4 the following; “neither Congress nor the FCC has expressly defined the relevant
5 area for a local exchange carrier’s provision of local dialing parity to a wireless
6 competitor.” Further, according to the Court, “the FCC and the industry are well
7 aware of the outstanding question, as demonstrated by the subject matter of a
8 pending petition for declaratory ruling before the FCC. See Sprint Corp, Petition
9 for Declaratory Ruling Regarding the Routing and Rating of Traffic by ILECs,
10 CC Docket No. 01-92 (May 9, 2002) (“Sprint Petition”) (Sprint, on behalf of its
11 wireless division, asking the FCC to define the scope of the duty to provide local
12 dialing parity when there exists no direct point of interconnection within the local
13 exchange network); Comments Sought on Sprint Petition for Declaratory Ruling
14 Regarding the Routing and Rating of Traffic by ILECs, (establishing the pleading
15 cycle and soliciting further comment on the Sprint Petition). In fact, on March 3,
16 2005, the FCC solicited further comments on the Sprint Petition; but the FCC has
17 not yet issued a ruling. See Developing a Unified Intercarrier Compensation
18 Regime, CC Docket No. 01-92, Further Notice of Proposed Rulemaking, FCC-05-

Final Regulatory Flexibility Analysis regarding the impact of the *Intermodal LNP Order* on small entities which the Court found to have been required by the Regulatory Flexibility Act (“RFA”). The Court accordingly directed the FCC to prepare the required RFA analysis and stayed future enforcement of the *Intermodal LNP Order* as applied to carriers that qualify as small entities under the RFA until the FCC prepared and published that analysis. As part of its analysis, the FCC sought comment on transport costs associated with delivery of calls to ported numbers served by distant switches. See Appendix A, para. 10. To date, such RFA has not been published.

1 33 (2005) (recognizing the continued pendency of the Sprint Petition and calling
2 for further comments).”²²

3 The Eighth Circuit then stated “that if and when the FCC rules, we may be
4 required to revisit the issue. At such time, we would be armed with better
5 arguments and a better understanding of the issue based upon the FCC’s
6 expertise.”²³

7 **Q17. Do you believe that Venture should be granted a suspension or modification**
8 **of local dialing parity as it applies to locations outside its service area?**
9

10 **A.** Yes, I do. SDTA submits that Venture should be granted a suspension and
11 modification as it applies to locations outside of its service area (i.e. separate
12 rating and routing) for the following reasons:

13 1) Venture has shown that substantial additional transport costs would be
14 incurred if wireless carriers are permitted to request separate rating and routing.

15 2) There continues to be uncertainty regarding how the FCC will ultimately rule
16 on this issue.

17 3) Granting Venture’s Petition for suspension and modification on this issue
18 would be consistent with the Commission’s previous suspension or modification
19 on LNP based on the “resulting costs to the ILECs and their customers and
20 unresolved apportionment of transport obligations.”

21 4) As Venture’s witness Ms. Shotwell testified, “the modifications requested by
22 Venture would essentially preserve the status quo under which the wireless

²² The FCC noted that petitions have been filed seeking to clarify a LEC’s current obligations with regard to the rating and routing of calls to wireless numbers that are associated with the LEC’s rate center, *See paragraph 143.*

²³ *Id.* at page 18.

1 carriers have been operating since the implementation of the Act, during which
2 time they have significantly increased the growth of wireless customers in South
3 Dakota and other states.”²⁴ For example, Alltel currently reports that it has 6,893
4 lines in Venture’s service area and Rural Cellular Corporation reports 1,057 lines
5 in Venture’s service area.²⁵ Verizon also operates in the Venture Service area but
6 its line count is not known since it does not report its current line count.²⁶ Given
7 the market share that wireless carriers have in the Venture service area, a
8 continuation of the current practices would not impede wireless service nor deny
9 consumers a choice in their communications offerings, an apparent rationale for
10 the Court’s decision.

11 5) In granting the suspension, Venture would rate and route calls to Alltel
12 subscribers no different than it rates and routes calls to Venture’s own
13 subscribers. Venture does not transport local calls outside of its network to a
14 distant location. Thus, Venture’s suspension would therefore utilize the same
15 rating and routing undifferentiated from that it provides itself.

16 6) As Venture’s witness Ms. Shotwell testified, “Approval of Venture’s
17 modification request will prevent Venture’s end users from subsidizing a business
18 decision made by a competing carrier.”²⁷ SDTA agrees with Ms. Shotwell that,

²⁴ See *In the Matter of the Petition of Venture Communications Cooperative for Suspension or Modification of Local Dialing Parity and Reciprocal Compensation Obligations*, PUC 7-01, Direct Testimony of Jo Shotwell on Behalf of Venture Communications Cooperative, June 12, 2007, (“Shotwell Testimony”) at p. 15, lns. 5-9.

²⁵ Line Counts were obtained from the Universal Service Administrative Company, CETC Reported Lines by Incumbent Study Area-Interstate Common Line Support, Appendix HC19, Third Quarter 2007.

²⁶ Excluding the Verizon line count, Alltel and RCC combined have 60% of the line count submitted by Venture.

²⁷ See Shotwell Testimony, p. 14, lns 9-10.

1 “since the decision to interconnect is the sole decision of the interconnecting
2 carrier, the costs of the business decision should not be borne by another carrier’s
3 end-users as is being requested by Alltel in this case.”²⁸ Alltel has chosen to
4 locate their switching facility at a location well outside Venture’s local calling
5 area where it competes. If Alltel then chooses to use indirect connections for their
6 network efficiency benefits, granting Venture’s request would assure that
7 Venture’s subscribers would not be responsible to pay the cost of transporting
8 local traffic to this distant, non-local location. Wireless carriers may elect to
9 deploy their network in ways that are the most efficient for them, which they
10 believe will foster competition in rural areas. In doing so, many wireless carriers
11 limit the deployment of switches and utilize long haul transport facilities of
12 tandem providers to connect to the networks of rural LECs such as Venture.
13 Granting Venture’s requested modification will assure its subscribers are not
14 burdened with a wireless carrier’s election to locate its facilities far from the rural
15 LEC’s serving area in which the wireless carrier has chosen to compete.

16 As an example, Alltel competes with Venture in Venture’s service area. Venture
17 does not compete with Alltel in the area where Alltel provides service and where
18 it wants Venture to transport calls, in Sioux Falls. Yet, Alltel’s request would
19 require Venture to pay to route local calls from the service area where Venture
20 and Alltel both provide service to a location, such as Sioux Falls where Alltel but
21 not Venture provides service. SDTA submits that it would not be consistent with
22 the public interest for a company that has chosen to compete in say location A, to

²⁸ See Shotwell Testimony, p. 14, lns 12-14.

1 request and require the company it seeks to compete against, to pay to get to
2 location B, even though there is no intent for such company to compete in
3 location B. Thus, granting Venture's suspension would assure that the public
4 interest is served by assuring Venture and its subscribers do not bear the cost of
5 transporting calls to locations where Venture does not compete and offer its
6 services.

7 7) Shifting additional costs to Venture and its end users to transport calls to
8 locations far removed from the existing service area is also contrary to good
9 universal service policy. The challenges of preserving universal service in high-
10 cost rural areas are already substantial and should not be increased by adopting a
11 position that works to shift even greater costs to rural carriers such as Venture and
12 its subscribers, particularly costs associated with network facilities outside of the
13 existing RLEC service areas.

14 **IV. Conclusion**
15

16 **Q18. Does SDTA believe that its member companies may be affected by the**
17 **precedent set in this proceeding?**
18

19 **A.** Yes, it does. As was stated at the outset of this testimony, SDTA's testimony is
20 based on the interests of other SDTA member LECs that are likely to be bound
21 and affected either favorably or adversely by the outcome of this proceeding. As
22 such, I have attached an exhibit which illustrates the distance SDTA members
23 would have to route so-called local calls if wireless carriers were to make a
24 similar request of that of Alltel to Venture, that is, to route local calls to a distant
25 location, in this example, to Sioux Falls.

1 **Q19. Does this conclude your testimony?**

2 **A.** Yes, it does.