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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

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IN THE MATTER OF THE PETITION OF  
BROOKINGS MUNICIPAL UTILITIES  
D/B/A SWIFTEL COMMUNICATIONS  
FOR SUSPENSION OR MODIFICATION  
OF DIALING PARITY, NUMBER  
PORTABILITY AND RECIPROCAL  
COMPENSATION OBLIGATIONS

Docket No. TC07-007

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**Direct Testimony of W. James Adkins**

**On Behalf of Brookings Municipal Utilities D/B/A Swiftel  
Communications**

**May 23, 2007**

**DIRECT PRE-FILED TESTIMONY OF  
W. James Adkins**

**Q. What is your name and address?**

A. My name is W. James Adkins. My business address is 415 4<sup>th</sup> Street, Brookings, South Dakota 57006. My business telephone number is 605-692-6211.

**Q. By whom are you employed and in what capacity?**

A. I am the Technical and Network Operations Manager of Brookings Municipal Utilities d/b/a Swiftel Communications (Swiftel). Swiftel is an independent local exchange carrier that provides local exchange, exchange access and other telecommunications services to approximately 12,500 subscriber lines in 2006 within its service territory in South Dakota, which includes the exchange of City of Brookings. This is less than 2% of the access lines nationwide.

**Q. As Technical and Network Operations Manager, briefly explain your job responsibilities.**

A. I am responsible for the delivery of the various telecommunications services offered by Swiftel Communications to its customers. Additionally, I perform administrative and supervisory work in planning, organizing, and directing the technical and network operation activities of Swiftel Communications.

**Q. Why does Swiftel request a suspension of wireline local number portability until 4 months after a competitive local exchange carrier (CLEC) is certificated to provide service in its service territory?**

A. As shown by Mr. Rasmusson, the cost to implement LNP is significant and Swiftel believes it should not be required to incur that cost until there is a possibility for numbers to be ported. Numbers will not be ported until another

wireline carrier is certificated by the Commission to provide service. Swiftel estimates that it could take 4 months to implement LNP after a carrier is certificated. Swiftel presented evidence in Docket No. TC05-137 demonstrating this.

**Q. How are calls dialed today by Swiftel customers?**

A. Local calls are dialed on a seven-digit basis. Currently, Swiftel does not transport local calls beyond its service territory. Calls that are transported beyond Swiftel's service territory must be dialed on a one plus ten-digit basis. These calls are toll calls and are routed to South Dakota Network (SDN) and then handed-off to the subscriber's presubscribed interexchange carrier (IXC) for transport. The only exception to this involves extended area service (EAS) calls exchanged with Interstate Telecommunications Cooperative (ITC) and Qwest Communications International, Inc.

**Q. In the Suspension Petition, is Swiftel proposing to require its subscribers to dial calls any differently than it does today?**

A. No.

**Q. In the Suspension Petition, is Swiftel proposing to route calls any differently than it does today?**

A. No.

**Q. Is there any reason for Swiftel to route local wireline calls to Sioux Falls?**

A. No. A local wireline call originates and terminates within Swiftel's service area. As a network architecture, there is no reason to, and it makes no sense for Swiftel to route local wireline calls to Sioux Falls. Such a network architecture is

inefficient and unnecessarily adds to the cost of providing service. This is only a question because Sprint would like to require Swiftel to route local wireline calls to Sioux Falls and to pay the cost to do so. This request is driven solely by Sprint's business purposes and, therefore, Sprint should pay for it.

**Q. How are calls from a Swiftel subscriber to a wireless subscriber dialed and routed?**

A. It depends on whether the call is considered a local call or a long distance call. Calls routed to a wireless subscriber in Swiftel's local service area are dialed on a seven-digit basis. Calls to a wireless subscriber outside of Swiftel's local service area are dialed on a 1 plus ten-digit basis and are routed to SDN and then handed-off to the subscriber's presubscribed IXC for transport. The only exception to this involves extended area service (EAS) calls exchanged with ITC.

**Q. Does this mean that a call from a Swiftel subscriber to a wireless subscriber in the MTA might be considered a toll call and routed to an IXC?**

A. Yes.

**Q. Has this dialing and routing pattern been in effect since the 1996 Act?**

A. Yes.

**Q. Has wireless competition increased in Swiftel's service area during this time?**

A. As I testified in Docket No. TC04-047, wireless carriers are successfully competing for customers within Swiftel's service area. As a result of the migration of customers from landline to wireless service, prior to 2004, Swiftel had lost over 1,200 access lines. Since 2004, Swiftel has lost over 1550 additional access lines. I also note that in that docket Western Wireless, now

Alltel, introduced a survey that demonstrated that wireless market penetration would be significant, even without LNP.

**Q. Does Swiftel have facilities in place that would allow it to route calls outside of its network as local calls?**

A. No. If Swiftel is required to route calls that terminate outside of its network as local calls, it would have to either lease or install the facilities to carry such traffic.

**Q. If Swiftel is required to allow its customers to dial calls on a local basis to wireless subscribers outside of its local service area and in the MTA, would Swiftel be able to maintain seven-digit dialing for local calls?**

A. No. Swiftel would have to require ten-digit dialing for all local calls because most NXXs are used more than once within the Minneapolis MTA in different NPAs. For example, the 996 NXX is used in the 702, 605, and 612 NPA.

**Q. Is it your experience that customers object to changes in dialing patterns and that they find such changes burdensome?**

A. Yes.

**Q. Do dialing pattern changes burden the company?**

A. Yes. The company would need to conduct extensive education efforts to explain the new dialing pattern and respond to customer complaints.

**Q. How many wireless carriers provide service in the Minneapolis MTA?**

A. Swiftel terminates traffic to 15 wireless carriers within the MTA, although there may be other wireless carriers providing service in the MTA.

**Q. How is toll traffic routed to and from Swiftel?**

A. Swiftel routes all toll traffic over common trunks to SDN, which performs the centralized equal access switching function and transmits the calls to the appropriate IXC or terminating carrier. As a result, Swiftel has not implemented end office equal access in its switch and does not distinguish calls to specific IXCs at its switch. Further, all toll traffic, with the exception of Qwest intrastate terminating toll traffic, is routed to Swiftel via SDN. Swiftel does not pay for the transport of calls to and from SDN. Rather, Swiftel assesses interstate and intrastate access charges to the IXC.

**Q. In its Response, Sprint indicates that certain modification requests made by Swiftel are not necessary. Do you agree?**

A. Swiftel is evaluating Sprint's response to determine whether it agrees with Sprint's assertions. After its review, Swiftel will amend its Petition and testimony, if appropriate.

**Q. Does this conclude your testimony?**

A. Yes. However, I wish to reserve the opportunity to supplement or amend this testimony in the future, if necessary.