

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE APPLICATION
OF NATIVE AMERICAN TELECOM, LLC
FOR A CERTIFICATE OF AUTHORITY TO
PROVIDE LOCAL EXCHANGE SERVICE
WITHIN THE STUDY AREA OF
MIDSTATE COMMUNICATIONS, INC.

Docket No. TC11-087

**DIRECT TESTIMONY OF
CAREY ROESEL
ON BEHALF OF
NATIVE AMERICAN TELECOM, LLC**

February 17, 2012

BACKGROUND & EXPERIENCE OF CAREY ROESEL

Q: Please state your name and business address.

A: My name is Carey Roesel and my business address is 2600 Maitland Center Parkway, Suite 300 - Maitland, Florida 32751.

Q: By whom are you employed, and in what capacity?

A: I am employed by Technologies Management, Inc. ("TMI") as Vice President and Consultant. I have been retained as a consultant by the applicant in this matter, Native American Telecom, LLC ("NAT").

Q: What is the purpose of your testimony in this proceeding?

A: The purpose of my testimony is to describe the managerial, financial, and technical ability of NAT to provide the telecommunications services as outlined in NAT's revised "Application for a Certificate of Authority" and filed with the Commission on January 27, 2012.

Q: Have you previously filed testimony or appeared as an expert witness before a regulatory or legislative body?

A: I have been an expert witness in CLEC cases in Florida, Kentucky, and Alabama. I have represented numerous CLECs in certification proceedings in all states that require certification.

Q: Please summarize your background and experience.

A: I joined TMI in 1996. In my role at TMI, I work with a wide variety of telecommunications carriers to obtain certification and manage ongoing regulatory issues. I also provide in-depth analysis regarding many key local telecommunications issues, with a particular focus on intercarrier compensation.

Prior to becoming part of TMI, I served as Manager - Business Planning at Sprint/United, where I provided input and support to the Executive team on a variety of economic and regulatory issues. From 1993 to 1995, I held the position of Manager-Tariffs, in which I was responsible for interpreting and maintaining the company's access, toll and private line tariffs. In my earlier career, I was assigned to Revenue Planning and Pricing where I worked directly with Florida Public Service Commission staff on behalf of United.

I earned my Bachelor of Arts in Economics at the University of Florida and my Master of Arts in Economics from the University of Central Florida.

NAT'S PROPOSED SERVICES AND EXPERTISE

Q: Please describe the services NAT proposes to offer.

A: NAT proposes to offer local exchange and interexchange service within the Reservation, which is within the study area of MidState Communications, Inc. ("MidState").

Q: Does NAT offer similar services as a CLEC in other states?

A: No.

Q: What managerial and technical ability does NAT possess to offer the proposed services in South Dakota?

A: NAT has many years of managerial and technical experience in providing the telecommunications services proposed in its revised Application.

Q: What classes of customers does NAT intend to serve?

A: NAT will provide service to all customer classes within the Crow Creek Sioux Tribe Reservation ("Reservation") which is within the study area of MidState.

Q: Please indicate the extent to and time-frame by which NAT will provide service through the use of its own facilities, the purchase of unbundled network elements, or resale.

A: NAT will provide service through its own facilities. NAT is currently interconnected with MidState and other carriers for the exchange of telecommunications traffic.

Q: Please provide a description of all facilities that NAT will utilize to furnish the proposed local exchange services, including any facilities of underlying carriers.

A: NAT is using WiMAX (Worldwide Interoperability for Microwave Access) technology operating in the 3.65 GHz licensed spectrum providing service to residential, small business, hospitality and public safety. The network supports high-speed broadband services, voice service, data and Internet access, and multimedia.

Through the use of advanced antenna and radio technology with OFDM/OFDMA (Orthogonal Frequency Division Multiplexing), NAT is able to deliver wireless IP (Internet Protocol) voice and data communications. WiMAX was selected because this 4G technology offers flexible, scalable and economically viable solutions that are key

components to deploying in vast rural environments, such as the Reservation.

Q: Please describe the geographic area proposed to be served by NAT.

A: NAT will provide service only within the boundaries of the Reservation. NAT requests a waiver of any requirement to serve the entire study area.

Q: Please describe the policies, personnel, or arrangements made by NAT which demonstrates NAT's ability to respond to customer complaints and inquiries promptly and to perform facility and equipment maintenance necessary to ensure compliance with any commission quality of service requirements.

A: NAT has established a toll-free number and email address for all customer inquiries and complaints, and has a physical location on the Reservation to handle all customer complaints and inquiries. NAT commits to respond to all inquiries and complaints within twenty-four (24) hours.

Q: Does NAT plan to interconnect with any local exchange carriers?

A: NAT currently interconnects with MidState for the exchange of telecommunications traffic.

Q: Please describe how NAT intends to market its local exchange services, its target market, and whether NAT engages in multilevel marketing.

A: NAT will target its direct marketing efforts to only those individuals and organizations within the Reservation.

Q: Please describe (1) what other jurisdictions is NAT registered or certified to provide telecommunications services; and (2) whether NAT has ever been denied registration or certification in any state and the reasons for any such denial.

A: As a newly-formed limited liability company, NAT is not registered or certificated to provide telecommunications services in other states, nor has NAT applied for or ever been denied authority to provide telecommunications services in other states.

Q: Please describe NAT's policies relating to solicitation of new customers and NAT's efforts to prevent the unauthorized switching of local service customers.

A: NAT will utilize advertising designed to market its services.

Further, NAT will not solicit customers via telemarketing. NAT will require all personnel to be trained in NAT's policies and procedures to ensure affirmative customer selection of service from NAT. NAT will require customers to complete an order form and/or a Letter of Authorization ("LOA") selecting NAT as the customer's carrier, if a consumer is switching local service providers. NAT will comply with all state and federal rules prohibiting the slamming of customers.

Q: Has NAT ever had a complaint filed against it with any state or federal commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered.

A: No.

Q: Please describe how NAT will make available any information concerning NAT's current rates, terms, and conditions for all of its telecommunications services.

A: NAT will post the current rates, terms and conditions for its local and interexchange services offered in South Dakota on its website located at www.NativeAmericanTelecom.com.

Q: Please describe how NAT will notify a customer of any materially adverse change to any rate, term, or condition of any telecommunications service being provided to the customer.

A: NAT will notify customers by mail, email or telephone, depending upon the customer's expressed preference; as to how notification should be made, to apprise them of any changes in rates, terms and conditions of service.

Q: What is NAT's Federal Tax Identification Number?

A: NAT's Federal Tax Identification Number is 26-3283812.

Q: What is NAT's South Dakota sales tax number?

A: NAT's South Dakota sales tax number is 1012-1173-ST

NAT'S FINANCIAL CAPABILITIES

Q: Is NAT a publicly-held entity?

A: No.

Q: What are NAT's financial capabilities to provide the services proposed?

A: For NAT's financial information, *see* "Confidential Financial Documents" provided to the Commission by NAT. Based upon my experience, NAT has the financial capabilities to provide the services it proposes to provide.

CONCLUSION

Q: Does NAT have the technical, financial, and managerial qualifications to provide local and interexchange services in South Dakota?

A: Yes, NAT has the technical, financial, and managerial qualification to provide the telecommunications services as outlined in NAT's revised "Application for a Certificate of Authority" and filed with the Commission. These proposed services include providing facilities-based basic telephone service to compliment NAT's advanced broadband services.

Q: Does this conclude your testimony?

A: Yes, it does.

VERIFICATION

I, *Carey Roesel*, state that I have first-hand knowledge of the matters set forth above and hereby verify that, to the best of my knowledge and belief, the allegations and statements contained herein are true and correct.

Dated this 17th day of February, 2012.



Carey Roesel

STATE OF Florida)
COUNTY OF Orange)

Subscribed and sworn to before
me this 17th day of February, 2012.



Notary Public

My Commission Expires:

(SEAL)

