

South Dakota
Public Utilities Commission
Data Requests 1 and 2
Metropolitan Telecommunications of South Dakota, Inc. d/b/a MetTel

- 1-1) It appears there is a typo in section 3.9.1.A. Is the “Per Originating Minute” charge supposed to be \$0.03842 as indicated in the supporting documentation?

The Per Originating Minute charge should be \$0.03842 (no change). MetTel will revise our tariff filing to correct the typographical error.

- 1-2) Deleted.

- 1-3) The FCC Release No. 11-161, Appendix A, Section 51.907(b)(2) requires demand be determined using the (Federal) Fiscal Year 2011. Could you recalculate using demand figures from October 1, 2010 to September 30, 2011?

Unfortunately, demand data prior to January 2011 is not available.

- 1-4) It appears the methodology used in the supporting documentation, is the option given in Section 51.907(b)(2)(v). Could you confirm this as required in the final sentence of this section of the order?

Yes, MetTel is electing to apply its interstate access rate structure and interstate rates to Transitional Intrastate Access Service as permitted by Section 51.907(b)(2)(v).

- 2-1) Please submit requests for waiver of ARSD 20:10:29:10, ARSD 20:10:29:12, and ARSD 20:10:29:16, as the amended tariff calls for unequal originating and terminating charges.

It is MetTel’s understanding that the above provisions were waived by Commission Order on 5/1/12 in Docket TC12-027. If our understanding is incorrect, please advise.

- 2-2) Please submit the pages of MetTel’s interstate tariff on file with the FCC which verify the access charges used in your work papers OR provide a link where these can be accessed online.

MetTel’s Interstate tariff pages scanned and filed electronically.

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- 2-3) When mapping intrastate rate elements into interstate rate elements, the common line and interconnection charge elements are lost and shared trunk port and multiplexing are gained. Functionally, how do these elements compare to one another?

Functionally, there is no relationship between these elements.

The common line rate element is designed to recover costs associated with providing the local loop to the end-user's customer premises. The interconnection charge has no functional purpose – it is simply a revenue generating rate element. The shared trunk port charge recovers the cost of terminating common trunks between the access tandem and end office for tandem-routed traffic. The multiplexing charge recovers the cost of muxing DS1 trunks onto higher capacity DS3 trunks between the access tandem and end office for tandem-routed traffic.

- 2-4) When comparing the rate elements, it appears demand for elements are either factors of 5 or 10 of some other element demand. Does this mean estimating was done to arrive at these demands? If so, please provide justifications for these estimates.

Total intrastate access minutes of use are accurate for the time period specified. However, since MetTel was billing a single Blended Rate for intrastate Switched Access, precise demand data for the new unbundled rate elements is not available.

Our next best option would have been to allocate total intrastate access minutes in the same proportions as interstate access minutes. Unfortunately, historical demand data at the rate element level is not available from MetTel's CABS billing vendor.

As a result, MetTel used very conservative estimates to allocate total intrastate access minutes. The estimates used were:

- Tandem Routing - 20 percent of total traffic was tandem-routed
- Facility Mileage - Average distance between end offices and the tandem was 10 miles.

20 percent Tandem-routing and 10 miles interoffice transport are estimates that are commonly used in the industry when it is necessary to estimate a composite rate. In the case of South Dakota, they are especially conservative. This is due to the fact that there are only 2 Access Tandems located in South Dakota (Sioux Falls and Rapid City). Thus, the average interoffice mileage between these tandems and the geographically dispersed subtending end offices is greater. Moreover, since IXCs tend to locate their POPs in close proximity to the Access Tandems, the increased distance to end offices discourages the use of Direct Trunked Transport facilities and thus a greater percentage of Tandem-routed transport.

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2-5) Is MetTel benchmarked to Price Cap Carrier or Rate of Return Carrier at the interstate level?

MetTel is benchmarked to CenturyLink at the interstate level. CenturyLink is a Price Cap Carrier.