

1200 ONE NASHVILLE PLACE 150 FOURTH AVENUE, NORTH NASHVILLE, TENNESSEE 37219-2433 (615) 244-9270 FAX (615) 256-8197 OR (615) 744-8466 T.R.A. DEGLET ROOM
Melvin J. Malone

Direct Dial (615) 744-8572 mmalone@millermartin.com

April 20, 2007

Honorable Sara Kyle, Chairman c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: In the Matter of: Tennessee Rural Independent Coalition Petition for Suspension and Modification Pursuant to 47 U.S.C. Section 251(f)(2) TRA Docket No. 06-00228

Dear Chairman Kyle:

Enclosed please find the original of the *Interim Rate Accounting For T-Mobile USA, Inc.* The required thirteen (13) copies were submitted on April 12, 2007. An additional copy of this filing is enclosed to be "File Stamped" for our records.

If you have any questions or require additional information, please let me know.

Very truly yours,

Melvin J. Malone

cc: Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In the Matter of:

Tennessee Rural Independent Coalition Petition for Suspension and Modification Pursuant to 47 U.S.C. Section 251(f)(2) Docket No. 06-00228

INTERIM RATE ACCOUNTING FOR T-MOBILE USA, INC.

T-Mobile USA, Inc. ("T-Mobile") respectfully responds to the Authority's request for an interim rate accounting per the procedural schedule adopted in this proceeding dated February 26, 2007 as follows:

1. T-Mobile has an executed multi-state interconnection agreement with TDS (which includes Concord Telephone Company, Humphreys Telephone Company, Tellico Telephone Company and Tennessee Telephone Company). T-Mobile has not received any invoices from either Concord Telephone or Tellico Telephone and thus is under the belief that neither is terminating any traffic on its behalf. T-Mobile has received and paid all invoices it is aware of from both Humphreys Telephone and Tennessee Telephone. T-Mobile has not yet billed either of these TDS companies for the reciprocal compensation it is owed under the T-Mobile/TDS agreement. The rate negotiated in these agreements is the result of a multi-state negotiation of multiple issues unrelated to the interim rate approved by the Authority in this proceeding.

- T-Mobile has entered into an interim interconnection agreement with Twin Lakes Telephone at the rate of \$.00667 which rate is subject to true-up based on the ultimate rate approved in this proceeding. T-Mobile has received and paid all invoices it has received from Twin Lakes pursuant to the interim agreement. Per the interim interconnection agreement, T-Mobile receives its reciprocal compensation as a credit to the invoice billed by Twin Lakes (e.g., net billing) pursuant to the factors set forth in the interim interconnection agreement.
- 3. T-Mobile has received bills from Ben Lomand Rural Telephone Company (at the rate of \$.033663), Crockett Telephone Company, DeKalb Telephone Company, North Central Telephone Company, Peoples Telephone Company, and West Tennessee Telephone Company (all that the rate of \$.0015). None of these rates are based on the interim rates approved by the Authority. Thus, T-Mobile has not paid any such invoices. Moreover, T-Mobile notes that is does not have any type of interconnection agreement (permanent or interim) with any of these companies and has not attempted to invoice these companies based on their improper rates (or any other rate).
- 4. T-Mobile does not have interconnection agreements with any of the other Coalition Members which includes Ardmore Telephone Company, Inc., Bledsoe Telephone Cooperative, the CenturyTel RLECs (i.e., CenturyTel of Claiborne, Inc., CenturyTel of Adamsville, Inc., CenturyTel of Ooltewah-Collegedale, Inc.), Highland Telephone Cooperative, Inc., Loretto Telephone Company, Inc., Millington Telephone Company, United Telephone Company, or West Kentucky Telephone and, to the best of its knowledge, has not received any

invoices from any of those carriers.¹ In turn, T-Mobile has not invoiced any of those carriers given the lack of an agreement and the lack of traffic data.

Respectfully submitted this 12th day of April, 2007.

Leon M. Ploomfield Wilson & Bloomfield, LLP 1901 Harrison St., Suite 1620 Oakland, CA 94610 510-625-8250

Dan Williams T-Mobile USA, Inc. 12920 SE 38th Street Bellevue, WA 98006

Attorneys for T-Mobile USA, Inc.

T-Mobile is aware that United Telephone Company asserts in its March 28th Interim Rate Accounting filing that it sent invoices to T-Mobile. T-Mobile does not dispute that assertion at this time but notes it has been unable to locate any such invoices. Based on United Telephone's filing, it appears that it was billing at the rate of \$.015.