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A. SCOTT ROSS
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OF COUNSEL
LISA B. TAPLINGER
BARRY W. LINDEEN
STAFF ATTORNEY
KRISTEN V. DYER

March 23, 2007

VIA HAND DELIVERY

Sharla Dillon, Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: Tennessee Rural Independent Coalition
Petition for Suspension and Modification
TRA Docket No. 06-00228

Dear Ms. Dillon:

Enclosed for filing in the above-referenced docket is the original and thirteen copies of the Joint Response of the Tennessee Rural Independent Coalition to CMRS Providers' Interrogatories and Requests for Production of Documents to Rural Coalition Members.

Thank you for your assistance in this matter.

Yours truly,



Sarah Martin McConnell
Paralegal

SMM:bms
Enclosures

cc: All Counsel 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

RECEIVED
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**JOINT RESPONSE OF THE
TENNESSEE RURAL INDEPENDENT COALITION TO
CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

The Tennessee Petitioners in Rural Independent Coalition submits the following responses to each of the "CMRS Providers' Interrogatories and Requests For Production Of Documents To Rural Coalition Members." The responses set forth below are the joint responses of the members of the Coalition and each joint response is the response that each individual Coalition member would provide if responding individually. To the extent that the Requests require individual Petitioner responses, the individual responses of each Petitioner are attached hereto together with an affidavit on behalf of each Coalition member.

INTERROGATORIES

1. For each Rural Coalition member, identify all affiliated entities (excluding individuals) (1) that hold an ownership interest in a Coalition member, or (2) that a Coalition member holds an ownership interest in.

RESPONSE: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

2. If not contained in the audited financial statements produced in response to Request for Production of Documents Number 1, identify the following for each Coalition member:
- a. After-tax earnings or “surplus” for the most recent three (3) years.
 - b. Current book value of plant, equipment and other assets.
 - c. Annual gross revenue for the most recent three (3) years.
 - d. For the most recent three (3) years, equity (or “retained surplus”) as a proportion of the book value of equity and debt (i.e., return on equity).
 - e. The effective corporate income tax rate.
 - f. For the most recent three (3) years, annual cash-flow both before and after capital expenditures.

RESPONSE: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The past financial and operational results of each company are not factors in the determination of whether a Coalition member should be subject to a suspension of the Authority’s decision to utilize TELRIC cost studies to determine the rate for reciprocal compensation. Nor is the requested information relevant to the ultimate establishment of a rate for reciprocal compensation. As set forth in Section 252(d)(2) of the Communications Act of 1934, as amended (the “Act”), the rate should be based on “a reasonable approximation of the additional costs of terminating such calls.” Moreover, the Act specifically does not “authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of transporting or terminating calls, or to require carriers to maintain records with respect to the additional costs of such calls.” (Underscoring added).

3. For each Rural Coalition member, provide:
- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
 - b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in “a” above.

RESPONSE: See individual response of each Coalition member attached.

4. For TDS:
- a. Identify each TELRIC cost study (by jurisdiction and date) that has been performed by or for TDS to support any Transport and Termination rate(s)

it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.

- b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act.
 - iv. If answer to “iii” is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - v. If answer to “iii” is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

RESPONSE: See individual response of TDS.

5. For CenturyTel:

- a. Identify each cost study (by jurisdiction and date) that has been performed by or for CenturyTel to support any Transport and Termination rate(s) it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.
- b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act;
 - iv. If answer to “iii” is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - v. If answer to “iii” is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

RESPONSE: See individual response of Century.

6. For each Rural Coalition member other than TDS and CenturyTel:

- a. Identify each cost study (by jurisdiction and date) that has been performed for the Coalition member or an Affiliate to support any Transport and Termination rate(s) that either the Coalition Member or an Affiliate has sought to charge any interconnecting Telecommunications Carrier.
- b. For each cost study, identify:
 - i. The name of the entity that performed the study.

- ii. The cost of performing the study.
- iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act;
- iv. If answer to “iii” is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
- v. If answer to “iii” is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

c. **RESPONSE: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. A prior cost study that may have been conducted on behalf of any Coalition member is not relevant to the determination of whether a Coalition member should be subject to a suspension of the Authority’s decision to utilize TELRIC cost studies to determine the rate for reciprocal compensation. Without waiver of this objection, the Coalition members to which this interrogatory is addressed report that no Coalition member has conducted a cost study “to support any Transport and Termination rate(s) that either the Coalition Member or an Affiliate has sought to charge any interconnecting Telecommunications Carrier.”**

7. For each Coalition member, please, complete the following chart, which is not asking for production of company-specific data. This interrogatory merely asks that, as to each category of information described in Column (A), each Coalition member answer “Yes” or “No” to the questions respectively posed in Columns (B), (C) and (D). If Column (B) is answered “yes,” then Columns (C) and (D) need not be answered. If Column (C) is answered “yes,” then Column (D) need not be answered. Column (D) need be answered only if Columns (A) and (B) are both answered “no.”

(A)	(B) Is This Information Currently Available Within Your Records?	(C) If the Answer in Column (B) is No, Can This Information be Collected by Current Employee(s)?	(D) If the Answer in Columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?
1. Identification of host, remote and tandem switches by common name and CLLI Code.			
2. For each identified tandem, whether wireless-originated traffic is switched by			

(A)	(B) Is This Information Currently Available Within Your Records?	(C) If the Answer in Column (B) is No, Can This Information be Collected by Current Employee(s)?	(D) If the Answer in Columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?
and transits that tandem.			
3. The year each switch was originally placed in service.			
4. Lines in service for each switch.			
5. Lines in service for each exchange.			
6. Host-remote trunks in service (DSOs) for each switch.			
7. Total interoffice trunks in service (DSOs) for each switch (i.e., trunks to other standalone/host switches or tandem switches).			
8. Total annual switched access minutes of use.			
9. Location of meet points with other landline carriers.			
10. Length of each interoffice cable route.			
11. Type of each interoffice cable (copper or fiber, buried, underground or aerial).			
12. Size of each interoffice cable (e.g. 24 fiber cable).			
13. Number of interoffice fibers assigned used for digital loop carrier systems.			
14. Number of interoffice fiber leased to third-parties.			
15. Number of interoffice fibers used by interoffice transport system.			
16. The size of transport transmission			

(A)	(B) Is This Information Currently Available Within Your Records?	(C) If the Answer in Column (B) is No, Can This Information be Collected by Current Employee(s)?	(D) If the Answer in Columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?
equipment located at each switch.			
17. Copy of continuing property record (CPR) for Central Office Switching (e.g., account 2212) for year end 2005.			
18. Composite interstate and intrastate access charges			
19. Total DS1 and DS3 circuits between each end office switch and its corresponding access tandem.			
20. Total DS1 and DS3 circuits between each host central office switch and its subtending remote switch(es).			

RESPONSE: The Petitioners each object to this request on the basis that the requested information is not relevant to the determination of whether the Authority should grant the requested suspension in accordance with Sec. 251(f)(2) of the Communications Act of 1934, as amended (the “Act”) in this proceeding. Accordingly, the interrogatory is not reasonably calculated to lead to the discovery of admissible evidence.

The interrogatory requests information that pertains to the accumulation of data that is essentially the first steps in performing a TELRIC cost study, the very requirement with respect to which the Petitioners each seek suspension. Moreover, the availability of the information identified in items 1 through 20 of this interrogatory are not even relevant to the statutory standard that governs the establishment of a rate for reciprocal compensation. As set forth in Section 252(d)(2) of the Act, the rate should be based on “a reasonable approximation of the additional costs of terminating such calls.” Moreover, the Act specifically does not “authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of transporting or terminating calls, or to require carriers to maintain records with respect to the additional costs of such calls.” (Underscoring added).

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. For each Rural Coalition member, produce copies of the three (3) most recent audited financial statements containing Part 32 – Uniform System of Accounts level detail.

RESPONSE: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The past financial and operational results of each company are not factors in the determination of whether a Coalition member should be subject to a suspension of the Authority's decision to utilize TELRIC cost studies to determine the rate for reciprocal compensation. Nor is the requested information relevant to the ultimate establishment of a rate for reciprocal compensation. As set forth in Section 252(d)(2) of the Communications Act of 1934, as amended (the "Act"), the rate should be based on "a reasonable approximation of the additional costs of terminating such calls." Moreover, the Act specifically does not "authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of transporting or terminating calls, or to require carriers to maintain records with respect to the additional costs of such calls."

2. Produce copies of all documents supporting the answers to Interrogatory Number 2.

RESPONSE: See **Response to Interrogatory 2.**

3. Produce copies of all documents supporting the answers to Interrogatory 3(b).

RESPONSE: See **individual responses attached.**

4. Produce all documents supporting the cost estimates in Petitioners' Supplemental Statement filed herein.

RESPONSE: See **individual responses attached.**

5. Produce a copy of each cost study identified in response to Interrogatory 4(a).

RESPONSE: See **Response to Interrogatory 4.**

6. Produce a copy of any orders supporting the answer to Interrogatory 4(b)(v).

RESPONSE: See **Response to Interrogatory 4.**

7. Produce a copy of each cost study identified in response to Interrogatory 5(a).

RESPONSE: **See Response to Interrogatory 5.**

8. Produce a copy of any orders supporting the answer to Interrogatory 5(b)(v).

RESPONSE: **See Response to Interrogatory 5.**

9. Produce a copy of each cost study identified in response to Interrogatory 6(a).

RESPONSE: **See Response to Interrogatory 6.**

10. Produce all documents supporting the answers to Interrogatory 6(b)(ii).

RESPONSE: **See Response to Interrogatory 6.**

11. Produce a copy of any orders supporting the answer to Interrogatory 6(b)(v).

RESPONSE: **See Response to Interrogatory 6.**

On Behalf of
The Tennessee Rural Independent Coalition and
Each Individual Petitioner

By William T Ramsey

William T. Ramsey
Neal & Harwell, PLC
2000 First Union Tower
150 Fourth Avenue North
Nashville, Tennessee 37219-2498

Stephen G. Kraskin
2154 Wisconsin Avenue N.W.
Washington, D.C. 20007

DATED: March 23, 2007

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF ARDMORE TELEPHONE COMPANY, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis
Inc. (JSI)

Estimated cost of TELRIC cost study: \$33,000-36,000

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

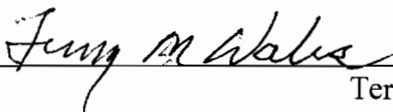
In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Terry M. Wales, being first duly sworn, states as follows:

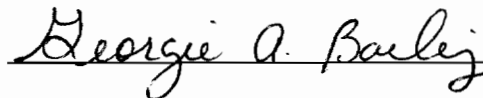
1. My name is Terry M. Wales. I am a resident of Limestone County, Alabama. I am the General Manager of Ardmore Telephone Company Inc..
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Terry M. Wales

Sworn to and subscribed before me this 19 day of March, 2007.



Notary Public

My Commission Expires:

9/30/07



March 16, 2007

Dear Terry:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Ardmore Telephone Company, Inc., ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF Ben Lomand Rural Telephone Coop, Inc
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis, Inc.

Estimated cost of TELRIC cost study: \$33,000 to \$ 36,000

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Levoy Knowles, being first duly sworn, states as follows:

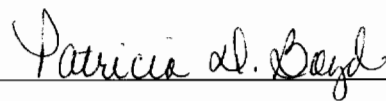
1. My name is Levoy Knowles. I am a resident of McMinnville, Warren County, Tennessee. I am the CEO of Ben Lomand Rural Telephone Coop, Inc.

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.

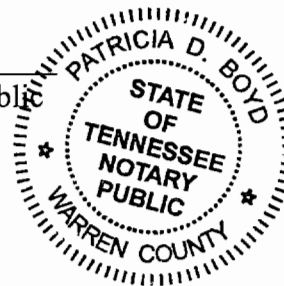

[name]

Sworn to and subscribed before me this 19th day of March, 2007.


Notary Public

My Commission Expires:

8-25-09





March 16, 2007

Dear Gail:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Ben Lomand Rural Telephone Co-op, Inc., ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF BLEDSOE TELEPHONE COOPERATIVE
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: Parrish Blessing & Associates working in conjunction with Warinner, Gesinger & Associates LLC

Estimated cost of TELRIC cost study: \$80,000

Estimate includes the cost of preparing the study plus costs of potential hearings and litigation. It also includes Bledsoe's internal cost to provide data related to the TELRIC study. Of course, the amount included for external costs (hearings, etc.) is strictly an estimate as there is no way of knowing the amount of activity that might occur.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

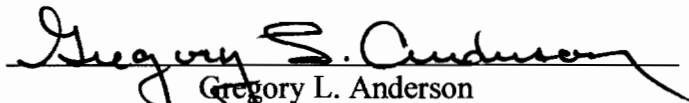
In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Gregory L. Anderson, being first duly sworn, states as follows:

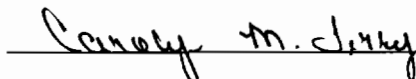
1. My name is Gregory L. Anderson. I am a resident of Bledsoe County, Tennessee. I am the General Manager of Bledsoe Telephone Cooperative
2. I have reviewed the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Gregory L. Anderson

Sworn to and subscribed before me this 19 day of March, 2007.



Notary Public

My Commission Expires:

9/1/2010

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF CENTURYTEL OF ADAMSVILLE, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: CenturyTel of Adamsville, Inc.

Estimated cost of TELRIC cost study: Parrish Blessing, and Associates, Inc, provided the estimated cost of \$50,0000 for performing the forward looking study.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Ted M. Hankins, being first duly sworn, states as follows:

3. My name is Ted M. Hankins. I am a resident of Monroe, Louisiana. I am the Director of Economic Analysis for CenturyTel Service Group, LLC.


4. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Ted M. Hankins

Sworn to and subscribed before me this 23rd day of March, 2007.



Notary Public

My Commission Expires:

At death

Gary Maxwell Cox
Louisiana Bar Roll No. 27419
Notary Public, Ouachita Parish, Louisiana
My Commission is for Life



From: Jeffrey W. Reynolds [mailto:jreynolds@pbanda.com]
Sent: Thursday, March 22, 2007 11:41 AM
To: Ted Hankins
Cc: Cathy Quinn
Subject: TN Study Estimate
Importance: High
Sensitivity: Confidential

Mr. Ted Hankins
CenturyTel

Ted:

Parrish, Blessing & Associates estimates that it will would charge CenturyTel \$50,000 fees to prepare and support a cost study to related to CenturyTel's rates to transport and terminate wireless traffic.

This would include preparation of the cost study, initial discovery, discussions w/
wireless carriers, direct and rebuttal
testimony and hearing.

The above is an estimate for budgetary purposes – it is “fees only” and is exclusive of expenses associated with on-site visits, travel and accommodations and associated with the hearing, etc. The fees assume a “normal” level of discovery, two rounds of testimony and a non-protracted hearing. The estimate does not include the costs incurred
by CenturyTel
and/or other consultants in accumulating data necessary to complete the study or respond to discovery.

Note: This estimate is for each individual CenturyTel entity.

Jeff

Jeffrey W. Reynolds
Principal
PBA - Economic Consultants
7704 Toltec Drive
North Little Rock, AR 72116
Work: 501 833-1900
Fax: 501 833-1887
Wireless: 501 425-0541

jreynolds@pbanda.com

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF CENTURYTEL OF CLAIBORNE, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: CenturyTel of Claiborne, Inc.

Estimated cost of TELRIC cost study: Parrish Blessing, and Associates, Inc, provided the estimated cost of \$50,0000 for performing the forward looking study.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Ted M. Hankins, being first duly sworn, states as follows:

5. My name is Ted M. Hankins. I am a resident of Monroe, Louisiana. I am the Director of Economic Analysis for CenturyTel of Service Group, LLC.

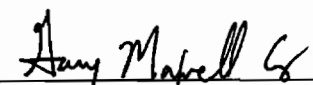
6. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Ted M. Hankins

Sworn to and subscribed before me this 23rd day of March, 2007.



Notary Public

My Commission Expires:

At death

**Gary Maxwell Cox
Louisiana Bar Roll No. 27419
Notary Public, Ouachita Parish, Louisiana
My Commission is for Life**



From: Jeffrey W. Reynolds [mailto:jreynolds@pbanda.com]
Sent: Thursday, March 22, 2007 11:41 AM
To: Ted Hankins
Cc: Cathy Quinn
Subject: TN Study Estimate
Importance: High
Sensitivity: Confidential

Mr. Ted Hankins
CenturyTel

Ted:

Parrish, Blessing & Associates estimates that it will would charge CenturyTel \$50,000 fees to prepare and support a cost study to related to CenturyTel's rates to transport and terminate wireless traffic.

This would include preparation of the cost study, initial discovery, discussions w/
wireless carriers, direct and rebuttal
testimony and hearing.

The above is an estimate for budgetary purposes – it is “fees only” and is exclusive of expenses associated with on-site visits, travel and accommodations and associated with the hearing, etc. The fees assume a “normal” level of discovery, two rounds of testimony and a non-protracted hearing. The estimate does not include the costs incurred
by CenturyTel
and/or other consultants in accumulating data necessary to complete the study or respond to discovery.

Note: This estimate is for each individual CenturyTel entity.

Jeff

Jeffrey W. Reynolds
Principal
PBA - Economic Consultants
7704 Toltec Drive
North Little Rock, AR 72116
Work: 501 833-1900
Fax: 501 833-1887
Wireless: 501 425-0541

jreynolds@pbanda.com

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF CENTURYTEL OF OOLTEWATH-
COLLEGEDALE, INC. TO THE CMRS PROVIDERS' INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO RURAL
COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: CenturyTel of Ooltewath-Collegedale, Inc.

Estimated cost of TELRIC cost study: Parrish Blessing, and Associates, Inc, provided the estimated cost of \$50,0000 for performing the forward looking study.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Ted M. Hankins, being first duly sworn, states as follows:


1. My name is Ted M. Hankins. I am a resident of Monroe, Louisiana. I am the Director of Economic Analysis for CenturyTel Service Group, LLC.
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Ted M. Hankins

Sworn to and subscribed before me this 23rd day of March, 2007.

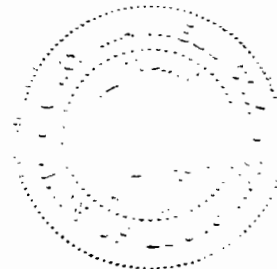


Notary Public

My Commission Expires:

At death

Gary Maxwell Cox
Louisiana Bar Roll No. 27419
Notary Public, Ouachita Parish, Louisiana
My Commission is for Life



From: Jeffrey W. Reynolds [mailto:jreynolds@pbanda.com]
Sent: Thursday, March 22, 2007 11:41 AM
To: Ted Hankins
Cc: Cathy Quinn
Subject: TN Study Estimate
Importance: High
Sensitivity: Confidential

Mr. Ted Hankins
CenturyTel

Ted:

Parrish, Blessing & Associates estimates that it will would charge CenturyTel \$50,000 fees to prepare and support a cost study to related to CenturyTel's rates to transport and terminate wireless traffic.

This would include preparation of the cost study, initial discovery, discussions w/
wireless carriers, direct and rebuttal
testimony and hearing.

The above is an estimate for budgetary purposes – it is “fees only” and is exclusive of expenses associated with on-site visits, travel and accommodations and associated with the hearing, etc. The fees assume a “normal” level of discovery, two rounds of testimony and a non-protracted hearing. The estimate does not include the costs incurred
by CenturyTel
and/or other consultants in accumulating data necessary to complete the study or respond to discovery.

Note: This estimate is for each individual CenturyTel entity.

Jeff

Jeffrey W. Reynolds
Principal
PBA - Economic Consultants
7704 Toltec Drive
North Little Rock, AR 72116
Work: 501 833-1900
Fax: 501 833-1887
Wireless: 501 425-0541

jreynolds@pbanda.com

**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)**

)
)
)
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)
)

Docket No. 06-00228

**SUPPLEMENTAL RESPONSE OF CENTURYTEL OF ADAMSVILLE, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

5. For CenturyTel:

- a. Identify each cost study (by jurisdiction and date) that has been performed by or for CenturyTel to support any Transport and Termination rate(s) it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.
- b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act;
 - iv. If answer to "iii" is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - i. If answer to "iii" is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

RESPONSE: To the best of the Companies' knowledge, CenturyTel has never performed a TELRIC study in the development of a reciprocal compensation rate.

CenturyTel
States with Negotiated Interconnection Agreements with CMRS Providers
As of March 15, 2007

CenturyTel	Cingular (AT&T Wireless)	Sprint Spectrum (PCS)	T-Mobile USA	Verizon Wireless
Alabama	Yes	Yes	No	Yes
Arkansas	Yes	Yes	No	Yes
Colorado	Yes	Yes	No	Yes
Idaho	Yes	Yes	No	Yes
Indiana	Yes	Yes	No	Yes
Iowa	No	Yes	No	Yes
Louisiana	Yes	Yes	No	Yes
Michigan	Yes	Yes	No	Yes
Minnesota	Yes	Yes	Yes	Yes
Mississippi	Yes	Yes	No	Yes
Missouri	Yes	Yes	Yes	Yes
Montana	No	No	No	Yes
Nevada	No	Yes	No	Yes
New Mexico	No	Yes	No	No
Ohio	Yes	Yes	No	Yes
Oregon	Yes	Yes	Yes	Yes
Tennessee	Yes	Yes	No	No
Texas	Yes	Yes	No	Yes
Washington	Yes	Yes	Yes	Yes
Wisconsin	Yes	Yes	Yes	Yes
Wyoming	No	Yes	No	Yes

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF CENTURYTEL OF CLAIBORNE, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

5. For CenturyTel:

- a. Identify each cost study (by jurisdiction and date) that has been performed by or for CenturyTel to support any Transport and Termination rate(s) it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.
- b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act;
 - iv. If answer to "iii" is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - i. If answer to "iii" is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

RESPONSE: To the best of the Companies' knowledge, CenturyTel has never performed a TELRIC study in the development of a reciprocal compensation rate.

CenturyTel
States with Negotiated Interconnection Agreements with CMRS Providers
As of March 15, 2007

CenturyTel	Cingular (AT&T Wireless)	Sprint Spectrum (PCS)	T-Mobile USA	Verizon Wireless
Alabama	Yes	Yes	No	Yes
Arkansas	Yes	Yes	No	Yes
Colorado	Yes	Yes	No	Yes
Idaho	Yes	Yes	No	Yes
Indiana	Yes	Yes	No	Yes
Iowa	No	Yes	No	Yes
Louisiana	Yes	Yes	No	Yes
Michigan	Yes	Yes	No	Yes
Minnesota	Yes	Yes	Yes	Yes
Mississippi	Yes	Yes	No	Yes
Missouri	Yes	Yes	Yes	Yes
Montana	No	No	No	Yes
Nevada	No	Yes	No	Yes
New Mexico	No	Yes	No	No
Ohio	Yes	Yes	No	Yes
Oregon	Yes	Yes	Yes	Yes
Tennessee	Yes	Yes	No	No
Texas	Yes	Yes	No	Yes
Washington	Yes	Yes	Yes	Yes
Wisconsin	Yes	Yes	Yes	Yes
Wyoming	No	Yes	No	Yes

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF CENTURYTEL OF OOLTEWATH-
COLLEGEDALE, INC. TO THE CMRS PROVIDERS' INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO RURAL COALITION MEMBERS**

5. For CenturyTel:
- a. Identify each cost study (by jurisdiction and date) that has been performed by or for CenturyTel to support any Transport and Termination rate(s) it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.
 - b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act;
 - iv. If answer to "iii" is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - i. If answer to "iii" is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

RESPONSE: To the best of the Companies' knowledge, CenturyTel has never performed a TELRIC study in the development of a reciprocal compensation rate.

CenturyTel

States with Negotiated Interconnection Agreements with CMRS Providers As of March 15, 2007

CenturyTel	Cingular (AT&T Wireless)	Sprint Spectrum (PCS)	T-Mobile USA	Verizon Wireless
Alabama	Yes	Yes	No	Yes
Arkansas	Yes	Yes	No	Yes
Colorado	Yes	Yes	No	Yes
Idaho	Yes	Yes	No	Yes
Indiana	Yes	Yes	No	Yes
Iowa	No	Yes	No	Yes
Louisiana	Yes	Yes	No	Yes
Michigan	Yes	Yes	No	Yes
Minnesota	Yes	Yes	Yes	Yes
Mississippi	Yes	Yes	No	Yes
Missouri	Yes	Yes	Yes	Yes
Montana	No	No	No	Yes
Nevada	No	Yes	No	Yes
New Mexico	No	Yes	No	No
Ohio	Yes	Yes	No	Yes
Oregon	Yes	Yes	Yes	Yes
Tennessee	Yes	Yes	No	No
Texas	Yes	Yes	No	Yes
Washington	Yes	Yes	Yes	Yes
Wisconsin	Yes	Yes	Yes	Yes
Wyoming	No	Yes	No	Yes

**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

**SUPPLEMENTAL RESPONSE OF *Crockett Telephone Co., Inc.*
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis, Inc.

Estimated cost of TELRIC cost study: \$30,000. – 32,000.

See John Staurulakis, Inc. provided estimate for details. The JSI estimate does not incorporate any legal expenses to be incurred in the defense of the cost model. The estimate does not include any Crockett Telephone Co. time incurred in gathering and reviewing data for the model input, review of the final cost model or JSI/Crockett Telephone Co. testimony.

In the Matter of)
Petition of the Tennessee Rural Independent Coalition) Docket No. 06-00228
Petition for Suspension and Modification)
Pursuant to 47 USC § 251 (f)(2))

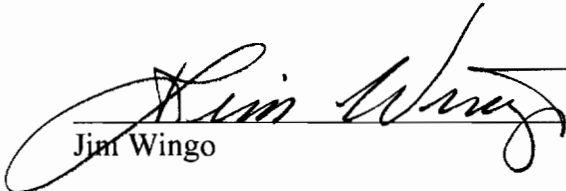
AFFIDAVIT OF

Jim Wingo, being first duly sworn, states as follows:

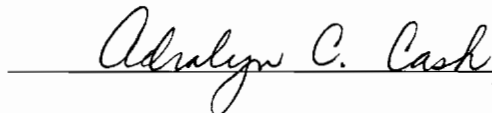
1. My name is Jim Wingo. I am a resident of Bradford, Gibson County, Tennessee. I am the General Manager of Crockett Telephone Co., Inc.

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.

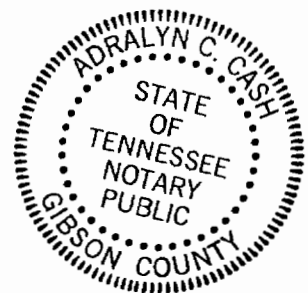

Jim Wingo

Sworn to and subscribed before me this 20th day of March, 2007.


Notary Public

My Commission Expires:

April 4, 2010





March 16, 2007

Dear Lera:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for the Crockett, Peoples and West Tennessee Telephone Companies ("companies"). I understand the companies are seeking to determine how much it will cost to develop a transport and termination study for each company that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of each company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For each company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for each of the three companies is between \$30,000 and \$32,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF DEKALB
TELEPHONE COOPERATIVE
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: PARRISH, BLESSING, & ASSOCIATES/
Jeffrey W. Reynolds

Estimated cost of TELRIC cost study: \$39,000

*(Estimate is attached.)**(Please note that the above cost does not include the cost of Dekalb Telephone Employees time for gathering, preparing, and attending hearing.)*

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

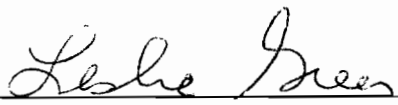
AFFIDAVIT OF

Leslie Greer, being first duly sworn, states as follows:

1. My name is Leslie Greer. I am a resident of Wilson County, Tennessee. I am the Chief Financial Officer of Dekalb Telephone Cooperative dba DTC Communications.

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Leslie Greer

Sworn to and subscribed before me this 22nd day of March, 2007.



Notary Public

My Commission Expires:

5-1-07

March 21, 2007

Ms. Vinnie Neal
DTC Communications

Dear Ms. Neal:

Following is a moderately detailed estimate for Parrish, Blessing & Associates to prepare and support a cost study to related to DTC's rates to transport and terminate wireless traffic.

Completion of cost study	\$15,000 (exclusive of fees already paid by DTC)
Initial discovery, discussions w/ wireless carriers	\$ 8,000
Direct and rebuttal testimony plus hearing	\$16,000

The above is an estimate for budgetary purposes – it is “fees only” and is exclusive of expenses associated with on-site visits, travel and accommodations and associated with the hearing, etc. The fees assume a “normal” level of discovery, two rounds of testimony and a non-protracted hearing. The estimate does not include the costs incurred by DTC and/or other consultants in accumulating data necessary to complete the study or respond to discovery.

Sincerely,

Jeffrey W. Reynolds
Principal
Parrish, Blessing & Associates, Inc.

jreynolds@pbanda.com

501 833-1900

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF
HIGHLAND TELEPHONE COOPERATIVE, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: Highland Telephone Cooperative, Inc. / John Staurulakis, Inc.

Updated estimated cost of TELRIC cost study: \$36,000.00

Estimate includes preparation of the study; preparation and response to interrogatories; preparation and filing of direct testimony and reply testimony supporting the study; and additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding. Estimate does not include travel expenses of consultant if required; legal expenses; and internal costs of Highland Telephone Cooperative to supply data required by the study.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

David C. Crawford, III , being first duly sworn, states as follows:

1. My name is David C. Crawford, III, I am a resident of Powell, Knox County, Tennessee. I am the Access Service Manager of Highland Telephone Cooperative, Inc.

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



[name]

Sworn to and subscribed before me this 21 day of MARCH, 2007.



Notary Public

My Commission Expires:

8-21-07



March 16, 2007

Dear Dave:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Highland Telephone Cooperative, Inc., ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF
LORETTO TELEPHONE COMPANY, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis Incorporated

Estimated cost of TELRIC cost study: \$ 33,000 to \$ 36,000

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

I, Desda Passarella Hutchins, being first duly sworn, states as follows:

1. My name is Desda Passarella Hutchins. I am a resident of Leoma, Lawrence County, Tennessee. I am the Chief Financial Officer of Loretto Telephone Company, Inc.

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.

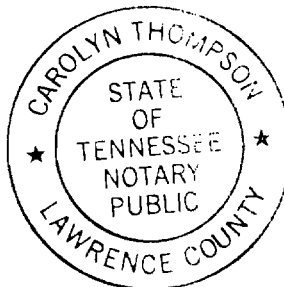
Desda Passarella Hutchins
Desda Passarella Hutchins

Sworn to and subscribed before me this 21st day of March, 2007.

Carolyn Thompson
Notary Public

My Commission Expires:

Jan 26, 2011





March 16, 2007

Dear Desda:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Loretto Telephone Company, Inc., ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a "not to exceed" price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF MILLINGTON TELEPHONE CO., INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Millington Telephone Company, Inc.

Company / Consultant providing estimate: John Staurulakis, Inc

Estimated cost of TELRIC cost study: \$33,000 to \$36,000

Copy of John Staurulakis Incorporated estimated cost to prepare the cost study is attached.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

W. S. Howard, being first duly sworn, states as follows:

1. My name is W. S. Howard, I am a resident of Millington, Shelby County, Tennessee. I am the President and General Manager of Millington Telephone Company, Inc.

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.

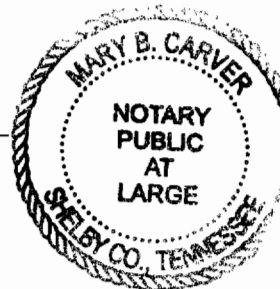
WSHoward
W. S. Howard

Sworn to and subscribed before me this 19th day of March, 2007.

Mary B. Carver
Notary Public

My Commission Expires:

My Commission Expires April 15, 2008





March 16, 2007

Dear David:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Millington Telephone Company ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**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)**

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Docket No. 06-00228

**SUPPLEMENTAL RESPONSE OF NORTH CENTRAL TELEPHONE
COOPERATIVE, INC.
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurakis, Inc.

Estimated cost of TELRIC cost study: Between \$33,000 - \$36,000

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

F. Thomas Rowland, being first duly sworn, states as follows:

1. My name is F. Thomas Rowland. I am a resident of Lafayette, Macor County, Tennessee. I am the President and CEO of North Central Telephone Cooperative, Inc.

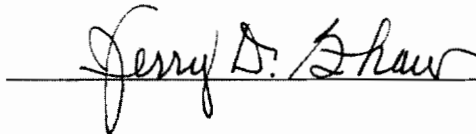
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



F. Thomas Rowland

Sworn to and subscribed before me this 22 day of March, 2007.


_____ Notary Public

My Commission Expires:

9-21-2009





March 16, 2007

Dear Johnny:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for North Central Telephone Cooperative, Inc., ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF *Peoples Telephone Company, Inc.*
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis, Inc.

Estimated cost of TELRIC cost study: \$30,000. – 32,000.

See John Staurulakis, Inc. provided estimate for details. The JSI estimate does not incorporate any legal expenses to be incurred in the defense of the cost model. The estimate does not include any Peoples Telephone Co. time incurred in gathering and reviewing data for the model input, review of the final cost model or JSI/Peoples Telephone Co. testimony.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

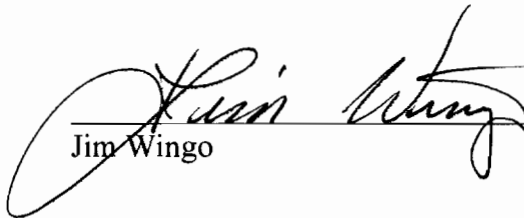
AFFIDAVIT OF

Jim Wingo, being first duly sworn, states as follows:

1. My name is Jim Wingo. I am a resident of Bradford, Gibson County, Tennessee. I am the General Manager of Peoples Telephone Company, Inc.


2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Jim Wingo

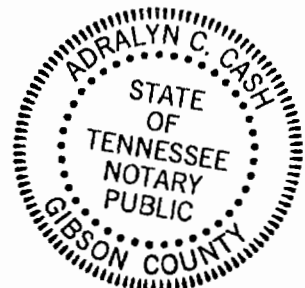
Sworn to and subscribed before me this 20th day of March, 2007.



Notary Public

My Commission Expires:

April 4, 2010





March 16, 2007

Dear Lera:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for the Crockett, Peoples and West Tennessee Telephone Companies ("companies"). I understand the companies are seeking to determine how much it will cost to develop a transport and termination study for each company that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of each company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For each company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for each of the three companies is between \$30,000 and \$32,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF TDS TELECOM
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: Parrish, Blessing and Associates, Inc.

Estimated cost of TELRIC cost study: \$75,000

See Parrish, Blessing and Associates (PBA) provided estimate for details. The PBA estimate does not incorporate any legal expenses to be incurred in the defense of the cost model. The estimate does not include any TDS Telecom time incurred in gathering and reviewing data for the model input, review of the final cost model or PBA / TDS Telecom testimony.

September 29, 2006

Bruce H. Mottern
Director - Revenue & Earnings
TDS Telecom
Knoxville, TN

Dear Bruce:

Pursuant to our discussion is an estimate for Parrish, Blessing and Associates ("PBA") to perform the following:

- Produce a TELRIC cost study designed to produce transport and termination rates for local interconnection for the four (4) TDS study areas in Tennessee
- Respond to data and discovery requests related to the above studies
- Provide expert witness testimony through the hearing phase (initial testimony, rebuttal and hearing).

PBA estimates that the above would result in fees and expenses in the range of \$75,000. This is consulting work related purely to the efforts involved in producing and defending the TELRIC studies and is exclusive of testimony related to capital recovery, cost of capital, network design, etc. . The estimate assumes that necessary TDS is readily available and in good order. It further assumes that the discovery and hearing portion of the proceeding are not protracted. No post-hearing fees and expenses are estimated.

Please give me a call if you would like to discuss this in further detail. Note that it will take at least 6 – 8 weeks to produce the studies.

Thank you for contacting us.

Sincerely,

Jeffrey W. Reynolds
Principal
Parrish, Blessing and Associates, Inc.
7704 Toltec Drive
North Little Rock, AR 72116
Office: 501 833-1900
Wireless: 501 425-0541
Fax: 501 833-1887
jreynolds@pbanda.com

cc: M. Scott Schultheis

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**


In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

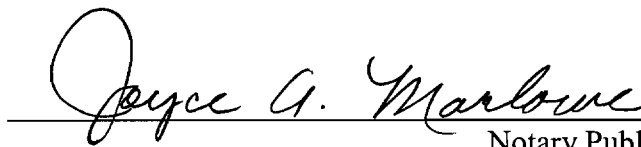
Bruce Mottern, being first duly sworn, states as follows:

1. My name is Bruce Mottern. I am a resident of Knox County, Tennessee. I am the Manager – State Government Affairs of TDS Telecom.
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

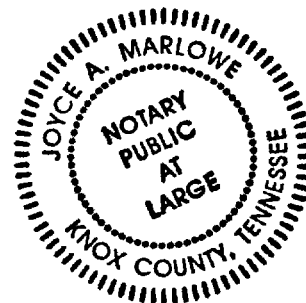
FURTHER AFFIANT SAITH NOT.


[name]

Sworn to and subscribed before me this 20 day of March, 2007.


Notary Public

My Commission Expires:
My Commission Expires June 7, 2008



**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF TDS Telecom
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

4. For TDS:

- a. Identify each TELRIC cost study (by jurisdiction and date) that has been performed by or for TDS to support any Transport and Termination rate(s) it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.
- b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act.
 - iv. If answer to "iii" is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - v. If answer to "iii" is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.

RESPONSE: TDS Telecom has an internal model that it uses in the development of a reciprocal compensation rate. This rate is used as the starting point in interconnection negotiations with the various wireless providers regarding reciprocal compensation. This is the same cost model filed by TDS Telecom that the wireless carriers participating in Docket No. 03 – 00585 stated was not "TELRIC compliant." TDS has not been involved in any proceeding in which a state commission required the filing of TELRIC cost models.

TDS Telecom has been able to negotiate with the wireless providers involved in Docket No. 03 – 00585 and 06 – 00228. The attached exhibit A indicates the states in which TDS Telecom has a negotiated interconnection agreement with these wireless carriers.

TDS Telecom

States with Negotiated Interconnection Agreements with CMRS Providers

As of March 15, 2007

TDS States	Cingular (AT&T Wireless)	Sprint Spectrum (PCS)	T-Mobile USA	Verizon Wireless
Alabama	Yes	Terminated	Yes	Yes
Arizona	Yes	No	Yes	Yes
Arkansas	Yes	Yes	Yes	No
California	Yes	No	Yes	Yes
Colorado	Yes	Yes	Yes	Yes
Florida	Yes	Terminated	Yes	Yes
Georgia	Yes	Terminated	Yes	Yes
Idaho	Yes	Yes	Yes	Yes
Indiana	Yes	Yes	Yes	Yes
Kentucky	No	No	Yes	No
Maine	Yes	No	Yes	Yes
Michigan	Yes	No	Yes	Yes
Minnesota	Yes	Yes	Yes	Yes
Mississippi	Terminated	Terminated	Yes	No
Missouri	Yes	Yes	Yes	Yes
New Hampshire	Yes	Yes	Yes	Yes
New York	Yes	No	Yes	Yes
North Carolina	Yes	Yes	No	Yes
Ohio	Yes	Yes	Yes	Yes
Oklahoma	Yes	Yes	Yes	Yes
Oregon	Yes	No	Yes	Yes
Pennsylvania	No	No	Yes	Yes
South Carolina	Yes	Terminated	No	Yes
Tennessee	No	No	Yes	Terminated
Vermont	No	No	No	Yes
Virginia	Yes	Yes	Yes	Yes
Washington	Yes	Yes	Yes	Yes
Wisconsin	Yes	Yes	Yes	Yes

**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)**

)
)
)
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)
)

Docket No. 06-00228

**SUPPLEMENTAL RESPONSE OF TWIN LAKES TELEPHONE
COOPERATIVE CORPORATION
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis, Incorporated

Estimated cost of TELRIC cost study: \$36,000

This cost estimate includes preparation of the study, preparing and responding to interrogatories, preparing and filing direct and reply testimony supporting the study, and additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding. The Cooperative's internal costs such as labor, supplies and overhead have not been included in this estimate.



March 19, 2007

Dear Wayne:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Twin Lakes Telephone Cooperative Corporation ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	


AFFIDAVIT OF

Wayne Gassaway, being first duly sworn, states as follows:

1. My name is Wayne Gassaway. I am a resident of Pikeville, Bledsoe County, Tennessee. I am the General Manager of Twin Lakes Telephone Cooperative Corporation.

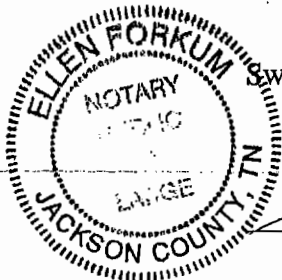
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

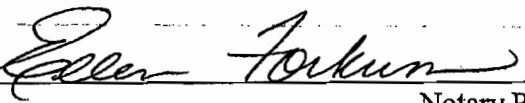
FURTHER AFFIANT SAITH NOT.



Wayne Gassaway, General Manager

Sworn to and subscribed before me this 21st day of March, 2007.





Notary Public

My Commission Expires: 03/01/2008

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF UNITED TELEPHONE COMPANY
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis
Inc. (JSI)

Estimated cost of TELRIC cost study: \$33,000-36,000

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

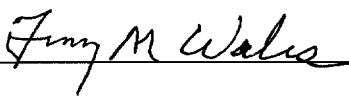
AFFIDAVIT OF

Terry M. Wales, being first duly sworn, states as follows:

1. My name is Terry M. Wales. I am a resident of Limestone County, Alabama. I am the General Manager of United Telephone Company.

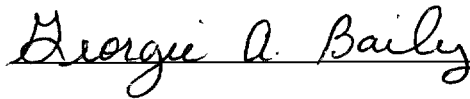
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Terry M. Wales

Sworn to and subscribed before me this 19 day of March, 2007.



Notary Public

My Commission Expires:

9/30/07



March 16, 2007

Dear Terry:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for United Telephone Company ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$33,000 and \$36,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF *West Tennessee Telephone Company, Inc.*
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

For each Rural Coalition member, provide:

- a. The name of each entity from which an estimate was received of the cost to perform a forward looking study (e.g., LRIC, TSLRIC, TELRIC) of Transport and Termination.
- b. Each and every cost estimate received for performing a forward looking study (e.g., LRIC, TSLRIC, TELRIC) from each entity identified in "a" above.

Response:

Company / Consultant providing estimate: John Staurulakis, Inc.

Estimated cost of TELRIC cost study: \$30,000. – 32,000.

See John Staurulakis, Inc. provided estimate for details. The JSI estimate does not incorporate any legal expenses to be incurred in the defense of the cost model. The estimate does not include any West Tennessee Telephone Co. time incurred in gathering and reviewing data for the model input, review of the final cost model or JSI/West Tennessee Telephone Co. testimony.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

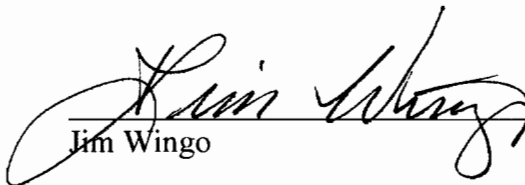
In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	

AFFIDAVIT OF

Jim Wingo, being first duly sworn, states as follows:

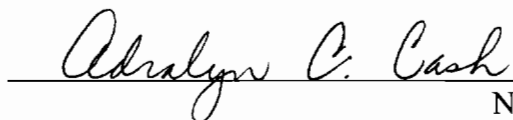
1. My name is Jim Wingo. I am a resident of Bradford, Gibson County, Tennessee. I am the General Manager of West Tennessee Telephone Company, Inc.
2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.



Jim Wingo

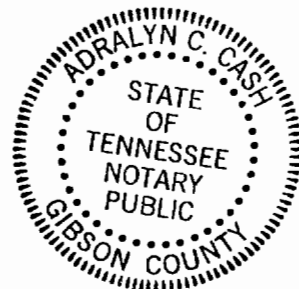
Sworn to and subscribed before me this 20th day of March, 2007.



Notary Public

My Commission Expires:

April 4, 2010





March 16, 2007

Dear Lera:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for the Crockett, Peoples and West Tennessee Telephone Companies ("companies"). I understand the companies are seeking to determine how much it will cost to develop a transport and termination study for each company that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of each company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For each company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for each of the three companies is between \$30,000 and \$32,000. This estimated cost range is only for budget purposes and is not to be considered a "not to exceed" price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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

**SUPPLEMENTAL RESPONSE OF WEST KENTUCKY RURAL TELEPHONE
COOPERATIVE CORPORATION, INC. (SUCCESSOR TO YORKVILLE
TELEPHONE COOPERATIVE, INC.)
TO THE CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

CMRS INTERROGATORY 3.

Response:

An estimate to perform a forward looking cost study of Transport and Termination was received from John Staurulakis, Inc.

The cost of the study was estimated to be between \$30,000 and \$33,000. A copy of the estimate is provided.

Also to be considered in the cost of the study are additional costs associated with internal data collection and other preparatory work by WKRT staff as well as legal fees.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In the Matter of)	
Petition of the Tennessee Rural Independent Coalition)	Docket No. 06-00228
Petition for Suspension and Modification)	
Pursuant to 47 USC § 251 (f)(2))	


AFFIDAVIT OF

Trevor R. Bonnstetter, being first duly sworn, states as follows:

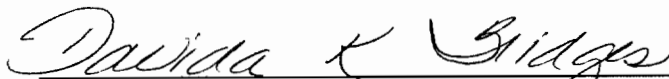
1. My name is Trevor R. Bonnstetter. I am a resident of Mayfield, Graves County, Kentucky. I am the Chief Executive Officer of West Kentucky Rural Telephone Cooperative Corporation, Inc. (successor of Yorkville Telephone Cooperative, Inc.).

2. I have reviewed the responses to the CMRS Interrogatories provided on behalf of the members of the Tennessee Rural Independent Coalition and the supplemental response provided on behalf of my company. The statements are true and accurate to the best of my knowledge.

FURTHER AFFIANT SAITH NOT.


[name]

Sworn to and subscribed before me this 30 day of March, 2007.


Notary Public

My Commission Expires:

04-14-10



March 22, 2007

Dear Trevor:

In this letter, John Staurulakis, Inc. ("JSI") responds to your request to provide a bid for consulting services for Yorkville Telephone Cooperative, Inc., ("company"). I understand the company is seeking to determine how much it will cost to develop a transport and termination study that conforms to Federal Communication Commission (FCC) rules and policy. The study and its results would be used in a Tennessee proceeding before the Tennessee Regulatory Authority.

The rules established by the FCC for the development of reciprocal compensation for transport and termination of telecommunications traffic are found in Subpart H of Part 51 of the Code of Federal Regulations. These rules permit using a rate developed from a forward-looking economic cost (FLEC) study using the FCC's total element long-run incremental cost (TELRIC) methodology plus a reasonable allocation of common costs.

The FCC does not have a specific TELRIC cost model it uses or proposes that state commissions use to develop rates for transport and termination. Rather than require the use of a specific model, FCC rules permit a carrier to establish a company-specific study. While FLEC models can and, not surprisingly, vary among carriers, the guiding principles are required to be met in order to satisfy the FCC rules.

Company information and joint cooperation with company personnel is vital for the success of this study. This is a joint venture and will require significant effort on the part of various company employees. A data request will be prepared and will require the compilation of information on various aspects of your company. Upon receipt of the required data, JSI will analyze the information and develop the inputs to be included in the JSI model. The JSI model complies with FCC regulations regarding TELRIC and calculates the forward-looking economic cost of a minute. For the company, the JSI model will develop the forward-looking economic cost of transport and termination on a minute of use basis.

The estimate I provide includes:

- The preparation of the study;

- The preparation and response to interrogatories;
- The preparation and filing of direct testimony and reply testimony supporting the study; and,
- Additional tactical support provided to the company and legal counsel regarding the study and resolution of the proceeding.

My estimate for completion and support of a study for your company is between \$30,000 and \$33,000. This estimated cost range is only for budget purposes and is not to be considered a “not to exceed” price. In the event that the cost for the study may exceed the estimated cost, JSI will notify the company as soon as possible to discuss the matter in order to determine an appropriate course of action. One example that may arise is an unexpectedly high volume of interrogatory responses that would need to be processed. I have based my estimate on a modest amount of interrogatories.

At this time, no travel related costs are included in the estimated cost of the study. In the event a trip is requested by the company, JSI will provide an estimate of the costs involved. Travel expenses to and from a hearing in Tennessee will be billed separately.

If you have any questions regarding this proposal, please let me know.

Sincerely,

Manny Staurulakis
President
John Staurulakis, Inc.