CASE NO. TO-2009-0037

SCHEDULE SEW-1

SUMMARY OF WORK EXPERIENCE AND EDUCATION

STEVEN E. WATKINS

September 2008

My entire 32-year career has been devoted to service to smaller, independent telecommunications firms that primarily serve the small-town and rural areas of the United States.

I am currently a Telecommunications Management Consultant working in conjunction with client companies and their telecommunications attorneys in several states. From June 1996 through the end of 2005, I was a consultant working with the firm of Kraskin, Moorman & Cosson, LLC. My consultant involvement with telecommunications law firms over the last 12 years has been to augment their practice in providing professional services to small telecommunications carriers. I have assisted smaller, rural, independent local exchange carriers ("LECs") and competitive local exchange carriers ("CLECs") in their analysis of a number of regulatory and industry issues, many of which arose with the passage of the Telecommunications Act of 1996 which revised the Communications Act of 1934, as amended (collectively the "Act"). I have been, and continue to be, involved in regulatory proceedings in several states and before the Federal Communications Commission on behalf of many small LECs. I am currently involved in the resolution of interconnection requirements, review and analysis of intercarrier relationships including intercarrier compensation policies, and Universal Service policy and rules.

I have over the last twelve years instructed smaller, independent LECs and CLECs on the specific details of the implementation of the Act including Universal Service mechanisms, interconnection requirements, and cost recovery. On behalf of clients in several states, I have drafted interconnection contracts, analyzed interconnection agreements, and conducted interconnection negotiations and arbitrations pursuant to the 1996 revisions to the Act. I have also represented groups of small LECs in several state proceedings regarding ongoing telecommunications policy and rules affecting the client companies.

From late 1984 to June of 1996, I held the position of Senior Industry Specialist with the Legal and Industry Division of the National Telephone Cooperative Association ("NTCA") in Washington, D.C. In my position at NTCA, I represented several hundred small and rural local exchange carrier member companies on a wide array of regulatory, economic, and operational issues. My work involved research, analysis, formulation of policy, and expert advice to member companies on industry issues affecting small and rural telephone companies.

My association work involved extensive evaluation of regulatory policy, analysis of the effects of policy on smaller LECs and their rural customers, preparation of formal written pleadings in response to FCC rulemakings and other proceedings, weekly contributions to association publications, representation of the membership on a large number of industry committees and task forces, and liaison with other telecom associations, regulators, other government agencies, and other industry members. I also attended, participated in, and presented seminars and workshops to the membership and other industry groups too numerous to list here.

For those not familiar with NTCA, it is a national trade association of approximately 500 small, locally-owned and operated rural telecommunications providers dedicated to improving the quality of life in rural communities through advanced telecommunications. The Association advocates the interests of the membership before legislative, regulatory, judicial, and other organizations and industry bodies.

Prior to my work at NTCA, I worked for over eight years with the consulting firm of John Staurulakis, Inc., located in Maryland. I reached a senior level position supervising a cost separations group providing an array of management and analytical services to over one hundred and fifty (150) small local exchange carrier clients. The firm was primarily involved in the preparation of jurisdictional cost studies, access rate development, access and exchange tariffs, traffic analysis, property records, regulatory research and educational seminars.

For over ten years during my career, I served on the National Exchange Carrier Association's ("NECA") Industry Task Force charged with reviewing and making recommendations regarding the interstate average schedule cost settlements system. For about as many years, I also served in a similar role on NECA's Universal Service Fund industry task force.

I graduated from Western Maryland College (now known as McDaniel College) with a Bachelor of Arts degree in physics. I have also attended industry seminars too numerous to list on a myriad of industry subjects over the years.

During my career representing small telecommunications firms, I estimate that I have prepared formal written pleadings for submission to the Federal Communications Commission on behalf of NTCA member and client LECs in over 200 proceedings. I have also contributed written comments in many state proceedings on behalf of client LECs. I have provided testimony in proceedings before the state telecommunications regulatory commissions in Arkansas, Florida, Colorado, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Montana, Nebraska, New Mexico, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Washington, and West Virginia. Finally, I have testified before the Federal-State Joint Board examining jurisdictional separations changes.