

Exhibit No.:	
Issue:	InterMTA Factors
Witness:	Ron Williams
Type of Exhibit:	Surrebuttal Testimony
Sponsoring Party:	Western Wireless Corporation
Case No.:	TC-2002-1077
Date Testimony Prepared:	October 24, 2003

WESTERN WIRELESS CORPORATION

CASE NO. TC-2002-1077

SURREBUTTAL TESTIMONY

OF

RON WILLIAMS

1 **I. QUALIFICATIONS AND PURPOSE OF TESTIMONY**

2 **Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A: My name is Ron Williams. My business address is 3650 131st Ave., SE,
4 Bellevue, Washington 98006.

5 **Q: HAVE YOU PREVIOUSLY FILED DIRECT TESTIMONY IN THIS DOCKET?**

6 A: I filed Direct Testimony on behalf of Western Wireless and T-Mobile USA on
7 September 10, 2003.

8 **Q: WHAT IS THE PURPOSE OF THIS SURREBUTTAL TESTIMONY?**

9 A: I wish to state Western Wireless' position with respect to interMTA factors to be
10 negotiated with the three Complainants (Cass County Telephone, Craw-Kan
11 Telephone, and Lathrop Telephone) with which Western terminates traffic subject
12 to this proceeding.

13

14 **II. INTERMTA FACTOR RESOLUTION**

15

16 **Q: WHAT IS WESTERN WIRELESS PROPOSING FOR RESOLUTION OF THE**
17 **INTERMTA FACTOR ISSUE?**

18 A: Western is proposing to accept the same interMTA factors as agreed to in
19 negotiations between T-Mobile USA and the Complainants.

20 **Q: WHY HAS WESTERN WIRELESS COME TO THIS POSITION?**

21 A: Since Western Wireless generates a relatively small amount of traffic terminating
22 to the Complainants, the cost to Western Wireless for consenting to these
23 interMTA factors is not substantial. From a cost-benefit point of view, it does not
24 make sense for Western Wireless to expend resources to achieve an objectively
25 accurate measure of interMTA traffic factors between its network and that of one

1 of the Complainants (Craw-Kan Telephone Cooperative). As I indicated in my
2 direct testimony, negotiation of mutually-acceptable interMTA factors is the most
3 efficient method of resolving this issue.

4 **Q: WHAT, SPECIFICALLY, ARE THE INTERMTA FACTORS THAT WESTERN**
5 **WIRELESS WILL ACCEPT WITH RESPECT TO THE COMPLAINANTS?**

6 A: Western Wireless agrees to the following interMTA factors for the three
7 Complainants with which Western terminates relevant traffic:

8	Cass County Telephone Company	0%
9	Craw-Kan Telephone Cooperative	53%
10	Lathrop Telephone Company	0%

11
12 **Q: DOES WESTERN WIRELESS AGREE THAT THE COMPLAINANTS' ACCESS RATES**
13 **APPLY TO TRAFFIC CLASSIFIED AS INTERMTA BY THIS FACTOR?**

14 A: Yes.

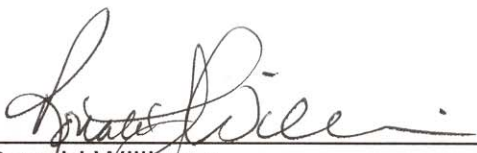
15 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A: Yes.

STATE OF WASHINGTON)
)
COUNTY OF KING) ss.

VERIFICATION

Comes now Ronald Williams, being of lawful age and duly sworn, and states that he has read the foregoing surrebuttal testimony, and that it is true and correct to the best of his knowledge and belief.



Ronald Williams

Sworn to and subscribed before me this 27th day of October, 2003



Notary Public

My commission expires 11/03/04

