

Exhibit No.:  
Issues: InterMTA Factors  
Witness: Derek Canfield  
Sponsoring Party: Sprint PCS  
Type of Exhibit: Surrebuttal Testimony  
Case No.: TC-2002-057  
Date Testimony Prepared: March 26, 2004

**SPRINT SPECTRUM, LP**  
d/b/a  
**SPRINT PCS**

**FILED**

MAR 26 2004

Missouri Public  
Service Commission

**SURREBUTTAL TESTIMONY**  
**OF**  
**DEREK CANFIELD**

**CASE NO. TC-2002-057**

Jefferson City, Missouri  
March 26, 2004

STATE OF MISSOURI

Northeast Missouri Rural Telephone Company )  
And Modern Telecommunications Company, et. al.)

Petitioners, )

) Case No. TC-2002-57 et al

v. )

Southwestern Bell Telephone Company, )  
Southwestern Bell Wireless (Cingular), )  
Voicestream Wireless (Western Wireless), )  
Aerial Communications, Inc., CMT Partners )  
(Verizon Wireless), Sprint Spectrum LP, )  
United States Cellular Corp., and Ameritech )  
Mobile Communications, Inc., )

Respondents. )

AFFIDAVIT OF DEREK CANFIELD


STATE OF KANSAS )

) ss:

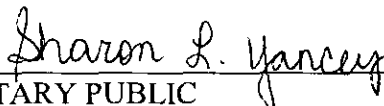
COUNTY OF JOHNSON )

I, Derek Canfield, being of lawful age and duly sworn, dispose and state on my oath the following:

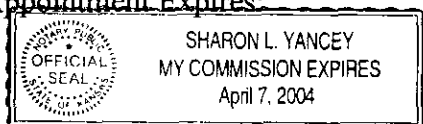
5. I am presently Manager of Access Verification for Sprint.
6. I have participated in the preparation of the attached Surrebuttal Testimony in question and answer form to be presented in the above entitled case;
7. The answers in the attached Surrebuttal Testimony were given by me; and,
8. I have knowledge of the matters set forth in such answers and that such matters are true and correct to the best of my knowledge and belief.

  
DEREK CANFIELD

Subscribed and sworn to before me on this 25<sup>th</sup> day of March, 2004.

  
NOTARY PUBLIC

My Appointment Expires:



1                   **BEFORE THE PUBLIC SERVICE COMMISSION**

2                   **OF THE STATE OF MISSOURI**

3                   **SURREBUTTAL TESTIMONY**

4                   **OF**

5                   **DEREK CANFIELD**

6

7   **Q.     Please state your name, business address, employer and current position.**

8   A.    My name is Derek Canfield. My business address is 6500 Sprint Parkway,  
9           Overland Park, KS 66251. I'm employed by Sprint/United Management  
10          Company as Manager, Access Verification.

11

12   **Q.     Are you the same Derek Canfield that provided Rebuttal Testimony on**  
13          **February 20?**

14   A.    Yes.

15

16   **Q.     What is the purpose of your testimony?**

17   A.    The purpose of my surrebuttal testimony is to rebut certain aspects of the Rebuttal  
18          Testimony of Staff witness Mr. Michael Scheperle. Specifically, Mr. Scheperle  
19          states that a traffic study based upon FCC criteria is not viable and recommends  
20          the Commission adopt interMTA factors between SprintPCS and Chariton Valley  
21          as well as between SprintPCS and Northeast.

22

1   **Q.    What are the interMTA factors recommended by Staff witness Mr. Mike**  
2       **Scheperle for SprintPCS/Chariton Valley and SprintPCS/Northeast?**

3   A.   Mr. Scheperle recommends Sprint PCS interMTA factors of 38% for Northeast  
4       and 41% for Chariton Valley (see Scheperle Schedule 5).

5

6   **Q.    Mr. Scheperle states that a traffic study based on FCC criteria is not viable.**  
7       **Do you agree?**

8   A.   No. Mr. Scheperle states that a FCC-based traffic study is not viable in Missouri  
9       do to the fact that the wireless calls sometimes transits a third carrier<sup>1</sup>. While the  
10      use of a transit carrier is common, this fact does not render a traffic study based  
11      on FCC criteria unviable. It is the originating cell site location and the physical  
12      location of the terminating party that determines if a wireless call is interMTA or  
13      intraMTA and the number of carriers has no bearing.

14

15   **Q.    Has Sprint developed a traffic study consistent with FCC criteria?**

16   A.   Yes. In my Rebuttal Testimony, I put forward individual traffic studies based  
17      upon FCC methodology for both Chariton Valley Telephone Company and  
18      Northeast Missouri Rural Telephone Company. The resulting interMTA factors  
19      contained in my Rebuttal Testimony were 11.91% and 11.33%, respectively.  
20      However, upon further refinement of Sprint's study, Sprint noted that the  
21      information for certain cell sites were not up to date (specifically, Schedule DAC-  
22      3 Cell Site Table) I have re-performed the study using the updated cell site

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<sup>1</sup> Additional Rebuttal Testimony of Michael Scheperle, February 20, 2004, page 8.

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1           information and the revised interMTA factors are 11.2% for Chariton Valley and  
2           15% for Northeast Rural. (Please see the following revised schedules: Schedule  
3           DAC-1 – Chariton Valley Summary, Schedule DAC-2 – Northeast Rural  
4           Summary, and Schedule DAC-3 Cell Site Table)

5

6   **Q.     Does this conclude your testimony?**

7   **A.     Yes.**

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## **INDEX OF SCHEDULES**

- DAC - 1      REVISED Summary Traffic Study Results for Chariton Valley**
- DAC - 2      REVISED Summary Traffic Study Results for Northeast**
- DAC - 3      REVISED Cell Cite Table (common table used for both studies)**