

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

EUGENE E. ANDERECK
TERRY M. EVANS
ERWIN L. MILNE
JACK PEACE
CRAIG S. JOHNSON
RODRIC A. WIDGER
GEORGE M. JOHNSON
BEVERLY J. FIGG
WILLIAM S. LEWIS
VICTOR S. SCOTT
COREY K. HERRON
MATTHEW M. KROHN

ATTORNEYS AT LAW
700 EAST CAPITOL AVENUE
COL. DARWIN MARMADUKE HOUSE
P.O. BOX 1438
JEFFERSON CITY, MISSOURI 65102-1438
TELEPHONE 573-634-3422
FAX 573-634-7822

LANETTE R. GOOCH
SHAWN BATTAGLER
JOSEPH M. PAGE
LISA C. CHASE
JUDITH E. KOEHLER
ANDREW J. SPORLEDER
REBECCA L. SELLERS
JASON A. PAULSMEYER
BRYAN D. LADE
CONNIE J. BURROWS
OF COUNSEL
MARVIN L. SHARP
GREGORY C. STOCKARD (1904-1993)
PHIL HAUCK (1924-1991)

March 26, 2004

Secretary of PSC
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²

MAR 26 2004

Re: Case No. TC-2002-57

**Missouri Public
Service Commission**

Dear Secretary:

Enclosed please find an original and eight (8) copies of *Surrebuttal Testimony of Gary Godfrey on Behalf of Northeast Missouri Rural Telephone Company* in the above cited case.

Please note that this testimony contains attachments designated highly confidential as it contains reports, work papers, or other documentation related to work produced by internal or external auditors or consultants. I would appreciate it if you would maintain the confidential nature of this information in accordance with the Commission's Protective Order.

Please bring this filing to the attention of the appropriate Commission personnel. Two copies of this testimony will be provided to all other parties of record. If you should have any question or concerns, please do not hesitate to contact me.

Sincerely,


Bryan D. Lade

Enc.

Cc: Office of the Public Counsel
Bret Dublinske
Lisa Creighton Hendricks
Ron Williams

PSC General Counsel
Leo Bub
Dan Menser
Paul Gardner

Joe Murphy
Mark Johnson
Larry Dority
MITG Managers

Trenton Office
9th And Washington
Trenton, Missouri 64683
660-359-2244
Fax 660-359-2116

Springfield Office
1111 S. Glenstone
P.O. Box 4929
Springfield, Missouri 65808
417-864-6401
Fax 417-864-4967

Princeton Office
207 North Washington
Princeton, Missouri 64673
660-748-2244
Fax 660-748-4405

Smithville Office
119 E. Main Street
P.O. Box. 654
Smithville, Missouri 64089
816-532-3895
Fax 816-532-3899

Exh. No. _____
Issue: InterMTA Traffic Volumes
Witness: Gary Godfrey
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Complainant Northeast
Case No. Tc-2002-57
Date: March 26, 2004

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

Northeast Missouri Rural Telephone)
Company and Modern Telecommuni-)
cations Company,)
Petitioners,)
vs.)
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,)
Ameritech Mobile Communications, Inc.)
Respondents.)

Case No. TC-2002-57

FILED²
MAR 26 2004
Missouri Public
Service Commission

Surrebuttal Testimony

Of

Gary Godfrey

Re Traffic Proportions

On behalf of

Northeast Missouri Rural Telephone Company

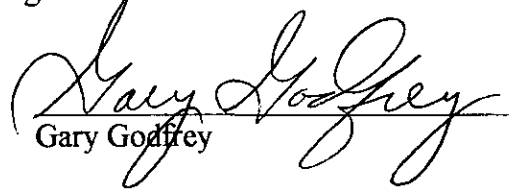
March 26, 2004

Exh. No. _____
Issue: InterMTA Traffic Volumes
Witness: Gary Godfrey
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Complainants MITG
Case No. Tc-2002-57
Date: March 26, 2004

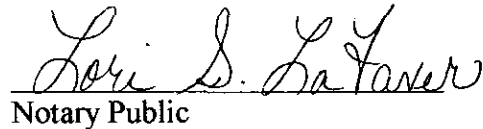
AFFIDAVIT OF GARY GODFREY

STATE OF MISSOURI)
) ss.
COUNTY OF SULLIVAN)

Gary Godfrey, of lawful age, on my oath states, that I have participated in the preparation of the foregoing direct testimony in question and answer form, consisting of _____ pages, to be presented in this case; that the answers in the foregoing testimony were given by me; that I have knowledge of the matters set forth in such answers; and that such matters are true to the best of my knowledge and belief.

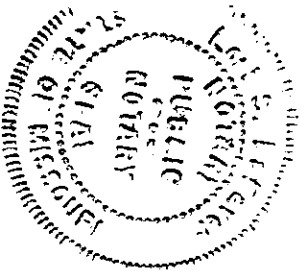

Gary Godfrey

Subscribed and sworn to before me this 19th day of
March, 2004.


Notary Public

My Commission Expires 9/26/04

**Lori S. LaFaver, Notary Public
Sullivan County, State of Missouri
My Commission Expires 9/26/2004**



1 **Q. Please state your name, capacity, and business address?**

2 A. Gary Godfrey. I am Office Manager of Northeast Missouri Rural Telephone
3 Company, P. O. Box 98, Green City, Missouri 63545.

4 **Q. On whose behalf are you testifying?**

5 A. Petitioner Northeast Missouri Rural Telephone Company. Due to a merger,
6 Northeast's affiliate Modern Telecommunications has been merged into Northeast.
7 Reference to Northeast herein will include references to the traffic terminated to Modern,
8 as Northeast succeeded to Modern's claim herein.

9 **Q. Are you the same Gary Godfrey that previously filed testimony in this case?**

10 A. Yes. I filed direct and surrebuttal testimony in the initial phase of this case, as
11 well as direct testimony in this phase of the case regarding the proportions of traffic that
12 are interMTA or intraMTA in jurisdiction.

13 **Q. What is the purpose of this testimony?**

14 A. The purpose of this surrebuttal testimony is limited to correcting the factor study
15 results Northeast previously submitted for Sprint PCS terminated traffic in Schedule 3 to
16 my Direct Testimony.

17 **Q. What is the nature of the correction to the Sprint PCS study?**

18 A. In their rebuttal testimony Sprint PCS's witnesses questioned the assignment of
19 two OCN codes to them. These OCNs were identified to us through a data request and
20 after investigating the ownership of those codes we determined that two OCNs and the
21 corresponding NPA-NXX codes contained in Schedule 3HC were not assigned to Sprint
22 PCS.

1 **Q. What is your decision with regards to this correction and its influence on**
2 **Northeast's factor study for Sprint PCS?**

3 A. Northeast decided to revise the factor study results for Sprint PCS contained in
4 Schedule 3, and submit a Revised Schedule 3 with this surrebuttal testimony that removes
5 the two lines related to the 573-489 and 816-560 NPA-NXX codes.

6 By removing this information, the Sprint PCS interMTA factor increases from
7 37% to 87%. We made this decision despite the dramatic impact it has on the resulting
8 factor, because we believe it is the correct result in light of the information currently
9 available to us.

10 **Q. Are there any other revisions needed to your previous testimony or schedules**
11 **at this time?**

12 A. No.

13 **Q. Based on the revision to Schedule 3HC which you have described above,**
14 **what is the proportion of Sprint PCS originated wireless traffic terminated to**
15 **Northeast's exchanges, which is interMTA in nature?**

16 A. 87%.

17 **Q. Does this conclude your surrebuttal testimony?**

18 A. Yes.

REVISED SCHEDULE 3

HIGHLY CONFIDENTIAL

(Schedule is attached under separate cover)