Exhibit No:
Issue: InterMTA Factor
Witness: Williams
Type: Rebuttal
Sponsoring Party:
Western Wireless
Case No.: TC-2002-57
Date: February 20, 2004

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Northeast Missouri Rural Telephone Company, et al.,	)	
	)	
Petitioners,	)	
	)	Case No. TC-2002-57, et al.
	)	consolidated.
	)	
	)	
Southwestern Bell Telephone Company, et al.,	)	
	)	
Respondents.	)	

REBUTTAL TESTIMONY

of

RON L. WILLIAMS

on Behalf of

WESTERN WIRELESS CORPORATION

February 20, 2004

DIRECT TESTIMONY OF RONALD WILLIAMS

Q: Please state your name, occupation, and address.

A: My name is Ron L. Williams. I am employed by Western Wireless as Director – InterCarrier Relations. My business address is 3650 131st Avenue S.E., Suite 400, Bellevue, Washington.

Q: Please describe your duties with Western Wireless.

A: I am employed as Director - InterCarrier Relations by Western Wireless Corporation. My duties and responsibilities include developing effective and economic interconnection and operational relationships with other telecommunications carriers. I work with other departments within Western Wireless to develop plans to deal with company needs and interface with carriers to ensure arrangements are in place to meet the operational objectives of the company.

Q: Please describe your background in the telecommunications industry.

A: I have ten years experience working for GTE (now Verizon), including six years in Telephone Operations and business development, and four years in cellular operations. I also have two years experience in start-up CLEC operations with FairPoint Communications. Since August 1999, I have worked for Western Wireless, first as the Director of CLEC operations and, more recently, in my current position in InterCarrier Relations.

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Western Wireless. It should be noted that some of the time period addressed in this docket was a time when Western Wireless owned VoiceStream[1] (prior to April 1999), my testimony is limited to a representation of Western Wireless' position.

Q: Are T-Mobile and Western Wireless affiliated?

A: Not today. T-Mobile (formerly VoiceStream) was spun off from Western Wireless in April 1999, and the companies are no longer affiliated.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to present to the Commission the conclusion of Western Wireless as to the best procedure to determine the jurisdictional allocation of wireless traffic in Missouri, between interMTA and intraMTA traffic.

Q: What would be the best procedure to determine the allocation of such traffic?

A: Due to the inherent difficulty in determining the jurisdiction of mobile originated traffic, Western Wireless believes that a negotiated settlement would serve all parties. It is impossible to forecast what percentage of future telecommunications traffic will be interMTA or intraMTA. Likewise, the jurisdictional nature of past traffic – whether the traffic originated and terminated within the same MTA – is very difficult to account for as the telecommunications industry is not set up to track originating and terminating jurisdiction for calls placed from a mobile device. Accordingly, Western Wireless has engaged in negotiations with the complainant ILECs' representatives to reach agreement on a percentage of mobile-to-land terminating traffic that is interMTA in nature.

[1] In August 2002, VoiceStream changed its name to T-Mobile.

Q: Do you believe that these negotiations will be successful?

A: Yes, I do. I believe that these negotiations will yield a percentage allocation of the traffic which Western Wireless would be willing to present to the Commission as a reliable estimate of the actual allocation. In fact, Western Wireless has just completed agreement with Alma and MoKan Dial in the form of a stipulation which sets the interMTA factor at two and one half percent (2 ½ %). Negotiations are underway with other complainants in this case.

Q. Do you believe it is possible to calculate an accurate interMTA factor without originating call data which identifies the point of origination?

A. No. I have reviewed several attempts to do this using a variety of methodologies. All the methods I have seen rely upon a surrogate (something other than actual mobile-to-land traffic volumes) for determination of a factor. You cannot accurately estimate the characteristics of a given CMRS provider's terminating traffic by using access lines, population, or traffic averages from any other carrier. Each CMRS provider's network and customer base is unique as is its traffic relationship with any given LEC or LEC exchange. For these reasons, bilateral, negotiated resolution of traffic factors is the best available approach for resolution of this matter.

Q: Does that conclude your testimony?

A: Yes.

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

VERIFICATION

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

Ron L. Williams

Sworn to and subscribed before me this 3rd day of March, 2004

Notary Public

My commission expires: 11/03/04

REGINA M. DEL GIORGIO
NOTARY PUBLIC
COMMISSION EXPIRES
11-3-04
STATE OF WASHINGTON