Conley E. Ward [ISB No. 1683]
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
Telephone No. (208) 388-1200
Fax No. (208) 388-1300
cew@givenspursley.com

Attorneys for Rural Telephone Company

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IDAHO PUBLIC
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF RURAL TELEPHONE COMPANY FOR ADDITIONAL SUSPENSION OF LNP REQUIREMENTS.	Case No. RUR-T-04-02 **REPLY COMMENTS OF RURAL TELEPHONE COMPANY**

Rural Telephone ("RTC" or "Company"), by and through its attorneys, Givens Pursley LLP, files these Reply Comments in response to Staff's Comments on RTC's petition for an extension of its current temporary suspension of wireline-to-wireless (intermodal) number portability responsibilities. In its Comments, Staff states:

> [o]ne possible option for Rural Telephone in the short term is to contract for the provision of LNP with Syringa Networks, LLC. Staff believes that Rural Telephone, as an apparent part owner of Syringa, could establish trunks to Syringa's tandem where LNP could be provided the same way it is being provided for other independent telephone companies in Idaho. Staff does not know what this would cost Rural Telephone but believes it is an option worth exploring so that LNP could be provided until the Company upgrades or replaces its Redcom switches..... Specifically, Staff needs to know Rural Telephone's assessment of using Syringa Networks to provide LNP in each of its Idaho exchanges. (Staff Comments, p.3)

Rural provides the following information in response to Staff's request.

ORIGINAL

I. Syringa's LNP Solution Presents Technical Problems for Rural.

Syringa's LNP service is not a long-term solution for Rural, and there are a number of technical and cost issues that make it unworthy even as a short-term solution for Rural. This in no way suggests that Syringa's solution is inappropriate for other LECs that choose to use it for their LNP needs. Rather, there are a few important distinctions between Rural's network and the networks of other Idaho LECs that make Syringa's solution non-viable for Rural. In order to understand this distinction, it is important to understand how the service would work for Rural and why Rural's situation is different from other ILECs that are using Syringa's service.

In order to obtain LNP service from Syringa, Rural would need to establish routing tables in its switch, whereby it would designate the trunk groups that should be used to route calls to numbers that have been ported. Under this scenario, if one of Rural's customers calls a ported number previously served by Rural, its terminating switch would recognize the number as being ported and would send the call over dedicated trunks to Syringa. Syringa's switch would then provide the LNP capability and Syringa would query the LNP databases to determine which carrier owns the number. Then Syringa would route the call to Qwest for ultimate termination to a wireless carriers' switch. The call would need to be routed through Qwest's tandem because no wireless carrier currently interconnects with Syringa.

In this non-EAS porting-out scenario, Syringa's service would probably work for Rural. However, problems would arise with EAS calls and when Rural would attempt to port-in from other carriers because Rural does not have SS7. The FCC's required location routing number (LRN) method of porting numbers is heavily dependent on the

utilization of SS7. The LRN is a 10-digit number that is assigned to an LNP-capable switch. When a customer ports a number to another carrier, the ported telephone number is associated with the LRN of the competitive carrier's switch in the LNP databases. When a call is made to a ported number, a database query is performed and the call is routed to the competitive carrier's switch based on the LRN of that switch and its assignment to the ported number. In a non-EAS porting-out scenario, Syringa could perform the database query and determine to which wireless carrier the call should be routed based on that carrier's LRN information. But because Rural does not have SS7, it could not port-in numbers that originally belonged to a wireless carrier because there is no field in a multi-frequency (MF) signal for LRN data, as there is in an SS7 signal. So, for example, if a local subscriber in New York City were to call the new Rural customer who ported his wireless number from a wireless carrier to Rural, the call could not be transmitted through Syringa's switch for termination to Rural, even if the N-1 carrier performed the query as required, because Rural does not have SS7 that would allow the LRN to be transmitted with the call for proper termination to Rural. In other words, Syringa's solution would mean porting could only occur one-way – from Rural to another carrier. Such a solution is not competitively neutral. In short, SS7 is required to comply with the FCC's mandated LRN-based LNP requirements.

A similar situation was presented in a Colorado proceeding when a wireless carrier (N.E. Colorado Cellular, Inc. ("NECC")) was opposed to an LNP suspension request of a small rural LEC (Willard Telephone Company ("Willard")) that would have otherwise had to upgrade its switch and add SS7 capability in order to provide LNP. NECC suggested that Willard could instead establish routing tables and route the calls to

ported numbers to Qwest for database queries. Upon examination of the issue, the Administrative Law Judge in the proceeding issued the following proposed finding last week:

> It is noted that while the methodology advanced by NECC might allow Willard to accomplish the porting-out function of LNP, it would not allow it to accomplish the corresponding porting-in function. Therefore, this methodology would not meet the FCC's definition of LNP since an NECC customer would not be able to keep his or her telephone number when switching from NECC to Willard. Nor would this methodology meet the goal of increased competition between wireline and wireless providers since Willard would not be able to offer customers the ability to retain their telephone number in an effort to regain their business. In sum, this methodology would not comply with the FCC's rules on LNP since it would not effectively implement a long-term database LNP solution.[1]

The lack of SS7 would be additionally problematic for EAS calls made from the three Rural exchanges that have EAS to Qwest exchanges. If Rural were to be designated as LNP-capable in the Location Exchange Routing Guide (LERG), Rural would be expected to query all calls destined for Qwest exchanges to which Rural has EAS and in which Qwest is LNP-capable. Currently, Qwest provides default query service to Rural for EAS calls made by Rural's customers to Qwest's customers because Rural is not LNP capable. However, Qwest is unlikely to perform such default queries if Rural becomes LNP capable. Therefore, since Rural would not have the porting information on EAS numbers to selectively route only ported EAS calls to Syringa for querying services, *all* EAS calls from Rural's customers to Qwest's customers would first need to be routed to Syringa for querying services. Once queried by Syringa, the EAS calls would need to be transported to Qwest. Theoretically, Syringa could send the calls over new trunks between its switch and Qwest's. But that would require a complete replacement of the

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[1] *Recommended Decision of Administrative Law Judge Dale E. Isle Granting Petition For Suspension, In Part.* Decision No. RO5-0074, paragraph 27. Docket No. 04M-423T – In The Matter of Willard Telephone Company's Petition For Suspension Of LNP Requirements. January 14, 2005.

existing EAS trunks currently in place between Rural and Qwest, and it is unknown whether Qwest would be willing to make such network changes. Alternatively, the EAS calls, once queried, would need to be sent back over the trunks between Syringa and Rural, and out over the EAS trunks between Rural and Qwest. But, similar to the porting-in scenario above, the LRN information could not be transmitted with the calls because Rural does not have SS7. To our knowledge, the other Idaho LECs that are using Syringa's LNP service do not have similar routing concerns.

Another primary difference between Rural and the other Idaho LECs that use Syringa is the level of access to Syringa's fiber ring. Only one of the six Rural exchanges, Tipanuk, has access to Syringa's fiber ring, whereas, the other LECs using Syringa's LNP service already had access to Syringa's fiber ring. Therefore, Rural would need to secure new transport from other ILECs to even access Syringa's network. As discussed in the Section II, the cost of such transport is prohibitive.

Each of these technical issues makes Syringa's service a non-viable LNP option for Rural, both in the short-term and in the long-term. Accordingly, Rural renews its request that it be granted a suspension of the LNP requirements until such time as Rural upgrades its own network for LNP and SS7 capability. For the Tipanuk exchange (the only one that has received actual interest in LNP from wireless carriers), Rural is already in the process of making such upgrades.

II. Syringa's LNP Solution Is Cost Prohibitive.

Ignoring the technical problems for the moment, it would be very costly from a routing perspective for Rural to use Syringa's LNP solution, primarily because many of Rural's exchanges are non-contiguous and don't currently have access to Syringa's fiber

ring. Attached are estimates of the monthly transport costs that Rural anticipates it would incur in order to set up the proper trunking between its exchanges and Syringa's switch. The total projected costs of transport for the LNP functionality alone would be approximately $9,109 per month, which allocated to Rural's 700 customers, works out to be $13.01 per line per month for the transport component alone. If new routing is required to handle EAS traffic as discussed in Section I, the transport costs could be higher than assumed in the attached document. Thirteen or more dollars per month is an excessive burden for customers to bear for a short-term, incomplete solution and for a service for which there is extremely low demand, as discussed in Section III.

Rural would also incur a number of other costs to deploy LNP. Specifically, Syringa would charge Rural $1,000 annually for the service plus $100 per ported number. In addition, Rural anticipates incurring a $1,000 non-recurring fee from NeuStar, approximately $2,500 in recurring fees from an LNP service order administrator (SOA) to ensure numbers are properly routed, $3,000 in employee education, and about $2,500 in legal fees associated with ensuring regulatory compliance and for negotiation of service level agreements with wireless carriers. Further, Rural anticipates it would incur about $10,000 in up-front engineering fees given the complexities associated with the routing arrangements that would need to occur. Finally, there is likely to be some transiting costs associated with sending ported calls through Qwest's tandem to wireless carriers, but Rural currently does not know the full extent of these costs.

III. The Demand For Intermodal LNP is Extremely Low.

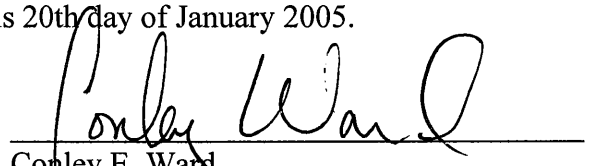
What further exacerbates the negative results of a cost-benefit analysis of deploying LNP, is that it is Rural's understanding that the level of demand for intermodal

LNP has been very low. The telecom consulting firm Rural uses, GVNW Consulting, is also an LNP SOA. As an LNP SOA, GVNW essentially handles all porting activities on behalf of the 41 rural LECs to which it provides services, such as submitting the proper data to NeuStar and coordinating with the wireless carriers to ensure that the number is ported properly. As of January 14, 2005, the 41 rural LECs for which GVNW provides LNP SOA services have ported a combined total of 195 numbers out of their approximately 303,783 access lines. That works out to a porting percentage of 0.06419%. Of those 41 companies, 4 are located in Idaho. None of the four Idaho companies have ported any numbers since they've been LNP capable. Given the low industry demand for intermodal LNP, the non-existent demand for intermodal LNP in Idaho to date, and the lack of demand for LNP in Rural's area, Rural believes it is very reasonable for the Commission to grant the LNP suspension as requested, especially when the Commission considers the technical limitations and the high costs of Syringa's service for Rural.

V. Conclusion.

For the foregoing reasons, Rural respectfully requests that the Commission grant Rural's request for an extension of its current temporary suspension of intermodal number portability responsibilities.

RESPECTFULLY SUBMITTED this 20th day of January 2005.



Conley E. Ward
GIVENS PURSLEY LLP
Attorneys for Rural Telephone Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of January 2005, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Jean Jewell, Secretary Idaho Public Utilities Commission 472 W. Washington Street P.O. Box 83720 Boise, ID 83720-0074	_____ U.S. Mail __X__ Hand Delivered _____ Overnight Mail _____ Facsimile

Conley E. Ward

Rural Telephone-Idaho (RTC-ID)
Projected LNP Transport Costs To Syringa Tandem
(Monthly DS-1 circuit costs for each RTC exchange to Syringa Tandem)

	RTC-ID Exchanges	Airlines Miles to Syringa Tandem	Monthly Recurring Transport Costs (One DS-1 Circuit) DS-1 Rate: Transport	DS-1 Rate: Entrance Facility	Total DS-1 Recurring
1)	**Tipanuk to Boise(Syringa Tandem)*** **	30			
	Qwest BP (82%)	24.6	$464.96 *	$125.00 *	$589.96
2)	**Atlanta to Boise(Syringa Tandem)**	57			
	Qwest BP (37%)	21.09	$414.48 *	$125.00 *	$539.48
3)	**Boise River to Boise(Syringa Tandem)**	47			
	Qwest BP (39%)	18.33	$374.80 *	$125.00 *	$499.80
4)	**Prairie to Boise(Syringa Tandem)**	32			
	Qwest BP (63%)	20.16	$401.11 *	$125.00 *	$526.11
5)	**Shoup to Boise(Syringa Tandem)**	166			
	Qwest BP (59%)	97.94	$1,604.00 *	$125.00 *	$1,729.00
	CenturyTel BP (40%)	66.4	$1,146.00 **	$2,404.00 **	$3,550.00
6)	**Three Creek to Boise (Syringa Tandem)**	115			
	Qwest BP (82%)	94.3	$1,549.22 *	$125.00 *	$1,674.22

Total Projected Transport Costs to Syringa Tandem (Monthly)	$9,108.56
RTC-ID Customer Lines	700
RTC-ID Projected Transport Costs Per Line (Monthly)	**$13.01**

* Priced from Qwest Access Service Catalog - Direct Trunk Transport Rates
** Priced from CenturyTel of Idaho Access Service Tariff (IPUC-12) - Special Access Rates
***Syringa quote for this circuit route not yet received