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March 6, 2009

*Via Hand Delivery*

Jean Jewell  
Idaho Public Utilities Commission  
472 W. Washington  
P.O. Box 83720  
Boise, ID 83720-0074

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2009 MAR -6 PM 4:52  
IDAHO PUBLIC UTILITIES COMMISSION

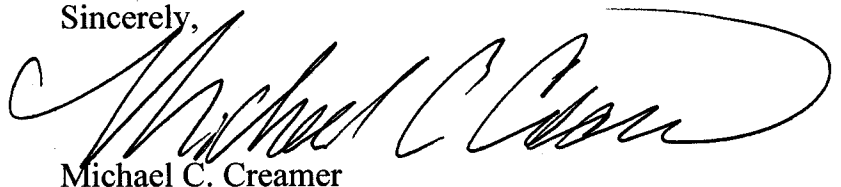
Re: *In the Matter of the Petition Regarding the Quality of Local Telephone Service in and to the Pearl, Idaho Area*  
Case No.: GNR-T-08-04  
Our File No. 1255-37

Dear Jean:

Enclosed for filing are an original and seven (7) copies of *Comments of Albion Telephone Company RE Communication Services to Existing and Future Residents*, in connection with the above-captioned matter.

If you have any questions, please call me.

Sincerely,



Michael C. Creamer

MCC:tma  
Enclosure

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ORIGINAL

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*Attorneys for Plaintiff Albion Telephone Company*

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2009 MAR -6 PM 4: 52

IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION  
REGARDING THE QUALITY OF LOCAL  
TELEPHONE SERVICE IN AND TO THE  
PEARL, IDAHO AREA

Case No.: GNR-T-08-04

**COMMENTS OF ALBION  
TELEPHONE COMPANY  
RE: COMMUNICATION  
SERVICES TO EXISTING AND  
FUTURE RESIDENTS**

Albion Telephone Company (“Albion” or “Company”), by and through its attorneys Givens Pursley LLP, files the Comments in the above-captioned matter. These comments include the attached correspondence from the Company to the Commission summarizing its preliminary estimate of costs to provide service to the community of Pearl, Idaho and supporting work papers.

**DISCUSSION**

As summarized in its letter to the Commission, the Company’s initial involvement with the Pearl Community was in an advisory role to Mr. Larry Cromwell, who was exploring the opportunity to provide internet and voice services to Pearl residents. The Company is not actively seeking to serve Pearl, but would be willing to provide service to the Pearl Exchange

were to be included in the Company's certificated service area, or the Company otherwise were deemed to be the incumbent carrier in the exchange. Unless the Company qualifies for universal service funds, neither the Company nor Pearl residents would be able to afford the costs to extend service to the area—costs, which the accompanying spreadsheets indicate would be high.

Based on preliminary estimates and the assumptions and qualifications described in the accompanying materials, the Company estimates that its additional revenue requirement that would need to be satisfied through increased draws from the state USF and interstate pool would be approximately \$60,000 from each. Interim supplemental State USF support may be required to bridge the time that may pass, if any, before interstate support becomes available. Given the extensive up-front investments being made, the Company would also want the benefits of available exemptions from, and suspensions of, the requirements of the 1996 Telecom Act afforded by Section 251(f).

DATED this 6<sup>th</sup> day of March, 2008.

Respectfully submitted,

GIVENS PURSLEY LLP

By



Michael C. Creamer

I HEREBY CERTIFY that on this 6<sup>th</sup> of March, 2009, the foregoing was filed,

served, or copied as follows:

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Michael C. Creamer



**ATC COMMUNICATIONS**

225 West North Street • P.O. Box 98 • Albion, Idaho 83311  
Telephone: (208) 673-5335 • Fax: (208) 673-6200 e-mail: atc@albiontel.com

February 27, 2009

Idaho Public Utilities Commission  
Grace Seaman  
P.O. Box 83720  
Boise, ID 83720-0074

RE: GNR-T-08-4

ATC Communications has been asked to submit a report outlining estimated costs and time involved to establish phone service for the residents of Pearl, Idaho.

As stated in our meeting of February 4<sup>th</sup>, ATC is not actively pursuing acquisition of this property. Our company became involved when contacted by Larry Cromwell who was applying for a Broadband Grant from Rural Utilities Service. This grant would have enabled Mr. Cromwell to provide internet and voice services to the residents of Pearl. Mr. Cromwell asked for our assistance in engineering and switching services. Our association with Mr. Cromwell ceased however, although the residents of Pearl asked ATC to continue to assist them in obtaining telephone service.

As we have consistently stated, ATC is unable to provide service to Pearl as a CLEC. We would be willing to provide service if our company would be granted ILEC status, this property would be included with our existing certificated territory and ATC obtained an exemption for the requirement of Sec. 251(c) of the 1996 Act.. Only if this happens will it be feasible for our company to invest in the Pearl community.

We have outlined the investment and expense we expect to incur if ATC is the service provider for Pearl.

Legal	State	\$25,000.00
	Federal	\$15,000.00
Consultants		\$10,000.00
Construction Attch. A		\$758,500.00
Annual Maintenance Contractor		\$45,000.00
Transport/Switching		\$5,000.00
Total		\$858,500.00



**ATC COMMUNICATIONS**

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Telephone: (208) 673-5335 • Fax: (208) 673-6200 e-mail: [atc@albiontel.com](mailto:atc@albiontel.com)

Based on our preliminary cost analysis, ATC would require additional support of approximately \$60,000 from both the Idaho USF and Interstate fund.

We also have attached an estimated timeline we see in completing the required tasks to provide service.

A Pearl resident would be served by ATC using a Host-Remote configuration. The Host office would be in Boise and connected to the remote office in Pearl via trunks delivered over fiber optic cable. The Host office would be responsible for switching the Pearl voice traffic via local and long distance trunks (already established) with Qwest.

If served by ATC, a Pearl resident would have access to the latest in voice and broadband services.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Mike Dolezal".

Mike Dolezal  
General Manager

PRELIMINARY PEARL COST ESTIMATE 2/24/2009

Using ATC Construction Tariff

Construction Costs	QUANTITY	MATERIAL	Total Material	LABOR	Total Labor	Total Costs
Fiber 48/60	114,009	0.68	\$77,526.12			\$77,526.12
Fiber Drop	7,500	0.70	\$5,250.00	0.70	\$5,250.00	\$10,500.00
Plowcon 1 1/4"	114,009	0.50	\$57,004.50	1.60	\$182,414.40	\$239,418.90
Interduct	9,500	0.50	\$4,750.00	1.60	\$15,200.00	\$19,950.00
Handholes/Placing	6	600.00	\$3,600.00			\$3,600.00
Pedestals	40	150.00	\$6,000.00			\$6,000.00
Splicing/per splice/Trays	40	70.00	\$2,800.00			\$2,800.00
Signage/Tape	80	40.00	\$3,200.00	7.25	\$580.00	\$3,780.00
Pull Fiber In/Blow	102,672			0.70	\$71,870.40	\$71,870.40
ONT Installation	32			300.00	\$9,600.00	\$9,600.00
Engineering Costs/Permits					\$10,000.00	\$10,000.00
Contingency						\$8,500.00
<b>Total Outside Plant Costs</b>			\$160,130.62		294,914.80	\$463,545.42
<b>Electronics/ONT/Transport</b>						
Electronics/ONT-32/GigE						\$37,985.75
Common Control						\$6,987.48
Third Party Equipment						\$4,968.15
<b>Total Electronics/Customer End</b>						\$49,941.38
<b>Telco Hut</b>						
Hut/Permit/Grnd Prep/Freight			\$30,000.00			\$30,000.00
Power Install/Electrician					\$6,000.00	\$6,000.00
Batteries/Generator/Pwr Dist			\$11,000.00		\$6,000.00	\$17,000.00
Fence			\$2,000.00		\$3,000.00	\$5,000.00
Training 2 Employees					\$6,000.00	\$6,000.00
Land/Lease Costs			\$10,000.00			\$10,000.00
<b>Total Hut Costs</b>						\$74,000.00
<b>TOTAL PROJECT COSTS</b>						\$587,486.80
<b>ATC Portion</b>	32000	\$5.15				\$164,800.00
<b>Aid in Construction</b>						\$422,686.80
<b>OPTIONS</b>						
Additional Duct	114,009	0.50	\$57,004.50	1.00	\$114,009.00	\$171,013.50
<b>ATC Portion</b>	32000	\$1.50				\$48,000.00
<b>Aid in Construction</b>						\$123,013.50
<b>TOTAL PROJECT COSTS W/OPTION</b>						\$758,500.30
<b>Aid in Construction w/option</b>						\$545,700.30

