

**Exhibit No.:**

**Issue:** *Application for Designation as an Eligible  
Telecommunications Carrier*

**Witness:** *David L. Jones*

**Type of Exhibit:** *Amended Surrebuttal Testimony*

**Sponsoring Party:** *Missouri RSA No. 7 Limited Partnership  
d/b/a Mid-Missouri Cellular*

**Case No.:** *TO-2003-0531*

**Date Testimony Prepared:** *January 14, 2004*

**MISSOURI RSA No. 7 LIMITED PARTNERSHIP**

**d/b/a**

**MID-MISSOURI CELLULAR**

**AMENDED SURREBUTTAL TESTIMONY**

**OF**

**DAVID L. JONES**

**CASE No. TO-2003-0531**

**Exhibit No.** 3  
**Case No(s).** TO-2003-0531  
**Date** 1-28-04 **Rptr** TWC

**AMENDED SURREBUTTAL TESTIMONY**  
**OF**  
**DAVID L. JONES**  
**APPLICATION OF MISSOURI RSA No. 7 LIMITED PARTNERSHIP**  
**d/b/a MID-MISSOURI CELLULAR**  
**CASE NO. TO-2003-0531**

Q. Please state your name and current business address.

A. David L. Jones

Air Direct, LLC

3850 FM 2648

Powderly, Texas 75473

Q. What is your current position with Mid-Missouri Cellular ("MMC")?

A. I am a member of the Board of Directors of Mid-Missouri Cellular, Inc., the general partner of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular.

Q. During the period from August of 1993 through and including January of 1995, in what capacity were you employed by MMC?

A. I was President of MMC. During that period, I was also Executive Vice President of Mid-Missouri Telephone Company.

Q. Have you reviewed the Rebuttal Testimony of: Adam McKinnie on behalf of the Telecommunications Department Staff ("Staff") of the Missouri Public Service Commission; Robert C. Schoonmaker on behalf of Alma Telephone Company and Citizens Telephone Company; and Arthur P. Martinez on behalf of Spectra Communications Group, LLC d/b/a CenturyTel and CenturyTel of Missouri, LLC in this proceeding?

A. Yes, I have.

1 Q. How will you refer to the three rebuttal testimonies in your instant surrebuttal  
2 testimony?

3 A. I will refer to them as: (a) the McKinnie Rebuttal (on behalf of Commission  
4 Staff); (b) the Schoonmaker Rebuttal (on behalf of Alma and Citizens); and (c) the Martinez  
5 Rebuttal (on behalf of CenturyTel).

6 Q. What general conclusions were reached by the rebuttal witnesses?

7 A. Mr. McKinnie implies that there is no basis for finding that the grant of ETC  
8 status to MMC would serve the public interest. Moreover, all of the rebuttal witnesses assert that  
9 granting ETC status to wireless carriers like MMC could jeopardize the USF.

10 Q. Why do you believe that designating MMC an ETC in the area proposed in its  
11 application will serve the public interest?

12 A. Based on my experience with both MMC and its wireline affiliate, Mid-Missouri  
13 Telephone Company ("MMTC"), I believe that wireless carriers are able to assist ILECs in  
14 fulfilling their commitments as carriers of last resort at substantially reduced costs and in a much  
15 shorter time interval than otherwise would be incurred and required by the ILEC. This view  
16 reflects an incident in which the Staff allowed MMTC to use MMC's wireless service to provide  
17 basic exchange service in an isolated portion of an MMTC exchange. For MMTC to extend its  
18 wireline plant to this location would have been an extremely costly and time consuming  
19 undertaking.

20 Q. Can you provide more specific information?

21 A. Some time between August 1993 and January 1995, MMTC received a request  
22 for basic exchange telephone service from Jeff and Michelle Nebergal. The Nebergals' home  
23 was located in a remote area not then served by MMTC. MMTC estimated that it would cost  
24 tens of thousands of dollars to run the single phone line out to that remote location using wireline  
25 technology. Accordingly, MMTC sought Staff concurrence that MMTC could meet its carrier of  
26 last resort obligations by purchasing fixed wireless service from MMC and reselling that service

1 to the Nebergals at MMTC's rate for standard LEC service. By doing so, MMTC's cost basis for  
2 providing that service would merely be the difference between the price of the wireless service  
3 and the cost of basic LEC service as opposed to the cost of constructing the requisite landline  
4 circuit. Staff accompanied me to the Nebergals' home and agreed that the public interest would  
5 best be served by allowing the use of wireless facilities to meet MMTC's carrier of last resort  
6 obligations in this instance.

7 Q. Was there any written record of this matter?

8 A. To the best of my recollection, I believe that, sometime between August 1993 and  
9 January 1995, the Staff, by or at the direction of Ms. Linda Gardner, former Manager of the  
10 Commission's telecommunications department, issued a letter to MMTC authorizing use of  
11 MMC wireless service in response to the Nebergal request. MMC issued a data request to the  
12 Staff for a copy of this correspondence. Unfortunately, as of the date of this testimony, both  
13 Staff's and my efforts to locate the correspondence have been unsuccessful.

14 Q. Does that conclude your surrebuttal testimony?

15 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

In the Matter of the Application of	)	
Missouri RSA No. 7 Limited Partnership	)	
d/b/a Mid-Missouri Cellular	)	
For Designation as a Telecommunications	)	Case No. TO-2003-0531
Company Carrier Eligible for Federal	)	
Universal Service Support pursuant to § 254 of	)	
the Telecommunications Act of 1996	)	
	)	

**AFFIDAVIT OF DAVID L. JONES**

CITY OF PARIS	)	
	)	ss.
DISTRICT OF LAMAR	)	

David L. Jones, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Amended Surrebuttal Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing Amended Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.

/s/ David L. Jones  
David L. Jones  
Director, Mid-Missouri Cellular, Inc.

Subscribed and sworn to before me this \_\_\_\_ day of January 2004.

/s/  
Notary Public