

Exhibit No.:
Issue: *Application for Designation as an Eligible
Telecommunications Carrier*
Witness: *David L. Jones*
Sponsoring Party: *Missouri RSA No. 7 Limited Partnership
d/b/a Mid-Missouri Cellular*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *TO-2003-0531*
Date Testimony Prepared: *January 14, 2004*

MISSOURI RSA NO. 7 LIMITED PARTNERSHIP

d/b/a

MID-MISSOURI CELLULAR

SURREBUTTAL TESTIMONY

OF

DAVID L. JONES

CASE NO. TO-2003-0531

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SURREBUTTAL TESTIMONY

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OF

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DAVID L. JONES

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**APPLICATION OF MISSOURI RSA NO. 7 LIMITED
PARTNERSHIP d/b/a MID-MISSOURI CELLULAR**

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CASE NO. TO-2003-0531

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Q. Please state your name and current business address.

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A. David L. Jones

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Air Direct, LLC

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3850 FM 2648

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Powderly Texas 75473

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

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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.

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

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

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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?

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1 A. Yes I have.

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

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

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

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

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

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

21 Q. Can you provide more specific information?

22 A. Some time between August 1993 and January 1995, MMTC received a request
23 for basic exchange telephone service from Jeff and Michelle Nebergal. The Nebergals’

1 home was located in a remote area not then served by MMTC. MMTC estimated that it
2 would cost tens of thousands of dollars to run the single phone line out to that remote
3 location using wireline technology. Accordingly, MMTC sought Staff concurrence that
4 MMTC could meet its carrier of last resort obligations by purchasing fixed wireless
5 service from MMC and reselling that service to the Nebergals at MMTC's rate for
6 standard LEC service. By doing so, MMTC's cost basis for providing that service would
7 merely be the difference between the price of the wireless service and the cost of basic
8 LEC service as opposed to the cost of constructing the requisite landline circuit. Staff
9 accompanied me to the Nebergals' home and agreed that the public interest would best be
10 served by allowing the use of wireless facilities to meet MMTC's carrier of last resort
11 obligations in this instance.

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

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

20 Q. Does that conclude your surrebuttal testimony?

21 A. Yes it does.

