

Exhibit No.:

Issue: Application for Designation as an Eligible
Telecommunications Carrier

Witness: Roger Bundridge

Sponsoring Party: Northwest Missouri Cellular Limited
Partnership

Type of Exhibit: Supplemental Direct Testimony

Case No.: TO-2005-0466

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**NORTHWEST MISSOURI CELLULAR
LIMITED PARTNERSHIP**

SUPPLEMENTAL DIRECT TESTIMONY

OF

ROGER BUNDRIDGE

CASE NO. TO-2005-0466

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1 **SUPPLEMENTAL DIRECT TESTIMONY**

2 **OF**

3 **ROGER BUNDRIDGE**

4 **APPLICATION OF NORTHWEST MISSOURI CELLULAR**

5 **LIMITED PARTNERSHIP**

6 **CASE NO. TO-2005-0466**

7 **Q. Please state your name and business address.**

8 A. Roger Bundridge, 1114-A South Main Street, Maryville, Missouri 64468.

9 **Q. By whom are you employed and in what capacity?**

10 A. Since September, 2001, I have been the General Manager of Northwest Missouri
11 Cellular Limited Partnership ("NWMC").

12 **Q. Please describe your education.**

13 A. I have a Bachelor of Science degree in Biopsychology from Northwest Missouri State
14 University as well as an Associates degree in Mortuary Science from Kansas City
15 Kansas Community College. I also attended the DeVry Technical Institute in Kansas
16 City.

17 **Q. Prior to becoming General Manager of NWMC, for whom did you work and in
18 what capacity?**

19 A. I was the Account Manager and District Manager for Pepsi Cola General Bottlers
20 from 1994-2001.

21 **Q. Have you provided testimony in previous portions of this proceeding?**

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1 A. Yes. I previously provided direct testimony with regard to NWMC's Application For
2 Designation As An Eligible Telecommunications Carrier for Purposes of Receiving
3 Federal Universal Service Support Pursuant to Section 214(e)(2) Of The
4 Telecommunications Act Of 1996 ("Application") in this docket.

5 **Q. What is the purpose of your testimony in this proceeding?**

6 A. My testimony will support and expand upon certain statements and factual
7 representations in NWMC's Application For Designation As An Eligible
8 Telecommunications Carrier for Purposes of Receiving Federal Universal Service
9 Support Pursuant to Section 214(e)(2) Of The Telecommunications Act Of 1996
10 ("Application") in this docket. Specifically, my testimony will address the
11 requirements identified in the Missouri Public Service Commission's pending Order
12 of Rulemaking for rule 4 CSR 240-3.570 that was adopted after NWMC's application
13 was submitted.

14 **Q. Are you familiar with the Missouri Public Service Commission's pending Order**
15 **of Rulemaking for rule 4 CSR 240-3.570?**

16 A. Yes, I have reviewed the pending Order, and based on the requirements I am
17 responding to each Section.

18 **Q. Will NWMC Comply with 2.A.1 - Each request for ETC designation shall**
19 **include: Intended use of the high-cost support, including detailed descriptions of**
20 **any construction plans with start and end dates, populations affected by**
21 **construction plans, existing tower site locations for CMRS cell towers, and**
22 **estimated budget amounts?**

23 A. Please see Highly Confidential Appendix M, attached hereto.

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- 1 **Q. Will NWMC Comply with 2.A.2 - Each request for ETC designation shall**
2 **include: A two (2)-year plan demonstrating, with specificity, that high-cost**
3 **universal service support shall only be used for the provision, maintenance and**
4 **upgrading of facilities and services for which the support is intended in the**
5 **Missouri service area in which ETC designation was granted?**
- 6 A. NWMC agrees to use the high-cost universal support it receives specifically for the
7 provision, maintenance and upgrading of facilities and services for which the support
8 is intended in the Missouri service area in which ETC designation is granted as
9 depicted in Highly Confidential Appendix M, attached hereto.
- 10 **Q. Will NWMC Comply with 2.A.3.A - The two (2)-year plan shall include a**
11 **demonstration that universal service support shall be used to improve coverage,**
12 **service quality or capacity on a wire center-by-wire center basis throughout the**
13 **Missouri service area for which the requesting carrier seeks ETC designation**
14 **including:**
- 15 **A. A detailed map of coverage area before and after improvements and in**
16 **the case of CMRS providers, a map identifying existing tower site locations for**
17 **CMRS cell towers?**
- 18 A. A map showing the coverage before improvements was provided in the Supplemental
19 Direct Testimony of Jonathan Reeves and was labeled as Appendix L. A map
20 showing the coverage area after the improvements was submitted in the application
21 and discussed in the prefiled direct testimony of Jonathan Reeves and was labeled
22 Appendix H.

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1 **Q. Will NWMC Comply with 2.A.3.B - The specific geographic areas where**
2 **improvements will be made?**

3 A. This information was provided in prefiled Direct Testimony of Jonathan Reeves as
4 Appendix F (Revised) and Appendix G (Revised).

5 **Q. Will NWMC Comply with 2.A.3.C - The projected start date and completion**
6 **date for each improvement?**

7 A. This information is provided in Highly Confidential Appendix M, attached hereto.

8 **Q. Will NWMC Comply with 2.A.3.D - The estimated amount of investment for**
9 **each project that is funded by high-cost support?**

10 A. This information is provided in Highly Confidential Appendix M, attached hereto.

11 **Q. Will NWMC Comply with 2.A.3.E - The estimated population that will be served**
12 **as a result of the improvements?**

13 A. This information was provided in Jonathon Reeves' Direct Testimony in Appendix E
14 (Revised).

15 **Q. Will NWMC Comply with 2.A.3.F - If an applicant believes that service**
16 **improvements in a particular wire center are not needed, it must explain its**
17 **basis for this determination and demonstrate how funding will otherwise be used**
18 **to further the provision of supported services in that area?**

19 A. At this time, there are no wire centers that have been determined not to need
20 improvement. While there are a few wire centers that do not have improved coverage
21 proposed through the addition of a new cell site, these wire centers are expected to
22 receive improvements through the proposed capacity increases identified.

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1 Additionally, after the initial 5-year time frame, and with the addition of more capital
2 these wire centers are also expected to receive improvements.

3 **Q. Will NWMC Comply with 2.A.3.G - A statement as to how the proposed plans**
4 **would not otherwise occur absent the receipt of high-cost support and that such**
5 **support will be used in addition to any expenses the ETC would normally incur?**

6 A. As I stated in my Direct Testimony, NWMC expanded its service area, each
7 additional cell site was designed to provide service to an area of lower population
8 density and traffic; areas that are higher in cost to serve. Accordingly, the expected
9 return on investment on any such cell sites is longer with each additional expansion
10 cell. There are areas within the proposed ETC service area where NWMC cannot
11 expect to be able to recover the cost of construction and operation of an additional
12 cell sites without USF support. These potential cell sites could only be constructed if
13 USF support is made available to NWMC.

14 **Q. Will NWMC Comply with 2.A.4 - A demonstration of the carrier's ability to**
15 **remain functional in emergency situations, including a demonstration that the**
16 **carrier has a reasonable amount of back-up power to ensure functionality**
17 **without an external power source, is able to reroute traffic around damaged**
18 **facilities and is capable of managing traffic spikes resulting from emergency**
19 **situations?**

20 A. As I stated in my Direct Testimony, the switches that serve the NWMC network are
21 fully redundant, have their own battery back-up plants and are further backed-up with
22 an emergency generator. The NWMC cell sites are also redundant and equipped with
23 battery back-up plants capable of operating the cell site under full load for more than

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1 six hours. NWMC has three portable generators which are kept in-place at three of
2 the NWMC cell sites (Maryville, Oregon, and Rock Port). These generators can be
3 moved to any of the remaining cell sites, which are all equipped with receptacles and
4 manual transfer switches. This enables NWMC to take a portable generator to any
5 cell site that experiences an extended power failure and literally "plug-in" a backup
6 generator to recharge the battery plants. The switching infrastructure is configured in
7 a manner to allow traffic to automatically reroute around damaged facilities should a
8 particular link to the PSTN be interrupted. Because of the nature of emergency
9 situation traffic spikes, it's impossible to specifically size and configure the wireless
10 network to handle the emergency load in advance. However, the normal operation of
11 the switch allows for significant additional overhead traffic above and beyond
12 "normal" use. Additionally, the nature of the CDMA technology allows the cell sites
13 to operate under heavier loads than designed at the trade-off of overall footprint and
14 quality.

15 **Q. Will NWMC Comply with 2.A.5 - A demonstration that the commission's grant**
16 **of the applicant's request for ETC designation would be consistent with the**
17 **public interest, convenience and necessity?**

18 A. As I stated in my Direct Testimony, NWMC has brought wireless service to
19 many rural parts of its FCC-licensed service area and offers a level of coverage better
20 than its competitors in the market. As extensive as NWMC's coverage is in this
21 market, there are still significant portions of its FCC-licensed service area that would
22 greatly benefit from enhanced CDMA coverage. These represent some of the most
23 rural portions of its licensed market. Perhaps even more important than the general

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1 availability of enhanced wireless services, the expansion of NWMC's service into
2 these most rural areas would bring wireless E911 services to those areas. While the
3 ILECs have done an outstanding job of bringing 911 and E911 to many rural
4 communities, access to those lifesaving services is limited to the ability of the person
5 in need to reach a wired telephone. In sharp contrast, wireless communication brings
6 the emergency access to the individual. The farmer with a CMRS phone who is
7 injured in the field no longer needs to be able to reach a wired telephone to summon
8 help. Wireless access to emergency services can help to mitigate the unique risks of
9 geographic isolation associated with living in rural communities. Where the local
10 PSAP is capable of processing the data, the NWMC network is capable of providing
11 locational information for CDMA automatic location identification ("ALI")-capable
12 handsets for all calls placed to 911. However, only the CDMA handsets are capable
13 of providing this critical locational information and then, and then only when
14 operating in a CDMA coverage area.

15 Significantly, wireless E911 service is not limited to NWMC subscribers.
16 NWMC's wireless E911 service is available to any compatible handset in NWMC's
17 coverage area, whether or not the user is a NWMC customer, the customer of a
18 competitor or not even a customer of any service provider. The NWMC network
19 routes all 911 calls regardless of the status of the caller. This is even true for a
20 customer whose wireless phone service has been disconnected. If the caller's handset
21 is not ALI-capable, NWMC still routes the call to the emergency personnel and
22 provides information with respect to the cell site location from where the call

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1 originated and, except with respect to a non-activated cell phone, such a phone that is
2 sold for placing 911 calls only, a call back number.

3 **Q. Will NWMC Comply with 2.A.6 - A commitment to advertise the availability of**
4 **services and charges therefore using media of general distribution throughout**
5 **the ETC service area?**

6 A. This current advertising distribution is provided in Appendix N, attached hereto.
7 NWMC commits to continue the same form of distribution to publicize the
8 availability of its services.

9 **Q. Will NWMC Comply with 2.A.7 - A commitment to provide Lifeline and Link**
10 **Up discounts consistent with 47 CFR 54.401 and 47 CFR 54.411. Each request**
11 **for ETC designation shall include a commitment to publicize the availability of**
12 **Lifeline service in a manner reasonably designed to reach those likely to qualify**
13 **for the service consistent with 47 CFR 54.405?**

14 A. NWMC will utilize the same advertising distribution channels as it does today, with
15 the addition of distributing literature in areas that would reach those likely to qualify
16 the greatest: unemployment offices, welfare offices, etc. NWMC will also notify the
17 Office of Public Counsel and the Public Service Commission of all new or changed
18 plans and discounts available.

19 **Q. Will NWMC Comply with 2.A.8 - A statement that the carrier will satisfy**
20 **consumer privacy protection standards as provided in 47 CFR 64 Subpart U and**
21 **service quality standards as applicable?**

22 A. NWMC is not subject to the same quality of service standards that this Commission
23 has established for traditional LECs. Those standards were developed to address

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1 quality of service issues related to the provision of traditional LEC service. For
2 example, in a “wired” environment, dropped calls are not expected to occur since the
3 connection between the subscriber’s telephone and the LEC central office is a
4 physical piece of wire. The subscriber remains in a stationary fixed location for the
5 entire duration of the telephone call. In sharp contrast, wireless services are designed
6 to offer mobility to the subscriber even during a telephone call and even when they
7 are traveling at 50-60 miles an hour along an interstate highway during the call. To
8 accomplish this, rather than using fixed wires to make the phone call, the wireless call
9 is accomplished by use of radio waves propagating through the environment.
10 Changes in environmental conditions effect radio wave propagation. The same
11 quality of service standards related to a service offering where dropped calls are not
12 expected to occur cannot be applied to a wireless environment.

13 In addition, unlike traditional wired networks that provide service only to
14 dedicated subscriber lines that are tied to a dedicated local loop, the wireless network
15 not only provides service to its subscribers from wherever they may be at the time of
16 any particular call, but are also designed to provide service to non-subscribers as they
17 “roam” through the wireless service area. As a result, mobility creates different
18 conditions and different customer care needs.

19 Traditional telephone quality of service requirements were required to protect
20 the consumer in an environment where the service provider has traditionally been a
21 monopoly. A customer receiving inadequate service, especially in rural areas, has
22 traditionally had no alternative service provider. The lack of competition creates an
23 environment where quality of service is appropriately regulated. In contrast, the

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1 wireless service environment is not licensed as a monopoly. If one service provider
2 offers inferior service, the customer often has the ability to switch their service
3 provider. As I stated in my Direct Testimony, NWMC affords its customers a trial
4 period in which they can effectively "test drive" the NWMC network. If a customer
5 is not satisfied with the service they actually receive from NWMC, they can cancel
6 their contract, without penalty, during the trial period. The advent of local number
7 portability allows the customer to even keep their telephone number as they move
8 from one provider to another, even if the contract is cancelled during the trial period,
9 subject of course to the availability of wireline to wireless local number portability.

10 **Q. Will NWMC Comply with 2.A.9 - A statement that the requesting carrier**
11 **acknowledges it shall provide equal access pursuant to 4 CSR 240-32.100(3) and**
12 **(4) if all other ETCs in that service area relinquish their designations pursuant**
13 **to section 214(e) of the Telecommunications Act of 1996?**

14 A. NWMC would commit to offer any customer the option to pre-select and pay its toll
15 carrier of choice for any and all toll calls placed by the customer on the NWMC
16 network in any area where the underlying LEC relinquishes its ETC designation.

17 **Q. Will NWMC Comply with 2.A.10 - A commitment to offer a local usage plan**
18 **comparable to those offered by the incumbent local exchange carrier in the areas**
19 **for which the carrier seeks designation. Such commitment shall include a**
20 **commitment to provide Lifeline and Link Up discounts and Missouri Universal**
21 **Service Fund (MoUSF) discounts pursuant to Chapter 4 CSR 240-31, if**
22 **applicable, at rates, terms and conditions comparable to the Lifeline and Link**

1 **Up offerings and MoUSF offerings of the incumbent local exchange carrier**
2 **providing service in the ETC service area?**

3 A. As I stated in my Direct Testimony, the local calling area that NWMC will offer to
4 subscribers will equal or exceed in size the calling area offered by the local LECs,
5 which will reduce intra-LATA toll charges associated with the service offered by
6 these wireline carriers. Customers of these LECs placing calls to destinations beyond
7 their local calling areas incur toll charges, while NWMC customers making similar
8 calls within NWMC's service area will avoid such charges. In addition, many of
9 NWMC's calling plans include bundles of minutes which can be used for placing
10 calls, whether local or domestic toll, without the caller incurring any additional per
11 minute charges or toll charges. NWMC's plans also offer mobility including, in most
12 cases roaming in other markets. Finally, NWMC will make available multiple local
13 usage plans that prospective customers can select from as part of its universal service
14 offering.

15 The proposed NWMC Lifeline rates would be comparable to those offered by
16 the ILECs. In addition, the NWMC Lifeline rates include vertical features not
17 included in the ILEC Lifeline rate. In my prefiled Direct Testimony, Appendix K
18 includes a table comparing several of the ILEC Lifeline rates (based upon their
19 tariffs) to the proposed NWMC Lifeline rates.

20 NWMC will offer discounts of 50% off of the \$35 activation fee to Link Up
21 eligible subscribers. In addition, NWMC will offer Link Up eligible subscribers a
22 deferred schedule for payment of the charges assessed for commencing service, for
23 which the consumer will not pay interest. The interest charges not assessed to the

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1 consumer shall be for connection charges of up to \$200.00 that are deferred for a
2 period not to exceed one year. This deferred payment plan would include the reduced
3 activation fee as well as the cost of the subscriber handset.

4 **Q. Will NWMC Comply with 2.B - Each request for ETC designation by a CMRS**
5 **provider shall include a commitment to abide by the consumer code for wireless**
6 **service recognized by the Cellular Telecommunications and Internet Association**
7 **(CTIA) at the time of the ETC designation request. As part of the initial**
8 **application, a CMRS provider shall include a copy of the consumer code for**
9 **wireless service currently recognized by CTIA to which it commits to abide. Any**
10 **CMRS provider designated as an ETC shall file with the Commission, any**
11 **change(s) to the consumer code for wireless service included with its application**
12 **or any subsequent code approved under this section of the rule, within 30 days of**
13 **the change(s). The Commission shall allow interested parties 30 days to provide**
14 **comment as to whether the CMRS provider should be required to commit to the**
15 **proposed changes, or should continue to abide by the consumer code for wireless**
16 **service currently approved for that provider?**

17 **A.** As I stated in my Direct Testimony, NWMC has already adopted the CTIA Consumer
18 Code for Wireless Service. Under the CTIA Consumer Code, wireless carriers agree
19 to: (1) disclose rates and terms of service to customers; (2) make available maps
20 showing where service is generally available; (3) provide contract terms to customers
21 and confirm changes in service; (4) allow a trial period for new service; (5) provide
22 specific disclosures in advertising; (6) separately identify carrier charges from taxes
23 on billing statements; (7) provide customers the right to terminate service for changes

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1 to contract terms; (8) provide ready access to customer service; (9) promptly respond
2 to consumer inquiries and complaints received from government agencies; and
3 (10) abide by policies for protection of consumer privacy. A copy of the CTIA
4 Consumer Code was appended as Appendix L to my Direct Testimony. NWMC
5 commits to provide a copy of the consumer code to the Commission should there be
6 any changes.

7 **Q. Will NWMC Comply with 2.C - Each request for ETC designation shall include**
8 **a plan outlining the method for handling unusual construction or installation**
9 **charges?**

10 A. If a potential customer requests service within the area in which NWMC is designated
11 as an ETC, but where the existing service area does not immediately allow NWMC to
12 provide service, NWMC will take the following steps to provide service: (1) modify
13 or replace the requesting customer's equipment to provide service; (2) install a roof-
14 mounted antenna or other equipment to provide service; (3) adjust the nearest cell site
15 to provide service; (4) identify and make any other adjustments that can reasonably
16 be made to the network or customer facilities to provide service; and (5) determine
17 the feasibility of installing an additional cell site, cell extender, or repeater to provide
18 service where all other options fail. If, after following these steps, NWMC still
19 cannot provide the requested service, it will notify the requesting party and include
20 that information in an annual report filed with the Commission detailing how many
21 requests for service were unfulfilled for the past year.

1 **Q. Will NWMC Comply with 3.A - ETCs shall develop a bill design that can be**
2 **easily interpreted by their customers and clearly sets forth charges in**
3 **compliance with state and federal billing requirements?**

4 A. NWMC currently complies with all state and federal billing requirements.

5 **Q. Will NWMC Comply with 3.B - ETCs shall provide customer service contact**
6 **information online and on billing statements. This requirement also applies to**
7 **ETCs that use a third party billing agent?**

8 A. NWMC provides a local and 800 number customer contact on both its billing
9 statements and on its website, www.nwmc.com.

10 **Q. Will NWMC Comply with 3.C.1.A - I - Service Provisioning Commitment**
11 **1. ETC shall make available to each end-user subscribing to its supported**
12 **services within its ETC designated service area the following service features:**

13 **A. Dual tone multi-frequency signaling or its functional equivalent?**

14 A. NWMC currently uses out-of-band digital signaling and in-band multi-frequency
15 signaling that is functionally equivalent to DTMF signaling.

16 **Q. B. Single-party service or its functional equivalent?**

17 A. NWMC provides a dedicated message path for the length of all customer calls.

18 **Q. C. Access to emergency services?**

19 A. NWMC customers can reach an emergency dispatch, or public safety answering point
20 (“PSAP”), by dialing “911.” NWMC then routes the call to the appropriate PSAP.

21 **Q. D. Emergency telephone number services capable of automatic number**
22 **identification, automatic location identification and call routing facilities to**
23 **facilitate public safety response; e.g., Enhanced 911 Service, where the local**

1 **government agency serving the end-user has implemented enhanced 911**
2 **systems?**

3 A. Enhanced 911 (“E911”), which includes the capability of providing both automatic
4 numbering information (“ANI”) and automatic location information (“ALI”), is
5 required only if a public emergency service provider makes arrangements with the
6 local provider for delivery of such information. In the wireless context, provision of
7 location information is broken down into two phases; Phase I involves providing the
8 PSAP with the location of the cell from which the 911 call originated and Phase II
9 provides the location of the originating subscriber phone to within an FCC-specified
10 accuracy. NWMC’s network is capable of providing Phase I E911 services and
11 currently does so to the following PSAPs: Maryville Public Safety and Nodaway
12 County Sheriff’s Department and is working with these same PSAPs with respect to
13 implementation of Phase II E911 services. NWMC’s CDMA network is capable of
14 providing E911 Phase II service to Phase II compatible PSAPs for handsets that are
15 ALI-compatible.

16 **Q. E. Access to interexchange service?**

17 A. NWMC has direct interconnection to multiple access tandems for delivering traffic to
18 all offices subtending those tandems as well as direct interconnection to local
19 exchange carrier end offices where traffic levels so justify. In addition, NWMC
20 provides indirect access to one or more interexchange carriers (“IXC”), for access to
21 any other exchanges.

22 **Q. F. Access to telecommunications relay services by dialing 711?**

23 A. NWMC provides telecommunications relay services by dialing 711.

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1 **Q. G. Access to Directory Assistance service?**

2 A. NWMC provides all of its customers with access to information contained in
3 directory listings by dialing "411" or "555-1212".

4 **Q. H. Access to operator services?**

5 A. NWMC currently offers its subscribers access to operator services for the placement
6 and billing of telephone calls, including collect calls, calling card calls, credit card
7 calls, person-to-person calls, and third party calls, as well as obtaining related
8 information, throughout its proposed ETC service area.

9 **Q. I. Toll limitation and/or blocking for qualifying low-income consumers?**

10 A. NWMC does not currently offer Lifeline or Link Up services. However, the NWMC
11 network is capable of providing Toll Blocking services. Currently, NWMC provides
12 Toll Blocking services for international calls. NWMC will utilize the same Toll
13 Blocking technology to provide toll limitation for qualifying low-income customers,
14 at no charge, as part of its universal service offerings for Lifeline and Link Up
15 customers.

16 **Q. Will NWMC Comply with 3.C.2 - ETCs shall publicize the construction of all
17 new facilities that will enhance services in unserved or underserved areas so that
18 consumers are aware of the improved service in the area?**

19 A. This current advertising distribution is provided in Appendix N, attached hereto.
20 NWMC commits to continue the same form of distribution to publicize the
21 availability of its service in areas where service has been improved.

22 **Q. Will NWMC Comply with 3.C.3 - ETCs shall extend their networks to serve new
23 customers upon a reasonable request. ETCs shall take the following steps, as**

1 **applicable, to respond to all such reasonable requests for service within its ETC**
2 **service area?**

3 **A. If a request comes from a customer residing within the ETC service area**
4 **where the ETC already provides service, the ETC shall immediately provide**
5 **service using its standard customer equipment.**

6 **B. If a request comes from a customer residing within the ETC service area**
7 **where the ETC does not already provide service, the ETC shall take reasonable**
8 **steps to provide acceptable service at no cost to the customer, including:**
9 **modifying or replacing customer equipment; deploying a roof-mounted antenna**
10 **or other network equipment at the premises; making adjustments at the nearest**
11 **cell site or to other network or customer facilities; employing, leasing or**
12 **constructing an additional cell site, a cell-extender, repeater or other similar**
13 **equipment; or offering resold service of other carriers that have facilities**
14 **available to that premises.**

15 **C. Where special conditions or special requirements of the customer involve**
16 **unusual construction or installation costs, the customer may be required to pay a**
17 **reasonable portion of such costs in accordance with the plan outlining the**
18 **method for handling unusual construction or installation charges approved by**
19 **the commission at the time of designation as an ETC.**

20 **D. If there is no possibility of providing service to the requesting customer, the**
21 **ETC shall notify the customer and include such information in its annual**
22 **certification documentation to the Commission.**

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1 A. NWMC agrees to follow the above steps to respond to request for service, as stated
2 also in the foregoing response to the question regarding unusual construction or
3 installation.

4 **Q. Will NWMC Comply with 3.D - Within thirty (30) days of receiving ETC status,**
5 **each CMRS carrier designated as an ETC shall make an informational filing**
6 **with the commission consisting of a complete description of all of its service**
7 **offerings? Such informational filings will be amended as service offerings are**
8 **introduced or modified.**

9 A. NWMC agrees to provide to the Commission within 30 days of receiving ETC status,
10 then current information brochures on service plans offered. NWMC agrees to
11 update these as new plans or changes are introduced.

12 **Q. Will NWMC Comply with 3.E - ETCs shall maintain a record of customer**
13 **complaints that have been received by the company in a manner that includes, at**
14 **a minimum: the end-user name; the account number; a description of the**
15 **complaint; the date the complaint was filed; the resolution; and the amount of**
16 **refund or credit, if any. ETCs shall also maintain a record of complaints from**
17 **consumers in the Missouri service area in which ETC designation was granted**
18 **that have been submitted to or filed with the Federal Communications**
19 **Commission for which the company has knowledge in a manner that includes, at**
20 **a minimum: a description of the complaint; the date the complaint was filed; the**
21 **date the complaint was resolved; the resolution of the complaint and the amount**
22 **of refund or credit, if any?**

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1 A. NWMC agrees to maintain a record of customer complaints consisting of, at a
2 minimum: the end-user name; the account number; a description of the complaint; the
3 date the complaint was filed; the resolution; and the amount of refund or credit, if
4 any. NWMC will also maintain a record of complaints from consumers in the
5 Missouri service area in which ETC designation was granted that have been
6 submitted to or filed with the Federal Communications Commission for which the
7 company has knowledge in a manner that includes, at a minimum: a description of
8 the complaint; the date the complaint was filed; the date the complaint was resolved;
9 the resolution of the complaint and the amount of refund or credit, if any.

10 **Q. Will NWMC Comply with 3.F - ETCs shall, within ten (10) days of a change in**
11 **the company-designated contacts, either notify the manager of the**
12 **Telecommunications Department, in writing or by electronic mail, or shall**
13 **update the commission's electronic filing system (EFIS)?. The notification or**
14 **update shall include the name(s), address(es) and/or telephone number(s) of the**
15 **designated individual(s). The contact name(s) provided pursuant to this section**
16 **shall be the individual(s) primarily responsible for: customer service; repair and**
17 **maintenance; answering complaints; authorizing and/or furnishing refunds to**
18 **customers; and informational or tariff filing issues.**

19 A. NWMC agrees to supply the company-designated contacts as requested above.

20 **Q. Will NWMC Comply with 4.A - All ETCs, including incumbent local exchange**
21 **telecommunications carriers that receive federal high cost support, shall, by**
22 **August 15 of each year, submit an affidavit executed by an officer of the**
23 **Company attesting that federal high-cost support is used consistent with the**

1 **commission's rules and the Telecommunications Act of 1996? The affidavit will**
2 **be accompanied by documentation of support received and costs incurred. The**
3 **commission or its staff may request additional information regarding the annual**
4 **certification. Questions regarding the appropriate documentation for ETCs**
5 **should be directed to the Commission's Telecommunications Department.**

6 A. NWMC agrees to provide by August 15 of each year, an affidavit executed by an
7 officer of the Company attesting that federal high-cost support is used consistent with
8 the commission's rules and the Telecommunications Act of 1996. The affidavit will
9 be accompanied by documentation of support received and costs incurred.

10 **Q. Will NWMC Comply with 4.B - ETCs seeking certification by October 1 of each**
11 **year shall, no later than June 15 of each year, set up a meeting with the**
12 **Telecommunications Department Staff and the Office of the Public Counsel to**
13 **review and discuss the ETC's proposal for the two-year improvement plan? The**
14 **meeting shall include a discussion of the proposed plan and any changes to the**
15 **plan that would improve coverage, service quality or capacity in unserved or**
16 **underserved areas in the Missouri service area in which ETC designation was**
17 **granted.**

18 A. NWMC commits to setting up a meeting with the Commission prior to June 15th of
19 each year to review and discuss the 2-year plan in the designated ETC area.

20 **Q. Will NWMC Comply with 4.B.1 - A two (2)-year improvement plan shall include**
21 **progress updates on any previously submitted plan? The two (2)-year**
22 **improvement plan shall include, with specificity, proposed improvements or**
23 **upgrades to the carrier's network on a wire center-by-wire center basis**

1 **throughout its proposed designated service area and address all of the separate**
2 **components addressed in the initial plan, set forth in (2)(A)2. above.**

3 A. NWMC agrees to update on the previous 2-year plan in detail, including proposed
4 improvements or upgrades to the carrier's network on a wire center-by-wire center
5 basis throughout its proposed designated service area and address all of the separate
6 components addressed in the initial plan, set forth in (2)(A)2. above.

7 **Q. Will NWMC Comply with 4.B.2 - Reports on unfilled service requests and**
8 **customer complaints for the previous year and how the two (2)-year**
9 **improvement plan may address such requests and complaints?**

10 A. NWMC agrees to discuss the report in 3.E and in 3.C.3 as to how the 2-year
11 improvement plan may have addressed these requests and complaints.

12 **Q. Will NWMC Comply with 4.C - ETCs shall submit a demonstration that the**
13 **receipt of high-cost support was used only for the provision, maintenance and**
14 **upgrading of facilities and services for which the support is intended in the**
15 **Missouri service area in which ETC designation was granted?**

16 **A. For purposes of this section, "support is intended" is defined consistent with**
17 **the Telecommunications Act which outlines the following principles:**

18 **(I) Quality and rates – quality services should be available at just, reasonable,**
19 **and affordable rates.**

20 **(II) Access to advanced services – access to advanced telecommunications and**
21 **information services should be provided in all regions of the State.**

22 **(III) Access in rural and high cost areas – Consumers in all regions of**
23 **Missouri, including those in rural, insular and high cost areas will have access to**

1 **telecommunications and information services, including interexchange services**
2 **and advanced telecommunications and information services, that are reasonably**
3 **comparable to those services provided in urban areas and that are available at**
4 **rates that are reasonably comparable to rates charged for similar services in**
5 **urban areas.**

6 A. NWMC agrees to submit a demonstration that the receipt of high-cost support was
7 used only for the provision, maintenance and upgrading of facilities and services for
8 which the support is intended in the Missouri service area in which ETC designation
9 was granted, as stated above.

10 **Q. Will NWMC Comply with 4.D - ETC shall submit a demonstration that high-**
11 **cost support was used to improve coverage, service quality or capacity in the**
12 **Missouri service area in which ETC designation was granted and that such**
13 **support was used in addition to any expenses the ETC would normally incur?**

14 A. NWMC agrees to submit a demonstration that high-cost support was used to improve
15 coverage, service quality or capacity in the Missouri service area in which ETC
16 designation was granted and that such support was used in addition to any expenses
17 the ETC would normally incur.

18 **Q. Will NWMC Comply with 4.E - ETCs shall submit an affidavit signed by an**
19 **officer of the company certifying that the ETC continues to comply with the**
20 **approved consumer code for wireless service recognized by the Cellular**
21 **Telecommunications and Internet Association (CTIA) and/or applicable service**
22 **quality standards and consumer protection rules, certifying that the ETC**
23 **continues to be able to function in emergency situations, continues to offer a local**

1 usage plan comparable to that offered by the incumbent local exchange
2 telecommunications carrier in the relevant service areas (if applicable), and
3 continues to acknowledge that it shall provide equal access pursuant to 4 CSR
4 240-32.100(3) and (4) if all other ETCs in that service area relinquish their
5 designations pursuant to section 214(e)(3) of the Telecommunications Act of
6 1996?

7 A. NWMC agrees to provide an affidavit certifying the above information.

8 **Q. Will NWMC Comply with 4.F - ETCs shall submit a report of complaints from**
9 **consumers in the Missouri service area in which ETC designation was granted**
10 **that have been submitted to or filed with the Federal Communications**
11 **Commission in the previous twelve (12) months for which the company has**
12 **knowledge? Such report shall include, at a minimum: a description of the**
13 **complaint; the date the complaint was filed; the date the complaint was resolved;**
14 **the resolution of the complaint and the amount of refund or credit, if any. If the**
15 **Commission finds the ETC's resolution of complaints is not satisfactory or if a**
16 **particular type of complaint is recurring without being satisfactorily addressed,**
17 **then the Commission may decline to certify the ETC during the annual**
18 **certification process.**

19 A. NWMC agrees to provide the Commission with the report produced in 3.E.

20 **Q. Will NWMC Comply with 4.G - An application for ETC designation shall be**
21 **deemed to be acceptance of Missouri Public Service Commission jurisdiction over**
22 **any issues related to ETC designation and status and USF funding and**
23 **acceptance of additional rules made applicable to that ETC?**

Supplemental Direct Testimony of
Roger Bundridge

1 A. NWMC acknowledges the Commission's jurisdiction related to ETC designation. It
2 is impossible for NWMC to confer additional jurisdiction or to commit to follow the
3 terms of as yet unknown future additional rules.

4 **Q. Will NWMC Comply with 4.H - All ETCs, including incumbent local exchange**
5 **telecommunications carriers, in non-rural areas of Missouri shall, in conjunction**
6 **with the annual high-cost certification process, assist the commission staff in**
7 **comparing residential rates in rural areas served by non-rural incumbent local**
8 **exchange carriers to urban rates nationwide?**

9 A. NWMC will provide appropriate assistance to Staff.

10 **Q. Will NWMC Comply with 4.I - All reports required to be submitted to the**
11 **commission shall be attested to by an officer or authorized agent of the ETC or**
12 **incumbent local exchange telecommunications carrier?**

13 A. NWMC agrees to have all reports submitted attested to by an officer or authorized
14 agent of the company.

15 **Q. Will NWMC Comply with 4.J - Except as otherwise provided in commission**
16 **rules, ETCs shall keep all books and records associated with its ETC designation**
17 **and/or the commission's annual certification process in accordance with good**
18 **business practices, and at such place as they are normally kept in the usual**
19 **course of business? The ETC shall make its books and records associated with its**
20 **ETC designation and/or the commission's annual certification process available**
21 **to the commission at reasonable times for examination and inspection at a**
22 **location designated by the commission?**

Supplemental Direct Testimony of
Roger Bundridge

1 A. NWMC agrees to keep its books in accordance with good business practices, and
2 aggress to make available those records to the Commission that pertain to ETC and
3 the certification thereof.

4 **Q. Will NWMC Comply with 4.K - All records required by this rule shall be**
5 **preserved for at least two (2) years?**

6 A. NWMC agrees to preserve all records pertaining to ETC designation for 2 years.

7 **Q. Will NWMC Comply with 4.L - ETCs, or carrier requesting ETC designation,**
8 **shall promptly furnish requested information, including financial information,**
9 **related to its designation as an ETC to the commission, its staff or the Office of**
10 **the Public Counsel?**

11 A. NWMC agrees to provide to the Commission, its staff, or the Office of Public
12 Counsel all requested information that pertains to ETC designation.

13 **Q. Will NWMC Comply with 5.A - Each CMRS provider shall submit to the**
14 **Commission a letter reflecting a change to the name and/or change, deletion or**
15 **addition of a trade name under which the ETC will be doing business in the state**
16 **of Missouri, attaching, as applicable, an amended Certificate of Incorporation,**
17 **Fictitious Name registration or an amendment thereof? The CMRS provider**
18 **shall modify its current informational filing, as required in Subsection 3D to**
19 **reflect the new name and shall attest that no revisions are being made, except for**
20 **the name change.**

21 A. NWMC agrees to notify the Commission of all name changes as well as trade name
22 changes in which the ETC is doing business.

1 **Q. Will NWMC Comply with 5.B - ETCs shall not self-certify to the Universal**
2 **Service Administrative Company for receipt of federal universal service funds?**

3 A. NWMC agrees not to self-certify for receipt of federal universal service funds to the
4 Universal Service Administrative Company.

5 **Q. Will NWMC Comply with 5.C - ETCs, including incumbent local exchange**
6 **telecommunications carriers, shall not willfully make any false entry in any**
7 **business record of any kind kept by it, nor shall it willfully destroy, mutilate,**
8 **alter or by any method falsify any such record, nor shall it willfully neglect or**
9 **fail to make full, true and correct entries in such records of all facts and**
10 **transactions appertaining to its business, nor shall it falsify any statement to the**
11 **commission?**

12 A. NWMC agrees not to make any false statements, false record entries, or falsify any
13 record or entries pertaining to its business.

14 **Q. Will NWMC Comply with 5.D - Allegations of failure to comply with this rule**
15 **shall be filed with the commission in the form of a formal complaint pursuant to**
16 **4 CSR 240-2.070. Resolution of the complaint may result in revocation of the**
17 **ETC designation?**

18 A. NWMC understands that failure to comply with this ETC rule may result in the filing
19 of a formal complaint.

20 **Q. Will NWMC Comply with 5.E - The Commission shall not certify, by October 1**
21 **of each year, any ETC, including incumbent local exchange telecommunications**
22 **carriers, that fails to comply with these rules?**

Supplemental Direct Testimony of
Roger Bundridge

1 A. NWMC understands that its failure to comply with these ETC rules may compel the
2 Commission not to certify its ETC status by October 1 each year.

3 **Q. Will NWMC Comply with 5.F - ETCs shall submit to the commission staff, by**
4 **August 15, 2006, a statement of compliance with 4 CSR 240-3.570? All carriers**
5 **with requests for ETC designation pending as of the effective date of this rule**
6 **shall submit, within 30 days of the effective date of the rule, any missing**
7 **information required by 4 CSR 240-3.570 or a statement that all required**
8 **information was previously submitted as part of the request for ETC**
9 **designation.**

10 A. NWMC agrees to submit a statement of compliance by August 15, 2006 and shall
11 submit all missing information within 30 days of the effective date of the rule.

12 **Q. Does that conclude your testimony?**

13 A. Yes it does.

Supplemental Direct Testimony of
Roger Bundridge

STATE OF MISSOURI

NORTHWEST MISSOURI CELLULAR)
LIMITED PARTNERSHIP)
)
Application for Designation as an) Case No. TO-2005-0466
Eligible Telecommunications Carrier)
for Purposes of Receiving Federal)
Universal Service Support Pursuant to)
Section 214(e)(2) of the)
Telecommunications Act of 1996.)

AFFIDAVIT OF ROGER BUNDRIDGE

COUNTY OF _____)
) ss.
STATE OF MISSOURI)

Roger Bundridge, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Supplemental Direct Testimony in question and answer form, consisting of _____ pages of testimony to be presented in the above case; that the answers in the foregoing Supplemental Direct 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.

Roger Bundridge

Subscribed and sworn to before me this ____ day of April, 2006.

Notary Public

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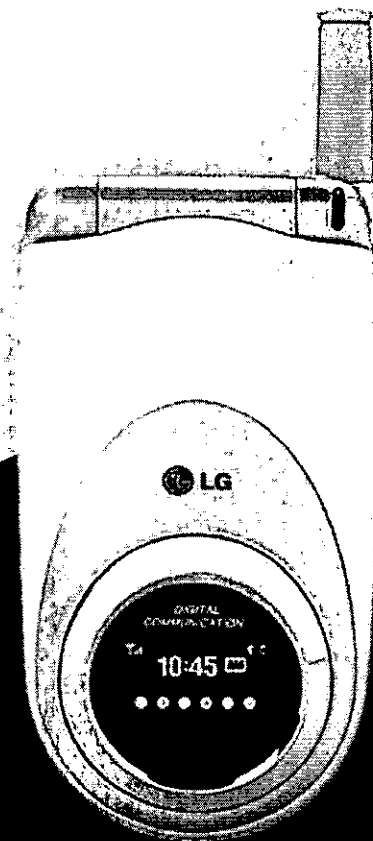
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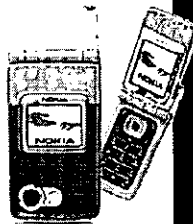


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