

Exhibit No.:

Issue: Application for Designation as an Eligible
Telecommunications Carrier

Witness: Roger Bundridge

Sponsoring Party: Northwest Missouri Cellular Limited
Partnership

Type of Exhibit: Surrebuttal Testimony

Case No.: TO-2005-0466

Date Testimony Prepared: May 18, 2006

**NORTHWEST MISSOURI CELLULAR
LIMITED PARTNERSHIP**

SURREBUTTAL TESTIMONY

OF

ROGER BUNDRIDGE

CASE NO. TO-2005-0466

****HC denotes *HIGHLY CONFIDENTIAL* information****

May 18, 2006

1 **SURREBUTTAL 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.**

8 A. My name is Roger Bundridge.

9 **Q. Are you the same Roger Bundridge that previously submitted Direct Testimony**
10 **in this case on or about February 13, 2006?**

11 A. Yes. I am the same person who previously submitted that testimony on that date.

12 **Q. From a substantive standpoint, is there anything that has changed since the time**
13 **your Direct Testimony was filed?**

14 A. No.

15 **Q. What is the purpose of your Surrebuttal Testimony?**

16 A. The purpose of my Surrebuttal Testimony is to respond to expressed concerns about
17 the Lifeline plans that Northwest Missouri Cellular proposes to offer to its subscribers should
18 ETC designation be granted.

19 **Q. Can you please describe in detail the Lifeline Plans that Northwest Missouri**
20 **Cellular plans to offer to its subscribers should ETC designation be granted?**

21 A. Northwest Missouri Cellular will offer two Lifeline Plans if ETC status is granted and
22 USF monies are received.

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1 Plan 1 will allow unlimited inbound and outbound airtime when calling from the cell
2 site that provides coverage to the customer's home. All calls from this same location to
3 exchanges within the ETC area granted to Northwest Missouri Cellular will be free. Should
4 any landline provider offer local calling as part of their Lifeline plan to an exchange outside
5 of the exchanges included by Northwest Missouri Cellular, the company will commit to
6 adding this (these) exchange(s) to the local calling area of this Lifeline plan. This plan will
7 have a monthly recurring charge of \$9.70.

8 Plan 2 will allow unlimited inbound and outbound airtime when calling from
9 anywhere within the Northwest Missouri Cellular designated ETC licensed service area. All
10 calls made within this same area to all exchanges within the ETC area granted to Northwest
11 Missouri Cellular will be free. Should any landline provider offer local calling as part of
12 their Lifeline plan to an exchange outside of the exchanges included by Northwest Missouri
13 Cellular, the company will commit to adding this (these) exchange(s) to the local calling area
14 of this Lifeline plan. This plan has a monthly recurring charge of \$13.70.

15 In both cases, these call plans exceed the ILEC offerings calling scopes through the
16 addition of mobility as well as the increased number of exchanges that will be included for
17 free as part of the plans.

18 **Q. Will these plans be offered absent USF support and how will the Commission be**
19 **informed of these plans?**

20 A. No. Both of these plans will only be offered as long as USF support is received.
21 Northwest Missouri Cellular will commit to notifying the Commission thirty days in advance

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1 of any rate or plan changes to Lifeline customers. Northwest Missouri Cellular will agree to
2 not raise a customer's rate while under their commitment period.

3 **Q. What fees, if any, will a Lifeline subscriber incur?**

4 A. Applicable fees that a customer will be charged are \$35 for equipment change, \$75
5 for early termination fees, assuming the customer is not simply on a month-to-month
6 contract, and \$0.00 (no charge) for the credit check, if one is performed.

7 **Q. What steps will Northwest Missouri Cellular take to provide Lifeline customers**
8 **with a wireless handset?**

9 A. Northwest Missouri Cellular will commit to informing the customer of the lowest cost
10 handset available. If the customer requests no contract, a phone will be offered at retail cost
11 and no credit check will be required. Contracts for one-year or two-year commitments will
12 allow the customer discounts on available handsets. In all cases, the Lifeline customer is
13 eligible for up to \$200 for 12 months in interest free deferred payments.

14 **Q. Will Northwest Missouri Cellular also provide toll free calling from the**
15 **exchanges within its granted ETC area to its Lifeline subscribers?**

16 A. The ability to provide such calls is outside of the control of Northwest Missouri
17 Cellular. Northwest Missouri Cellular is unable to compel any landline or wireless company
18 to provide local calling to Northwest Missouri Cellular's wireless numbers. Northwest
19 Missouri Cellular is extremely interested in working on an agreement with these wireless and
20 landline carriers to achieve this goal.

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1 Northwest Missouri Cellular is unable to resell ILEC service because it would violate
2 Missouri statutes. Northwest Missouri Cellular is not certificated to provide local exchange
3 landline service.

4 **Q. Concerns have been raised that current customers will receive no additional**
5 **benefit when areas that are not currently served are covered in the 5 year plan. Can**
6 **you please address this issue?**

7 A. This concern is not justified. Not only will current wireless customers benefit when
8 traveling into these areas but landline customers will also be able to reach these wireless
9 customers, including customers roaming into the market, that live, work and travel into these
10 newly covered areas.

11 **Q. Will the addition of sites and the associated coverage benefit 911 services and if**
12 **so, how?**

13 A. Today there is no single carrier that covers every area within the RSA 1 licensed area.
14 Even if a single carrier did, there are several different technologies providing this service,
15 and it is likely that a single carrier would only provide service to one particular technology
16 type. Though a customer is not required to have active service to be able to call 911, they do
17 have to have a phone capable of utilizing the technology associated with the signal covering
18 that area. If a customer with a handset only capable of CDMA technology is in an area that
19 is served only by a GSM signal, that customer will not be able to initiate the call to the PSAP
20 because they are not compatible technologies. Currently there are no handsets commercially
21 available in the US that support both CDMA and GSM technologies. Thus, allowing
22 multiple carriers with competing technologies to become ETC certified helps increase the

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1 chances that handsets capable of different technologies will be capable of making an
2 emergency call in all areas.

3 **Q. How does Northwest Missouri Cellular propose to spend and account for the**
4 **monies received from USF?**

5 A. Northwest Missouri Cellular is committed to use USF funds to expand service and
6 coverage within its licensed service area using every cent it receives from USF. These funds
7 will be utilized to build new sites to provide coverage to as yet unserved or underserved areas
8 and, as an extension, increase the 911 services in those areas. These funds will also be used
9 to deploy and extend advanced wireless services including high-speed wireless data through
10 EVDO technology (EVDO, Evolution Data Only) to rural areas that would otherwise remain
11 unserved from this technology. EVDO is a CDMA wireless radio broadband data protocol
12 being adopted by all national CDMA mobile phone providers throughout urban areas of the
13 U.S. Absent USF support, Northwest Missouri Cellular is only planning to provide EVDO
14 on four of the current cell sites that cover the more populated areas in the licensed area. With
15 USF support, Northwest Missouri Cellular will be able to provide EVDO to all its existing
16 and proposed future sites.

17 As shown in the attached Highly Confidential Appendix P, Northwest Missouri
18 Cellular is planning to spend approximately **_____** as an annual average to
19 support the new site construction and operation as well as advanced wireless services and
20 capacity increases throughout the requested ETC area.

21 The budget as presented is a guide to how that service and coverage is currently
22 expected to be expanded. In the event that revenues are higher, Northwest Missouri Cellular

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1 will be able to increase the pace at which the network expands beyond that already identified.
2 Each year, Northwest Missouri Cellular has committed to present to the Commission an
3 updated plan for the coming five years to spend the monies it will receive from the USF on
4 network upgrades, expansions and maintenance. Lastly, Northwest Missouri Cellular is
5 wholly located within the state of Missouri, so there is no question that these funds will only
6 be spent within Missouri to the benefit of the residents of Missouri.

7 **Q. The public interest issue has been addressed in the rebuttal testimony of a**
8 **number of parties. Do you believe that granting ETC status to Northwest Missouri**
9 **Cellular is in the public interest, and if so, why?**

10 A. I do believe that granting ETC status to Northwest Missouri Cellular is in the public
11 interest.

12 When considering the granting of ETC status to Northwest Missouri Cellular,
13 mobility, technological advances, choice, and safety are all key considerations. Although
14 some particular rebuttal testimony has claimed that mobility is not an important service,
15 Northwest Missouri Cellular remains convinced that it is a huge benefit to consumers and is
16 absolutely in the public interest. The U.S. has become a mobile society and enjoys the
17 freedom and flexibility of instant communication with others regardless of where they are.
18 This includes the ability of landline subscribers to reach wireless customers or even landline
19 customers who have setup their landline numbers to reach them on their wireless phones
20 when otherwise not available to their landline. Upon the receipt of USF monies, Northwest
21 Missouri Cellular has committed to build out into remote communities that currently have

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1 little or no wireless service. Without this wireless service, the people living, working and
2 traveling through these rural areas do not have an option for wireless service.

3 As identified, the deployment of high-speed wireless data services (EVDO) to rural
4 areas can only be possible with the addition of these funds. Without these funds, it will be
5 many years, if ever, before Northwest Missouri Cellular would be able to justify and deploy
6 this high-speed wireless service in these most rural areas.

7 Even if the FCC has mandated that competition and choice alone is not sufficient
8 justification of public interest, allowing a consumer to choose what wireless or landline
9 service best suits their need and lifestyle is undoubtedly in the customer's and public's best
10 interest. Not only choice for service, but customer service, expanded calling scopes, services
11 provided: each customer has different reasons for choosing a service provider but,
12 ultimately, without an option, there isn't any decision to be made.

13 Without USF support, Lifeline customers will also not have the ability to choose
14 Northwest Missouri Cellular because those plans cannot be offered without USF support. If
15 the choice is available, Lifeline customers will have access to Lifeline plans identified
16 previously that would provide additional benefits to those customers that otherwise would
17 not be possible from the current landline offerings, including mobility and additional free
18 calling capabilities.

19 Safety and 911 issues, as discussed above, are a primary concern when considering
20 what is in the public interest. Without USF monies, these areas will not receive the service
21 required to allow consumers access to emergency services in these underserved, or no
22 service, areas.

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1 **Q. Have you reviewed the rebuttal testimony of all parties?**

2 A. Yes.

3 **Q. Do you have any response to other issues raised by those parties?**

4 A. Yes. In large part they seem to address broad policy issues not raised by the specific
5 request for ETC approval in this case. Any lack of a direct response by Northwest Missouri
6 Cellular to each assertion or allegation does not indicate that Northwest Missouri Cellular
7 agrees with or acquiesces to the positions taken by those parties. There may be
8 misstatements and/or false or misleading statements that Northwest Missouri Cellular has
9 chosen not to further investigate or to provide a response.

10 **Q. Does this conclude your surrebuttal testimony?**

11 A. Yes.

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION

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 eight (8) 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 May, 2006.

Notary Public