Great Plains Communications Responses to AT&T Ex Parte filed May 13, 2011

June 15, 2011
AT&T Ex Parte References to Great Plains Network

- AT&T May 13, 2011 Ex Parte on Pages 6-7 suggests that Great Plains Communications, Inc. ("GPC") is somehow involved in AT&T’s self-defined "Most Cost Routing."
- AT&T presents partial facts regarding GPC’s Network Deployment Plan relating to only one of GPC’s sixty-eight rate centers, the Gordon Exchange.
- Once all facts concerning GPC’s Network Deployment Plan are understood, AT&T’s innuendos regarding GPC’s “Trying to Foist Construction and Transport Costs on to IXCs” are demonstrated to be without basis.
- In response to AT&T’s initiation of a complaint before the Nebraska Public Service Commission ("NPSC") in formal Complaint No. FC-1348 in November 2010, GPC currently is litigating issues arising from its Network Deployment Plan.
- GPC respectfully submits that the issues related to GPC's Network Plan should properly be resolved at the NPSC for the reasons stated herein.
Great Plains Background

- GPC is a rural incumbent local exchange carrier providing telecommunications services in the State Of Nebraska, including *Interstate And Intrastate* switched access services pursuant to issued and effective tariffs.

- GPC’s expansive service area is dispersed throughout the State of Nebraska, covering approximately 14,000 square miles through 68 rate centers, serving approximately 25,000 voice customers and approximately 13,000 broadband customers.
Great Plains serves 14,000 square miles, an area larger than Connecticut, New Jersey and Rhode Island combined, with about 2 customers per square mile.
For The Last Decade, GPC Has Been Engaged in Planning and Implementing A Network Plan

- The Network Plan’s Objective was, and continues to be, straightforward:
  - Provide high quality service to all of GPC’s retail and wholesale customers by:
    - Progressively consolidating switching locations into more efficient host/remote configurations; and
    - Deploying inter-office fiber transport facilities for voice and Internet services.
  - By so doing, GPC’s plan was and is to increase network capacity, to reduce switching costs and maintenance, and to provide a network platform with the flexibility to expand based on future customer needs.
Specific Details of GPC’s Network Plan

- To date, GPC has consolidated 22 host and 47 remote switches existing in its network in 2002 into 15 host and 55 remote switches today, with further reduction to 2 state-of-the-art Genband C15 host soft switches with Class 4 tandem capabilities to be implemented by October 2012.

- Further, GPC has constructed approximately 700 miles of inter-office fiber transport facilities over the last 10 years.

- As one of the interim steps in accomplishment of GPC’s network plan, GPC determined that interconnection of its 68 rate centers to a single tandem was required.

- From March 2003 through May 2010 GPC transitioned its rate centers to the tandem switch operated by Cablevision, Inc. in Blair, Nebraska (the “Blair Tandem”).

- Transport mileage for approximately 35% of GPC’s exchanges was reduced by re-homing to the Blair tandem.
The redesign/rearrangement that is proceeding through GPC’s network plan, including the process of re-homing to the Blair tandem, provides benefits to all GPC’s customers including, but not limited to:

1. Creating network redundancy to minimize network outages;
2. Addressing and correcting deficiencies in the interoffice network jointly-provided with Qwest Communications (now CenturyLink) and in the tandem switching services provided by Qwest;
3. Increasing availability, affordability and speeds of broadband to end user customers in GPC’s service area;
4. Increasing quality of service provided to all of GPC’s customers, including wholesale customers; and
5. Creating an operational structure to facilitate accomplishment of future network changes or upgrades in a more efficient and timely manner.
GPC Traffic Re-homing History

- GPC has implemented and continues to implement its network plan in a manner consistent with GPC’s tariffs.
- None of GPC’s routing changes effected since 2003 were ever disputed by AT&T until August 2010, followed by AT&T’s filing of its NPSC complaint in November 2010.
- In addition to timely updating of the LERG with tandem changes for all exchanges, all access customers were provided notice of GPC’s re-homing to the Blair tandem and, in fact, at a date prior to commencement of GPC’s re-homing to the Blair tandem in March 2003, AT&T established a point of presence at the Blair tandem which was a prerequisite for GPC to move to the Blair tandem.
AT&T’s Ex Parte is Intentionally Misleading

- AT&T’s reference to the Gordon exchange as an example is selective, given Great Plains’ widespread geographical territory.

- Based upon the reconfiguration of GPC’s network completed to date, approximately 35% of the transport routes that AT&T utilizes within the GPC network involve fewer billed air miles to the Blair tandem than existed prior to the network reconfigurations.

- To the extent that AT&T has now disputed GPC’s tandem switched access billings and objects to the amounts of such billings, AT&T possesses the option to request from GPC direct connection of AT&T’s facilities with GPC’s exchanges.
Current Status of Great Plains-AT&T Disputes

- AT&T and GPC are currently litigating AT&T’s refusal to pay the proper intrastate switched access charges assessed by GPC to AT&T. Great Plains filed counter-complaint at NPSC regarding AT&T’s unlawful “self-help” withholding of access payments.

- AT&T has chosen its forum to resolve this matter – the NPSC – and that is where the issues should be resolved.

- The NPSC should be allowed to continue to engage in the fact-intensive examination that is being undertaken and that is required to resolve the existing disputes.

- In the interim, however, GPC has demonstrated that AT&T’s selective recitation of the facts fails to present the bona fide long-term network redesign that GPC has legitimately pursued over the last decade to better serve its retail and wholesale customers.