



Citizens Communications  
180 South Clinton Avenue  
Rochester, NY 14646

April 15, 2004

Petition for Waiver

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
12<sup>th</sup> Street Lobby, TW-A325  
Washington, DC 20554

ATTENTION: WIRELINE COMPETITION BUREAU

Dear Secretary:

Citizens Telecommunications Companies ("Citizens") submits this Petition for Waiver of Section 52.33(a)(1)(iv) of the Commission's rules to reduce the recovery period of its Local Number Portability (LNP) Surcharge rate element for exchanges where this charge is already in effect.

Citizens had originally filed an LNP Surcharge rate of \$0.41 per line. This rate was tariffed for the LNP surcharge to be recovered on a per line basis for five years in accordance with Section 52.33(a)(1)(iv). In several filings, Citizens implemented this rate for various exchanges with different five year recovery periods. In reviewing the costs for a recent filing, it was determined that the cost study that underlay this rate included certain costs that should have been excluded. Citizens will be submitting a revised cost study that excludes these costs and results in a rate of \$0.34 per line. This lower rate will be applied to exchanges where Citizens implements the LNP Surcharge in the future.

Because the \$0.41 rate has been collected for part of the five year recovery period for several exchanges, it is no longer possible to recover the appropriate amount for these exchanges through a levelized rate over five years as required by Section 52.33(a)(1)(iv). Changing the rate in these exchanges is likely to result in considerable customer confusion. Citizens believes the most reasonable thing to do for these exchanges is to reduce the recovery period sufficiently to ensure that Citizens does not over-recover the costs of providing Local Number Portability. Citizens submits this Petition for Waiver in order to make this reduction of recovery period while maintaining the existing \$0.41 rate in the exchanges where LNP Surcharge is already being assessed. In support of this Petition, Citizens submits cost information showing the calculations of the reduced recovery period for those exchanges where the LNP Surcharge is already being assessed.

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The following table displays the FCC Registration Number (FRN) and Tax Identification Number (TIN) associated with each company participating in Citizens Tariff F.C.C. No. 1:

<u>Company</u>	<u>FRN</u>	<u>Tax ID Number</u>
Citizens Telecommunications Company of the White Mountains, Inc.	0003-5726-17	06-1473448
Citizens Utilities Rural Company, Inc.	0003-5839-37	06-0798524
Citizens Telecommunications Company of California, Inc.	0003-5743-16	06-1387094
Citizens Telecommunications Company of Tuolumne	0003-5737-06	06-1418451
Citizens Telecommunications Company of the Golden State	0003-5734-17	06-1428831
Citizens Telecommunications Company of Idaho	0003-5745-89	06-1381499
Citizens Telecommunications Company of Montana	0003-5745-63	06-1381501
Citizens Telecommunications Company of Nevada	0001-5968-81	88-0038970
Citizens Telecommunications Company of New York, Inc.	0003-5745-48	06-1381503
Citizens Telecommunications Company of Oregon	0003-5745-22	06-1381505
Citizens Telecommunications Company of Tennessee LLC	0003-5733-91	06-1431902
Citizens Telecommunications Company of the Volunteer State LLC	0004-2605-68	06-1431906
Citizens Telecommunications Company of Utah	0003-5745-06	06-1381506
Citizens Telecommunications Company of West Virginia	0004-0549-38	55-0276420
Citizens Telecommunications Company of Minnesota, LLC	0004-0367-03	06-1554080
Navajo Communications Company, Inc.	0001-6713-20	75-1310073
Citizens Telecommunications Company of Nebraska	0004-3410-95	06-1557684
Citizens Telecommunications Company of Illinois	0003-9342-05	36-4348451
Rhineland Telephone LLC	0002-7227-42	39-0227610
Ogden Telephone Company	0003-4132-42	16-0576170

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Questions regarding this filing may be directed to:

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Respectfully Submitted,

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Manager, Regulatory – Pricing & Tariffs