

WINDSTREAM TELEPHONE SYSTEM
TARIFF F.C.C. NOS. 1 and 3
LOCAL NUMBER PORTABILITY CHARGES
DESCRIPTION AND JUSTIFICATION

Transmittal No. 5

May 17, 2007

1. INTRODUCTION

Windstream Telephone Services Corporation companies (Windstream) proposes to extend the application of the existing average Local Number Portability (LNP) End User Charges in its Tariff Nos. 1 and 3 for the Windstream companies listed in Appendix A, for a period of 2 months to recover Windstream's intermodal LNP implementation expenses. Coincident with this filing, the National Exchange Carrier Association, Inc. (NECA) will file revisions to extend the application of the existing average LNP End User Charges in its NECA Tariff F.C.C. No. 5 for the same period of time for those companies listed in Appendix A participating in this tariff. The services provided by Windstream are consistent with Section 13.14, Local Number Portability Services, of NECA's Tariff F.C.C. No. 5; Section 13.12, Local Number Portability Services, of Windstream Telephone System's Tariff F.C.C. No. 1; and Section 13.6, Local Number Portability Services, of Windstream Telephone System's Tariff F.C.C. No. 3.

The proposed 2 month extension will enable Windstream to recover its intermodal LNP implementation expenses, which were incurred after the currently tariffed recovery period (5 year) became effective. Since wireless LNP implementation expenses were not included or recovered in the currently tariffed recovery period, a 2 month extension is requested for the 25 companies listed in Appendix A.

2. LNP DEMAND, COST AND RATE DEVELOPMENT

The demand for LNP capable access lines, including PBX trunks and ISDN-PRI lines for the 25 companies included in this filing was projected over 2 months. The PBX End User Charge and ISDN-PRI End User Charge have been calculated at nine times and five times the End User Charge, respectively.

Windstream did not include any incremental investment costs in this filing since Windstream's investment costs for LNP implementation are being recovered in the currently tariffed recovery period that is scheduled to end on June 7, 2007.

Windstream identified only incremental expenses, which the companies listed in Appendix A incurred to implement intermodal LNP. In identifying incremental expenses that could be included in this filing, the companies used two criteria to isolate LNP costs, based on the FCC guidelines: (1) the costs would not have been incurred by the telephone companies if number portability was not implemented, and (2) the costs were incurred "for the provision of" number portability. Using these criteria yielded an incremental expense amount of \$1,516,365.

Current year expenses provided by Windstream fall into the following categories: a) incremental regional database administrator charges, b) incremental LNP order processing labor expenses and c) incremental LNP implementation and testing labor expenses.

Windstream incurred costs for these expense categories prior to the current year. In compliance with the FCC's order¹ on LNP cost recovery, those past dollars were brought to the current year's value. However, only three years' worth of costs for any specific expense category has been included for recovery in this filing.

Demand and costs used to support this filing are detailed in Exhibit 1A. (See Exhibit 1A attached.)

¹ Memorandum Opinion and Order on Reconsideration and Order on Application for Review, CC Docket No. 95-116, released February 15, 2002 (FCC 02-16) para. 64. Footnote 205.

APPENDIX A

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
National Exchange Carrier Association, Inc. Tariff F.C.C. No. 5 Participants		
Windstream Accucomm Telecommunications, Inc.	GA	220395
Windstream Georgia Telephone, Inc.	GA	220364
Windstream Ohio, Inc.	OH	300665
Windstream Standard, Inc.	GA	220386

Windstream Telephone Systems Tariff F.C.C. No. 1 Participants

Georgia Windstream Telecom Inc.	GA	223036
Oklahoma Windstream, Inc.	OK	432011
Texas Windstream	TX	442153
Windstream Alabama, Inc.	AL	250302
Windstream Arkansas, Inc.	AR	401691
Windstream Florida, Inc.	FL	210336
Windstream Georgia, Inc.	GA	220357
Windstream Georgia Communications Corporation	GA	223037
Windstream Kentucky West, Inc.	KY	260402
Windstream Mississippi	MS	280453
Windstream Missouri	MO	421885
Windstream New York, Inc. - Fulton	NY	150106
Windstream New York, Inc. - Jamestown	NY	150109
Windstream New York, Inc. - Red Jacket	NY	150113
Windstream North Carolina, Inc.	NC	230476
Windstream Oklahoma	OK	431965
Windstream Pennsylvania, Inc.	PA	170176
Windstream South Carolina, Inc.	SC	240517
Windstream Sugar Land, Inc.	TX	442147
Windstream Western Reserve, Inc.	OH	300666

Windstream Telephone Systems Tariff F.C.C. No. 3 Participants

Windstream Nebraska, Inc.	NE	371568
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Local Number Portability - Windstream Telephone Services Corporation Companies

EXHIBIT 1A

May 17, 2007

End User Charge Rate Development

LINE		0	1	Year 2	3	4	5
	<u>Investment</u>						
1	LNP End User Investment	\$0	\$0	\$0	\$0	\$0	\$0
2	Present Value Factors						
3	Present Value of Investment	\$0	\$0	\$0	\$0	\$0	\$0
4	Sum of Present Value of Investment	\$0					
	<u>Expenses</u>						
5	LNP End User Expenses	\$1,516,365	\$0	\$0	\$0	\$0	\$0
6	Present Value of Expenses	\$1,516,365	\$0	\$0	\$0	\$0	\$0
7	Sum of Present Value of Expenses	\$1,516,365					
	<u>Access Lines</u>						
8	PBX	172,800	0	0	0	0	0
9	ISDN-PRI	10,300	0	0	0	0	0
10	Other	1,867,450					
11	Total Chargeable Lines ¹	2,050,550	0	0	0	0	0
12	Present Value of Chargeable Lines	2,050,550	0	0	0	0	0
13	Sum of Present Value of Chargeable Lines	2,050,550					
14	LNP End User Basic Charge ²	\$0.37					
15	LNP End User ISDN-PRI Charge ³	\$1.85					
16	LNP End User PBX Charge ⁴	\$3.33					

NOTES

1. Line 11 = (Line 8 * 9) + (Line 9 * 5) + Line 10
2. Line 14 = ((Line 4 + Line 7) / Line 13)/2
3. Line 15 = 5 * Line 14
4. Line 16 = 9 * Line 14