

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
2007 Annual Access Tariff Filings	)	WCB/Pricing File No. 07-10
	)	
Alliance Communications Cooperative, Inc.	)	Transmittal No. 8
Tariff FCC No. 1	)	
	)	
Broadband Network Group	)	Transmittal No. 1
Tariff FCC No. 1	)	
Arthur Mutual Telephone Co.	)	
Bascom Mutual Telephone Co.	)	
Benton Ridge Telephone Co.	)	
Buckland Telephone Co.	)	
Fort Jennings Telephone Co.	)	
Glandorf Telephone Co.	)	
Kalida Telephone Co.	)	
Middle Point Home Telephone Co.	)	
Ottoville Mutual Telephone Co.	)	
Ridgeville Telephone Co.	)	
Sherwood Mutual Telephone Co.	)	
Vaughnsville Telephone Co.	)	
	)	
Consortia Consulting	)	Transmittal No. 1
Tariff FCC No. 1	)	
Beresford Municipal Telephone Co.	)	
McCook Cooperative Telephone Co.	)	
Roberts County Telephone Coop. Assn.	)	
Western Telephone Co.	)	
	)	
Elsie Communications, Inc.	)	Transmittal No. 1
Tariff FCC No. 1	)	
	)	
Farmers Mutual Telephone Company	)	Transmittal No. 1
Tariff FCC No. 1	)	
	)	
ICORE	)	Transmittal No. 80
Tariff FCC No. 2	)	
Jordan-Soldier Valley Telephone Co.	)	
Killduff Telephone Co.	)	
Lynnville Telephone Co.	)	
Northeast Iowa Telephone Co.	)	

Reasnor Telephone Co.	)	
Sully Telephone Assn.	)	
	)	
John Staurulakis, Inc.	)	Transmittal No. 130
Tariff FCC No. 1	)	
Chesnee Telephone Company	)	
Gearheart Communications Co., Inc.	)	
Skyline Telephone Membership	)	
Yadkin Valley Telephone Membership Corp.)	)	
	)	
Royal Telephone Co.	)	Transmittal No. 1
Tariff FCC No. 1	)	

**PETITION TO SUSPEND AND INVESTIGATE**

**OF**

**SPRINT NEXTEL CORPORATION**

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June 22, 2007

## Table of Contents

Summary .....	iv
I. BACKGROUND AND INTRODUCTION .....	4
II. THE PROPOSED TARIFFS CANNOT BE ASSUMED TO BE JUST AND REASONABLE .....	7

## Summary

The captioned tariff filings are not just and reasonable, and accordingly should be suspended for five months and set for investigation.

The events of the past 12 months since the last annual access charge revisions all point to the conclusion that most, if not all, of the incumbents withdrawing from the NECA pool intend to engage in “traffic pumping” practices that Sprint Nextel and other long distance carriers have challenged in pending federal court actions as patently unlawful. Traffic pumping schemes, combined with the excessively high rates proposed by the local exchange carriers (“LECs”), will enable these LECs to earn unjustified, extraordinary rates of return. The Commission, therefore, must take reasonable steps to ensure that long distance carriers and their customers are not subjected to another wave of excessive increases in interstate access charges by carriers withdrawing from the NECA pool. The Commission can accomplish that goal by suspending and investigating all of the tariffs. Sprint Nextel recommends that the Commission’s investigation include several elements:

- A requirement that these LECs provide the historic revenue requirement and demand data on which their proposed rates were based.
- A requirement that these LECs submit quarterly monitoring reports of their interstate demand, costs, and rate of return. If the earned rate of return for any of these LECs exceeds 11.65% for any reporting category (common line, traffic sensitive, or special access), or 11.50% for total interstate, that LEC should be required to adjust its rates in the following quarter to pass through all reported overearnings.
- A requirement that these LECs adjust their rates quarterly using rolling recent historical demand to capture the most recent minute of use information.
- A requirement that these LECs certify that they are not now engaging in, and in the 2007 tariff period will not engage in, traffic pumping activities.

- Consideration of the merits of adopting a new policy under which LECs whose actual demand exceeds their historic demand levels by some specified percentage (say, 50%) will be subject to full cost-of-service regulatory review.

These measures are necessary to help ensure the justness and reasonableness of the rates once the tariffs do go into effect, and to guard against unlawful traffic pumping schemes.

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**PETITION TO SUSPEND AND INVESTIGATE  
OF  
SPRINT NEXTEL CORPORATION**

Sprint Nextel Corporation (“Sprint Nextel”) hereby respectfully requests that the above-captioned tariff filings be suspended for five months and set for investigation. The local exchange carriers (“LECs”) listed above either have exited from the NECA pool and now propose to implement their own interstate access rates, or have proposed unjustified rate increases in existing tariffs. As demonstrated below, suspension and investigation is warranted because the proposed rates are not just and reasonable.

The events of the past 12 months since the last annual access charge revisions all point to the conclusion that most, if not all, of the incumbents withdrawing from the NECA pool intend to engage in “traffic pumping” practices that Sprint Nextel and other long distance carriers have challenged in pending federal court actions as patently unlawful.<sup>1</sup> Traffic pumping schemes, combined with excessively high rates proposed by

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<sup>1</sup> See, e.g., *Sprint Communications Co., L.P. v. Superior Telephone Cooperative; The Farmers Telephone Company of Riceville, Iowa; Reasnor Telephone Company, LLC; Farmers and Merchants Mutual Telephone Company; Aventure Communication*

*Footnote continued on next page*

the above-captioned carriers, will enable these LECs to earn unjustified, extraordinary rates of return. The Commission, therefore, must take reasonable steps to ensure that long distance carriers and their customers are not subjected to another wave of excessive increases in interstate access charges by carriers withdrawing from the NECA pool. The Commission can accomplish that goal by suspending and investigating all of the tariffs.

Sprint Nextel recommends that the Commission's investigation include several elements:

- A requirement that these LECs provide the historic revenue requirement and demand data on which their proposed rates were based.
- A requirement that these LECs submit quarterly monitoring reports of their interstate demand, costs, and rate of return. If the earned rate of return for any of these LECs exceeds 11.65% for any reporting category (common line, traffic sensitive, or special access), or 11.50% for total interstate, that LEC should be required to adjust its rates in the following quarter to pass through all reported overearnings.
- A requirement that these LECs adjust their rates quarterly using rolling recent historical demand to capture the most recent minute of use information.
- A requirement these LECs certify that they are not now engaging in, and in the 2007 tariff period will not engage in, traffic pumping activities.
- Consideration of the merits of adopting a new policy under which LECs whose actual demand exceeds their historic demand levels by some specified percentage (say, 50%) will be subject to full cost-of-service regulatory review.

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*Technology, LLC; Dixon Telephone Company; Great Lakes Communications Corp.; Interstate 35 Telephone Company d/b/a/Interstate Communications Company; Mediapolis Telephone Company; Spencer Municipal Utilities; Global Conference Partners, LLC d/b/a FreeConference.com; Keenan Communications Inc. d/b/a QualityConference Call.com; Future Fone Services Inc. d/b/a FutureFone.com; FuturePhone.com LLC d/b/a FuturePhone.com; Does 1-10; and Roes 1-10, Docket No. 04-07-cv-00194, United States District Court for the Southern District of Iowa Central Division. Lawsuits have also been filed in US District Court by AT&T and Qwest against numerous LECs and their "free" service provider partners.*

These measures are necessary to help ensure the justness and reasonableness of the rates once the tariffs do go into effect, and to guard against unlawful traffic pumping schemes.

## **I. BACKGROUND AND INTRODUCTION.**

In the 2006 annual access tariff proceeding, numerous LECs exited the NECA pool and filed their own interstate access tariffs, which went into effect on or about July 1, 2006. Because these LECs were subset 3 companies, they were allowed, under Section 61.39 of the Commission's rules, to base their tariffed interstate rates on their historic (most recent 12 month period) cost and demand levels. In part because their historic demand levels were quite low – as is entirely expected in exchanges consisting of only several dozen to a few hundred lines – their resulting access rates were significantly higher than those charged by NECA, and even higher than the rates charged by the Regional Bell Operating Companies (“RBOCs”).<sup>2</sup>

Almost immediately, many of the LECs that had tariffed their own access rates began billing Sprint Nextel at levels that were hundreds or even thousands of percent

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<sup>2</sup> For example, in the 2006 tariff period, Sprint Nextel paid NECA approximately \$.03 per minute, and one RBOC approximately \$.006 per minute, for interstate traffic sensitive access. In contrast, Sprint Nextel was billed substantially higher per minute interstate traffic sensitive rates by several LECs engaged in unlawful traffic pumping schemes:

Superior Tel.	\$.134
Farmers Tel. Co. of Riceville	\$.058
Reasnor Tel. Co.	\$.105
Farmers and Merchant Mutual Tel.	\$.051
Aventure Communications	\$.058
Dixon Tel. Co.	\$.056
Great Lakes Communications Corp.	\$.045
Interstate 35 Tel. Co.	\$.064
Spencer Municipal Utilities	\$.045

higher than the pre-July 2006 bills. The sharp increase in access bills was attributable to both higher rates and vastly higher traffic volumes. Upon investigation, Sprint Nextel discovered that the most dramatic increases in traffic were associated with offers of “free” conference calling, “free” international calling, “free” chat services, “free” voice mail, and the like.<sup>3</sup> The entities providing these services were able to offer them to end users at no charge because they received payments from the LECs that “terminated” (or, less often, “originated”) the calls. The LECs involved were able to enter into such revenue sharing arrangements because they were billing interexchange carriers (“IXCs”) and wireless carriers such as Sprint Nextel up to \$.13 *per minute* in access fees. While the conference call, etc. services were “free” to end users, they certainly were not free to the IXCs and wireless carriers being billed access charges for these calls.<sup>4</sup> Between July 2006 – May 2007, Sprint Nextel alone has been billed approximately 360 million minutes by 10 different LECs which have been actively engaged in these traffic pumping schemes, compared to only 100 million minutes for the period July 2005 – June 2006.<sup>5</sup> On-going analysis and investigation indicate that several other LECs also appear to be engaged in similar traffic pumping schemes. A number of lawsuits, and at least one formal complaint before this Commission, have been filed against LECs identified as

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<sup>3</sup> End users availing themselves of these services are subject to the applicable usage charges of their long distance or wireless carrier (usually equal to zero if the caller subscribed to a flat-rated calling plan) for calling the 10-digit access number. However, there is generally no charge associated with the conference/chat line/international, etc. portion of the call.

<sup>4</sup> Because of the rate averaging requirements of Section 254(g) of the Act (codified at Section 64.1801 of the Commission’s Rules), Sprint Nextel and other wireline IXCs are required to charge the same rates in all areas of the Nation, even if the access costs incurred in a specific location are far in excess of the average cost.

<sup>5</sup> The 100 million minutes figure also included a certain volume of pumped minutes.

being engaged in illicit traffic pumping schemes.<sup>6</sup> These lawsuits cite multiple statutory and tariff violations which cast serious doubt about the legitimacy of the charges and practices of the plaintiff LECs and their “free” service provider partners.<sup>7</sup>

Left unchecked, traffic pumping schemes are likely to result in long distance and wireless rate increases, and could even threaten the future availability of the enormously popular flat-rated, “all you can eat” long distance and wireless calling plans to which consumers have eagerly subscribed for many years. It is also conceivable that wireline carriers facing access expenses that exceed revenues by millions of dollars a month might seek waivers of the rate averaging requirements in service territories served by LECs engaged in traffic pumping schemes. Wireless carriers that are not subject to rate averaging requirements might assess a surcharge on calls to telephone numbers assigned to LECs charging extremely high access rates and identified as being participants in traffic pumping schemes. These outcomes would harm consumers generally, including consumers that do not even use the “free” services involved in traffic pumping schemes.

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<sup>6</sup> *See n. 1 supra.*

<sup>7</sup> Sprint Nextel’s lawsuit explains that the calls that connect through these conference calling, chat line, etc. services do not terminate in the territories of the LECs at all; that the services to which the callers connect are not “end users” but are themselves carriers; and that the services are not customers, but rather are business partners of the LECs -- all of which means that the calls are not subject to terminating access under the tariffs. It may well be that under the terms of the new tariffs, traffic that is pumped will not really be access traffic either. But without knowing the scope of any planned traffic pumping, this is difficult to evaluate. What is almost certain is that the LECs intend to try to pump traffic that they will bill as access traffic. IXCs should not be left to fight after the fact whether it really is such traffic.

## **II. THE PROPOSED TARIFFS CANNOT BE ASSUMED TO BE JUST AND REASONABLE.**

As explained above, the traffic pumping schemes identified by Sprint Nextel and other carriers are illegitimate, and constitute a genuine threat to long distance and wireless calling plans proven to be of great value to consumers. Although it is possible that a few LECs have decided to exit the NECA pool for legitimate reasons, history certainly suggests that nearly all of the LECs exiting the NECA pool as part of the 2007 annual access proceeding are doing so to maximize their traffic pumping gains. Whatever the case, the above-captioned LECs have proposed rates that are so high as to raise questions about whether they are just and reasonable. These tariffs should accordingly be suspended and set for investigation.

As was the case in the 2006 annual access filings, the above-captioned LECs that are exiting the NECA pool in 2007 are subset 3 carriers that are allowed under Section 61.39 to use historic demand and cost data to establish the rates which will be assessed prospectively. On this basis, these LECs have proposed access rates which are excessively high -- substantially higher even than the rates charged by NECA.<sup>8</sup> Given the complete lack of cost support data filed with the transmittals, it is impossible to analyze the proposed rates in any detail. However, several LECs have proposed rates that are so much higher than both NECA's current rates (which are the rates that almost all of these LECs, as current pool members, charge today) and NECA's proposed rates (which are in most cases higher than current rates), as to raise substantial doubt over their

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<sup>8</sup> Sprint Nextel recognizes that any individual LEC may have costs which legitimately exceed the NECA pooled average. However, the rates proposed by the above-captioned LECs are so much higher than NECA's that it seems unlikely that they could be justified.

reasonableness. For example, the LECs listed in Table 1 below – all of which are scheduled to be out of the NECA pool as of July 1, 2007 -- have proposed tandem switched transport termination rates (per minute per termination) that are *several hundred to several thousand percent higher* than the NECA rates (see Attachment 1 for summary of the percentage change in other traffic sensitive rate elements). Such results are especially surprising given that NECA's rates generated a switched access rate of return of 10.19% through April 2007.<sup>9</sup> While rate parity across LECs is neither expected nor required, differences of the magnitude reflected below raise red flags about the reasonableness of the proposed rates.

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<sup>9</sup> See NECA Transmittal No. 1172, filed June 15, 2007, Description and Justification, Volume 1, p. 34.

Table 1  
Tandem Switched Transport Termination Rates  
Percentage Difference from NECA Rates

	% increase over <b>NECA current rates</b>	% increase over <b>NECA proposed rates</b>
Alliance	547.3%	444.6%
Elsie	322.3%	255.2%
Farmers	115.4%	81.2%
Jordan-Soldier	484.0%	391.3%
Kilduff	2072.8%	1727.9%
Lynnville	2680.9%	2239.5%
Reasnor	864.8%	711.6%
Sully	221.3%	170.3%
Royal	1769.2%	1472.5%
Beresford Municipal	169.3%	126.6%
McCook Coop.	1849.2%	1539.8%
Roberts County	181.8%	137.0%
Arthur Mutual	640.3%	522.8%
Bascom Mutual	6090.9%	5108.3%
Benton Ridge	1208.1%	1000.4%
Buckland Tel.	786.7%	645.9%
Fort Jennings Tel.	6376.6%	5348.6%
Glandorf Tel.	1228.2%	1017.4%
Kalida Tel.	547.2%	444.4%
Middle Point Home	1054.8%	871.5%
Ottoville Mutual	400.9%	321.4%
Ridgeville Tel.	546.9%	444.2%
Sherwood Mutual	513.0%	415.7%
Vaughnsville Tel.	1954.2%	1628.2%
Gearheart	656.7%	536.6%
Skyline	229.6%	177.3%

LECs engaged in unlawful traffic pumping schemes will almost certainly experience significant, even extraordinary, increases in the volume of minutes charged for access very shortly after their new tariffs become effective, rendering the historic demand quantities on which their rates were based totally meaningless. These LECs must know that the historic demand quantities used in the 2007 annual access filings are inaccurate and only a fraction of the likely actual 2007-2008 demand quantities, resulting

in grossly excessive proposed rates and extraordinary overearnings. To discourage unlawful traffic pumping schemes and to protect the public interest, the Commission must take steps more stringent than it has typically employed to monitor -- and adjust, when necessary -- LEC results, including for LECs that are eligible to file tariffs pursuant to Section 61.39 of the Rules.

Section 61.39 rules were adopted on the assumption that historic demand levels would be reasonably related to prospective demand levels.<sup>10</sup> This clearly will not be the case for LECs that engage in traffic pumping, and use of historic data will certainly result in rates that are orders of magnitude higher than the rates that would result from use of prospective, far higher, demand quantities.

Because of the unique problems associated with identifying and addressing traffic pumping activity before it occurs, the Commission's investigation here must go beyond the steps it has traditionally taken to evaluate annual access tariff filings. To mitigate the effect of the surely grossly overstated rates charged by LECs engaged in traffic pumping, Sprint Nextel recommends that the investigation of the 2007 annual access tariffs include several elements. First, as provided in Section 61.39(b), the Commission should require the above-captioned LECs to make their historic cost and demand data underlying their proposed rates publicly available. Second, consistent with Section 61.39(c),<sup>11</sup> the

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<sup>10</sup> *Regulation of Small Telephone Companies*, 2 FCC Rcd 3811, 3812 (para. 12 and n. 22) (1987) (Allowing small telephone companies to use historical data to set their rates should be "self-correcting and thus rate neutral over time" because "historical data is likely to be a close and unbiased substitute for prospective data").

<sup>11</sup> This Rule specifies that "[t]he Commission may require any carrier to submit [rate of return] information if it deems it necessary to monitor the carrier's earnings." Sprint Nextel would not object to having an entity such as NECA compile this information and inform the Commission of any overearnings, so long as the information is made publicly

*Footnote continued on next page*

Commission should require the above-captioned LECs to file quarterly reports of their interstate revenue and costs, demand, and rate of return for the previous quarter, for total interstate as well as the common line, traffic sensitive and special access categories, in order to assess the reasonableness of their interstate rates. Any LEC that earns in excess of the maximum allowable rate of return (11.50% for total interstate, or 11.65% for any category)<sup>12</sup> should be required to adjust its rates in the following quarter to flow through overearnings refunds (the difference between the earned rate of return and the maximum allowable rate of return, plus interest). Third, the affected LECs should be required to make quarterly mid-course rate corrections to reflect rolling demand quantities. While their rates would still be based on historic demand quantities, those demand quantities would be updated quarterly to reflect the most recent results. Fourth, the Commission should consider whether to require subset 3 LECs to comply with the same cost-of-service regulations as apply to mid-size cost-of-service LECs (including setting rates based on prospective rather than historical data) if the subset 3 LEC's actual demand exceeds its reported historic demand by a specified amount (say, 50%). Finally, the Commission should require these LECs to certify that they are neither now engaging nor will engage (in the 2007 tariff period) in traffic pumping schemes, including but not limited to any arrangement whereby it shares access revenue with providers of calling services to enable these providers to induce customers to use their services.<sup>13</sup> The

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available and that the LECs that do overearn adjust their rates appropriately via the tariff process.

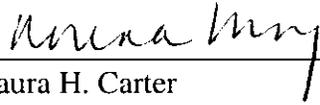
<sup>12</sup> See Sections 65.700(a) and (b) of the Commission's Rules, 47 C.F.R. 65.700(a) and (b).

<sup>13</sup> Less rigorous monitoring and investigation may be required of LECs willing to make such certification.

Commission must take aggressive action in the tariff review process to forestall additional unlawful traffic pumping activities and to ensure that whatever rates are allowed to become effective are as just and as reasonable as possible.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

A handwritten signature in cursive script, appearing to read "Norina Moy", is written over a horizontal line.

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June 22, 2007

ATTACHMENT 1

	NECA Current	NECA proposed	Alliance proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.000500	210.56	160.42
per minute, per termination	0.000795	0.000945	0.005146	547.30	444.55
Tandem switching	0.002888	0.002439	0.003636	25.90	49.08
Local switching					
Rate band 1	0.005745	0.007330	0.002882	-49.83	-60.68
Rate band 8	0.019153	0.024435	0.002882	-84.95	-88.21
	NECA Current	NECA proposed	Elsie proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.000681	322.98	254.69
per minute, per termination	0.000795	0.000945	0.003357	322.26	255.24
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.074657	1199.51	918.51
Rate band 8	0.019153	0.024435	0.074657	289.79	205.53
	NECA Current	NECA proposed	Farmers proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.000347	115.53	80.73
per minute, per termination	0.000795	0.000945	0.001712	115.35	81.16
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.048753	748.62	565.12
Rate band 8	0.019153	0.024435	0.048753	154.54	99.52

	NECA Current	NECA proposed	Jordan- Soldier proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.000942	485.09	390.63
per minute, per termination	0.000795	0.000945	0.004643	484.03	391.32
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.022673	294.66	209.32
Rate band 8	0.019153	0.024435	0.022673	18.38	-7.21
Tandem switched transport per minute, per mile	0.000161	0.000192	0.003504	2076.40	1725.00
per minute, per termination	0.000795	0.000945	0.017274	2072.83	1727.94
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.034373	498.31	368.94
Rate band 8	0.019153	0.024435	0.034373	79.47	40.67
Tandem switched transport per minute, per mile	0.000161	0.000192	0.004485	2685.71	2235.94
per minute, per termination	0.000795	0.000945	0.022108	2680.88	2239.47
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.016661	190.01	127.30
Rate band 8	0.019153	0.024435	0.016661	-13.01	-31.82

Lynnvilleville  
proposed

Lynnvilleville  
proposed

Lynnvilleville  
proposed

Lynnvilleville  
proposed





	NECA Current	NECA proposed	Roberts County proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.000454	181.99	136.46
per minute, per termination	0.000795	0.000945	0.002240	181.76	137.04
Tandem switching	0.002888	0.002439	0.002191	-24.13	-10.17
Local switching					
Rate band 1	0.005745	0.007330	0.014884	159.08	103.06
Rate band 8	0.019153	0.024435	0.014884	-22.29	-39.09
Tandem switched transport per minute, per mile	0.000161	0.000192	0.000135	-16.15	-29.69
per minute, per termination	0.000795	0.000945	0.000665	-16.35	-29.63
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.022795	296.78	210.98
Rate band 8	0.019153	0.024435	0.022795	19.02	-6.71
Tandem switched transport per minute, per mile	0.000161	0.000192	0.002501	1453.42	1202.60
per minute, per termination	0.000795	0.000945	0.005885	640.25	522.75
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.020006	248.23	172.93
Rate band 8	0.019153	0.024435	0.020006	4.45	-18.13

Arthur  
Mutual  
proposed

% diff  
current

% diff  
proposed

	NECA	NECA	Bascom	% diff	% diff
	Current	proposed	Mutual	current	proposed
Tandem switched transport	0.000161	0.000192	0.020579	12681.99	10618.23
per minute, per mile	0.000795	0.000945	0.049218	6090.94	5108.25
per minute, per termination	0.002888	0.002439	0.000000	-100.00	-100.00
Tandem switching					
Local switching					
Rate band 1	0.005745	0.007330	0.029059	405.81	296.44
Rate band 8	0.019153	0.024435	0.029059	51.72	18.92

	NECA	NECA	Benton	% diff	% diff
	Current	proposed	Ridge	current	proposed
Tandem switched transport	0.000161	0.000192	0.003503	2075.78	1724.48
per minute, per mile	0.000795	0.000945	0.010399	1208.05	1000.42
per minute, per termination	0.002888	0.002439	0.000000	-100.00	-100.00
Tandem switching					
Local switching					
Rate band 1	0.005745	0.007330	0.029703	417.02	305.23
Rate band 8	0.019153	0.024435	0.029703	55.08	21.56

	NECA	NECA	Buckland	% diff	% diff
	Current	proposed	proposed	current	proposed
Tandem switched transport	0.000161	0.000192	0.005216	3139.75	2616.67
per minute, per mile	0.000795	0.000945	0.007049	786.67	645.93
per minute, per termination	0.002888	0.002439	0.000000	-100.00	-100.00
Tandem switching					
Local switching					
Rate band 1	0.005745	0.007330	0.037902	559.74	417.08
Rate band 8	0.019153	0.024435	0.029703	55.08	21.56

	NECA Current	NECA proposed	Fort Jennings proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.044390	27471.43	23019.79
per minute, per termination	0.000795	0.000945	0.051489	6376.60	5348.57
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.048599	745.94	563.02
Rate band 8	0.019153	0.024435	0.048599	153.74	98.89
Tandem switched transport per minute, per mile	NECA Current	NECA proposed	Glandorf proposed	% diff current	% diff proposed
per minute, per termination	0.000161	0.000192	0.009085	5542.86	4631.77
Tandem switching	0.000795	0.000945	0.010559	1228.18	1017.35
	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.043044	649.24	487.23
Rate band 8	0.019153	0.024435	0.043044	124.74	76.16
Tandem switched transport per minute, per mile	NECA Current	NECA proposed	Kalida proposed	% diff current	% diff proposed
per minute, per termination	0.000161	0.000192	0.003380	1999.38	1660.42
Tandem switching	0.000795	0.000945	0.005145	547.17	444.44
	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.024323	323.38	231.83
Rate band 8	0.019153	0.024435	0.024323	26.99	-0.46

	NECA Current	NECA proposed	Middle Pt. Home proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.008556	5214.29	4356.25
per minute, per termination	0.000795	0.000945	0.009181	1054.84	871.53
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.042923	647.14	485.58
Rate band 8	0.019153	0.024435	0.042923	124.11	75.66
			Ottoville Mutual proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.001516	841.61	689.58
per minute, per termination	0.000795	0.000945	0.003982	400.88	321.38
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.030295	427.33	313.30
Rate band 8	0.019153	0.024435	0.030295	58.17	23.98
			Ridegville proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.003809	2265.84	1883.85
per minute, per termination	0.000795	0.000945	0.005143	546.92	444.23
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.025014	335.40	241.26
Rate band 8	0.019153	0.024435	0.025014	30.60	2.37

	NECA Current	NECA proposed	Sherwood Mutual proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.001552	863.98	708.33
per minute, per termination	0.000795	0.000945	0.004873	512.96	415.66
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.028250	391.73	285.40
Rate band 8	0.019153	0.024435	0.028250	47.50	15.61
Tandem switched transport per minute, per mile	0.000161	0.000192	Vaughnsvl proposed	% diff current	% diff proposed
per minute, per termination	0.000795	0.000945	0.016795	10331.68	8647.40
Tandem switching	0.002888	0.002439	0.016331	1954.21	1628.15
Local switching			0.000000	-100.00	-100.00
Rate band 1	0.005745	0.007330	0.092540	1510.79	1162.48
Rate band 8	0.019153	0.024435	0.092540	383.16	278.72
Tandem switched transport per minute, per mile	0.000161	0.000192	Chesnee proposed	% diff current	% diff proposed
per minute, per termination	0.000795	0.000945	0.000146	-9.32	-23.96
Tandem switching	0.002888	0.002439	0.000718	-9.69	-24.02
Local switching			0.000000	-100.00	-100.00
Rate band 1	0.005745	0.007330	0.009500	65.36	29.60
Rate band 8	0.019153	0.024435	0.009500	-50.40	-61.12

	NECA Current	NECA proposed	Gearheart proposed	% diff current	% diff proposed
Tandem switched transport per minute, per mile	0.000161	0.000192	0.001220	657.76	535.42
per minute, per termination	0.000795	0.000945	0.006016	656.73	536.61
Tandem switching	0.002888	0.002439	0.008901	208.21	264.94
Local switching					
Rate band 1	0.005745	0.007330	0.009200	60.14	25.51
Rate band 8	0.019153	0.024435	0.009200	-51.97	-62.35
Tandem switched transport per minute, per mile	0.000161	0.000192	Skyline proposed	229.81	176.56
per minute, per termination	0.000795	0.000945	0.002620	229.56	177.25
Tandem switching	0.002888	0.002439	0.000000	-100.00	-100.00
Local switching					
Rate band 1	0.005745	0.007330	0.012000	108.88	63.71
Rate band 8	0.019153	0.024435	0.012000	-37.35	-50.89
Tandem switched transport per minute, per mile	0.000161	0.000192	Yadkin proposed	80.12	-83.33
per minute, per termination	0.000795	0.000945	0.000156	-80.38	-83.49
Tandem switching	0.002888	0.002439	0.001444	-50.00	-40.80
Local switching					
Rate band 1	0.005745	0.007330	0.012000	108.88	63.71
Rate band 8	0.019153	0.024435	0.012000	-37.35	-50.89

Note: NECA is the only carrier to propose local switching rates that vary by band. Rate band 1 is the lowest local switching rate, and rate band 8 is the highest local switching rate. NECA's proposed rates included in Transmittal No. 1172, filed June 15, 2007.

## Certificate of Service

I, Jo-Ann Monroe, do hereby certify that copies of the foregoing "Petition to Suspend and Investigate" of Sprint Nextel Corporation were sent via e-mail or first class mail, postage prepaid, on this 22nd day of June 2007, to the following:

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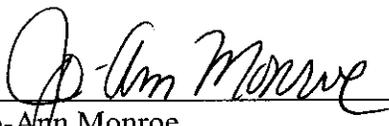
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