

2009 ANNUAL TELECOMMUNICATIONS REPORT

prepared by the

Wyoming Public Service Commission

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under W. S. § 37-15-407 of the

Wyoming Telecommunications Act

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Foreword

2009 Annual Telecommunications Report

The Annual Telecommunications Report provides an update on the state of the telecommunications industry in Wyoming for the calendar year 2008. The report provides background and information in the following areas:

- Regulatory matters;
- The telecommunications industry in Wyoming; and
- Other information.

In addition, the report provides information in the following areas:

- The 2007 Wyoming Telecommunications Act;
- Industry trends;
- Issues affecting:
 - Consumers;
 - The Commission; and
 - Incumbent and competitive local exchange carriers (CLECs), and IXC;
- Eligible telecommunications carriers;
- Quality of service;
- The Wyoming universal service fund; and
- Federal trends.

2007 Wyoming Telecommunications Act

Wyoming's telecommunications law as it existed in the original Wyoming Telecommunications Act of 1995 and as it was rewritten in 2007 has changed significantly. The Wyoming Telecommunications Act of 1995 preceded the federal Telecommunications Act of 1996 and was very progressive by establishing:

- cost based pricing of telecommunications services
- the WUSF
- definitions for competitive and noncompetitive services
- criteria for competitive designations
- prohibitions against cross subsidies between services

Cost based pricing requires prices that recover total service long-run incremental cost (TSLRIC). TSLRIC approximates the concept of long-run marginal cost set forth in economic theory. TSLRIC is the total forward-looking cost of providing a service, using least cost technology, divided by the number of units of production.

The WUSF provides for an assessment on gross intrastate wireline, cellular and long distance retail revenues to support high-cost basic line charges in order to maintain affordable rates. The goal is - after crediting high-cost customers for federal universal service high-cost support that the carrier receives - no customer pays more than 130% of the statewide average price for local service. Each year this benchmark is recalculated. (Currently it is \$33.61 per month.)

In 1995, Wyoming had 14 incumbent local exchange carriers (ILECs) and no CLECs. Today Wyoming has 59 CLECs, and 210 interexchange carriers (IXCs, or long distance companies) registered in the state.

Since Wyoming's 1995 Act and the passage of the federal Telecommunications Act of 1996, there have been significant structural changes in the industry with new entrants providing both competitive local exchange and long distance service. The most significant changes in the telecommunications industry have been the explosive growth of the Internet, the success in the marketplace of wireless communications, and the entry of the cable industry in voice, and data services.

Industry Trends

During the past decade there have been significant technological developments positively affecting customer choices.

Cable voice telecommunications service is available in the 13 largest communities in the state. Bresnan is the primary provider of cable service. In 2008, Bresnan expanded its footprint with service offerings in RT's service area. Since receiving a certificate of public convenience and necessity (CPCN) for voice service in 2005, Bresnan has become the second largest local exchange service provider in Wyoming -- behind Qwest.

Bresnan offers a digital telephone service, which the Commission determined required a CPCN because the formatting of calls into an Internet protocol (IP) format is performed locally and calls are not carried over an Internet landscape. Bresnan offers the triple play of services - voice, data and video.

Qwest, the largest wireline service provider in Wyoming, offers digital subscriber line (DSL) service.

Now, cellular services have the largest share of market for voice services in Wyoming. In 1999, there were approximately 127,000 cellular subscribers and 303,000 traditional landline customers. In 2008, the number of cellular customers has almost tripled to approximately 414,161, significantly exceeding the 294,000 traditional landline customers. Wyoming's cellular penetration is 84% of the estimated 2008 population of 522,830.

There has been burgeoning growth of Internet services via broadband choices such as DSL and high-speed cable modem. According to the FCC, the number of high-speed lines (200 kbps plus) has increased in Wyoming from 7,856 lines in 2001 to 260,191 lines as of December 2007.

In 2008, Verizon announced its acquisition of Alltel. The process was completed in January of 2009. However, Verizon will be required to divest itself of some of its newly duplicated holdings in Wyoming.

2007 Telecommunications Act, effective December 1, 2007

The 2007 Telecommunications Act was based upon understanding that sufficient competition had been achieved to support rewriting the 1995 Act – thus giving the incumbent providers a level playing field to compete.

Key elements of the 2007 Telecommunications Act are:

- Recognizes competition;
- Protects consumers from price increases for basic local service rates, although ILECs have the ability to reduce prices for noncompetitive essential telecommunication services without Commission approval;
- Eliminates TSLRIC pricing standards;
- Requires ILECs with intrastate switched access rates above \$0.03 to reduce them to \$0.03 by 2010. Carriers may request an extension to 2012; and
- Eliminates the requirement for filing of tariffs for competitive and non-essential services by both local and IXC's.

The 2007 Telecommunications Act fundamentally changed the direction of telecommunications policy in Wyoming by repealing outdated and anachronistic requirements and sections of the 1995 Act and by directing substantial changes to the provisioning, pricing and regulation of telecommunications services in Wyoming. Through a sunset provision, the entire chapter will be automatically repealed effective July 1, 2015. This is an incentive for the legislature to revisit the Act before 2015.

For Consumers:

The Commission sees the Wyoming Telecommunications Act of 2007 affecting consumers in several ways. Due to the elimination of cost-based pricing requirements for all telecommunications services (section 402) and the elimination of the prohibition against cross-subsidies among services (section 403), the law provides for considerable downward pricing flexibility for all telecommunications services including non-competitive essential basic local exchange service. The Commission has not seen a rush by industry to lower rates, but the opportunity is there nonetheless.

Prices in effect as of July 1, 2006, are deemed fair and reasonable -- they function as a cap on noncompetitive essential basic local exchange service until at least 2009 and

the 2007 Act provides further protections against price increases beyond 2009. Most price increases for noncompetitive essential basic local exchange service are subject to review and approval by the Commission. Consumers retain the ability to bring price complaints to the Commission concerning the reasonableness of the price for any noncompetitive telecommunications service. The operation and function of the WUSF will remain virtually intact to the benefit of those consumers dependent upon the monthly support payments.

On the downside, the amount of information relating to telecommunications services accessible to consumers through the Commission is significantly reduced due to the elimination of the price schedules and tariff filing requirements for nonessential services.

For the Commission:

The 2007 Act generally limits the Commission's jurisdiction to essential local service and switched access service provided by ILECs. For a period, the Commission will have review and approval authority for increases in essential local service prices. The Commission is required to determine a maximum price for essential local service. The initial maximum is the price in effect as of July 1, 2006. Revisions in the 2007 Act give the Commission specific standards and requirements to apply in reviewing an ILEC's application for designation of competitive services. The Commission will have less ability and a lesser role in responding to customer inquiries and price and service complaints because of the elimination of many filing requirements of the current law including many price schedules.

For Incumbent, Competitive and Interexchange Carriers (Industry):

The 2007 Act provides a transition for intrastate switched access charges -- by 2010, they may not exceed \$0.03 per minute. The 2007 Act also provides a revenue neutral provision for any possible corresponding adjustments to essential basic local exchange service subject to review and approval by the Commission. It provides ILECs the opportunity to file applications for revenue neutral adjustments with the Commission when switched access charges have to be reduced to the \$0.03 per minute level. ILECs have the ability to apply to the Commission to increase the price for essential local service based on certain external factors affecting the cost of those services. In 2008, Embarq, Range and RT filed to rebalance their rates. In December 2008, Dubois Telephone Exchange filed to reduce their intrastate switched access rates from \$0.11853 in three phases to \$0.03 by 2012. Embarq increased their intrastate switched access rate to \$0.03 from \$0.004571, thus offsetting the increase with a decrease in local rates.

The 2007 Act substantially revises and simplifies the process by which essential basic local exchange service can be found subject to effective competition and no longer subject to price regulation by the Commission. "Essential services" are defined as basic local exchange service, switched access, and are treated as noncompetitive, remaining subject to economic and service quality regulation. "Non-essential services" such as long

distance, enhanced local calling features like call forwarding, for example, are treated as competitive and are not subject to economic price regulation. “Essential services” are subject to TSLRIC requirements for pricing.

Criteria for competitive designations include whether functionally equivalent services are available from other providers in the relevant market, substitutability at reasonably comparable prices, terms and conditions; and existing economic, regulatory or technological barriers to entry. ILECs have the discretion and ability to lower prices for all telecommunications services in order to respond to competition or other factors. Only ILECs providing noncompetitive telecommunications services will have to maintain price schedules and tariffs with the Commission. CLECs and IXC’s will no longer have to submit or maintain price schedules with the Commission. Further, revisions remove telecommunications company mergers and reorganizations from Commission jurisdiction.

Eligible Telecommunications Carrier Certifications

In 2007, the Federal Communications Commission (FCC), asked states to issue rulemaking pursuant to Sections 214 and 254 of the Federal Telecommunications Act of 1996. The purpose of the rulemaking was to reduce the disparity between states in processing applications for eligible telecommunications carrier (ETC) designation.

The Commission amended its rules in 2007. The former rules only reflected the ETC requirements promulgated in Section 214 of the Telecommunications Act of 1996. The FCC encouraged states to mirror the ETC designation rules it adopted in 2005. Major changes to the Commission’s rules were made and a more comprehensive process was undertaken in 2008 after hearings were held on the ETC designation process:

- Requiring the applicant to provide detailed maps of service areas such as in the case of the Wind River Indian Reservation, and requiring the applicant to work with the Tribal authorities.
- Requiring applicants to provide public interest analysis exploring the advantage of having additional carriers advancing universal service.

Wyoming receives approximately \$55 million in federal universal service high cost funds.

Quality of Service

The 2007 Act does not hinder the Commission’s ability to continue to monitor and hold hearings on quality of service, nor does it hinder its ability to require corrective action. The Commission has opened a docket looking at statewide issues of “quality of service” because of complaints filed by individuals on the Wind River Indian Reservation. The initial investigation and hearing indicated that there were service problems affecting multiple customers and that there were underserved areas. The complaints were about chronically bad quality of landline service including phantom

ringing, cross talk, crackling on the line, no dial tone, interruption of 911 services and so forth. Investigation and initial data gathered relative to facilities throughout the state has indicated much of the analog outside plant circuit equipment (Anaconda carrier) is more than thirty years old and was last manufactured in 1980's.

Although the Commission commenced an investigation focused on the Wind River Indian Reservation and surrounding areas, because of the data gathered the Commission later expanded its investigation to a statewide review of telecommunications quality of service. The investigation broadened in 2008 with hearings held in Kemmerer, Riverton, Medicine Bow, Beulah, Lusk, Glenrock, and Wheatland. The service quality investigation is ongoing.

Outage Reporting

Because of the 911 outage in August 2006 and subsequent Commission investigation and hearings, the Commission ordered Qwest to pursue the establishment of a 911 task force with responsibility for improving communications with Public Service Answering Points (PSAPs), developing best practices, and serving as a clearinghouse to improve communications. In October 2008, the 911 task force reported to the Commission on its progress and subsequent development of best practices to improve communications and coordination between carriers and the PSAPs.

WUSF

In Wyoming, pursuant to statute, lines with rates in excess of 130% of the statewide average rate, determined this year to be \$33.61, and after application of federal universal service high-cost support, are eligible for WUSF support. The number of lines eligible for WUSF has generally stabilized at approximately 26,000 lines due to increased federal support and better targeting of federal support. The WUSF is being managed and administered so that all eligible access lines receive support and the assessment necessary to operate the WUSF is as small as possible. For the 2008-2009 fiscal year, six ILECs receive monthly support from the WUSF. Total support for the fiscal year will be approximately three million dollars and the assessment funding the WUSF is set at 1.00% of gross intrastate retail telecommunications revenues. (Effective July 1, 2008)

Federal Trends

In 2008, the FCC embarked upon its own vision of universal service reform, issuing a Further Notice of Proposed Rulemaking in a group of dockets involving intercarrier access and universal service reform. Distributing over 400 pages of text for comment, the FCC continued to ignore a 2005 Remand Order by the U.S. Court of Appeals for the Tenth Circuit to which the Wyoming Commission was a party, along with the regulatory utility commissions from Vermont, Maine, and Montana, the Montana Consumer Counsel, and Qwest. The gist of the matter is that in making the national universal service program the FCC has neglected its responsibility under Section 254 of the federal Telecommunications Act of 1996 to provide a universal service fund

that is sufficient to afford reasonably comparable rates between urban and rural areas. It is Wyoming's position that rural rates for Qwest are not reasonably comparable to the nationwide urban benchmark. Since Wyoming has been diligent in addressing access reform at the state level, and has concomitantly created the WUSF to support high-cost rural rates, it remains the federal agency's responsibility to provide sufficient funding to make Qwest's rates reasonably comparable.

It is not expected that the FCC will act on the issues raised in its Further Notice of Proposed Rulemaking on access and universal service reform until summer of 2009 at the earliest. In the meantime, on January 15, 2009, the Commission filed a Petition for Writ of Mandamus at the U.S. Court of Appeals for the Tenth Circuit jointly with the regulatory utility commissions from Vermont and Maine, and Qwest. The Court has ordered the FCC to respond by February 15, 2009.

SECTION 1: REGULATORY MATTERS

a. Commission Telecommunications Activities 2008

January

Qwest, at open meeting, asked the Commission to consider revising Rule 500 to allow for use of federal universal service funds to target and upgrade select service and facilities. Funds are currently used by Qwest to reduce all its customer rates in high cost areas throughout the state.

The Commission cancelled the operating authority of several telecommunications companies for failure to submit annual reports or Department of Revenue utility assessments.

Qwest provided the Commission with an update on its effort to improve service quality and reliability problems along Trout Creek on the Wind River Indian Reservation.

February

The Commission continued deliberations from December 20, 2007 on Embarq's application to increase its switched access rates from \$0.004571 to \$0.03. Embarq's filing was the first under provision of the 2007 Telecommunications Act, W.S. § 37-15-203(e) on the regulation of essential services. The application was approved with one Commissioner dissenting.

One Commissioner and staff members attended the winter meeting of National Association of Regulatory Utility Commissioners (NARUC) in Washington D.C.

At an open meeting, Qwest representatives presented a revised customer bill format to be tried on 8,000 Wyoming customers. The new format is intended to simplify and make the bills more customer friendly.

Commission staff, in open meeting, advised the Commissioners of potential inconsistencies in the calculation of WUSF affecting the statewide average and 130% benchmark from 2003 through 2006. Staff asked for and received approval to pursue an audit of the fund.

There were 22 telecommunications complaints.

The Commission held an open meeting with citizens concerned about cellular service and digital conversion in the Big Horn Mountains, Sheridan and Buffalo areas. Industry representatives, county commissioners, Big Horn Economic Development Council, US Forest Service, and a representative from Senator Enzi's office participated. Discussion focused on service reception, digital conversion and need for additional

coverage. The Commission staff presented information to the Big Horn Economic Development Council on grants and loans for telecommunications and broadband deployment to rural areas by the Rural Utility Service of the U.S. Department of Agriculture.

The Commission issued an order for a formal investigation on August 1, 2006, concerning the 911 emergency telecommunication outage. Following investigation, hearings, and reports from Qwest, the Commission issued an order directing Qwest to improve the diversity and redundancy it had promised. The Commission directed Qwest to initiate a task force to promote better, more timely communications and best practices. It directed that the task force serve as a clearinghouse of information, offer assistance to 911 providers, coordinate efforts, establish best practices, and generate necessary emergency action plans.

March

The Commission, at an open meeting, authorized the commencement of a rulemaking to address changes to the statutory framework governing the regulation of telecommunications utilities as enacted in the Wyoming Telecommunications Act, which became effective July 1, 2007. The Commission scheduled public hearings on the new proposed rules for May 12 and 15, 2008.

The Commission opened a formal rulemaking to revise Commission Rule 500 to target federal universal service funds to replace specific infrastructure replacements or improvements as urged by Qwest.

April

The Commission joined the regulatory utility commissions from Maine and Vermont, and Maine's ConnectME Authority to file comments with the FCC regarding identical support, reverse auctions, and comprehensive reform of federal universal service high cost support.

Staff members attended the annual Qwest Regional Oversight Committee (ROC) meeting in Denver. Attendees included representatives from the 14 state utility commissions in Qwest's service territory, and industry representatives. Topics included deregulation, broadband deployment and telephone numbering requirements. A presentation was given concerning continuation of the Qwest Performance and Assurance Plan (QPAP). The QPAP deals with interconnection service quality requirements for the 14 states.

The Commission approved Bresnan's application for a certificate to provide local exchange service in RT Communications' service territory and its request to be designated as a competitive carrier.

The Commission finalized the WUSF interim 2007-2008 assessment level at 1.05% of gross intrastate retail telecommunications revenue. The weighted statewide average local exchange service rate was determined to be \$24.98 and the 130% benchmark was set at \$32.47.

May

A hearing was held to establish the WUSF assessment level for fiscal year 2008 – 2009. The assessment level was set at 1.00% of gross intrastate revenue, the statewide average local exchange service rate of \$25.85, and the 130% support benchmark was set at \$33.61.

The Commission held a public hearing on a proposed rulemaking to address changes in the regulation of telecommunications pursuant to the 2007 Telecommunications Act. The proposed rules address the Legislature's recognition of competition, the determination that competition exists, and regulate telecommunications in a more pro-competitive manner. Participants in the hearing included industry, the Wyoming Telephone Association and the Office of Consumer Advocate (OCA).

The Commission took comments from the industry, the National Exchange Carrier Association, and the OCA on the annual filing process for ETC certification. The participants presented their views on the processes and efforts necessary to meet annual certification. ETC certification allows ETCs to receive federal universal service funds.

June

Staff continued to resolve complaints and process applications.

July

The Commission continued to hold hearings on service quality in Kemmerer, Riverton and Glenrock. Several members of the public attended the hearing in Kemmerer, expressing concerns about the locating of lines, compatibility between county networks and Qwest's system, and marketing issues associated with cable television.

One Commissioner attended a meeting of the Legislative Select Committee on Tribal Relations in Fort Washakie, reporting on Commission issues on the Wind River Reservation. Qwest reported on repairs and upgrades. The Committee asked the Commission to coordinate with the Wyoming Department of Transportation, the Bureau of Indian Affairs (BIA), utility companies and tribes at a rights of way workshop.

August

As part of the ongoing investigation into service quality, the Commission held a public comment hearing in Medicine Bow. CenturyTel customers attending the hearing expressed their concern about phantom calls, blocked calls, inability to make 911 calls, and inability to access high-speed Internet service. Representatives from CenturyTel attended the meeting. A follow-up meeting was scheduled for October. The service quality investigation was initiated after the public comment hearing in January 2007, in Fort Washakie revealed many service complaints.

Chairman Lewis made a presentation to the Tri-State Telecommunications Conference in Midway, Utah. The presentation discussed the development of telecommunications law and regulatory activities affecting rural telecommunications' companies. The Chairman of the Utah Commission and an Idaho Commission staff member also made presentations.

The Commission held a hearing in Chugwater on Chugwater Telephone's application to increase local service rates by \$128,000 and decrease switched access rates to \$0.03 per minute of use. The OCA was an intervener, and offered a stipulation for the Commission to consider and approve. The Commission approved a revenue increase of \$110,324 per annum, effective for service on and after August 23, 2008. Chugwater Telephone's local service rates increased from \$38.20 to \$80.76. This rate increase was due to network upgrades and expense increases.

September

The Commission granted RT Communications' application for approval of a plan, filed in accordance with W.S. § 37-15-203(j), to reduce RT's intrastate switched access rates from \$0.075 to the statutory ceiling rate of \$0.03 per minute of use. To offset the loss of switched access revenues, the Commission allowed RT to increase local service rates by \$1.49, per business line and \$7.99 per residential line, resulting in equalized prices for both business and residential lines in its service areas.

The Commission held open meetings throughout the month reviewing applications for ETC certification, allowing carriers to continue to receive federal universal service support in 2009. The Commission sent certification and non-rural residential rate comparability letters to the FCC and the Universal Service Administrative Company (USAC), certifying 11 independent telephone companies, five competitive ETCs (CETCs), and Qwest.

The Commission staff hosted a conference to discuss topics related to the WUSF. Subjects included process, commission rules, statutes, calculations, and time frames.

The 911 task force reported to the Commission on its efforts and the development of best practices. The 911 task force reported that it would be giving a presentation in November to the state PSAP organization.

October

A public hearing was held to hear the application by United Telephone of the West, doing business as Embarq to increase its federal universal service debit by \$1.02 per access line per month. The OCA and Embarq described their agreement in principal to resolve outstanding issues. The OCA and Embarq agreed that there should be a credit given to Guernsey and Torrington customers of \$1.02 per month from July 1, 2008, until billing was corrected. The credit was to refund customers improperly assessed charges. The OCA and Embarq also agreed to re-target federal universal service fund credits to high-cost exchanges, and agreed upon access line rates for all Embarq Wyoming exchanges, effective December 1, 2008.

A service quality hearing was held in Beulah at Ranch A. Members of the public, the county attorney, Ranch A board members, individual business owners, and Nels Smith, former WPCS commissioner attended. Common themes were concern about access to 911, phantom calls, and emergency calls being routed through the Spearfish, South Dakota switch serving the area to the sheriff's office that are then forwarded to the Crook County sheriff's department.

November

Chairman Lewis and Commission staff members attended the fall meeting of the NARUC. Individuals attended workshops, seminars, and committee meetings.

The FCC issued a notice of proposed rulemaking to change compensation between carriers for originating and terminating long distance calls, modifying the federal universal service fund, and imposing a timetable for deployment of broadband to underserved areas. The Commission filed comments asking the FCC to first address the issue of sufficiency of the fund to provide rate comparability between urban and rural areas. Resolving this issue would bring more federal universal service support to Qwest in Wyoming.

December

Range Telephone Cooperative applied to revise its intrastate switched access rate from \$0.07261 to \$0.03 in two phases and offset the decrease with an increase in non-competitive essential local exchange service prices. The company proposed that the first phase would be effective February 1, 2009 and the second phase would be effective January 1, 2010. The increase for each phase would be \$2.70, per residential line, and \$3.44, per business line.

The 911 task force reported to the Commission on its successful meeting with the statewide PSAP organization and its presentation of best practices. Agenda and Minutes of Meetings 2008 are available on the Commission Web site.

Summary of Docketed Items Requiring Specific Commission Action

Interconnection Agreements	41
CPCN	8
Transfer of Control	1
Complaint Hearings	5

b. The WUSF

The WUSF is authorized in the Wyoming Act at W.S. §§ 37-15-501 and 37-15-502 and is further defined in Section 500 of the Commission’s Rules. The WUSF assists maintenance of affordable prices for local exchange services. According to the Wyoming Act, the WUSF was established to “assist only those customers of telecommunications companies located in areas of this state with relatively high rates for essential services.” The fund provides support to high-cost customers when their rate for local telecommunications service, after a credit for federal universal service funds, 130% of the statewide weighted average rate.

The WUSF is funded through an assessment on customer bills that is applied to all intrastate telecommunications services. Table 1 shows the assessment level has varied over time as funding requirements change due to [i] fluctuations in local telecommunications service prices, [ii] the level of federal support provided to Wyoming’s local exchange carriers, and [iii] the balance in the WUSF. Because collections in prior years were sufficient to sustain the fund in the 2004-2005 and 2005-2006 fiscal years, the universal service fund assessment percentage applied to customer bills was set at 0% for two years. The Commission authorized and approved the 2008 WUSF assessment to be 1.0% of gross intrastate retail telecommunications revenues.

Table 1
WUSF Assessments

Assessment	Docket Number	Effective Date
1%	90072-XO-97-1	07/01/97
2%	90072-XO-98-2	04/01/98
2%	90072-XO-98-3	07/01/98
6%	90072-XO-98-4	10/01/98
3%	90072-XO-99-6	03/01/99
2%	90072-XO-99-10	07/01/99
3%	90072-XO-99-11	10/01/99
2%	90072-XO-00-13	07/01/00
4%	90072-XO-01-17	07/01/01
4%	90072-XO-02-20	07/01/02
1%	90072-XO-03-22	07/01/03
0%	90072-XO-04-24	07/01/04
0%	90072-XO-05-25	07/01/05
0.85%	90072-26-XO-06	07/01/06
1.05%	90072-27-XO-07	07/01/07
1.00%	90072-XO-28-08	07/01/2008

Under Sections 500(e) and 500(k) of the Commission's rules, the manager of the WUSF filed reports and documentation with the Commission, providing details regarding the computation of a recommended assessment level for the 2007-2008 WUSF fiscal year, providing details of fund activity for the 2006-2007 fiscal year, as set forth below:

Table 2
Schedule of Receipts and Disbursements
July 1, 2007, through June 30, 2008

Fiscal Year beginning balance		\$584,288.36
Net Assessments received		\$325,226.91
Qwest section 271 QPAP payments	\$4339.00	
Investment income	\$21,910.40	
Total Fiscal Year receipts		\$3,278,519.31
Disbursements for support		(\$3,267,878.14)
Disbursements for administrative expenses		(\$69,882.05)
Fiscal Year ending balance		\$525,047.48

Table 3
Rate Averages and Total Support Projections
July 1, 2008, through June 30, 2009

	Essential Access Lines
Statewide Weighted Average Local Service Rate	\$25.85
130% Support Benchmark	\$33.61
Total 2008-2009 Support Projection	\$2,791,054.32

The Commission addressed several important issues regarding the WUSF in 2008, including but not limited to the establishment of the WUSF assessment level for the twelve-month period beginning July 1, 2008, at 1.0% of gross intrastate retail revenues. The Commission also established the weighted statewide average rate at \$25.85 and the associated 130% support benchmark at \$33.61 for the WUSF fiscal year beginning July 1, 2008.

Find out more about the WUSF and related telecommunications matters on the Internet at psc.state.wy.us/wyusf.htm

c. Federal Universal Service Fund Issues

Activity related to federal universal service funding in 2008 centered on responding to FCC requests for comment on various reform proposals. The Commission also performed annual certification of ETCs, and certified that Qwest's residential rates for rural customers are not comparable to national benchmark urban rates. As reported in the Commission's 2008 Annual Telecommunications Report, in 2007, the Federal-State Joint Board on Universal Service released its recommended decision, proposing a major overhaul of the federal universal service program. The Joint Board proposed changes to the support mechanism, including the establishment of three funds to replace the existing high-cost support mechanism. The three funds would provide continued support to high-

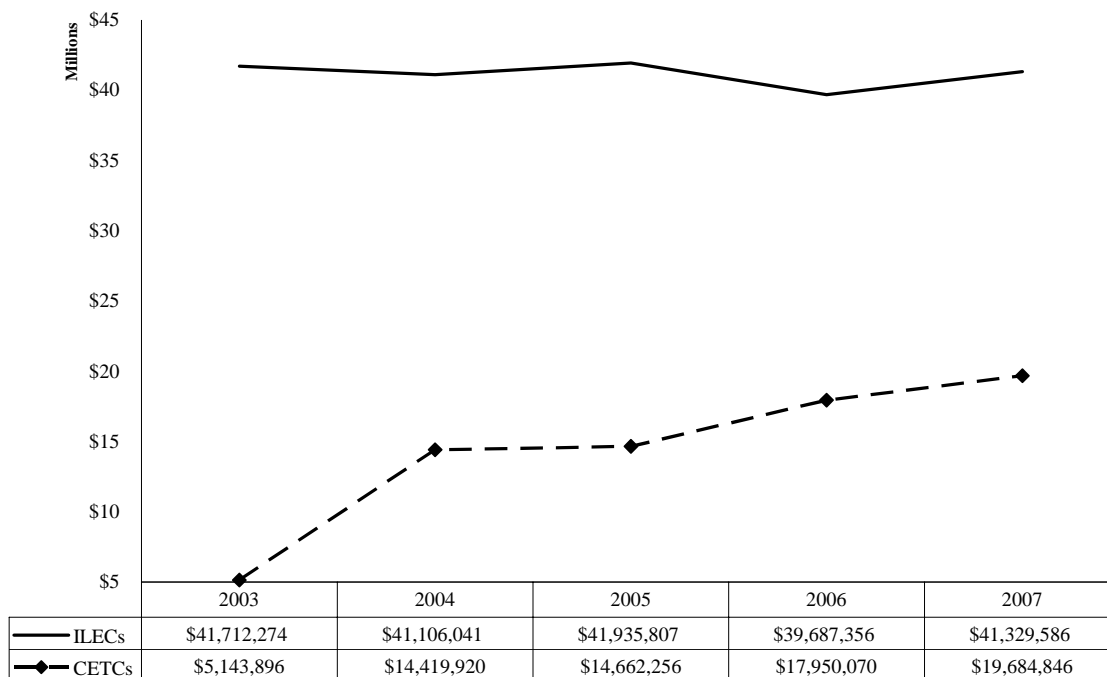
cost, rural, and insular areas for the provision of (1) landline, (2) mobile services, and (3) new support for broadband services.

In 2008, the FCC issued a request for comments on the Joint Board's recommendations. In June 2008, the Commission filed joint reply comments with the regulatory utility commissions in Maine and Vermont, and the Maine ConnectME Authority, jointly filing reply comments – see Appendix F to read them. The joint reply comments focus on the FCC failure to respond to the February 23, 2005 remand by the U.S. Court of Appeals for the Tenth Circuit of the FCC's previous decisions on universal service. In *Qwest Corp. v. FCC*, 258 F.3d 1191 (2001) ("Qwest I"), the Court reversed and remanded the FCC's mechanism for providing federal support to non-rural telecommunications carriers under the 1996 Telecommunications Act, 47 U.S.C. § 254 (the "Act"). The court instructed the FCC to respond to the requirement under 47 U.S.C. § 254 for a federal universal service fund that is sufficient to provide rate comparability between rural and urban areas.

On May 1, 2008, the FCC released an order capping the amount of funding for competitive ETCs. This was in response to growing concerns about the rapid growth of the fund. The chart below illustrates the growth of the federal fund for Wyoming from 2003 to 2007 for ILECs and for CETCs.¹

Chart 1

Growth in Federal High Cost Universal Service Funding for Wyoming (2003-2007) in Millions



¹ Source: www.usac.org.

As the chart shows, funding for ILECs has held steady. However, the chart shows funding for CETCs has multiplied almost four times during the five-year period for which data is available. This is mostly attributable to the explosive growth of the cellular phone service industry.

Choosing an alternative path to reform, on November 5, 2008, the FCC issued a *Further Notice of Proposed Rulemaking* setting forth various reforms of intercarrier compensation and universal service, including the proposal to reduce intrastate and interstate terminating access charges practically to zero, and accordingly making carriers whole by allowing them to increase subscriber line charges or, alternatively, local rates. The *Further Notice of Proposed Rulemaking* did not respond to the remand order from the U.S. Court of Appeals for the Tenth Circuit. On November 26, 2008, the Commission provided initial comments. The Commission urged the FCC to address the Court's order to provide for sufficiency and comparability before undertaking further reform. The Commission opposed the FCC proposal to usurp State jurisdiction over intrastate access charges and local rates. The Commission explained its serious concerns that rural customers of Qwest are already paying excessively high rates that are not comparable to urban prices. The Commission explained that Wyoming has already been diligent in addressing implicit support contained in access rates and in proceeding to make local rates cost based and to ensure that provision of necessary support explicitly through the WUSF. A copy of the November 26, 2008, comments are available in Appendix G. On December 22, 2008, the Commission reiterated its position, filing joint reply comments with a coalition of state regulatory utility commissions including Wyoming, Nebraska, Iowa, Vermont, and Maine. See Appendix H.

On September 29, 2009, the Commission filed its annual certifications of rural, non-rural, and CETCs (Appendix I) with the FCC and the USAC. The Commission's review of each carrier's application certifies that federal universal service support for ETCs is used for the purposes intended.

Table 4
Certified Rural ETCs

All West Communications	Silver Star Communications
CenturyTel of Wyoming	Tri County Telephone Association
Chugwater Telephone Company	TCT West
Dubois Telephone Exchange	Union Telephone Company
RT Communications	United Telephone Company d/b/a Embarq
Range Telephone Cooperative	

Table 5
Certified CETCs

Advanced Communications Technology	Union Telephone Co. d/b/a Union Cellular
Alltel Communications	VCI Company
Silver Star Communications	

Table 6
Certified Non-Rural ETCs

Qwest Corporation	
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Annual certification is a federal requirement for the continued receipt of federal universal service support by Wyoming's designated ETCs. The ETC certification requirements are set forth in Commission Rule 514.

Appendix J is the Commission's certification that Qwest's rural rates (\$49.50 in least densely populated areas, including federal and WUSF credits, taxes and surcharges) are not comparable to the nationwide urban benchmark (\$37.36 per month).

Each year, the Federal-State Joint Board on Universal Service releases a Monitoring Report on the various components of the federal universal service fund support programs. The Monitoring Report contains information on various universal service support mechanisms. It also summarizes annual contributions to, and disbursements from, the major federal universal service support programs: low-income; high-cost; schools and libraries; and rural health care. Below is trend data for federal universal service fund support for Wyoming from the 2008 Monitoring Report.

Table 7
Federal Support for Low Income and Rural Health Care

	2006	2007
Wyoming Low Income Support	\$1,309,664	\$858,718
Wyoming Rural Health Care Support	\$189,198	\$66,532

Chart 2

Schools and Libraries Support for Wyoming by Type of Service
(funds disbursed, in millions)

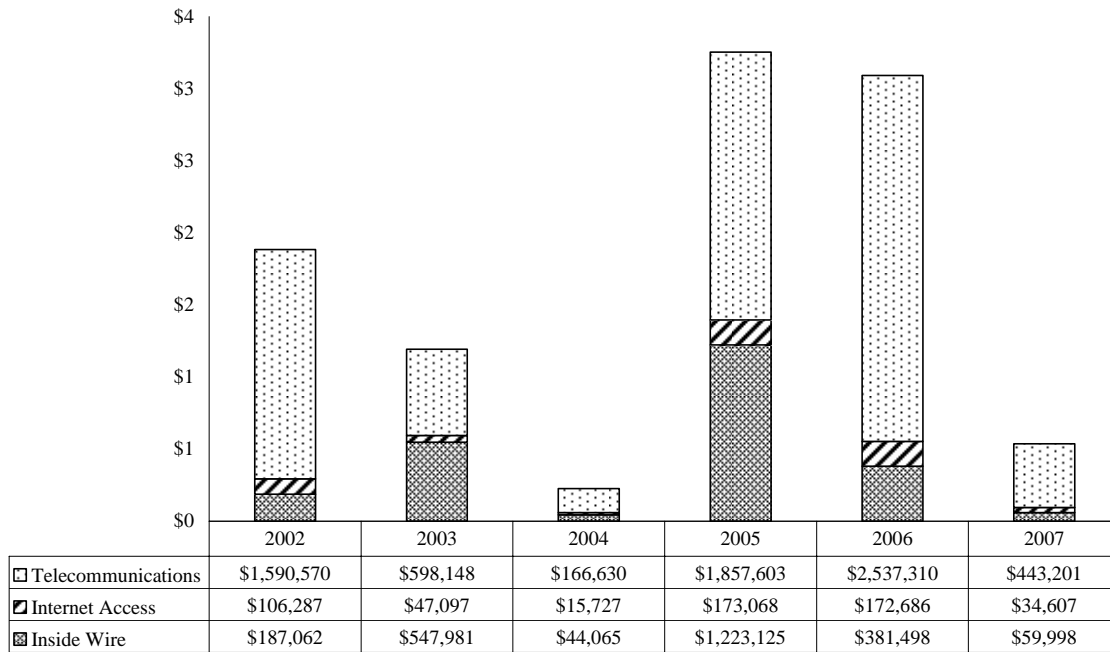


Table 8

Federal Universal Service Mechanisms: 2007
(Annual Payments and Contributions in Thousands)

					Total Payments		Estimated Contributions		
	High-Cost Support	Low-Income Support	Schools and Libraries	Rural Health Care	Amount	% of Total	Amount	% of Total	Estimated Net Dollar Flow
Wyoming	\$61,014	\$873	\$7,656	\$172	\$69,715	1.00%	\$15,541	0.22%	\$54,174
US	\$4,286,733	\$822,762	\$1,807,961	\$37,381	\$6,954,837	100.00%	\$7,058,910	100.00%	-\$104,073

The Monitoring Report shows that Wyoming's ETCs receive federal high-cost support (including all federal high-cost support mechanisms – high-cost loop, interstate access and common line, long term, and local switching) in the total amounts shown in the table below. These amounts are subject to quarterly revisions and updates throughout the reporting year and thereafter. Data from the previous year provides a comparison.

Table 9
Total Federal High-Cost Support Payments
Wyoming ETCs

Company	2007	2008
United Telephone Co. of the West - Wyoming, d/b/a Embarq	\$1,297,167	\$1,219,515
Range Telephone Cooperative	\$7,111,599	\$7,151,034
Chugwater Telephone Company	\$334,563	\$369,663
All West Communications	\$119,790	\$95,697
Dubois Telephone Exchange	\$2,255,790	\$2,407,824
Silver Star (ILEC)	\$2,578,359	\$2,696,370
Tri-County Telephone Association	\$7,106,597	\$8,136,990
Union Telephone	\$7,357,854	\$4,620,657
CenturyTel	\$866,742	\$928,695
Qwest	\$12,301,125	\$11,446,228
Silver Star (CLEC)	\$22,194	\$30,061
Western Wireless d/b/a Alltel	\$7,501,137	\$8,197,013
Advanced Communications Technology	\$18,453	\$30,012
WWC Holding d/b/a Cellular One	\$2,008,632	\$1,634,575
Union Telephone d/b/a Union Cellular	\$10,134,430	\$6,653,787
Total	\$61,014,432	\$55,618,121

Lifeline Telephone Assistance Program

A data request was sent to all carriers in the state providing local exchange service. The eligibility and certification of eligibility of potential recipients of Lifeline service are governed by the Wyoming Public Assistance and Social Services Act, W.S. §42-2-301 et seq. Of the twenty-two companies queried, seventeen responded. To be an ETC a carrier must offer Lifeline service. USAC reports 5,102 Lifeline customers in Wyoming for 2008, a decrease of 1,221 in subscribers from 2007. Of the 16 companies reporting, only seven companies charge a Telephone Assistance Program assessment to their customers. The remaining companies give their Lifeline customers the state matching amount of \$3.50 as a bill credit.

The data collected by USAC, shows that 20% to 50 % of potentially qualified low-income customers in Wyoming participate in the program. The low-income levels in the state would indicate that the program continues to be under-utilized by low-income residents.

d. Implications and Compliance with the Wyoming Act

Wyoming's telecommunications statutes encourage the development of competition in telecommunications markets. In Wyoming, and throughout the entire nation, low residential rates were supported implicitly in the past through revenues from other services. The 1995 Act required the elimination of implicit support and made any support for high-cost customers explicit through the WUSF. With the passage of the 2007 Act mandating reduction of intrastate switched access rates to \$0.03 by 2010, some local rates increase to offset the loss of switched access revenues.

Table 10, below, shows local business and residential basic service prices as they were prior to the 1995 Wyoming Act was passed and as of December, 2008. Because the WUSF's 130% support threshold is now \$33.61 per month, no customer will be required to pay more than that for local service. The table shows that residential and business rates of established telephone companies have increased significantly since 1995, except for certain rates of Qwest, Embarq, RT Communications, Silver Star Communications and Teton Telecom. This result was driven in significant part by TSLRIC-based pricing floors, how far the customer is from the central office (loop length), and density (expressed as the number of customers in a given area or per mile of line). In most cases, higher prices for local exchange service have been partially offset by lower switched access and toll prices. The influence of distance and density shows up clearly in the various base rates for local service when they are contrasted with the rates for customers of that company farthest from the base rate area (examples of de-averaging). Some companies do not de-average prices because of the geographic configuration of the areas involved, or due to lending requirements of such institutions as the Rural Utilities Service at the U.S. Department of Agriculture.

In 2008, Embarq applied for a local rate decrease due to switched access rate to decrease from \$0.04635 to \$0.03 per minute of use. Three ILECs have applied to lower their switched access rates under W.S. § 37-15-203(j). Range Telephone Cooperative and RT Communications were authorized to lower their intrastate switched access rates in 2008. Dubois Telephone filed to decrease the switched access rates in December. The Commission will act on the filing in January of 2009. Table 10 illustrates current rates. Chugwater Telephone Company applied for a rate increase and reduced switched access charges in 2007 and there was a hearing in 2008.

Table 10
Basic Local Residential and Business Telephone Service Rates

Company	Residential Rates			Business Rates		
	1995	12/31/2008	change	1995	1/1/2008	change
Qwest						
base rate area:	\$14.64	\$23.10	58%	\$30.56	\$23.10	-24%
farthest from base area:	\$24.54	\$69.35*	183%	\$41.46	\$69.35*	67%
Union Telephone						
base rate area:	\$8.49	\$40.95*	382%	\$13.69	\$40.95*	199%
farthest from base area:	\$26.49	\$88.47*	234%	\$31.69	\$88.47*	179%
CenturyTel of Wyoming						
base rate area:	\$10.00	\$15.00	50%	\$15.00	\$15.00	0%
farthest from base area:	\$17.50	\$28.00	60%	\$26.25	\$28.00	7%
Dubois Telephone	\$11.00	\$19.25	75%	\$19.55	\$24.25	24%
Range Telephone	\$11.65	\$17.50	50%	\$18.40	\$21.00	11%
RT Communications						
Shoshoni & central WY exch:	\$10.04	\$23.99	139%	\$19.66	\$23.99	4%
farthest from base area:	\$19.94	\$33.89	70%	\$29.56	\$33.89	4%
Thermopolis & Newcastle:	\$10.78	\$23.89	123%	\$22.03	\$23.99	9%
farthest from base area:	\$20.68	\$33.89	64%	\$31.93	\$33.89	6%
Worland exchange:	\$11.51	\$23.99	108%	\$24.42	\$23.99	-2%
farthest from base area:	\$21.41	\$33.89	58%	\$34.32	\$33.89	-1%
Pine Bluffs, Burns, Carpenter:	\$12.98	\$23.99	85%	\$29.19	\$23.99	-18%
farthest from base area:	\$22.88	\$33.89	48%	\$39.09	\$33.89	-13%
Embarq/United						
Guernsey exchange:	\$7.94	\$34.86*	339%	\$13.39	\$34.86	160%
LaGrange exchange:	\$11.13	\$70.82*	536%	\$17.35	\$70.82	308%
Lingle exchange:	\$11.13	\$70.82*	536%	\$24.63	\$70.82	187%
Torrington exchange:	\$11.13	\$26.12	536%	\$24.63	\$70.82	6%
TCT West						
Greybull exchange:	\$10.14	\$27.31	172%	\$19.66	\$27.31	39%
Lovell exchange:	\$10.78	\$30.63	184%	\$22.03	\$30.63	39%
Basin exchange:	\$10.78	\$31.42	191%	\$22.03	\$31.42	43%
Frannie & Meeteetse:	\$10.78	\$45.08*	318%	\$22.03	\$45.08*	105%
Tri County Telephone						
Burlington exchange:	\$6.75	\$44.86*	565%	\$10.25	\$44.86*	338%
all other exchanges:	\$8.25	\$45.08*	446%	\$14.00	\$45.08*	222%
Teton Telecom **	\$29.65 **	\$31.25	5%	\$40.46 **	\$31.25	-23%
Silver Star	\$16.80	\$24.50	46%	\$25.20	\$24.50	-3%
Chugwater Telephone	\$10.50	\$80.76*	264%	\$15.25	\$80.76*	150%
All West	\$14.25	\$59.52*	670%	\$20.25	\$80.76*	430%

* Before applying credits for Wyoming and federal universal service fund support.

** Teton Telecom did not exist in 1995. Earlier prices shown are Teton's initial rates.

Switched access rates under the 1995 and 2007 Acts

W.S. § 37-15-411 in the 1995 Act required the Commission to investigate the appropriate way to calculate intrastate switched access charges and ways to phase out intercompany subsidies in Wyoming by January 1, 2002. The Commission held an investigation in its General Order No. 74 proceeding, deciding to handle switched access service pricing on a case-by-case basis and determining it lacked the statutory authority to implement pricing by rule. Since 1999, switched access prices have changed principally in ILEC pricing cases, which also changed local service rates to comply with the 1995 Act's TSLRIC mandate. Generally, switched access rates were reduced as local business and residential rates increased to cover their own TSLRIC costs, reversing the long-standing pricing policy, prevalent throughout the United States, allowing higher access and toll service prices to offset some of the cost of basic local service. Below is a table illustrating the changes in switched access prices in Wyoming between the advent of the 1995 Act and the reporting year.

Because switched access is considered a noncompetitive essential telecommunications service under the 2007 Act, switched access rates are subject to the initial maximum price as defined in W.S. § 37-15-203(a). In 2008, Chugwater, Range, RT, and Embarq were granted approval to charge the maximum switched access rate of \$0.03 per minute of use. Dubois Telephone Exchange has filed an application under this statute, which will be acted upon in January 2009 with a requested date of implementation of March 1, 2009.

Table 11
Switched Access and Intrastate Toll Rates

Company	Switched Access Rates (¢ per minute)			Intrastate Toll Rates (¢ per minute)		
	1995	12/31/2008	change	1995	2007	change
Qwest (U S WEST)	9.71¢	1.4698¢	(85%)	20.86¢	**	‡
Tri County Telephone	16.53¢	1.5445¢	(91%)	20.86¢*	**	‡
TCT West	9.71¢	1.5445¢	(84%)	20.86¢*	**	‡
Dubois Telephone	11.52¢	11.470¢	(0.4%)	20.86¢*	**	‡
Union Telephone	10.60¢	3.2500¢	(69%)	20.86¢*	**	‡
Embarq/United	10.33¢	3.0000¢	(71%)	20.86¢*	**	‡
RT Communications	9.71¢	3.0000¢	(70%)	20.86¢*	**	‡
Range Telephone	9.08¢	4.8560¢	(47%)	20.86¢*	**	‡
CenturyTel	6.60¢	3.1369¢	(52%)	20.86¢*	**	‡
All West Communications	14.78¢	1.5000¢	(90%)	20.86¢*	**	‡
Chugwater Telephone	8.99¢	3.0000¢	(67%)	20.86¢*	**	‡
Silver Star Communications	9.71¢	6.37¢	(34%)	20.86¢*	**	‡
Teton Telecom***	6.59¢	6.37¢	(3%)	n/a	**	n/a

* In 1995, Qwest (then U S WEST) was the designated toll carrier in Wyoming.

** There are multiple calling plans available from approximately 100 active interexchange telecommunications carriers registered at the Commission to provide long distance service through the implementation of equal access with all of the incumbent local exchange service providers in Wyoming. Prices vary from approximately 2.5¢ to 7.5 ¢ per minute.

*** Did not exist in 1995. Initial Teton Telecom rates are shown.

‡ Intrastate toll prices have been reduced up to 70% from 1995 levels.

e. Competitive Provision of Local Exchange Service

The 1995 Act and the federal 1996 Act encourage the development of competition in local exchange service markets. Both Acts require the ILECs to open their networks to competitors, to allow them to interconnect fairly with their networks and to offer services at wholesale prices suitable for resale.

By the end of the reporting year, the Commission had approved an additional eight applications for concurrent CPCNs, in addition to the 100 certificates that had been approved by the end of 2007, to provide competitive local exchange service in Wyoming. Under W.S. § 37-1-201(b), most of these companies sought authority to provide competitive local exchange service only in those Wyoming exchanges served by Qwest. Several companies have also been authorized to provide service in the Wyoming exchanges served by all incumbent local exchange companies serving in the state. Note that the 2007 Act removed from W.S. § 37-1-201 those subsections preempted by the FCC and the United States Court of Appeals for the 10th Circuit which offered special protection to smaller incumbent telecommunications companies with fewer than 30,000 access lines in Wyoming.

Among these competitive companies, McLeodUSA Telecommunications (PAETEC) is active in 22 Wyoming local exchange service markets. Bresnan Broadband of Wyoming offers Digital Phone Service in Casper, Gillette, Powell, Sheridan, Laramie, Lander, Riverton, Jackson, Buffalo, Cody, Rawlins, and Cheyenne. In 2008, Bresnan requested certification to provide service in RT Communications exchanges in Fremont, Natrona, Laramie and Weston counties. Silver Star Telecommunications offers direct facilities-based competitive local service in Afton and private line/special access services (T-1) in the Jackson exchange (and is preparing to provide a full range of local services in the Jackson exchange). All West Communications offers competitive local exchange service in the Evanston area. Advanced Communications Technology (ACT) offers facilities-based competitive local service in Sheridan and Buffalo. MCI offers its Neighborhood local exchange service plan in all Qwest exchanges in Wyoming. AT&T, under an approved interconnection agreement with Qwest, offers competitive local exchange services and Outbound ADL business services throughout Qwest's territory. Other companies are in various stages of advertising and serving, or otherwise preparing to do so.

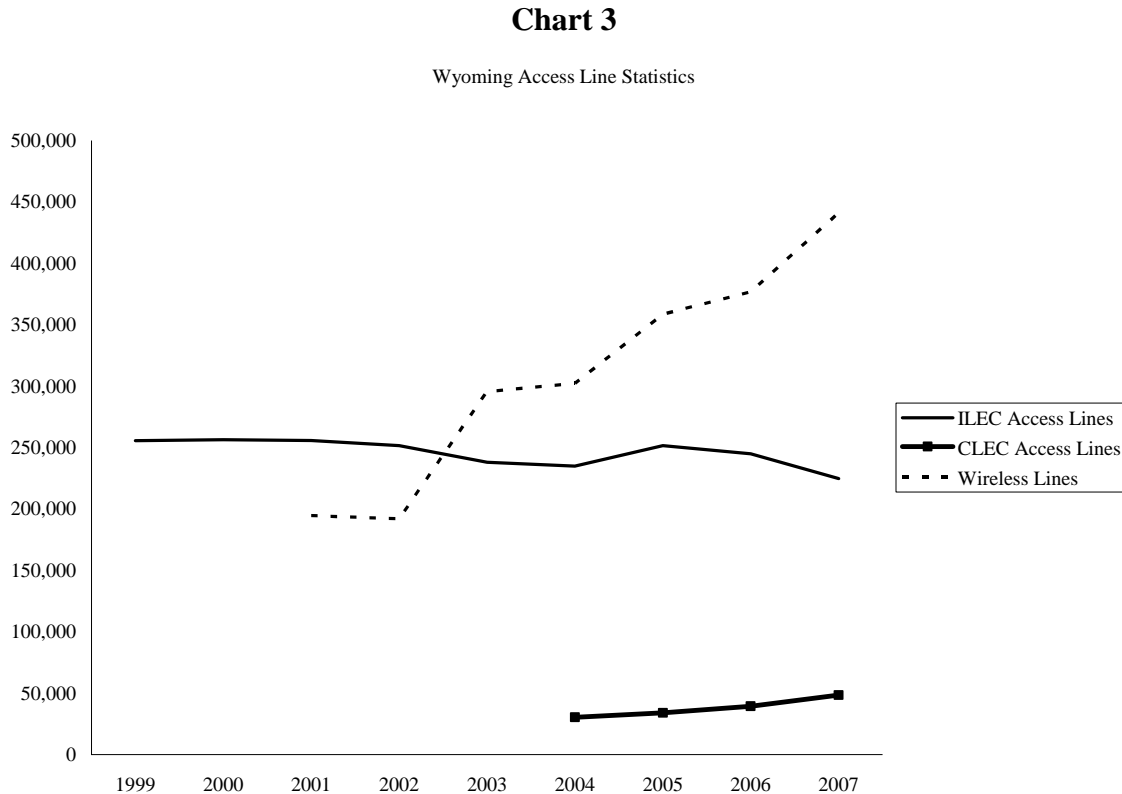
More information about these competitive local exchange service providers may be obtained by contacting them at the addresses listed in Appendix C to this Report.

f. Comparative Statistical Overview of Market Trends in Wyoming

In September 2008, the Industry Analysis and Technology Division of the FCC issued its *Local Telephone Competition* report containing selected local exchange telecommunications data, reported to it by industry for calendar year 2007. The report analyzes the state of competitiveness in the nation's telecommunications market. The

report also provides a snapshot of local telephone service competition based on switched access lines in service and numbers of mobile wireless subscribers.

Wyoming access line statistics, as reported to the FCC for its *Local Telephone Competition* report, are presented in Chart 3 below:



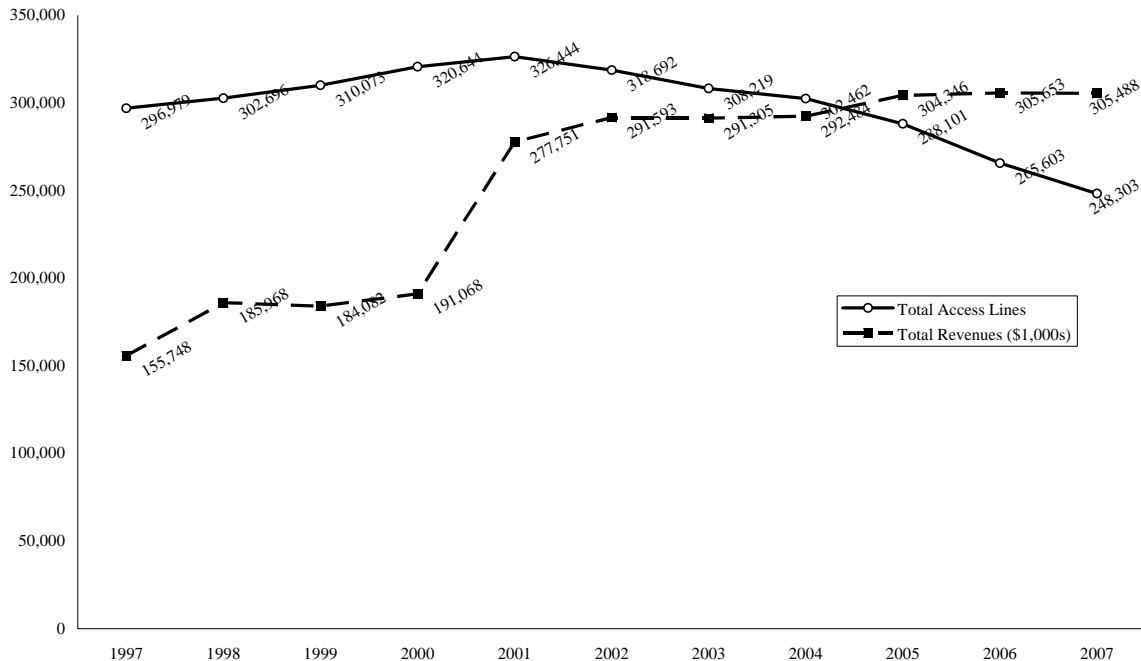
Prior to June 2005, the FCC collected data only from carriers with at least 10,000 switched access lines or mobile telephony subscribers in service in a particular state. Small carriers, many of whom serve rural areas with relatively small populations, were therefore underrepresented in the earlier data. In Wyoming, the FCC required reports from Qwest, Union Telephone, RT Communications, Verizon Wireless, and Western Wireless (now Alltel Communications). For the December 31, 2006, reporting period the FCC began collecting data from all carriers regardless of size. By including these carriers, the reported number of incumbent LEC and competitive LEC holding companies and unaffiliated carriers reporting local telephone service information tripled and the number of reporting facilities-based mobile telephony providers doubled. Thus, the post-December 2006 data provide more truly comprehensive comparative statistics for Wyoming and the nation.

Another source of information about Wyoming's local exchange industry is the annual reports each company files with the Commission. Using the most recently available data Chart 4 below illustrates the gradual decline in ILEC access lines from 1997 – 2007. The chart also shows total revenues for the ILEC industry, reflecting

regulated revenues from interstate and intrastate operations in Wyoming. It is interesting to note that while the number of access lines provided by the ILECs has been declining over the past decade, much as is displayed in Chart 3 above – at the same time these companies have actually experienced a noticeable increase in their revenues as shown in Chart 4.

Chart 4

Wyoming Access Lines and Revenues Trends (1997-2007)



g. Interconnection and Resale of Local Exchange Service

In the 2007 Act, W.S. § 37-15-404(d) requires telecommunications companies to “disclose in timely and uniform manner information necessary for the design of equipment and services that will meet the specifications of interconnection;” Subsection (e) of this statute gives the Commission the power to make rules on, among other subjects, interconnection of networks at nondiscriminatory and reasonable rates, terms and conditions; for the unbundling of services into reasonable basic network features; and for the resale and sharing of services and functions at reasonable and nondiscriminatory rates. There are similar provisions in the federal Telecommunications Act of 1996:

- § 251(a)(1), telecommunications providers must interconnect with the facilities and equipment of other telecommunications carriers; and
- § 251(c)(1), ILECs must negotiate interconnection agreements with competitive carriers.

If carriers cannot reach agreement, § 252 of the federal Act provides for arbitration by state commissions of interconnection disputes. The last request for arbitration between carriers was considered by the Commission during the reporting year.

By December 31, 2008, the Commission had approved 41 negotiated interconnection agreements and amendments for use in providing telecommunications services in Wyoming under Section 252 of the federal Act.

h. Lowering Technical Barriers to Competition

Barrier 1. “1+” IntraLATA Equal Access is an important mechanism for promoting competition in Wyoming telecommunications markets. IntraLATA “1+” equal access allows customers to select and use a long distance carrier by dialing “1” plus the telephone number without the need to use “dial around” or other multi-digit alternatives. All Wyoming ILECs have implemented “1+” equal access.

Barrier 2. Local number portability (LNP) allows consumers to keep their local telephone numbers when they change their local exchange service provider. It was addressed at the federal level by 47 CFR § 251(f)(2) which requires local exchange carriers throughout the United States to implement local number portability during 2004. All Wyoming local exchange service customers enjoy local number portability.

i. Wyoming Regulatory Policies and Practices

i. The Wyoming telecommunications market

The Wyoming Act and the federal Act have encouraged, with some success, the emergence of competitive communications options for retail customers. Competition and communications infrastructure enhancement are increasing, and it is being done by a changing mix of traditional and non-traditional service providers. Examples include high speed data services offered by telecommunications and cable companies in many Wyoming markets, the local exchange communications service of Bresnan Communications using its cable television distribution infrastructure, the proliferation of digital cellular service throughout the state, and the local infrastructure projects discussed below). As shown above, of Wyoming’s 687,091 reported access lines (and their generally equivalent wireless services) on December 31, 2007, 441,161, or about 64%, were wireless. The remaining 273,091 were landlines with only 224,700, or 82% of the total reported access lines being supplied by ILECs. The data does not differentiate the extent to which new cellular services are either “second phones” or the subscriber’s only access to the public switched network.

Telecommunications subscribers in Wyoming have a choice of multiple in-state long distance service providers and many also have choices of up to four local exchange service providers. Economic developments in the telecommunications industry in Wyoming and throughout the United States have resulted in many reorganizations, business failures and mergers among companies -- especially those who find it difficult to

survive in smaller and more challenging markets. This market winnowing was not caused by the 1995 Act, which sought to encourage more companies to provide service in Wyoming. As with the rest of the United States, the development of Wyoming's telecommunications markets and the offering of newer, more technology-intensive services depends heavily on market forces, including the influences of the cost of the service, the demand and the willingness of the market to support the investment needed for new services.

The 2007 Act eliminated the TSLRIC pricing floor and the prohibition against cross subsidies. It also added a provision allowing companies to lower their prices unilaterally and with virtually no notice. Service providers have shown almost no interest in this provision with only one company unilaterally lowering the price of basic service in some of its exchanges (but not to the extent that customers actually pay less, given the level of WUSF support). In theory, the TSLRIC pricing floor in the 1995 Act was intended to provide an economic stimulus encouraging facilities-based competitors to enter Wyoming's local exchange service markets by eliminating implicit cross-subsidies, which inhibit competition. The 1995 Act's creation of the WUSF, and its elimination of implicit subsidies, was also intended to help ease the impact of price increases.

TSLRIC compliance is virtually universal with the exception of a few small companies principally regulated by adjacent states which account for about 0.01% of Wyoming's landlines. The TSLRIC transition underlined the fact that it is relatively expensive to serve Wyoming's small and widely separated telecommunications markets. Some competition has developed, although the level of competition has not been uniform throughout the state. It remains apparent that market forces are among the most significant drivers of the uneven development of competition in Wyoming's local exchange markets.

ii. Better regulatory procedures

Among the steps taken by the Commission to simplify the regulatory process for telecommunications service providers are:

- Streamlining the approval process for certification of local exchange competitors (also recognized in the 2007 Act's simplification of W.S. § 37-15-201(b).
- Simplified registration of new IXCs, and faster review and approval of interconnection agreements and amendments.
- Online electronic filing of annual reports by all utilities, including telecommunications service providers (See the report forms at <http://psc.state.wy.us/htdocs/arforms.html>)
- Acceptance of routine telecommunications filings in electronic format.
- Information packages to help new market entrants through the registration and certification processes.

- Managing the WUSF in-house to lower expenses and improve communications with service providers.
- An online electronic system for the forms and reports associated with the WUSF.

iii. Local services subject to competition

The 2007 Act made it simpler for companies to demonstrate the existence of competition for a service, freeing the service from price regulation by the Commission. See, W.S. § 37-15-202. The 2007 Act also clarified that essentially all telecommunications services in Wyoming, except for “local exchange service and switched access provided by a local exchange company . . .” are competitive. W.S. § 37-15-202(c). It also remains possible to prove that a service is no longer subject to competition and should be reregulated. Under the 1995 Act, the Commission found the local exchange services of Qwest and Silver Star Communications in the Afton exchange subject to effective competition.

iv. A note about cellular telecommunications

The Commission does not regulate the service offerings of cellular providers but acts in such matters as, for example, the arbitration of controversies between wireless and land line companies and with respect to some surcharges and assessments, including E-911, Wyoming Relay and the assessment for the WUSF. Much detailed information is therefore not routinely available to the Commission. However, as described above, there has been great expansion in Wyoming cellular markets, with the number of cellular subscribers now exceeding the number of land access lines. Now that the FCC requires line count reports from all service providers, large and small, wireline and wireless, the comparative statistics about different types of service providers discussed above in this Report portray more definitively the rise in popularity of wireless telephony in Wyoming. Wyoming consumers continue to find more cellular service offerings, including packages, routinely and widely available to them. Cellular competition remains vigorous and PCS and digital wireless service is more prevalent in Wyoming markets. Appendix D lists cellular and PCS providers in Wyoming and the markets they serve.

j. Telecommunications Slamming, Complaints and Related Matters

i. Slamming.

The practice of changing a telephone customer’s long distance or local carrier without the customer’s knowledge or authorization is called slamming. During the reporting year, slamming accounted for about 1% of the complaints received by the Commission. Slamming is a consumer problem that emerged in the competitive telecommunications marketplace. This percentage is the same as that for the previous reporting period, and much less than the 11% rate experienced in 1999. Wyoming’s slamming and cramming law, W.S. § 37-15-412, is a deterrent to the growth of in-state slamming, as this statistic shows. The Commission continues to emphasize rapid

correction of consumer slamming complaints and to discuss emerging slamming problems with service providers.

The Commission's Complaint Section continues to see *supposed* slamming complaints; that is, telemarketers often do not correctly give their company's name to the customers; and, if the customers do not listen carefully to the third party verifier, they agree to change their long distance carrier by mistake. Furthermore, as long-distance companies continue to merge, customer bills will often display the name of a merged company or the name of the long distance company's billing agent, which are generally not familiar to the customer. Unfortunately, there is often no explanation on the bill; and customer service personnel are frequently unable to answer questions about this problem. Consumers therefore erroneously believe that they have been slammed. Similarly, changes of company names also occur when customers change local exchange service companies and the change orders are not submitted correctly. Customers may have the correct local and long distance carrier on their bills; but, within 30 days thereafter, they are switched to a different company due to local or long distance company errors relating to mergers, reorganizations or bankruptcies. Because the anti-slamming law views habitual "slammers" with disfavor, the Commission documents slamming incidents carefully to determine whether companies operating in Wyoming are using slamming as a "business practice." Wyoming's slamming law equips the Commission with important tools for dealing with the practice and moving to end it.

Because most slamming occurs with respect to interstate long distance service, jurisdiction, in most cases, lies with the FCC. As most other states have done, Wyoming confirmed for the FCC that it would take over primary responsibility for resolving both intrastate and interstate slamming complaints lodged by Wyoming consumers. The process, known as "Opting-In," allows Wyoming to act as the primary forum for all slamming complaints arising in the state. This shortens the lines of communications, allowing interstate problems of Wyoming consumers to be addressed more efficiently.

The Commission and its Complaint Section will help Wyoming customers experiencing either state or federal level problems to obtain information and resolve slamming problems efficiently and rapidly. The Commission's brochure on the subject, *Telephone Slamming: You don't have to be a victim!*, is available free of charge.

ii. Telecommunications complaints.

The overall number of utility complaints received by the Commission increased from 406 in 2007 to 669 in 2008, excluding cellular complaints. Table 12 provides a percentage breakdown of the complaints received by the Commission during the reporting year, and places the volume of telecommunications complaints into perspective:

Table 12
Consumer Complaints

Year	Water	Gas	Electric	Local Telecommunications	Long Distance Telecommunications
2005	1%	43%	20%	28%	8%
2006	1%	33%	20%	42%	4%
2007	1%	27%	19%	49%	4%
2008	0%	56%	12%	29%	3%

Although the Commission sees a substantial number of telecommunications complaints stemming from competitive telecommunications markets, many complaints still concern more “traditional” subjects such as service quality, support for advanced services, availability (or not) of service enhancements, billing errors and disagreements, and misunderstanding of the various charges appearing on bills. The Commission’s Complaint Section and the Commission were pleased to see that so many customers were aware of billing changes and had the desire to understand the reasons for the changes.

iii. Some problem areas persist:

- The Complaint Section still experiences complaints when telephone companies misquote the cost of services to customers and have generally given them incorrect information. Misquotes are most often significant in dollar amount and create billing errors in addition to the misinformation.
- The response time of local exchange companies and long distance companies to Commission investigations of consumer complaints remains poor, with most companies no longer responding within five working days as requested. Some simply do not respond adequately (if at all), necessitating follow up e-mails and telephone calls to companies to resolve complaints.
- Local number portability requirements in Wyoming have helped to decrease problems experienced by consumers in changing from one service provider to another. Companies must work together to release a customer’s line and ensure that it is working properly with the newly chosen service provider. Procedures for requesting and implementing carrier changes appear to be working, even if some problems persist. Many of the complaints involve changes from a landline local service provider to a cellular provider.
- The Commission has experienced an increase in the number of cramming complaints, from 5 in 2007 to 16 in 2008. “Cramming” is the inclusion in consumers’ telephone bills of unauthorized, misleading, or deceptive charges. The most common cramming charges have been for miscellaneous monthly fees, unauthorized voice mail service, Internet set-up fees for service not requested, and unauthorized yellow page advertising.

iv. Information requests.

In addition to the 669 complaints received during the reporting year, the Commission also received 64 customer requests for information that did not fall into the category of formal complaints. Most often, these questions concern the need for additional and higher speed service, price and service charges, customer deposits, the Do Not Call List (which remains a very popular subject), extended area service, line extensions and rate increases. Customers are still very interested in the details of the taxes, fees, surcharges and distance charges appearing on their telephone bills. The Commission continues to see more customers who do not understand distance or zone charges and who are unable to get clear answers from telephone companies. Customers often want charges verified and seek regulatory and legislative ways to eliminate them. The public continues to show an interest in understanding the telecommunications industry and regulation.

v. Speeding up the process.

Despite occasional difficulties in locating some interexchange telecommunications service providers and sometimes unsuccessful attempts to obtain timely responses from others, the Complaint Section has decreased the number of unresolved complaints carried over each month to an average of 48, a 4% increase over 2007.

k. Legislative activity.

Section 37-15-203(e) governing price regulation of noncompetitive services allows local exchange companies to make revenue neutral adjustments, considering only revenue from noncompetitive essential telecommunications services. Price adjustments to these services may eliminate or reduce differences in different portions of a company's service area. However, a local exchange company may not increase receipt of state universal service funds by virtue of these adjustments. During the 2008 legislative session §37-15-203(e) was amended to clarify that adjustments may not be made to increase existing switched access prices.

SECTION 2: THE TELECOMMUNICATIONS INDUSTRY IN WYOMING

a. Introduction

This section of the Report provides a general description of the telecommunications industry in Wyoming, the technology employed, the general availability of various services and developing technologies likely to be deployed in the future. This section should be read in conjunction with Appendix E, which contains detailed exchange-by-exchange information on the telecommunications technology deployed in Wyoming, the nature of the interoffice plant in service and the specific services generally available in the various exchanges. Because telecommunications companies have been steadily increasing the availability of improved services and technology, the number of new services not previously available is relatively small. Questions about the availability of specific services in particular places within exchanges and the nature of existing but unused local telecommunications plant capacity should be directed to the telecommunications service providers themselves. Most service providers consider information on unused capacity and its location highly confidential and commercially sensitive but may respond to questions from interested customers.

b. Number, Type and Size of Companies

There are 14 incumbent facilities-based ILECs and 17 active CLECs providing local exchange service in Wyoming. Qwest, Wyoming's largest ILEC, provides service to approximately 150,000 of the state's access lines, not counting the access lines provided by Qwest to CLECs in Wyoming on a resold or unbundled basis. The remaining access lines in Wyoming are served by the 13 independent local telephone companies and the 17 CLECs. CLECs serve approximately 48,391 total access lines in Wyoming with Bresnan being the largest competitive provider. Appendix B to this Report contains a brief summary of the basic facts about Wyoming ILECs.

When the 1995 Act went into effect on March 1, 1995, there were 24 interexchange (long distance or toll service) resellers and nine facilities-based IXC's providing long distance service in Wyoming. Before the 1995 Act, there were no CLECs in the state; and now there are 59 (a decrease of one from the previous reporting year). Because the interexchange resale market is dynamic and characterized by new entrants, acquisitions, mergers, bankruptcies, business failures and reorganizations, you may find the most current information about the companies participating in the Wyoming market at the Commission's Web site: psc.state.wy.us.

Note: "Facilities-based" telecommunications companies own or lease physical *facilities* to acquire, switch, enhance, transport, or terminate traffic on their own systems, while "resellers" purchase or lease *services* from facilities-based providers to serve their customers. Facilities-based carriers do not necessarily carry all of their traffic over their own facilities and may purchase or lease facilities of others to help furnish the needed services.

By December 31, 2008, the combined number of facilities-based companies and resellers serving as IXC's in Wyoming has increased tenfold since 1995, including the registration of 10 new IXC's. By the end of 2008, 108 CLECs had been certified to provide local telephone service (either statewide or in Qwest's Wyoming exchanges) although quite a few of these carriers are, because of the highly competitive nature of the market and other business considerations, no longer in business or offering services in Wyoming. Nevertheless, some level of competition for local telecommunications service is present in most Wyoming exchanges. CLECs, wireless companies and others provide alternatives to land line service, and there are many options available to consumers.

The exchanges served by Wyoming's ILECs are listed in Appendix B. Appendix C lists the CLECs that have been certificated to provide competitive service in Wyoming.

With respect to long distance telecommunications services, Wyoming customers have a wide selection of carriers and choices of many differing terms, conditions and prices brought about by the development of a competitive interexchange market. Resale of services is an easy and rapid way to enter into local market competition, but it does not always provide an attractive return to the competitor. Facilities-based local competition, seen by many as the more stable and long term competitive option (and the one offering the most possibilities for technological advancement), requires substantial expenditures for the physical facilities needed to provide competitive local service. Capital markets also affect the ability of facilities-based CLECs to obtain the funds needed to construct networks and other facilities. Some smaller competitors do not have the financial capabilities for this type of market entry. Successful entry of Silver Star Communications, Advanced Communications Technology, All West Communications, and Bresnan into direct facilities-based local service competition with Qwest and RT communications in many exchanges shows it is possible to be technologically advanced and successful in such competitive endeavors in Wyoming -- even in relatively small markets.

c. Technologies in Use and Under Development

i. Technology Trends.

Deployment of new technology that leverages the capabilities of existing copper, fiber and coaxial cable infrastructure offers opportunities to improve the availability of broadband to Wyoming residents, businesses and institutions. Technical developments such as DSL, cable modem, and Voice over IP (VoIP) use and enhance the abilities of existing copper, fiber, and coaxial cable, offering the opportunity for citizens of Wyoming to expand their use of new technologies throughout the state. Consumer Internet traffic is expected to triple over the next five years. Additionally, wireless communications technologies (PCS, CMRS) are giving citizens new mobility. Cable systems have the capability to deliver voice, data, Internet and video via cable modem (commonly referred to as the "triple play"). Bresnan Communications began offering digital voice telecommunications services using its local cable distribution system in

2005, with continued expansion of its service to more than a dozen Wyoming communities. Bresnan has, in this short time, become the second largest supplier of voice service, and continues to grow in Wyoming. Facing competition from other technologies, Qwest continues to deploy DSL and upgrade speeds.

Not to be forgotten is satellite technology, which delivers video programming and a limited offering of broadband services, providing advanced functionality to customers who might be geographically isolated from other technologies. Rural electric cooperatives like Carbon Power & Light now offer satellite service. Wild Blue satellite service is now used by some of our rural ILECs as the vehicle to deliver broadband to the more remote areas where DSL service is economically impractical. Wild Blue is technologically capable of providing television programming, Internet service, and VoIP. This service is targeted at consumers in rural areas that are at great distances or remote from services that can be provided economically.

Local telephone service providers continue assessing the use of different technologies and evaluating next-generation technology for upgrading central office switching capability. Today, switching capabilities are dominated by circuit-type switching. Next-generation technology, often referred to as “soft switch”, is software driven. This technology costs less and has the ability to offer broadband services to all customers over existing copper lines or a combination of copper and fiber facilities. It is relatively easy to upgrade at a lower cost than prior switching technologies. Tri-County, Silver Star, Chugwater and Bresnan deployed soft switch technology in 2005, 2006 and 2007. In 2007, Chugwater Telephone upgraded its switching technology with the purchase and installation of a soft switch. Other service providers continued to evaluate soft switch technology deployment.

ii. Infrastructure.

Wyoming entered 2007 with significant upgrades to the telecommunications infrastructure and system; and companies continued to deploy broadband services throughout the state. This took the form of expansion of DSL service and the increase in the diverse fiber optic backbone. The local ILECs continue to deploy broadband in their exchanges. The only limitation continues to be the distance reach of DSL and the cost of providing the service to the smallest exchanges and the most remote customers.

Wyoming’s fiber optic backbone, which provides enhanced voice, data and video capability, giving Wyoming’s citizens and telecommunications service providers with many more options for voice, data and video products as stand alone or bundled services for residents, businesses and institutions. It provides Wyoming with its all-important link to the broadband networks of the national carriers and Internet service providers. Now Wyoming’s local telephone companies, both large and small, have the ability to link their customers to the nation and the world economies, which increasingly depend on efficient and rapid information services dominated by data transfer rather than the traditional voice grade service.

The southern tier of the state is crossed by significant fiber facilities owned by Sprint, AT&T, Level 3, MCI, and 360 Networks. In the north central area of the state, regional companies such as ACT have constructed fiber facilities.

iii. Digital Subscriber Line (DSL).

DSL is the transmission of digital frequencies over existing copper wire above traditional voice grade service frequencies. It is considered to be one of the best investments to extend the life and usefulness of copper facilities that characterize the great majority of the local telecommunications plant in Wyoming (that portion of the network between the central office and the customer's premises). DSL takes advantage of the fact that voice grade service uses only a small portion of the available capacity of copper loops, generally in the lower frequencies (DSL can also transmit voice over high frequencies).

The most dominant form of DSL is asynchronous DSL (ADSL). It offers higher download speeds than upload speeds on the premise that the most efficient use of available bandwidth is to offer the subscriber the enhanced ability to download rapidly. Higher speeds are available but have service limitations. The higher the speed, the shorter the distance from the central office the residence or business must be to obtain higher speed services like full motion video. Technology enhancements and local exchange carrier upgrades to existing copper plant have increased the availability of DSL services to rural areas. Generally speaking, broadband transmission is limited to copper loops less than 18,000 feet long.

Most local telephone companies offer DSL service in Wyoming. As a result of this technology, more rural customers located farther from the local central office are getting the potential of receiving broadband services to access the Internet and get IP video. Local exchange service providers are striving to provide this service with one provider (TCT West) reporting that 100% of its customers have access to the service. Tri County has extensive deployment of DSL service and will provide 1 mb service to the remotest of customers. Additionally, this medium can deliver information services and VoIP to residences, businesses, schools, libraries, hospitals and institutions of government in rural areas that have low population densities. This does not mean that every residence or business in the state can be served by DSL. Other technologies such as wireless and satellite should also to be considered. *See Appendix E* for more information on DSL deployment.

Like all technologies, DSL faces technical issues; and, its major issue is the loop limit. Copper loops, and therefore DSL technology, may one day be replaced by fiber to the home. In the past, such technological migrations were slowed by the substantial cost of replacing existing facilities, in terms of investment and depreciation of local telecommunications plant.

iv. Voice Over IP (VoIP).

VoIP is growing in popularity and is considered to be the technology that voice communications services are likely to employ in the future. It is viewed as an alternative to the circuit switched technology now employed by traditional telephone companies. Rather than streaming voice signals over dedicated circuits as switched telecommunications technology does now, VoIP converts a voice call to Internet Protocol, which is the framing of digital signals into packets that are sent over the Internet. Voice, data and video signals are broken into multiple packets that can take different routes through the network. At the final destination, the packets are re-assembled and delivered as one information stream to the receiving party. VoIP is considered an inherent competitor to traditional circuit switching technology because it uses the network more efficiently and cheaply. To date, the primary application has been voice service over long distance networks. In 2005, Bresnan began offering local telephone service using digital technology with the roll out of service in Casper, Cheyenne, Gillette, Laramie, Powell, Riverton, and Sheridan. During 2006, Bresnan began offering services in Buffalo, Cody, Jackson, Lander and Rawlins. In 2008, Bresnan applied to expand its certificated area to operate in Fremont, Natrona, Laramie, Weston, Crook, Washakie, Johnson and Hot Springs counties. Major deployments of VoIP have been done by established long distance service providers and competing companies. Additionally, local exchange companies are enhancing their facilities to offer VoIP services.

VoIP also has its limitations. To take advantage of VoIP, one needs a broadband connection to the residence or business. The last mile of connection to the home or business from the incumbent local service provider (the loop connecting the local switch to the customer) is required for the service. This must be a digital connection over existing copper wire that takes advantage of frequencies above those needed for voice grade services.

v. Wireless Services (Cellular).

Citizens of Wyoming are increasingly using wireless telephones, and wireless customers in Wyoming now exceed the number of wireline customers. The number of cell phone users has increased dramatically in recent years. Approximately 8 out of 10 (441,161) individuals now have cell phones. While cellular service is not universal in Wyoming, subscribership levels are similar to nationwide averages. In 2008, Verizon announced its acquisition of Alltel. The deal was finalized in January 2009.

Initially, cell phones were considered complementary to traditional wireline telephone service provided over copper lines; however, more telecommunications is being conducted exclusively over cellular telephones. Because of the packaging of services by wireless providers, free or low cost long distance service is routinely available to cellular customers, encouraging replacement of an estimated 40% of all long distance minutes of use by cellular phone users. This has reduced dependence on

traditional landlines for long distance calling; and, consequently, local exchange carriers are experiencing dramatic reductions both in long distance minutes of use and related revenues.

Wireless has its limitations on the quality and availability of service, the most common of which are system capacity and distance from cell sites. Another limitation is E911 capability, although this is rapidly being overcome. An individual placing an E911 call on a cell phone does not have a permanent address location tied to the cell phone, as would be the case with traditional wireline phone service. However, cell phones now must be “chipped” with the ability to provide GPS (Global Positioning System) location information to local PSAPs. The cost of deploying E911 capabilities in PSAPs has slowed the wider use of this functionality. The FCC requires wireless/cellular carriers to provide 911 and enhanced 911 where a PSAP requests it and can pay for the service.

vi. Cable Modem.

Cable modem is the delivery of broadband over cable television lines. It provides the cable subscriber with the opportunity to use the cable connection for Internet access and digital voice service. Using existing cable lines, individuals can get packages of video on demand, informational and voice services. While video services and information services have been available in Wyoming, a digital voice service was deployed in 2005. In December 2007 there were an estimated 196,000 TV households in Wyoming. It is estimated that approximately 133,500 homes have access to cable services with approximately 88,500 of them actually subscribing to basic cable service. In its infancy, the cable industry advertised bringing TV service to rural areas, but service areas have generally been limited to higher density markets such as cities and towns. With VoIP and cable modem service offerings, the cable industry is challenging the incumbent landline telecommunications providers in populous communities as the predominant source of voice, data and video services in Wyoming.

vii. What Does the Future Hold?

In the near term, new technology will rely more on broadband over copper and fiber telecommunications lines leveraging these systems to increase speeds. Technology upgrades such as the “soft switch” will enhance the competitive abilities of local exchange service providers.

While technology offers new options for broadband voice communications there is a convergence or bundling of services by the telecommunications and information service providers. The trend is toward all of them offering, now or in the near future, packages of voice, data and video services. Telephone companies are offering traditional POTS, broadband over DSL, VoIP and wireless. Cable companies will be offering video, broadband and voice services. Silver Star Communications and the Tri County group of companies now offer Internet Protocol video service, and some other telephone companies are also planning to offer video services delivering television programs to the home.

Today the options are many and the choices multiplying. The delivery of these services has been the result of private initiatives and innovation. Citizens of Wyoming are spending more on telecommunications than they have before, as a result of the many new services and service choices available to them in the market place. Based on national data, the average customer is spending 2.4% of their income on telecommunications, up from 2.1% ten years ago.

d. Differences in Geographical Availability in Wyoming

The availability of various telecommunications services in Wyoming is described in considerable detail in Appendix E. Appendix E shows, with some small exceptions, that voice grade telecommunications services and features are generally numerous and fairly comparable among Wyoming exchanges. Some systems offer a longer or shorter list of features, but most companies provide most of the features which their subscribers actually want and which the market will support. There is still somewhat of a disparity in the availability of high speed data services among Wyoming exchanges due to the cost of providing the service and some technical limitations. Silver Star now offers one-gigabit service in its exchanges. Those areas limited by economic and demographic considerations look to wireless and satellite alternatives that are becoming more popular in the more difficult to serve areas of the state.

The Commission continues to find that most of the differences in the local availability of voice telecommunication features and services are less a matter of geography than of a difference in composition of the markets served and the abilities of the serving companies. While differences in the availability of voice grade features are not particularly marked, there are larger variances in the availability of DSL-type services by company and within exchanges. Fiber backbone projects connecting Wyoming exchanges provide for the capacity to the “front door” of the community. However, within the community or exchange, there must be sufficient demand to encourage communications service providers to make plant upgrades needed to support these services. Competitive challenges from the coaxial cable distribution systems in Wyoming are examples of how new technology stimulates more active interest in technological upgrades for the public switched network. The JPTB and City of Powell projects described in this Report are intended to provide technologically flexible advanced connectivity useful in supporting high speed data services.

e. Telephone Subscribership Levels in Wyoming and the Nation

The percentage of households that have telephone service is a standard measure of the universality of telecommunications service; and the United States Bureau of the Census collects relevant data as part of its Current Population Survey, which monitors trends between the complete ten-year censuses under an ongoing arrangement with the FCC. This undertaking allows the FCC, state commissions and others to examine the possible effects of various actions on household decisions to maintain, acquire or drop telephone service. The report *Telephone Subscribership in the United States* is prepared by the Industry Analysis and Technology Division of the FCC’s Wireline Competition Bureau and is the source of the telephone subscribership information. The most current

report was released by the FCC in August 2008 and was based on data through March 2008.

Two accepted measures of subscribership levels are [i] “Unit” (the percentage of households for which there is landline telephone service in the housing unit) and [ii] “Available” (the percentage of households which have telephone service available for incoming and outgoing calls, either in the housing unit or somewhere else such as work or at a neighbor’s home). The most current penetration rates for Wyoming, as of March 2008, are set forth in Table 13 below, together with comparative data from previous reports.

Table 13
Penetration Levels

Date	Wyoming		National	
	“Unit”	“Available”	“Unit”	“Available”
8-Mar	95.6%	97.3%	95.2%	95.9%
Mar-07	96.4%	96.9%	94.6%	95.3%
Mar-06	94.5%	95.3%	92.8%	93.9%
Jul-05	96.2%	96.6%	94.0%	95.1%
Aug-04	95.8%	96.5%	94.2%	95.1%
Aug-03	93.8%	95.0%	95.5%	96.2%
Aug-02	93.7%	95.0%	95.1%	96.0%
Aug-01	94.2%	95.1%	94.6%	95.4%
Aug-00	94.8%	96.1%	94.4%	95.2%
Aug-99	95.0%	95.6%	94.4%	95.3%
Aug-98	94.8%	95.2%	94.1%	95.2%
Aug-97	92.7%	94.5%	93.9%	95.0%
Aug-84	89.9%	92.8%	91.6%	93.7%

Considering the penetration levels for 1984 and 2007, Wyoming has sustained a significant increase in penetration rates in both “Unit” and “Available” penetration statistics. Table also summarizes the comparable nationwide average penetration rates for the same points in time and illustrates how Wyoming’s subscribership levels compare against the flat, to slightly declining, penetration trends nationally.

These statistics do not include data on customers using cellular or other wireless technology as their primary source of local service. However, any downward trends over the past few years may indicate that some households have replaced their traditional landline telephone service with cellular/wireless service.

Table 14 below presents more comprehensive comparative data on individual state penetration rates, measured on a “unit” basis during the reporting year and for a 1983 historical baseline. The downward trends in this table may also show that some households have replaced their traditional landline telephone service with cellular/wireless service.

Table 14
Telephone Penetration by State (Percentage of Households with Telephone Service)
(States with declining penetration levels are italicized for ease of review)

State	November 1983	March 2008	Change
Alabama	87.9%	91.8%	3.9%
Alaska	83.8%	95.9%	12.1%
Arizona	88.8%	93.7%	4.9%
Arkansas	88.2%	92.5%	4.3%
California	91.7%	96.6%	4.9%
Colorado	94.4%	98.4%	4.0%
Connecticut	95.5%	97.4%	1.9%
Delaware	95.0%	95.2%	0.2%
<i>District of Columbia</i>	<i>94.7%</i>	<i>93.9%</i>	<i>-0.8%</i>
Florida	85.5%	93.8%	8.3%
Georgia	88.9%	95.0%	6.1%
Hawaii	94.6%	96.1%	1.5%
Idaho	89.5%	98.1%	8.6%
<i>Illinois</i>	<i>95.0%</i>	<i>94.1%</i>	<i>-0.9%</i>
Indiana	90.3%	92.2%	1.9%
Iowa	95.4%	97.1%	1.7%
Kansas	94.9%	96.5%	1.6%
Kentucky	86.9%	92.4%	5.5%
Louisiana	88.9%	96.7%	7.8%
Maine	90.7%	97.8%	7.1%
<i>Maryland</i>	<i>96.3%</i>	<i>94.7%</i>	<i>-1.6%</i>
Massachusetts	94.3%	96.4%	2.1%
Michigan	93.8%	96.1%	2.3%
Minnesota	96.4%	98.0%	1.6%
Mississippi	82.4%	92.7%	10.3%
Missouri	92.1%	96.5%	4.4%
Montana	92.8%	95.1%	2.3%
Nebraska	94.0%	95.3%	1.3%
Nevada	89.4%	93.8%	4.4%
New Hampshire	95.0%	96.7%	1.7%
New Jersey	94.1%	94.3%	0.2%
New Mexico	85.3%	94.0%	8.7%
New York	90.8%	94.2%	3.4%
North Carolina	89.3%	92.2%	2.9%
North Dakota	95.1%	97.7%	2.6%
Ohio	92.2%	97.4%	5.2%
Oklahoma	91.5%	95.1%	3.6%
Oregon	91.2%	97.3%	6.1%
Pennsylvania	95.1%	97.7%	2.6%
Rhode Island	93.3%	95.9%	2.6%
South Carolina	81.8%	91.0%	9.2%
South Dakota	92.7%	96.1%	3.4%
Tennessee	87.6%	93.0%	5.4%
Texas	89.0%	93.6%	4.6%
Utah	90.3%	97.2%	6.9%
Vermont	92.7%	97.3%	4.6%
Virginia	93.1%	96.6%	3.5%
Washington	92.5%	98.3%	5.8%
West Virginia	88.1%	93.8%	5.7%
Wisconsin	94.8%	97.0%	2.2%
Wyoming	89.7%	95.6%	5.9%
Total United States	91.4%	95.2%	3.8%

Other data on penetration levels in the United States as of March 2008 show:

- The telephone penetration rate for households with incomes under \$20,000 was at or below 94.2%, while the rate for households with incomes greater than \$60,000 was at least 98.3%.
- Penetration rates ranged from 90.2% for households headed by a person under 25 to 96% for households headed by a person over 55.
- Households with one person had a penetration rate of 92%, compared to a rate of 96.1% for households with four to five persons.
- The penetration rate for unemployed adults was 93.2%, while the rate for employed adults was 96.5%.

f. The Wyoming Equality Network: Telecommunications Technology Serving Education

After the Wyoming Supreme Court's decision in *Campbell County School District v. State*, 907 P.2d 1238 (Wyo. 1995) and 1997 legislation requiring the development and implementation of a statewide education technology plan, the State developed a plan for connectivity for data transfer between schools and interactive video among all high schools in Wyoming. During the first phase of implementation, Qwest contracted to provide data connectivity to all schools. The system included provision for network, frame relay, ATM-CRS, and private line services. It was designed to support advanced high-speed data equipment, satellite service, maintenance, and management services. The project, officially known as the Wyoming Equality Network (WEN), covers the entire state; and Wyoming's independent telephone companies, in partnership with Qwest, are responsible for substantial portions of the system. WEN serves all Wyoming high schools and community colleges, as well as the University of Wyoming's College of Education. It provides educational classes and educational service support at remote locations throughout Wyoming.

At the end of the reporting year, the WEN will have been in service for nine and one half years. In each year of its existence, we have seen a need for larger, faster circuits. The end of year eight also brought about the end of the Qwest contract for the WEN.

In anticipation of the expiring Qwest contract in June of 2006, the Wyoming Department of Education released a request for proposals for a next generation WEN in July of 2005. The RFP process ran for approximately 6 months and included required mandatory bidders' conference, question and answer sessions, and other required State RFP processes. The RFP was broken up into 5 packages. These packages were as follows:

- Physical Connectivity Package – Connections to Schools and Colleges
- Video Connectivity Package – Video Hardware and controllers
- Voice over IP Connectivity Package – Voice integration on the circuits

- Network Management Package – Management and monitoring
- Internet Connectivity Package – Connection of the WEN to the Internet

The Wyoming Department of Education received bids from three providers, Qwest, Bresnan, and Tandberg. Qwest was chosen to provide the physical connectivity, Voice Over IP, Network Management and Internet connectivity. Tandberg was chosen to provide the Video Hardware.

The RFP resulted in benefits to many Wyoming communities, as public ATM clouds were expanded into the communities of Wheatland, Lusk, Douglas, Glenrock, Buffalo, Lander, Afton, Kemmerer, Evanston and Green River. In addition, Qwest's Metropolitan Optical Ethernet is also now available in Casper and Cheyenne.

The requests for bandwidth in 2007 followed an ever-growing pattern. Federal requirements on education reporting are requiring numerous data transfers, almost on a daily basis through out the year, to the Department of Education. In addition, the demands on the network continue to grow in terms of reliability and robustness with the Wyoming PAWS testing, an online standards assessment of children in grades 3 through 11. The colleges are also seeing increasing numbers of students enrolling in online courses and are requiring more bandwidth to online services such as registration, grades, transcripts, and communication between students and professors.

In an effort to meet the demand, Internet access was increased from a full OC3 service at 155 mbps to a fractional OC-12 at 180mbps with the capacity of easily increasing to 622mbps. Individual locations were again assessed to confirm that all options for bandwidth were being considered. DSL services have been expanding across the state with very reasonable rates and fast bandwidth offerings. The WEN has taken advantage of some of the new offerings, and DSL service has been used in some locations to replace connections previously provided by satellite services. Single T1 circuits have been added to locations that currently have existing T1 circuits to create IMA (inverse multiplexing over ATM) groups. This has resulted in quicker, more robust services to meet the growing need for connectivity.

Improved connectivity is essential to the WEN network. Wyoming schools have enjoyed the benefits of good connectivity for eight and one half years. Access to the Internet and other locations has grown in importance on almost a daily basis. Course structure, teaching methods, research, collaboration, distance education, centralized administration, enterprise-wide policy distribution, testing, IT administration, security and performance measurements are all functions that have been enhanced or made possible by quality communications. Young people are learning to use the communications tools that have become increasingly important in our daily lives. Is it any wonder that the need for bandwidth is so dynamic? Wyoming's Community Colleges have indicated that they have become a 24/7, 365 days a year business. The Internet has had that effect on many who used to function in an eight-to-five, five day a week world. The compressed video portion of the WEN network has witnessed growth

on a month-by-month basis for the past six years. New classes have been added almost every semester, and repeat course scheduling attests to the success of the process.

More information about the WEN system is available from the Wyoming Department of Education at 307-777-7690.

g. Wyoming Relay

Telecommunications Relay Service (TRS), under the mandates of Title IV of the federal Americans with Disabilities Act (ADA), is designed to provide universal telephone service for all Americans, including people who are deaf, hard of hearing, or speech-impaired. On July 16, 2008, the FCC again granted certification to Wyoming's TRS program (Wyoming Relay) as meeting or exceeding all established operational, technical, and functional minimum standards. The certification is in effect through July 25, 2013.

Hamilton Relay, Inc., (Hamilton) is Wyoming's current TRS provider. Hamilton was selected as the result of a competitive bidding process, and began processing Wyoming relay calls on August 1, 2004. Based in Aurora, Nebraska, Hamilton currently provides relay services to Nebraska, Idaho, Kentucky, Louisiana, Wisconsin, Rhode Island, Maine, Iowa, Massachusetts, Pennsylvania, Montana, Georgia, Arizona, Kansas, Maryland, West Virginia, the District of Columbia, Saipan and the Virgin Islands. Established in 1901, Hamilton also provides local telephone and cable television service, call center services, Internet services, computer sales, network integration, and other services to customers in Nebraska and across the country.

In 2008, the average number of inbound traditional Wyoming Relay calls per month was 1,990. This is a decrease of 491 calls a month from 2007. Feedback from customers indicates that Wyoming Relay customers are continuing to switch technology and services. Many are now making Internet (IP) relay calls, and video relay (VRS) calls. Since July 2005, the National Exchange Carrier Association (NECA) has been providing monthly data on the number of IP and VRS calls from all providers that terminate in a state. From January 2008, through October 2008, there was an average of 1,786 IP relay calls and 1,030 VRS calls a month that terminated in Wyoming. There has been customer feedback that there is an increased use of two-way pagers, e-mail, and instant messaging as methods of communication. After 711 dialing access for relay services was implemented nationwide in 2001, Wyoming Relay maintained the existing toll-free access numbers in addition to adding 711 as a convenience. The majority of Wyoming Relay calls now come in via 711 dialing access.

CapTel service continues to show explosive growth with an average of 2,518 inbound calls each month. The CapTel telephone lets users listen to callers, and, at the same time, receive written captions of everything the caller says. Captions, provided by a service that uses the latest in voice-recognition technology, are displayed nearly simultaneously with the caller's speech, making CapTel ideal for anyone finding it difficult to hear over the telephone. Telephone calls are made in a customary manner --

by simply dialing the called party's telephone number directly. As customers dial, the CapTel automatically connects to a captioning service. It all happens quickly, automatically, and transparently, so callers do not interact with the operator or "set up" the call in any special way. Wyoming Relay also provides 2-Line CapTel that requires two telephone lines and provides advanced features not available with 1-line CapTel. In the last year, Web CapTel and wireless CapTel became available.

Wyoming legislation authorizes funding for both the TRS and an equipment distribution program by a telephone line surcharge. Persons seeking equipment through the program must demonstrate financial need. Twenty-five amplified telephones/devices, seven text telephones (TTYs), one voice carryover device, nineteen signaling devices, and eleven CapTel telephones were distributed free of charge to individuals with communication impairments who met the financial needs test.

Table 15
Summary of Important Contact Information for TRS

All call types	711
Text Telephone (TTY) access to Wyoming Relay	1-800-877-9965
Voice users access to Wyoming Relay	1-800-877-9975
To reach a CapTel user	1-877-243-2823
Voice Carryover (VCO) users access to Wyoming Relay	1-877-877-1474
Speech-to-Speech (STS) users access to Wyoming Relay	1-877-787-0503
Servicio en Español (Spanish Language Service)	1-800-829-2783
24-Hour Customer Service Center	1-888-694-4450 V/TTY
Relay Service Information	1-800-452-1408 V/TTY

Other services offered by Wyoming Relay include:

Equal Access to Carrier of Choice: Wyoming Relay gives users access to their chosen Inter-LATA (interstate) and Intra-LATA (intrastate) carrier or carriers when making relay calls, and to all other operator services to the same extent that such access is provided to standard phone users.

Pay Phones: All local relay calls made from a pay phone are free. When placing a long distance relay call from a pay phone, the relay operator must be provided with a way to bill the call (a calling card, for example). Coins cannot be used to pay for a long distance relay call from a pay phone.

TTY (Text Telephone): Traditional relay is a service for people who use a TTY-typing their side of the conversation and reading the other party's response.

Voice Carryover (VCO): VCO allows a deaf or hard-of-hearing person to speak directly to a hearing person. When the hearing person speaks, a relay operator will type to the deaf or hard-of-hearing person everything that is said and the communication will appear on a text display. The Wyoming Relay access phone number for VCO is **1-877-877-1474**. Two-line VCO is also available, allowing a VCO user to have a more interactive conversation. By using two telephone lines, the caller can listen to the conversation on one line while receiving typed text from a relay operator on the other line, thus creating a more natural flow of conversation.

Hearing Carryover (HCO): HCO allows speech-disabled users who can hear to listen to the person they are calling. The HCO user types the desired conversation for the relay operator to read to the standard telephone user. Two-line HCO is also available. Two-line HCO uses two telephone lines and 3-way calling.

Speech-to-Speech Relay Service (STS): Specially trained relay operators help persons with speech disabilities voice their conversations. The relay operators repeat to the other party the words of persons with speech disabilities or persons who use a speech synthesizer. The Wyoming Relay access phone number for STS is **1-877-787-0503**.

Servicio en Español: Wyoming Relay Service ofrece el sistema de Relay en Español para llamadas en las cuales ambas partes hablen español. Para usar el sistema de Relay en Español de Wyoming Relay Service, marque el **1-800-829-2783** (TTY/Voz).

Spanish Language Relay Service: TTY users can type in Spanish and the conversations will be relayed in Spanish or translated to English. This is also available to hearing/voice relay users. To access this service, users should dial **1-800-829-2783** (TTY/Voice).

Pay-per-call Calls: Deaf, hard-of-hearing, deaf-blind, and speech-disabled callers may access 900 pay-per-call services using Wyoming Relay.

Directory Assistance: Wyoming Relay provides access to local, intrastate, and interstate directory assistance.

Answering Machine Retrieval (AMR): Users can ask relay operators to retrieve messages from their voice or TTY answering machines or voice mail. If needed, the caller gives the relay operator a password, and places the handset next to the speaker of the answering machine or voice mail until all messages are retrieved, and then the relay operator types or voices the message back to the relay user.

Handling of Emergency Calls: This provides a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP, also known as an emergency dispatch or 911 center). In addition, the relay operators pass along the caller's telephone number to the dispatcher when a caller disconnects before being connected to emergency services. *Despite this, Wyoming Relay encourages users to dial 911 directly in case of an emergency.*

Relay Operator Gender Preferences: Wyoming Relay users may request a relay operator of either gender at the initiation of a call or when there is a change of relay operators.

Speed of Answer: 90% of all Wyoming Relay calls are answered within ten seconds. This service requirement helps to ensure that relay calls are answered quickly and are not placed on hold or in queue.

60 WPM Typing Speed: Relay operators are required to type a minimum of 60 words per minute (WPM).

Caller ID and Other Advanced Services: Wyoming Relay uses SS7 technology to provide true Caller ID that transmits the 10-digit number of the calling party. Because Wyoming Relay can pass, send and receive calling line identification information, a whole host of other advanced features is now available including: Call Rejection, Call Acceptance, Anonymous Call Rejection, Preferred Call Forwarding and Unique Flash. Previously, a relay call would show up on Caller ID as either “unavailable” or “out of area.”

Wireless Calls: Wyoming Relay Service is capable of processing relay calls that involve pagers, cellular and personal communication services (PCS).

Consumer Complaints: Complaint resolution procedures incorporate multiple checks and balances to ensure that complaints are promptly and satisfactorily resolved with Wyoming Relay customers. For questions, problems, or to receive free relay training and information, contact Wyoming Relay Customer Service [available 24 hours a day at **1-888-694-4450**] or the state office [available during working hours at **1-800-452-1408** V/TTY and by e-mail at lcieli@state.wy.us].

The Wyoming TRS Advisory Committee

In 1991, W.S. §§ 16-9-202 through 16-9-204, created the TRS Advisory Committee, a seven-member committee appointed by the Governor for three-year terms. The Committee provides advice concerning the administration of the Wyoming Relay Program, and annually determines the amount of the telephone surcharge per access line. Members are selected from appointment districts, and not more than four members may be affiliated with the same political party. The current members are: Patricia McCabe (D) [Cheyenne]; Kenneth Coiteux (D) [Laramie]; Lynette Nate (R) [Cokeville]; John D. Cosner (R) [Gillette]; vacant [District 6: Crook, Weston, or Niobrara County]; Heather Parsons (D) [Casper]; and vacant [District 5: Park, Big Horn, Washakie, or Hot Springs County].

h. City of Powell – North West Joint Powers Board Managed Open Access Infrastructure Project

The City of Powell, in conjunction with USMetronets, has determined that its citizens and the City's business development efforts will be enhanced through the provision of an ultra high-speed communications network providing high capacity fiber-optic capabilities directly to business and residential premises in the city. The City's conclusion resulted from the determination that existing providers were not likely to provide the desired network capabilities in the near future and that between 60% and 73% of the prospective consumers were interested in acquiring at least one service from a fiber network of the proposed capabilities.

Tri County Telephone Association of Basin is the intended anchor tenant for the first six years during which it will guarantee initial debt service. Thereafter, the network will be opened to all providers on an equal and non-discriminatory basis. In 2007 the Legislature enacted anchor tenant exclusivity requirements for municipal projects of this nature; however, given the contractual status of the Powell project at the time of enactment, the revised requirements are not applicable.

During 2008, planning and engineering efforts were completed and financing was obtained. Construction has begun and is approximately 50% complete. In those sections of the City where Construction has been completed, service orders are being taken and service installations are proceeding.

Seoul Digital University, Eleutian, TCT Education Project

In conjunction with Seoul Digital University and Tri County Telephone Association (TCT) a recently formed corporation, Eleutian, Inc. is providing, via high bandwidth Internet connections, English language education for citizens of South Korea. Using an Internet connection employing a simultaneous video, voice and keyboard capability, over 150 part time instructors, under the direction of 23 Eleutian employees, all located in the Big Horn Basin of Wyoming, are providing the one-on-one English language educational sessions. The instructors are conducting the sessions from their homes where high bandwidth capabilities exist as well as from a high bandwidth capable call center located in Lovell Wyoming.

SECTION 3: OTHER INFORMATION

a. The Commission's Geographic Information System (GIS)

Since December 2000, the Commission has been utilizing a Geographic Information System (GIS) to delineate the certificated area boundaries of all jurisdictional utilities in Wyoming, including data on the certificated territories of all facilities-based incumbent local exchange companies operating in Wyoming. Prior to the implementation of GIS, maps of certificated area boundaries were maintained primarily by hand, using traditional hand drafting methods. The Commission's GIS maps are more accurate and much simpler to maintain and update. These more accurate computer maps help to keep territory disputes among utility companies to a minimum. A robust GIS system permits changes to utility certificated areas, brought about by, among other things, acquisitions, mergers and agreements among utilities, to be reflected in the official records of the Commission shortly after the Commission approves them.

As planned by the Commission, updates to the GIS were completed in 2007. The Commission has addressed this situation with the assistance of CBM Associates with which they were contracted to update and convert the WPSC existing GIS data and software to the latest ESRI® ArcGIS technology. The project entailed the conversion of existing GIS data to a new database, along with editing and updating of the data. Additionally it provided recommendations of software for use within the Commission. The project scope included the following:

- Conversion of shape files to an ESRI® personal geodatabase (GDB);
- Converted and Edited GIS data in a personal geodatabase;
- Set up a geodatabase of current base data (i.e., cities and towns, counties, roads, etc.); and
- Conducted ArcGIS editing training, specifically tailored to the needs of the Commission.

The Commission is also working on additional uses for its updated GIS capabilities. For example, the Commission's facilities engineers continue developing data on the geographic location of utility facilities in Wyoming using GPS technology. While this effort has been primarily focused on electric facilities throughout the state, as time and resources allow, we will capture similar data on telecommunications and natural gas facilities. This in turn will allow a more accurate understanding of telecommunications services and service quality issues in Wyoming.

The Commission has requested in the 2009-2010 biennium budget a request for replacement of our current GPS system hardware and software. This request will provide the agency's facility engineers equipment to use during inspections, allowing them to accurately position utility infrastructure in the GIS System. The request will also allow for the mapping of outages, citations, and accidents in utility infrastructure systems and will assist in identifying areas of concern.

A GIS map of the ILEC certificated service areas can be found at Appendix K. [See our most current color GIS maps of the service territories of Wyoming's gas, electric and telecommunications companies at the Commission Web site: psc.state.wy.us/htdocs/cert_terr_new.htm

Appendix A

Some Telecommunications Terms Used In This Report

The following definitions of telecommunications industry terms and acronyms will be useful to you in reading this Report.

Note on docket numbers: The Public Service Commission's docket numbering system by places a unique case identifying number next to the telecommunications company's 5-digit identification number. For example, the first five digits are the company's identification number, which is followed by the case number, then two letter codes indicating the type of filing, and ending with the year. For example, 70000-1500-TA-07.

“access” Access, as used in “access charge” and “switched access” means the ability of a customer to have access to the local telephone company's switch to make or receive long distance calls. Long distance companies depend on access to complete calls made by their customers; and these companies pay on a per minute-of-use basis for this access. See W.S. § 37-15-203(j) for new statutory provisions on access charges.

“BOC” This federal Act acronym stands for Bell Operating Company and includes the companies formed during the breakup of AT&T in 1984 and their successors. Section 3(a)(2)(35) of the federal Act lists all of the BOCs. These companies are also known as RBOCs, or Regional Bell Operating Companies. Qwest, successor to U S WEST, is the only BOC providing service in Wyoming.

“central office” A central office is the facility containing the local telephone switch serving a community and the surrounding area (the “local exchange”). The central office switch connects customers to the local and long distance networks.

“CETC” A competitive ETC. See “ETC.”

“CFR” The Code of Federal Regulations is the standard compilation of all federal agency regulations. References can be to either individual sections or Parts containing several sections on a single topic. Their numbering (e.g., 47 CFR) follows the numbering of titles in the United States Code.

“CLEC” A Competitive Local Exchange Carrier offering local exchange telecommunications services in Wyoming in competition with an incumbent (established) carrier. Wyoming CLECs are listed in Appendix C to this Report.

“CMRS” Commercial Mobile Radio Service, as defined by the FCC, is a type of wireless carrier holding an exclusive federally-issued license in a defined geographic area for a certain period of time. CMRS service providers can include PCS, cellular, Radio Common Carriers and others.

“competitive” Under W.S. § 37-15-202, the Legislature has deemed some telecommunications services “competitive” and the PSC may find other services competitive. Most competitive services are not subject to price regulation by the PSC. Local basic telephone services and switched access provided by ILECs are not automatically considered “competitive.” Most other services are “competitive,” including local service provided by resellers, long distance services of long distance companies, and added custom calling features like call waiting and caller ID. As a general rule, if a customer has the choice of similar services at similar prices from different providers, the service can be found competitive by the PSC under the Act. The 2007 Act established, among other things, ceiling prices for noncompetitive telecommunications services. See W.S. § 37-15-202.

“de-averaging” When a telecommunications company de-averages its rates, it breaks down its subscribers into rate categories recognizing the different costs of serving different customer groups. Subscribers all pay the same price if the company has averaged rates.

“embedded” An embedded cost of providing telephone service is an actual investment that has already been made. It shows up on the books of the company.

“equal access” This is the ability of a customer to choose any in-state and any interstate long distance carrier and to use that carrier to complete calls without having to dial any extra numbers. This is also called “1+” equal access.

“ETC” Under 47 U.S.C. §254(e) in the federal Act, only a telecommunications carrier designated as an Eligible Telecommunications Carrier (ETC) can receive federal universal service support. Under 47 U.S.C. §214, an ETC must, in the area for which support is sought, offer all the services eligible for federal universal service support, either through its own facilities or a combination of its facilities and the resale of another carrier’s services. It must advertise the price and availability of the services throughout the area. Designations of ETC status are made by state regulatory commissions. More than one carrier may be certified in a particular area, and Commission certifications must be made annually to the Federal Communications Commission. During the 2007 reporting year, the Commission engaged in rulemakings to update its ETC certification and annual reporting requirement rules. Section 514 of the Rules, dealing with annual ETC certification reporting requirements, was finalized as a permanent rule during 2007. A companion rulemaking concerning ETCs was Section 513 of the Rules, dealing with ETC designation was largely completed during the reporting year and is expected to be finalized shortly thereafter. **“CETC”** is a Competitive Eligible Telecommunications Carrier eligible to receive federal support in an area also served by an incumbent ETC.

“explicit subsidy” An explicit subsidy is one that a consumer can see on the telephone bill. An example is the credit against high cost basic service from either the WUSF or the federal universal service fund.

“FCC” The Federal Communications Commission.

“federal Act” The federal Telecommunications Act of 1996, P.L. 104-104, generally consisting of amendments to the federal Communications Act of 1934 (47 U.S.C. 151, *et seq.*).

“hot cut” A hot cut is a process by which an ILEC manually disconnects the customer’s loop (which is hardwired to its local switch) and physically rewires it to the switch of its local competitor, while reassigning the customer’s telephone number to the competitor’s switch. Properly performed, a hot cut would not be noticed by the customer.

“ILEC” An Incumbent Local Exchange Carrier is an established, facilities-based telecommunication carrier offering local telecommunications services in Wyoming. Wyoming’s 14 ILECs are listed in Appendix B to this Report.

“implicit subsidy” An implicit subsidy is one that cannot be identified on the customer’s bill. An example would be a rate for a service which is lower than its cost because part of the cost of the service is paid out of revenues generated by the sale of other services priced above their costs.

“interconnection agreement” A contract between two telecommunications carriers which spells out the terms and conditions on which the carriers will connect and deal with each other for the purpose of providing services to the public. Qwest’s Wyoming SGAT (defined below) is a form interconnection agreement which spells out Qwest’s generally offered terms of interconnection with CLECs desiring to compete with Qwest in the provision of local exchange service. Section 1i of this Report contains a list of interconnection agreements which various companies have concluded with Qwest, Embarq/United and other incumbent local exchange companies.

“LNP” Local number portability allows customers switching service providers to retain their existing telephone numbers after the move, including wireline-to-wireline, wireline-to-wireless, wireless-to-wireline and wireless-to-wireless moves. Considered a key provision supporting a competitive market, federal law allows state regulatory commissions to grant waivers of existing federal LNP requirements on a showing of good cause. Under W.S. § 37-15-404(e)(v) in the 2007 Act, the Commission has authority to make rules on “Telephone number portability to the full extent technically feasible” for the protection of consumers.

“NASUCA” The National Association of State Utility Consumer Advocates is a voluntary national association of 44 consumer advocates in 42 states, the District of Columbia and Barbados. The Wyoming OCA is a member of NASUCA.

“OCA” The Office of Consumer Advocate was created by the Wyoming Legislature, effective March 6, 2003, as a “separate division within the public service commission.” It is charged with representing “the interests of Wyoming citizens and all classes of utility customers in matters involving public utilities” but is not allowed to “advocate for or on behalf of any individual, organization or entity.” As an independent entity, it may,

among other things, appeal Commission decisions, negotiate proposed settlements in contested cases and present them for Commission approval, and participate in court proceedings as a “friend of the court” (i.e., *amicus curiae*). You can read the statutes creating the OCA at: <http://legisweb.state.wy.us/statutes/compress/title37.doc> and [search for 2-401](#). Find out more about the OCA on the Internet at: psc.state.wy.us/oca.htm

“phantom traffic” Telephone calls which lack sufficient accompanying signaling data and information to allow intermediate and terminating service providers to bill properly for intercarrier compensation are called phantom traffic. For example, local service providers recover part of their operating costs through access charges paid by other telecommunications companies. Phantom calls prevent the local telephone company from billing access charges to the proper carrier for terminating those calls on their local network. Phantom traffic hinders the creation of accurate billing records, conceals the identity of parties responsible for payment and hampers the appropriate rating of calls.

“PID” A Performance Indicator Definition quantifies a particular aspect of Qwest’s performance under its QPAP to allow accurate and objective measurement of this performance in Qwest’s dealing with CLECs and in opening its market fully and fairly to local service competition. Payments by Qwest under the QPAP (defined below) are triggered by performance under the PIDs.

“POTS” The industry’s acronym for Plain Old Telephone Service, POTS describes the basic level of telecommunications service once characterized by a single line, black, rotary dial telephone connected to the local central office. The companion acronym **“PANS”** denotes Pretty Amazing New Stuff, a catch-all acronym for more sophisticated technology and the services it offers.

“QPAP” Qwest’s Wyoming Statement of Generally Available Terms, defined below, contains provisions for payments by Qwest when it fails to meet defined standards in interconnecting with local exchange service competitors. These payments are provided for in SGAT Exhibit K, the Qwest Performance Assurance Plan or QPAP. A Performance Assurance Plan is nominally “voluntary” but the FCC has not approved any Section 271 (q.v.) application that did not include such a plan.

“ROC” The Regional Oversight Committee is comprised of state regulators from the 14 states in which Qwest provides local telephone service, and the Commission is a member. The ROC meets twice a year, sharing information on telecommunications regulatory issues concerning Qwest and undertaking regulatory projects of common interest. [See the ROC’s Web site at regionalsoversightcommittee.org

“Section 271” Section 271 of the federal Act and related provisions prohibit an Regional Bell Operating Company (RBOC) from offering originating long distance telecommunications service across state and local access and transport area (LATA) boundaries unless the RBOC has demonstrated that it has fairly and fully opened its local exchange service markets [e.g., in Wyoming] to competition, including a showing that it

meets the requirements of a 14-element competitive checklist under Section 271 of the federal Act. After lengthy Commission proceedings, Qwest received a favorable recommendation that it met the relevant criteria in December 2002. The FCC accepted this recommendation and Qwest started to offer originating in-region long distance telecommunications service early in 2003. [Docket No. 70000-TA-00-599] Qwest retained its Section 271 approval throughout the reporting year.

“Section 503” This section of the Commission’s Rules deals with required reporting and record keeping by telecommunications service providers in Wyoming. You will note below that several service providers have asked for waivers of certain provisions of Section 503. The applying companies are not facilities-based carriers, and the service quality reporting requirements for which waivers are routinely sought only apply to facilities-based carriers. Read Section 503 on-line at: <http://soswy.state.wy.us/RULES/4868.pdf>

“SGAT” SGAT stands for Statement of Generally Available Terms, and it is described at Section 252(f) of the federal Act. It is a form contract under which competitors may interconnect with Qwest to provide local service in competition with Qwest in Wyoming (formally entitled *Statement of Generally Available Terms and Conditions for Interconnection, Unbundled Network Elements, Ancillary Services and Resale of Telecommunications Services*). The Wyoming SGAT has been examined and allowed to go into effect as part of the Commission’s Section 271 proceedings. The Commission continues to monitor the functioning of the SGAT and participates in the regulatory group of states undertaking long term administration of the PIDs used to measure Qwest’s performance under the SGAT. Qwest’s Wyoming SGAT and its related exhibits can be viewed on line at: <http://www.qwest.com/about/policy/sgats/WY.html>

“TELRIC” or “Total Element Long Run Incremental Cost” Section 252(d) of the federal Act generally describes a “just and reasonable” pricing standard for interconnection and network element charges which must be “based on the cost (determined without reference to a rate-of-return or other rate-based proceeding) of providing the interconnection or network element (whichever is applicable).” It must be “nondiscriminatory,” and “may include a reasonable profit.” The FCC articulated this as the forward looking TELRIC methodology, establishing TELRIC by rule in its *Local Competition Order*. It is used to ensure that prices are set at levels “that encourage efficient market entry” or, in other words, to encourage competition. TELRIC was the wholesale pricing standard used in connection with Qwest’s Section 271 proceeding. TELRIC forms the basis for the prices that Qwest charges to competitive providers for individual elements of its network, such as loop, switching and transport.

“TRO” or “Triennial Review Order” In 2003, the FCC issued its *Report and Order on Remand and Further Notice of Proposed Rulemaking*, FCC 03-36, called the Triennial Review Order or TRO, in its Review of the Section 251 Unbundling Obligations of ILECs; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications

Capability, held in CC Dockets No. 01-338, 96-98, and 98-147. It is intended as a review and examination of the facts on a state by state basis bearing on the various duties of ILECs to unbundle the individual elements of their network provisioning to accommodate competition.

“TRRO” or “Triennial Review Remand Order” In February 2005, the FCC released its *Order on Remand*, WC Docket 04-313 and FCC 04-290, called the Triennial Review Remand Order or TRRO. Several parties appealed the Triennial Review Order; and the U.S. Court of Appeals for the District of Columbia Circuit, in the proceeding known as *USTA II*, remanded and/or vacated the unbundling framework, dedicated interoffice transport, high-capacity loops and mass market local circuit switching components of the FCC’s Triennial Review Order. In the TRRO, the FCC provided additional clarification and new network unbundling rules and standards on the above issues which had either been remanded or vacated by the *USTA II* decision.

“TSLRIC” or “Total Service Long Run Incremental Cost” According to the Wyoming Act at W.S. § 37-15-103(a)(xiii), this means “. . . the total forward-looking cost, using least cost technology, for a telecommunications service or basic network function that the telecommunications provider would incur if it were to initially offer such telecommunications service or basic network function;” The 2007 Act eliminated TSLRIC requirements of the 1995 Act except for one minor provision. Under W.S. § 37-15-203(f) and beginning in 2010, a telecommunications company providing noncompetitive switched access services in Wyoming and seeking to charge more than 3¢ per minute must support those prices with a current long run incremental cost study.

“UNE” An unbundled network element. Section 251(c)(3) of the federal Act requires ILECs, like Qwest, to provide nondiscriminatory access to network elements on an unbundled or individual basis to any telecommunications carrier requesting them for the provision of a telecommunications service. That Section states that “An incumbent local exchange carrier shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service.” Qwest’s UNE prices for Wyoming are found at Exhibit A to Qwest’s Wyoming SGAT. [See the Wyoming SGAT and its Exhibits at <http://www.qwest.com/about/policy/sgats/WY.html>]

“UNE-P” Unbundled network element-platform. It is a group of physical and functional elements (UNEs) of a facilities-based carrier’s network which, when combined, provide a complete local service circuit or service “platform”.

“USAC” The Universal Service Administrative Company, established as a non-profit corporation by the National Exchange Carriers Association, to administer federal universal service funding mechanisms.

“1995 Act” or “1995 Wyoming Act” The original Wyoming Telecommunications Act, effective March 1, 1995, which was the basic telecommunications regulatory law in Wyoming through June 2007.

“2007 Act” or “Wyoming Act” The Wyoming Telecommunications Act, Chapter 15 of Title 37 of the Wyoming Statutes, effective July 1, 2007, is the basic telecommunications regulatory law in Wyoming. (W.S. §§ 37-15-101 through 37-15-502. This entire Chapter 15 is scheduled to be repealed effective July 1, 2015.)

Appendix B

Wyoming Incumbent Local Exchange Carriers (ILECs)

- | | | | |
|----|---|---|---------------------------------------|
| 1. | <u>All West Communications</u>
P. O. Box 588
Kamas, UT 84036-0588

County Served: Lincoln
Exchange: Cokeville | Access Lines
Revenues
Gross Plant | 330
\$ 822,130
\$2,962,780 |
| 2. | <u>Chugwater Telephone Company</u>
P. O. Box 223
Chugwater, WY 82210-0223

Counties Served: Laramie, Platte
Exchange: Chugwater | Access Lines
Revenues
Gross Plant | 196
\$ 508,232
\$1,156,747 |
| 3. | <u>Dubois Telephone Exchange</u>
P. O. Box 246
Dubois, WY 82513-0246

Counties Served: Fremont, Sweetwater and
Carbon
Exchanges: Baggs, Crowheart and Dubois | Access Lines
Revenues
Gross Plant | 2,518
\$ 5,371,510
\$23,894,836 |
| 4. | <u>Golden West Telephone Cooperative</u>
P. O. Box 411
Wall, SD 57790-0411

Counties Served: Niobrara and Weston
Exchange: Edgemont, SD | Access Lines
Revenues
Gross Plant | 31
\$ 83,262
\$338,247 |
| 5. | <u>Project Telephone Company</u>
P. O. Box 600
Scobey, MT 59263-0600

County Served: Park
Exchange: Clark | Access Lines
Revenues
Gross Plant | 305
\$ 116,717
\$2,007,180 |

6.	<u>Range Telephone Cooperative</u> P. O. Box 127 Forsyth, MT 59327-0127	Access Lines	2,128
		Revenues	\$ 2,849,009
		Gross Plant	\$18,992,736
	Counties Served: Crook, Weston, Campbell, Sheridan and Johnson		
	Exchanges: Alzada, MT, Decker, MT, Arvada, Clearmont, Southeast Sheridan, and Sundance		
7.	<u>RT Communications</u> P. O. Box 506 Worland, WY 82401	Access Lines	15,564
		Revenues	\$ 19,465,158
		Gross Plant	\$110,292,710
	Counties Served: Fremont, Natrona, Laramie, Weston, Crook, Washakie, Johnson, and Hot Springs		
	Exchanges: Albin, Burns, Carpenter, Pine Bluffs, Gas Hills, Hulett, Jeffrey City, Kaycee, Midwest, Moorcroft, Newcastle, Shoshoni, Thermopolis, Upton/Osage and Worland		
8.	<u>Silver Star Communications</u> 104101 Highway 89 Freedom, WY 83120	Access Lines	5,142
		Revenues	\$ 7,341,865
		Gross Plant	\$31,369,350
	County Served: Lincoln		
	Exchanges: Alpine and Freedom		
8a.	<u>Silver Star Communications at Alta, d/b/a Teton Telecom</u>	Access Lines	241
		Revenues	\$ 467,401
		Gross Plant	\$1,034,883
	County Served: Teton		
	Exchange: Driggs, ID		

- | | | |
|--|---|---|
| 9. <u>CenturyTel of Wyoming</u>
<u>formerly PTI Communications</u>
110 South Franklin
Pinedale, WY 82941 | Access Lines
Revenues
Gross Plant | 5,901
\$ 5,200,833
\$22,875,695 |
| Counties Served: Sublette, Sweetwater,
Carbon, and Albany
Exchanges: Big Piney, Eden-Farson, Medicine
Bow and Pinedale | | |
| 10. <u>TCT West</u>
P. O. Box 671
Basin, WY 82410 | Access Lines
Revenues
Gross Plant | 5,130
\$11,102,068
\$46,737,730 |
| Counties Served: Big Horn, Park and Hot
Springs
Exchanges: Lovell, Meeteetse, Greybull,
Frannie/Deaver and Basin | | |
| 11. <u>Tri County Telephone Association</u>
P. O. Box 310
Basin, WY 82410-0310 | Access Lines
Revenues
Gross Plant | 1,084
\$ 2,786,764
\$17,502,823 |
| Counties Served: Washakie, Big Horn, Park,
and Hot Springs
Exchanges: Burlington, Hamilton Dome,
Hyattville and Ten Sleep | | |
| 12. <u>Union Telephone Company</u>
P. O. Box 160
Mountain View, WY 82939-0160 | Access Lines
Revenues
Gross Plant | 5,678
\$ 62,638,476
\$209,619,834 |
| Counties Served: Uinta, Sweetwater, Carbon,
Albany, Lincoln, and Sublette
Exchanges: Mountain View, Lyman,
Hanna/Elk Mountain, Rock River, LaBarge,
Shirley Basin, Saratoga and Encampment | | |

13. <u>Embarq Communications d/b/a United Telephone Company of the West</u> P. O. Box 2128 Scottsbluff, NE 69363	Access Lines	6,341
	Revenues	\$ 5,748,289
	Gross Plant	\$16,164,293

Counties Served: Goshen and Platte
Exchanges: Guernsey, LaGrange, Lingle,
Torrington and Lyman, NE

14. <u>Qwest Corporation</u> 6101 Yellowstone Road P. O. Box 428 Cheyenne, WY 82003-0428	Access Lines	199,098
	Revenues	\$191,580,623
	Gross Plant	\$880,929,128

Counties Served: All Wyoming Counties
(Albany, Big Horn, Campbell, Carbon,
Converse, Crook, Fremont, Goshen, Hot
Springs, Johnson, Laramie, Lincoln, Natrona,
Niobrara, Park, Platte, Sheridan, Sublette,
Sweetwater, Teton, Uinta, Washakie and
Weston) and Yellowstone National Park.
Exchanges: Afton, Buffalo, Casper,
Cheyenne, Cody, Dayton/Ranchester, Douglas,
Evanston, Gillette, Glendo, Glenrock, Green
River, Jackson, Kemmerer, Lander, Laramie,
Lusk, Powell, Rawlins, Riverton, Rock
Springs, Sheridan, Story, Wheatland, Wright,
Yellowstone Park (Lake, Mammoth, Old
Faithful)

Sources: Telecommunications company annual reports filed with the Commission during the reporting year.

Appendix C

Wyoming Competitive Local Exchange Carriers (CLECs)

Company ID	Company Name
70017	AT&T Communications of the Mountain States, Inc. Room 2B115E, One AT&T Way Bedminster, NJ 07921
70019	VarTec Solutions, Inc. 433 E. Las Colinas Blvd. Suite 1300 Irving, TX 75039
70020	Comtel Telcom Assets LP d/b/a Excel Telecommunications 433 E. Las Colinas Blvd. Suite 1300 Irving, Texas 75039
70021	Sprint Communications Company L.P. 6200 Sprint Parkway Overland Park, KS 66251
70022	Ionex Communications North, Inc. 2300 Main Street, Suite 600 Kansas City MO 64108-2415
70023	McLeodUSA Telecommunications Services, Inc. (PAETEC) One Marthas Way Hiawatha, IA 52233
70026	Contact Communications 937 West Main Street Riverton, WY 82501
70027	MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services 22001 Loudoun County Parkway Ashburn, VA 20147
70033	1-800-Reconex, Inc. 2500 Industrial Ave. Hubbard, Oregon 97032
70039	Western CLEC Corporation One Allied Drive Little Rock, Arkansas 72202
70041	Tri Tel, Inc. P.O. Box 350 405 S. 4th St Basin, WY 82410
70042	WWC Holding Co., Inc. a/k/a Western Wireless d/b/a Cellular One 3650 131 st Ave., SE, #400 Bellevue, WA 98006

70043	Level 3 Communications, LLC 1025 Eldorado Blvd Broomfield, CO 80021
70047	BT Communications Sales LLC 11440 Commerce Park Drive Reston, VA 20191
70048	DSLnet Communications, LLC 50 Barnes Park North, Suite 104 Wallingford, CT 06492
70049	Inttec, Inc PO Box 2799 Gillette, WY 82717
70050	All West/Wyoming, Inc. P.O. Box 588 Kamas, UT 84036
70054	QuantumShift Communications, Inc. d/b/a VCOM Solutions 12657 Alcosta Boulevard, Suite 418 San Ramon, CA 94583
70056	New Edge Network, Inc. 3000 Columbia House Blvd., Suite 106 Vancouver, WA 98661-2969
70061	Citizens Telecommunications Company of Wyoming 100 CTE Drive Dallas, PA 18612
70071	DIECA Communications, Inc. d/b/a Covad Communications Company 7901 Lowry Boulevard, 2nd floor Denver, CO 80230
70075	360networks (USA) inc. 867 Coal Creek Circle, Suite 160 Louisville, CO 80027
70082	Regal Diversified, Inc. a/k/a Regal Telephone Company, Inc. 1119 West Kent, Ste. J, P.O. Box 1240 Missoula, MT 59806
70085	NOS Communications, Inc. 4380 Boulder Highway Las Vegas, NV 89121
70088	Intrado Communications, Inc. 1601 Dry Creek Drive Longmont, CO 80503

70092	Comtel Telecom Assets LP d/b/a VarTec Telecom 433 E. Las Colinas Blvd. Suite 1300 Irving, Texas 75006
70093	KMC Data LLC 3200 W Pleasant Run Rd, Suite 260 Lancaster, TX 75146
70095	Budget Phone 1325 Barksdale Boulevard, Suite 200 Bossier City, LA 71111
70096	Advanced Communications Technology, Inc. 290 N. Brooks Street Sheridan, WY 82801
70097	Orbitcom Inc 1701 N Louise Drive Sioux Falls, SD 57107
70098	iLOKA, Inc. d/b/a Microtech-tel, Inc. 5600 Greenwood Plaza Boulevard, Suite 300 Greenwood Village, CO 80111
70099	Qwest Communications Corporation 1801 California Street Denver, Colorado 80202
70104	VCI Company d/b/a Vilaire 2228 South 78th Street Tacoma, WA 98409
70105	Covista, Inc 4803 Highway 58 Chattanooga TN 37416
70106	IDT America, Corp. 520 Broad Street Newark, NJ 07102
70107	XO Communications Services, Inc. 13865 Sunrise Valley Drive Herndon, VA 20171
70108	Granite Telecommunications, LLC 100 Newport Avenue Ext. Quincy, MA 02171
70109	Computer Network Technology Corporation 4 McData Parkway Broomfield, CO 80021

70110	SBC Long Distance, LLC d/b/a AT&T Long Distance 1010 N Saint Mary San Antonio, TX 78215
70111	Comtech21, LLC. One Barnes Park South Wallingford, CT 06492
70112	WERCS Communications, Inc. d/b/a Mountain West Telephone 400 East First Street Casper, Wyoming 82601
70113	ACN Communication Services, Inc. 32991 Hamilton Court Farmington Hills, MI 48334
70114	Bresnan Broadband of Wyoming, LLC 1 Manhattanville Road Purchase, NY 10577
70115	CommPartners LLC 3291 N. Buffalo Drive, Suite 150 Las Vegas, NV 89129
70116	BullsEye Telecom, Inc. 25900 Greenfield Road, Suite 330 Oak Park, MI 48237
70118	France Telecom Corporate Solutions L.L.C. 13775 McLearen Road, Mail Stop 1100 Oak Hill, VA 20171-3212
70119	UCN, Inc. 7730 S. Union Park Avenue, Suite 500 Midvale, UT 84047
70120	BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service 2180 Lake Blvd. NE, Suite/Floor 5C48 Atlanta, GA 30319-6004
70121	YMax Communications Corp. P.O. Box 6785 West Palm Beach, FL 33405-6785
70122	Impact Telecom, LLC 5909 NW Expressway, Ste. 101 Oklahoma City, OK 73132
70123	American Fiber Network, Inc. 9401 Indian Creek Parkway, Suite 140 Overland Park, KS 66210

70124	Sage Telecom, Inc. 805 Central Expressway South, Suite 100 Allen, TX 75013-2789
70125	Global Capacity Group, Inc. 5909 NW Expressway, Ste. 101 Oklahoma City, OK 73132
70200	Matrix Telecom, Inc. d/b/a Matrix Business Technologies 7171 Forest Lane, Ste. 700 Dallas, TX 75230
70201	Ernest Communications, Inc. 5275 Triangle Pkwy, Suite 150 Norcross, GA 30092
70203	Metropolitan Telecommunications of Wyoming, Inc. d/b/a MetTel 44 Wall Street, 6th Floor New York, NY 10005
70204	Trans National Communications International, Inc. d/b/a TNCI, Inc. 2 Charlesgate West Boston, MA 02215
70205	Access Point, Inc. 1100 Crescent Green, Suite 109 Cary, NC 27518
70206	Clertech.Com, Inc. 3500 N State Rd 7 Ste # 290 Fort Lauderdale, FL 33319
70207	Momentum Telecom, Inc. 2700 Corporate Dr. Ste. 200 Birmingham, Alabama
70208	CenturyTel Fiber Company II, LLC d/b/a LightCore 14567 N. Outer Forty Road, Suite 500 Chesterfield, MO
70209	Neutral Tandem-Wyoming, LLC One South Wacker Drive, Suite 200 Chicago, IL 60606

Appendix D

Wholesale Cellular and PCS Providers in Wyoming

County	Seat	Zip	Altel	AT&T	Clear Talk PCS	Cellular One of Northeast Colorado	Comnet Wireless	Cricket	Edge Wireless	GW Wireless	Nextel	Personal Communications Services	Silver Star Wireless	Sprint	Telematrix	T-Mobile	UBET Wireless	Union Telephone Cellular	Verizon Wireless
1 Albany	Laramie	82070	x	x			x	x			x			x		x		x	x
2 Big Horn	Basin	82410	x							x			x		x		x	x	
3 Campbell	Gillette	82716	x				x	x		x			x		x		x	x	
4 Carbon	Rawlins	82301	x				x	x		x			x		x		x	x	
5 Converse	Douglas	82633	x					x		x			x		x		x	x	
6 Crook	Sundance	82729	x				x	x		x			x		x		x	x	
7 Fremont	Lander	82520	x				x	x		x			x		x		x	x	
8 Goshen	Torrington	82240	x			x	x	x		x			x	x	x		x	x	
9 Hot Springs	Thermopolis	82443	x					x		x			x		x		x	x	
10 Johnson	Buffalo	82834	x				x			x			x		x		x	x	
11 Laramie	Cheyenne	82001	x	x			x	x		x			x		x		x	x	
12 Lincoln	Kemmerer	83101	x				x	x	x		x	x	x		x	x	x	x	
13 Natrona	Casper	82601	x				x	x		x			x		x		x	x	
14 Niobrara	Lusk	82225	x				x	x		x			x		x		x	x	
15 Park	Cody	82414	x							x			x		x		x	x	
16 Platte	Wheatland	82201	x				x	x		x			x		x		x	x	
17 Sheridan	Sheridan	82801	x				x			x			x		x		x	x	
18 Sublette	Pinedale	82941	x				x	x		x	x	x	x		x	x	x	x	
19 Sweetwater	Green River	82935	x				x	x		x	x	x	x		x	x	x	x	
20 Teton	Jackson	83001	x		x		x		x		x	x	x		x		x	x	
21 Uinta	Evanston	82930	x	x			x	x		x			x		x	x	x	x	
22 Washakie	Worland	82401	x					x		x			x		x		x	x	
23 Weston	Newcastle	82701	x				x	x		x			x		x		x	x	

Source: www.wirelessadvisor.com

Appendix E

Wyoming Central Office Information

Note: Changes and additions since the previous report are shown in **Bold**.
Inquire locally about Internet service availability and Internet service providers.

Afton

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100/RSC (Digital) Host Jackson

NPA Code: 307, 208

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 238	Wyocom LLC dba Contact Communications	CLEC
(307) 886	Qwest Communications	RBOC
(208) 225	Qwest Communications	RBOC
(307) 885	Silver Star Telephone Company, Inc	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 884	Union Cellular	Wireless Provider
(307) 248	Comnet Cellular, Inc	Wireless Provider
(307) 887	Gold Star Communications	Wireless Provider

Switch Features Enabled:

Custom	Centron, Call Waiting, Remote Call Forwarding, Call Forwarding, Speed Dialing, Custom Ringing, 3-Way Calling, Call Curfew, Call Data Collection and Transmission Service, Long Distance Alert, TrackLinePlus
CLASS	Caller Identification-Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Select Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options	Measured and Flat Rate Service, Private Branch Exchange Trunks, 911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711
Other	xDSL

EAS: Freedom and Alpine (Silver Star Communications - Independent)

Interoffice:

To Freedom	Digital
To Kemmerer	Digital
To Jackson	Digital
To Casper	Digital
To Evanston	Digital

Afton

Silver Star Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: **CS-1500 Softswitch**

NPA Codes: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
885	Silver Star Telephone Co.	Independent

Switch Features Enabled:

Custom	Short List Speed Calling, Long List Speed Calling, Call Forwarding, Toll Call Forwarding, Remote Call Forwarding, Call Waiting, 3-Way Calling, 2-Party Custom Calling Features, Cancel Call Waiting, Integrated Business Service (Small Centrex), Enhanced Business Service (Large Centrex), Teen Service,, Enhanced Voice Mail, Call Forward-Remote Access, Call Forward-Busy, Call Forward DMO Activation, Fax on Demand, Fax Fwd on Demand, 911, 711.
SYSTEM	Internet Service, Multiple PIC, World Line Card, Switched 56, DS-1, DS-3, ATM, Full SONET, OC-3, Pilot Program VoIP
Other	xDSL, I. P. Video

EAS: Afton (886 - Qwest exchange), Alpine/Freedom and Tygee, ID

Interoffice:

To Freedom	OC-48
To Pocatello, ID	via Freedom OC-12
To Cheyenne (via Evanston)	OC-3
To Boise, ID (via American Falls)	OC-12 & 1 GIG E
To Casper	288 Digital

Albin

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: **RLCM Remote off of Pine Bluffs DMS 10**

NPA Codes: 307, 308

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 246	RT Communications	Independent

Switch Features/Services Enabled:

Custom Calling/CLASS Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID, Special Service Circuit – Switched 56, T1, T3, SS7 equipped
Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID, Per Call Blocking, Call Forward No Answer, Call Forward Remote, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Teleconference PCS Service. xDSL

EAS: Cheyenne, Burns, Carpenter and Pine Bluffs

Interoffice:

To Burns	Digital
To Carpenter	Digital
To Cheyenne	Digital
To Pine Bluffs	Digital

Alpine

Silver Star Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSLE 1024 (Digital)

NPA Codes: 307, 208

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 883, 654	Silver Star Telephone Company, Inc –WY	Independent
(307) 886	Qwest Communications	RBOC EAS (Afton, WY)
(208) 873, 564	Silver Star Telephone Company, Inc. – Wy.	Independent
(208) 225	Qwest Communications	RBOC EAS (Tygee, ID)
Wireless NNX Codes:		
(307) 656	Gold Star Communications	Wireless Provider

Switch Features Enabled:

Custom	Short List Speed Calling, Long List Speed Calling, Call Forwarding, Toll Call Forwarding, Remote Call Forwarding, Call Waiting, 3-Way Calling, 2-Party Custom Calling Features, Cancel Call Waiting, Integrated Business Service (Small Centrex), Enhanced Business Service (Large Centrex), Teen Service, Enhanced Voice Mail, Call Forward-Remote Access, Call Forward-Busy, Call Forward DMO Activation
SYSTEM	Internet Service, Multiple PIC, World Line Card, Switched 56, DS-1, DS-3ATM, SONET, Pilot program for voice-over IP.
Other	xDSL, I. P. Video

EAS: Afton and Tygee, ID

Interoffice:

To Afton (via Jackson)	OC-48
To Casper (via Jackson)	288 Digital
To Pocatello, ID	OC-12
To Cheyenne (via Evanston)	OC-3
To Boise, ID (via American Falls)	OC-12

Alta

Teton Telecom

Central Office:

Switch Manufacturer: Nortel

Switch Model: **CS-1500 Softswitch**

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
353	Columbine Telephone dba Teton Telecom	Independent– EAS (Driggs, ID)

Switch Features Enabled:

Custom:	Short List Speed Calling, Long List Speed Calling, Call Forwarding, Toll Call Forwarding, Remote Call Forwarding, Call Waiting, 3-Way Calling, 2-Party Custom Calling Features, Cancel Call Waiting, Integrated Business Service (Small Centrex), Enhanced Business Service (Large Centrex)
Options:	Equal Access Feature Group A, Equal Access
System:	Internet Service, Multiple PIC, World Line Card, Switched 56, DS-1, DS-3
Other:	xDSL, I. P. Video

Interoffice:

To WY	Freedom, OC- 48
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South Alzada

Range Telephone Cooperative, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 RLCM (Digital)

NPA Codes: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 878	Range Telephone Cooperative, Inc, MT	Independent
(406) 828	Range Telephone Cooperative, Inc. MT	Independent

Switch Features Enabled:

Custom:	Touch Tone Dialing, Centrex, Call Forwarding, Call Waiting, 3-Way Calling, Speed Calling, Teen Service, Voice Mail, Usage Sensitive Custom Calling, Common Channel Signaling 7, Enhanced 800 Dialing, Call Forward Remote Access, User Programmable Call Forward Don't Answer, Sw 56 Data, Calling Name and Number Delivery, Call Forward Busy, Remote Call Forward, Selective Call Forward, Digital PBX, Caller ID Blocking, Customer Originated Trace, E-911, Automatic Call Back, Automatic Recall, Selective Call Acceptance, Selective Call Rejection, Anonymous Call Rejection, User Transfer, Selective Distinctive Ringing
Other:	xDSL

Interoffice:

To Broadus, MT	Digital
To Billings, MT	Digital

Anschutz Ranch East Plant (vacant)

All West Communications

Central Office:

Switch Manufacturer: AG Communications System

Switch Model: GTD5

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
	VACANT	

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Cancel Call Waiting, Distinctive Ring
Options:	Distinctive Ringing, Toll Restrictions, Call Name Delivery, Calling Number Delivery, Auto Call Back
System:	Flat Rate, Tone Dialing, PBX Trunks, Multi-line Hunting, DID, Toll Restriction, 911
Other:	Internet, xDSL

Interoffice:

To Cokeville	Digital (Fiber)
To Evanston	Digital (Fiber), DS-3 (1)

Arvada

Range Telephone Cooperative, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 RLCM (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
736	Range Telephone Cooperative, Inc. – WY	Independent

Switch Features Enabled:

Custom:	Touch Tone Dialing, Centrex, Call Forwarding, Call Waiting, 3-Way Calling, Speed Calling, Teen Service, Voice Mail, Usage Sensitive Custom Calling, Common Channel Signaling 7, Enhanced 800 Dialing, Call Forward Remote Access, User Programmable Call Forward Don't Answer, E-911, Switched 56 Data, Calling Name and Number Delivery, Call Forward Busy, Remote Call Forward, Selective Call Forward, Digital PBX, Caller ID Blocking, Customer Originated Trace, Automatic Call Back, Automatic Recall, Selective Call Acceptance, Selective Call Rejection, Anonymous Call Rejection, User Transfer, Selective Distinctive Ringing
Other:	xDSL

Interoffice:

To SE Sheridan	Digital
To Casper	Digital
To Clearmont	Digital

Baggs/Dixon/Savery

Dubois Telephone Company

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital)

Switch Configuration: HSO/SSO

SSO with Dubois

Switch Generic: 505.10

NPA Codes: 307(WY), 970(CO)

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 383	Dubois Telephone Exchange, Inc.	Independent
(970) 583	Dubois Telephone Exchange, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
380	Union Cellular	Wireless Provider

Switch Features Enabled:

Class/Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Digital Centrex , (n) 11, Enhanced versions of all features, (see tariff)
Options:	Flat Rate Service, Touch Tone Dialing, Private Branch Exchange Trunks, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, 900 Access Blocking, Digital Connectivity
Other:	Local Access Internet, Switched 56, xDSL

Interoffice:

To Rawlins/Cheyenne	Sonet/Fiber
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Basin

TCT West, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

(*Note: Burlington, Frannie-Deaver, Hamilton Dome, Hyattville, Lovell, Meeteetse, Greybull and Ten Sleep are all served by digital line carrier trunked to Basin.)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
568	TCT West, Inc.	Independent
764	TRI Telephone, Inc.	CLEC

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, Video
Other:	xDSL

EAS: Greybull

Interoffice:

To Casper	Digital
To Greybull	Digital

Big Piney

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
276	CenturyTel of Wyoming, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
260	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	Short List Speed Call, Long List Speed Call, Call Forward, 3-Way Calling, Call Waiting, Cancel Call Waiting, Remote Call Forward, Toll Call Forward, Teen Service, Ring Again, Enhanced 800, Call Forward Remote Access, Centrex; Voice Mail
Options:	Touch Tone Dialing, Toll Restriction, 1+ and 0+ Dialing, Trunk Hunting, , Equal Access, Integrated Business Services, Enhanced Business Services
System:	Local T1, 280 IDS
Other:	xDSL

Interoffice:

To Pinedale	Digital
To Cheyenne	Digital

Boulder

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 remote off Pinedale switch (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
537	CenturyTel of Wyoming, Inc.	Independent – EAS (Pinedale)

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
231	Comnet Cellular, Inc. –Wyoming	Wireless Provider

Switch Features Enabled:

Custom:	Short Speed Call, Long Speed Call, Call Forward, 3-Way Calling, Call Waiting, Cancel Call Waiting, Remote Call Forward, Toll Call Forward, Teen Service, Ring Again, Enhanced 800, Call Forward Remote Access, Centrex, Voice Mail
Options:	Touch Tone Dialing, Toll Restriction, 1+ and 0+ Dialing, Trunk Hunting, Wire Maintenance Plan, Equal Access, Integrated Business Services, Enhanced Business Services
System:	Local T1, 280 IDS
Other:	xDSL

Interoffice:

To Pinedale	Digital
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Buffalo

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
285	Wyocom, LLC dba Contact Communications	CLEC
684	Qwest Communications	RBOC
	VACANT	
278	Level 3 Communications, LLC – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
620, 621,	Comnet Cellular, Inc. - Wyoming	Wireless Provider
217	Western Wireless Corporation - WY	Wireless Provider
719	Union Telephone Company	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification-Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Select Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711
Other	xDSL

Interoffice:

To Casper	Digital
To Sheridan	Digital
To Story	Digital

Burlington

Tri County Telephone Association, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
762	Tri-County Telephone Association, Inc.	Independent

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, Video.
Other:	xDSL

Interoffice:

To Casper	Digital
To Basin	Digital

Burns

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSC Remote off of Pine Bluffs DMS 10

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
547	RT Communications	Independent

Switch Features/Services Enabled:

Services:	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID, Special Service Circuit- PRI – Switched 56, T1, T3, SS7 equipped
Custom Calling/CLASS Features Enabled	Caller Identification-Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, 3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Teleconference, xDSL

EAS: Cheyenne, Albin, Carpenter and Pine Bluffs

Interoffice:

To Albin	Digital
To Carpenter	Digital
To Cheyenne	Digital
To Pine Bluffs	Digital

Carpenter

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RLCM Remote off of Pine Bluffs DMS 10

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
649	RT Communications	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID, Special Service Circuit – PRI - Switched 56, T1, T3, SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Teleconference, xDSL

EAS: Cheyenne, Burns, Albin and Pine Bluffs

Interoffice:

To Albin	Digital
To Burns	Digital
To Cheyenne	Digital
To Pine Bluffs	Digital

Casper

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: AT&T

Switch Model: 5ESS (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
215	AT&T – Local – WY	CLEC
224	Embarq	CLEC
227	WyoCom LLC, d/b/a Contact Communications	CLEC
232,233,234,235, 237,253,261,265,266, 268,472,473, 577,995	Qwest Communications	RBOC
	VACANT	
462	Level 3	CLEC
315	Bresnan Broadband of Wyoming, LLC	CLEC
333	IDT America, Corp, - WY	CLEC
439	Advanced Communications Technology, Inc – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
230	Versatel Communications	Wireless Provider
267, 797, 247	Western Wireless Corporation	Wireless Provider
377, 702, 724	Union Cellular	Wireless Provider
277	Comnet Cellular	Wireless Provider
258,259,262,251	Verizon	Wireless Provider

Switch Features Enabled:

Custom:	Custom Ringing, 3-Way Calling, Call Waiting, Call Forwarding, Speed Call, IntraCall, Centron Service, Single Number Service, Remote Call Forwarding, Remote Access Forwarding, Schedule Forwarding, Business Continuation Routing, Call Curfew, Call Data Collection and Transmission, Long Distance Alert, TrackLine Plus
CLASS:	Caller Identification-Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Select Call Forwarding, Last Call Return, Continuous Redial, SS-7, Do Not Disturb, No Solicitation, Security Screen, Selective Call Waiting.
Options:	Measured or Flat Rate service, Touch Tone Dialing, Private Branch Exchange Trunks, Equal Access, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, Voice Messaging, Frame Relay, PCS wireless, 211, 311, 511, 711, ATM, ISDN BRI, ISDN PRI

Other:	xDSL
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EAS: Glenrock

Interoffice:

To Glenrock	Digital
To Buffalo	Digital Fiber
To Midwest	Digital
To Shoshoni	Digital
To Wright	Digital Fiber
To Cody	Digital Fiber
To Gillette	Digital Fiber
To Sheridan	Digital Fiber
To Lander	Digital Fiber
To Riverton	Digital Fiber
To Lander	Digital Radio
To Riverton	Digital Radio

Cheyenne

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: AT&T

Switch Model: 5ESS (Digital)

NPA Code: 307, 970

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
222, 223	Sprint Communications Company, L.P. – Wy	CLEC
243	Wyocom LLC dba Contact Communications	CLEC
432, 433, 632, 633, 634, 635, 637, 638, 771, 772, 773, 775, 777, 778, 996	Qwest Communications	RBOC
757	AT&T Local	CLEC
(970) 662	Qwest Communications	RBOC
	VACANT	
459	Level 3	CLEC
514	IDT America Corp. – WY	CLEC
426	Bresnan Broadband of Wyoming, LLC – WY	CLEC
274	MCIMetro, ATS, Inc	CLEC
275	Commpartners, LLC – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
220,920	Voice Stream Wireless Corporation	Wireless Provider
221,256	Sprint PCS	Wireless Provider
421,630,631,286,287	Verizon	Wireless Provider
477,701	Union Cellular	Wireless Provider
640	Western Wireless Corporation	Wireless Provider
650	Nextel Communications	Wireless Provider
214	Comnet Cellular	Wireless Provider
316	360NTWS (USA), INC, - WY	Wireless Provider

Switch Features Enabled:

Custom:	IntraCall, Custom Ringing, 3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Centron Service, Single Number Service, Remote Call Forwarding, Remote Access Forwarding, Scheduled Forwarding, Business
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	Continuation Routing, Call Curfew, Call Data Collection and Transmission, Long Distance Alert, TrackLine Plus, Local Area Network Switching Service
CLASS:	Caller Identification - Name and Number, Caller Identification Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7, Do Not Disturb, No Solicitation, Security Screen, Selective Call Waiting
Options:	Flat Rate Service, Measured Service, Private Branch Exchange Trunks, Equal Access, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, Voice Messaging, E-911, Frame Relay, 211, 311, 511, 711, ATM, ISDN BRI, ISDN PRI.
Other:	xDSL

EAS: Albin, Burns, Carpenter and Pine Bluffs (RT Communications - Independent)

Interoffice:

To Glendo	Digital
To Laramie	Digital
To Pine Bluffs	Digital
To Casper	Digital fiber OC48
To Wheatland	Digital

Chugwater

Chugwater Telephone Company

Central Office:

Switch Manufacturer: Redcom

Switch Model: MDX 384 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
422	Chugwater Telephone Co.	Independent

Switch Features Enabled:

Custom:	Standard Digital offerings plus Custom Calling Features
Options:	911, 711, 511
Other:	xDSL

EAS: To Qwest exchanges of Wheatland and Glendo

Interoffice:

To Cheyenne	Digital
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Clark

Project Telephone Company

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 **RSLE** (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
341	Project Telephone Company (Wyola, MT)	Independent
645	Project Telephone Company, Inc. (Clark)	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
884	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	Business Phone Systems & Service, Calling Features, Call Acceptance, Call Forward Busy, Call Forward No Answer, Call Forward Select, Call Rejection, Call Rejection Anonymous, Call Trace, Call Waiting & Cancel Call Waiting, Caller ID, Caller ID Name & Number, Caller ID Blocking, Continuous Redial, Home Intercom, Last Call Return, Selective Distinctive Ring, Smart Line, Speed Call 8 or 30, Twin Line, Voice Mail
CLASS:	All
SYSTEM:	Automatic Digital Carrier Module, Digitone, Satellite Switching Office, Five Day AMA Backup, Dial Pulse, internet dialup, SS-7, FC digital loop.
Other:	xDSL

Interoffice:

To Billings, MT	Digital
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Clearmont

Range Telephone Cooperative, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 RLCM (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
758	Range Telephone Cooperative, Inc.	Independent

Switch Features Enabled:

Custom:	Touch Tone Dialing, Centrex, Call Forwarding, Call Waiting, 3-Way Calling, Speed Calling, Teen Service, Voice Mail, Usage Sensitive Custom Calling, Common Channel Signaling 7, Enhanced 800 Dialing, Call Forward Remote Access, User Programmable Call Forward Don't Answer, E-911, Sw 56, Calling Name and Number Delivery, Call Forward Busy, Remote Call Forward, Selective Call Forward, Digital PBX, Caller ID Blocking, Customer Originated Trace, Automatic Call Back, Automatic Recall, Selective CallAcceptance, Selective Call Rejection, Anonymous Call Rejection, User Transfer, Selective Distinctive Ringing, 711
Other:	xDSL

Interoffice:

To Sheridan	SE	Digital
To Arvada		Digital
To Casper		Digital

Cody

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
263	Wyocom, LLC dba Contact Communications	CLEC
527, 578, 587	Qwest Communications	RBOC
	VACANT	
213	Level 3	CLEC
586	TRI TEL, Inc	CLEC
769	Contact Communications – Wyo	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
250, 269, 272	Comnet Cellular, Inc. - Wyoming	Wireless Provider
292	MTPCS LLC	Wireless Provider
712	Union Telephone Company	Wireless Provider
899	Western Wireless Corporation – WY	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Call Rejection, Caller ID On Call Waiting, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 911, 211, 311, 511, 711, ATM, Frame Relay
Other:	xDSL

Interoffice:

To Basin	Digital
To Casper	Digital
To Deaver	Digital
To Lovell	Digital
To Powell	Digital
To Worland	Digital

Cokeville

All West Communications

Central Office:

Switch Manufacturer: AG Communications Systems

Switch Model: GTD-5 Remote

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
279	All West Communications	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
270	Union Cellular	Wireless Provider
600	All West Wireless, INC	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, BETRS
Options:	Measured or Flat Rate Service, Tone Dialing, Private Branch Exchange Trunks, Equal Access, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, E-911, Internet, Cancel Call Waiting, Distinctive Ringing
System:	SONET NEXT OC48 capability: telephone services, ISP.
Other:	xDSL

Interoffice:

To Randolph , UT	Digital (Fiber)	OC 48	Radio 8)DS1
To Evanston, WY	Digital (Fiber)	OC 48	Radio 8)DS1

Crowheart

Dubois Telephone Exchange, Inc.

Central Office:

Switch Manufacturer: Telstrat

Switch Model: DLC/**BLC**

Switch Configuration: GR303 interface to Dubois DMS 10

NPA Code: 307 (WY)

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
486	Dubois Telephone Exchange, Inc.	Independent

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Digital Centrex; (N)11 , Enhanced versions of the above, too numerous to list
Options:	Flat Rate Service, Touch Tone Dialing, Private Branch Exchange Trunks, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, 900 Access Blocking, Digital Connectivity
Other:	Local Access Internet , xDSL

EAS: Dubois, **Sonet Fiber Terminal**/Digital Radio

Interoffice:

To Dubois	Digital Radio
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Daniel

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 remote off Pinedale switch (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
859	CenturyTel of Wyoming, Inc.	Independent – EAS (Pinedale)

Switch Features Enabled:

Custom:	Short Speed Call, Long Speed Call, Call Forward, 3-Way Calling, Call Waiting, Cancel Call Waiting, Remote Call Forward, Toll Call Forward, Teen Service, Ring Again, Enhanced 800, Call Forward Remote Access, Centrex, Voice Mail
Options:	Touch Tone Dialing, Toll Restriction, 1+ and 0+ Dialing, Trunk Hunting, Wire Maintenance Plan, Equal Access, Integrated Business Services, Enhanced Business Services
System:	Local T1, 280 IDS.
Other:	xDSL

Interoffice:

To Pinedale	Digital
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Dayton-Ranchester

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 655	Qwest Communications	RBOC-EAS (Sheridan)
(406) 659	Qwest Communications	RBOC-EAS (Sheridan)

Switch Features Enabled:

Custom:	3 Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service,
CLASS:	Caller Identification – Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Equal Acces, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, Frame Relay
Other:	xDSL

Interoffice:

To Casper	Digital
To Sheridan	Digital

Decker

Range Telephone Cooperative, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 RLCM (Digital)

NPA Codes: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 750	Range Telephone Cooperative, Inc	Independent
(406) 757	Range Telephone Cooperative, Inc. – MT.	Independent

Switch Features Enabled:

Custom:	Touch Tone Dialing, Centrex, Call Forwarding, Call Waiting, 3-Way Calling, Speed Calling, Teen Service, Voice Mail, Usage Sensitive Custom Calling, Common Channel Signaling 7, Enhanced 800 Dialing, Call Forward Remote Access, User Programmable Call Forward Don't Answer, E-911, Switch 56, Calling Name and Number Delivery, Call Forward Busy, Remote Call Forward, Selective Call Forward, Digital PBX, Caller ID Blocking, Customer Originated Trace, Automatic Call Back, Automatic Recall, Selective Call Acceptance, Selective Call Rejection, Anonymous Call Rejection, User Transfer, Selective Distinctive Ringing
Other:	xDSL

Interoffice:

To Casper	Digital
To SE Sheridan	Digital

Douglas

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
358	Qwest Communications	RBOC
368	Wyocom LLC dba Contact Communications	CLEC
	VACANT	
298	Level 3 Communications, LLC – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
351, 624	Western Wireless Corporation – WY	Wireless Provider
359	Verizon	Wireless Provider
717	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	Call Forwarding, IntraCall, Speed Calling, Call Waiting, Centron Service, 3-Way Call, Custom Ringing, Long Distance Alert, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Call Rejection, Calling ID On Call Waiting, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Flat Rate Service, Measured Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Toll Restriction, Direct Inward Dialing, Digital Connectivity, 911, 211, 311, 511, 711
Other	xDSL

Interoffice:

To Casper	Digital
To Glendo	Digital
To Glenrock	Digital
To Lusk	Digital

Dubois

Dubois Telephone Exchange, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital)

Switch Configuration: HSO/SSO

HSO for Baggs

GR-303 interface to Crowheart

Switch Generic: **505.10**

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
455	Dubois Telephone Exchange, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
450	Union Cellular	Wireless Provider

Switch Features Enabled:

Class/Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Digital Centrex; (N)11, Enhanced versions of all features (see tariff)
Options	Flat Rate Service, Touch Tone Dialing, PBX Trunks, E-911, Multiline Hunt, DID, PRI, Toll Restriction, 900 Access Blocking, Digital Connectivity
Other:	Local Access Internet, xDSL

EAS: Crowheart by Sonet Fiber Terminal

Interoffice:

To Casper	Sonet Fiber/Digital Microwave
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Edgemont

Golden West Telecommunications Cooperative, Inc.

Central Office:

Switch Manufacturer: NTI

Switch Model: DMS-10 (Digital) - Remote

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
663	Golden West Telephone Cooperative, Inc.	Independent

Switch Features Enabled:

Custom:	DID, Multi Hunt, Toll Restriction, Speed Calling, 3-Way Calling, Call Waiting, Digital Connectivity
CLASS:	Selective Call Acceptance, Call Forwarding, Automatic Call Back, Automatic Recall, Call Forward Busy, Call Forward No Answer, Selective Call Rejection
Options:	Flat rated service, Tone Dial, PBX Trunks, 911
CLASS/System	ATM, FRS, Nortel.

Interoffice:

To Sioux Falls, SD	Digital (All interoffice facilities are fiber based)
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Elk Mountain/Shirley Basin

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: Elk Mountain, RLCM (Remote Line Concentrated Module)

Shirley Basin, Digital Direct trunks to Elk Mountain

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
348	Union Telephone Company (Elk Mountain)	Independent
356	Union Telephone Company (Shirley Basin)	Independent
339	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	Tone Dialing, PBX Trunks, 911, Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7, Enable Enhance 800.
CLASS:	Flat rate calling, Call Forward Busy, Call Forward No Answer, Caller ID, Automatic Call Distribution, Remote Call Forward, Selective Call Forward and Rejection Caller ID Blocking.
Options:	Voice Mail
Other:	xDSL (Elk Mountain)

Interoffice:

To Encampment	Digital
To Shirley Basin	Digital
To Rawlins	Digital

Encampment

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: RSCS (Remote Switching Center - SONET)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
327	Union Telephone Company	Independent

Switch Features Enabled:

Custom:	Tone Dialing, PBX Trunks, 911 enabled, Toll Restriction, Direct Inward Dialing, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, Enable Enhanced 800.
CLASS:	Caller ID Blocking, Cancel Call Waiting, Call Waiting, Call Forward, 3 Way Calling, Speed Calling, Call Forward Busy, Call Forward No Answer, Caller ID, Automatic Call Distribution, Remote Call Forward, Selective Call Forward and Rejection.
Options:	Local Internet Access by Union, Voice Mail
Other:	xDSL

Interoffice:

To Mountain View	Digital microwave
To Rawlins	Digital microwave
To Saratoga	Digital fiber
To Hanna	Digital microwave
To Rock River	Digital microwave
To Elk Mountain	Digital microwave

Evanston

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE 10 (Digital)

NPA Code: 307, 435, 801

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 384	Wyocom, LLC dba Contact Communications	CLEC
(307) 444, 497	All West Communications, Inc.	Independent
(307) 783, 789	Qwest Communications	RBOC
(435) 289	Qwest Communications	RBOC
	VACANT	
	VACANT	
(307) 255	Unitah Basin Electronic Telecommunications	CLEC
288	Level 3 Communications LLC, - WY	CLEC
313	Sprint Communications	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 677, , 679	Comnet Cellular, Inc. – WY.	Wireless Provider
(307) 799,708	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	3 Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification - Name and Number, Caller Identification Number, Calling ID, On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured of Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, 911
Other:	xDSL

Interoffice:

To Kemmerer	Digital
To Cheyenne	Digital
To Cokeville	Digital
To Green River/Rock Springs	Digital
To Jackson	Digital

Farson/Eden

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10, (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
273	CenturyTel of Wyoming, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
280	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	Short Speed Call, Long Speed Call, Call Forward, 3-Way Calling, Call Waiting, Cancel Call Waiting, Remote Call Forward, Toll Call Forward, Teen Service;
Options:	Flat Rate Service, Touch Tone Dialing, Private Branch Exchange Trunks, Integrated Services, Enhanced Business Service
System:	Local T1, 280 IDS

Interoffice:

To Riverton	Digital
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Frannie-Deaver

TCT West, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Codes: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 664	TCT West, Inc.	Independent
(406) 764	TCT West, Inc.	Independent

Switch Features Enabled:

Options:	Automatic Call Back, Automatic Route Selection, Advanced Services Platform, Call Forwarding All, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call Acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, Video
Other:	xDSL

Interoffice:

To Basin	Digital
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Freedom

Silver Star Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: **CS-1500 Softswitch**

NPA Codes: 307, 208

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) , 883, 885, 886	Silver Star Telephone Company, Inc.	Independent
(208) 564, 873	Silver Star Communications, Inc.	Ind. EAS (Afton, Wy.)

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 890	Union Cellular	Wireless Provider
(307) 880	Gold Star Communications, LLC	Wireless Provider

Switch Features Enabled:

Custom:	Short List Speed Calling, Long List Speed Calling, Call Forwarding, Toll Call Forwarding, Remote Call Forwarding, Call Waiting, 3-Way Calling, 2-Party Custom Calling Features, Cancel Call Waiting, Integrated Business Service (Small Centrex), Enhanced Business Service (Large Centrex), Teen Service, Enhanced Voice Mail, Call Forward-Remote Access, Call Forward-Busy, Call Forward DMO Activation, Fax on Demand, Fax Fwd on Demand, E911
SYSTEM:	Internet Service, Multiple PIC, World Line Card, Switched 56, DS-1, DS-3, ATM, FRS, OC-48 System, SONET (full),
Other:	XDSL, I. P. Video

EAS: Afton and Tygee, ID

Interoffice:

To Afton (via Jackson)	OC-48
To Casper (via Jackson)	288 Digital
To Boise, ID (via Wayan, ID)	OC-12 & 1 GIG E

Gas Hills

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: Remote Star off of Worland DMS 100

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
457	RT Communications	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing,, E-911 Service, DID, Special Service Circuit – PRI – Switched 56, T1, T3, SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Teleconference, xDSL and Local Internet Access.

Interoffice:

To Worland	Digital
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Gillette

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
445	Wyocom LLC dba Contact Communications	CLEC
682, 685, 686, 687, 688	Qwest Communications	RBOC
	VACANT	
257	Level 3 Communications, LLC – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
567,704	Union Cellular	Wireless Provider
660, 680,299	Western Wireless Corporation – WY.	Wireless Provider
670, , 689	Comnet Cellular, Inc. – WY.	Wireless Provider

Switch Features Enabled:

Custom:	Call Forwarding, Call Waiting, 3-Way Call, Speed Dialing, IntraCall, Centron, Custom Ringing, Long Distance Alert, Remote Call Forwarding
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, 911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, Frame Relay, ATM, 211, 311, 511, 711, ISDN PRI
CLASS	Call Forwarding, 1st Call Return, Continuous Redial, SS-7
System:	Digital Cross Connects DS-1 to DS-1 Caller Identification,-Name and Number, Caller Identification Number, Calling ID and Call Waiting, Call Rejection, Priority Call, Selective
Other:	xDSL

EAS: Wright

Interoffice:

To Casper	Digital
To Wright	Digital
To Recluse	Digital

Glendo

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100/RSC (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
735	Qwest Communications	RBOC

Switch Features Enabled:

Custom:	Call Forwarding, Speed Call, Call Waiting, Centron Services, 3 Way Calling, Intracall, Remote Call Forwarding, Custom Ringing, Long Distance Alert
CLASS:	Caller Identification - Name & Number, Calling ID On Call Waiting, Caller Identification - Number, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Flat Rate Service, Measured Rated Service, Private Branch Exchange Trunks, Multi-line Hunting, Toll Restriction, Direct Inward Dialing, Digital Connectivity, 211, 311, 511, 711, 911

EAS: Wheatland, Chugwater

Interoffice:

to Lusk	Digital
to Casper	Digital

Glenrock

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital, remote off Douglas)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
436	Qwest Communications	RBOC
554	Commpartners, LLC – WY	CLEC

Wireless NNX Codes:

,741	Union Cellular	Wireless Provider
309	Western Wireless Corporation – WY	Wireless Provider

Switch Features Enabled:

Custom:	Call Forwarding, IntraCall, Speed Calling, Call Waiting, Centron Services, 3- Way Calling, Remote Call Forwarding, Custom Ringing, Long Distance Alert
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Flat Rate Service, Measured Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Toll Restriction, Direct Inward Dialing, Digital Connectivity, 211, 311, 511, 711, 911, Frame Relay
Other:	xDSL

EAS: Casper

Interoffice:

To Casper	Digital
To Douglas	Digital

Green River

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE -10 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
297	Uintah Basin Electric	Independent
478	Wyocom LLC dba Contact Communications	CLEC
872,875	Qwest Communications	RBOC
	VACANT	
466	Commpartners, LLC – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
870,707	Union Cellular	Wireless Provider
871	Comnet Cellular, Inc. – WY.	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, E-911, Digital Connectivity, Multi-line Hunting, Toll Restriction, Frame Relay, 211, 311, 511, 711
Other:	xDSL

Interoffice:

To Evanston	Digital
To Rock Springs	Digital
To Cheyenne	Digital

Greybull

TCT West, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
568, 765	TCT West, Inc.	Independent

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call Acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, and Video.
Other:	xDSL

EAS: Basin

Interoffice:

To Basin	Digital
To Casper	Digital

Guernsey

Sprint Communications (Embarq)

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 RSC (Digital, remote off Scottsbluff, NE)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
836	United Telephone Co. of the West – WY dba Embarq	Independent

Switch Features Enabled:

Custom:	Call Waiting; Call Forwarding, Three-way Calling, Speed Calling 8, Speed Calling 30, Directory Number Transfer, Call Forwarding-Busy, Call Forwarding-No Answer, Remote Call Forwarding, Hot line/Warm Line, Intercom, Signal Ring
CLASS:	Return Call, Caller ID with Name, Anonymous Call Rejection, Repeat Dialing, Selective Call Forward, Selective Call Rejection, Selective Call Ring
Options:	ACD, Business Premise Wiring, CCS7, Channel Banks, Data Service Units, Data Terminals, Digital Central Office, Digital Data Service, DS0, DS1 Clear Channel, E-911, LAN Networks, Modems, Other LAN Equipment, Residential Premise Wiring, Routers, School Premise Wiring, Switched 56, T-1 Multiplexers, Telephone Sets, Touch Tone Dialing, UCD, Voice Mail, Centrex offering, Fractional T1 & Term Discounts, Special Access, Internet, ISDN
SYSTEM:	SONET OC48
Other:	xDSL

EAS: Torrington, LaGrange, West Lyman and Lingle

Interoffice:

To Morrill, NE	Digital
To Scottsbluff, NE	Digital
To Torrington	Digital

Hamilton Dome

Tri County Telephone Association, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
867	Tri-County Telephone Association, Inc.	Independent

Switch Features enabled:

Enabled:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, and Video.
Other:	xDSL

EAS: Thermopolis

Interoffice:

To Thermopolis	Digital
To Casper	Digital

Hanna

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: RLCM (Remote Line Concentrator Module)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
325	Union Telephone Company	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
339	Union Cellular	Wireless Provider

Switch Features Enabled:

Enabled:	Flat Rate Calling, Tone Dialing, PBX Trunks, 911
Custom:	Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7 enable, Enhanced 800.
CLASS:	Caller ID, Cancel Call Waiting, Caller ID Blocking, Call Waiting, Call Forward, 3-way Calling, Speed Calling, Call Forward Busy, Call Forward No Answer, Automatic Call Distribution, Remote Call Forward, Selective Call Forward and Rejection.
Options:	Internet Access by Union, Voice Mail
Other:	xDSL

Interoffice:

To Mountain View	Digital microwave
To Saratoga	Digital microwave

Hulett

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSC Remote off NewCastle DMS 10

NPA Codes: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 467	RT Communications	Independent
(406) 767	RT Communications, Inc.	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, 911 Service, DID, (E-911 capable) Special Service Circuit – PRI – Switched 56, T1, T3 SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Local Internet Access, Teleconference, xDSL for (307) 467, DSL not available to (406) 767.

EAS To: Osage, Moorcroft, New Castle, Upton

Interoffice:

To Newcastle	Digital
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Hyattville

Tri County Telephone Association, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
366	Tri-County Telephone Association (Ten Sleep)	Independent
469	Tri-County Telephone Association (Hyattville)	Independent

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call Acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM	Full SONET (ring bus), ATM, TV, and Video.
Other:	xDSL

EAS: Ten Sleep

Interoffice:

To Basin	Digital
To Casper	Digital
To Ten Sleep	Digital

Jackson

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
522	Wyocom LLC dba Contact Communications	CLEC
732, 733, 734, 739	Qwest Communications	RBOC
200	Level 3	CLEC
201	Embarq	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
203	Sprint Spectrum ID	PCS
413	Edge Wireless	Wireless Provider
690, , 699	Comnet Cellular, Inc.	Wireless Provider
730, 740, 713	Union Cellular	Wireless Provider
774	Gold Star Communications, LLC	Wireless Provider

Switch Features Enabled:

Custom:	IntraCall, Centron, Call Waiting, Call Forwarding, Speed Dialing, Custom Ringing, 3-Way Calling, Remote Call Forwarding, Long Distance Alert
CLASS:	Caller Identification - Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, Frame Relay, ISDN BRI, 211, 311, 511, 711, ISDN PRI, ATM
Other:	xDSL

EAS: Moran

Interoffice:

To Afton	Digital
To Casper	Digital
To Moran	Digital
To Freedom/Alpine	Digital
To Riverton	Radio (3 DS3's)
To Evanston	Digital

Jeffrey City

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: **Star Hub** Remote off of Worland DMS 100

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
544	RT Communications	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
540	Union Cellular	Wireless Provider

Switch Features/Services Enabled:

Services:	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID Special Service Circuit- PRI - – Switched 56, T1, T3, SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other:	Voice Messaging, Call Answering, Teleconference, xDSL and Local Internet Access

Interoffice:

To Worland	Digital
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Kaycee

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital) RSC **Remote off of Worland DMS 100**

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
738	RT Communications, Inc.	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID, Special Service Circuit-PRI -- Switched 56, T1
Custom Calling/CLASS Features Enabled	(Services requiring SS7 local only) 3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Number Delivery, Caller ID Per Line Blocking, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Warm Line, Teen Line, Ring Again, Call Transfer
Other:	Voice Messaging, Teleconference, xDSL, Local Internet Access and Call Answering.

Interoffice:

Worland	Digital
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Kemmerer

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
, 563	Wyocom LLC dba Contact Communications	CLEC
828, 877	Qwest Communications	RBOC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
727, 723	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification – Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, 911
Other	xDSL

Interoffice:

To Afton	Digital
To Moran	Digital
To Cheyenne	Digital
To Alpine	Digital

LaBarge

Union Telephone Company

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RLCM (Remote Line Concentrator Module)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
386	Union Telephone Company – WY.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
390	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	PBX Trunks, 911 enabled, Tone Dialing, Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7 enabled, Enhanced 800.
CLASS:	Cancel Call Waiting, Call Waiting, Call Forward, 3 Way Calling, Speed Calling, Call Transfer, Call Forward Busy, Call Forward No Answer, Caller ID, Automatic Call Distribution, Remote Call Forward, Call Forward and Rejection, Caller ID Blocking.
Options:	Voice Mail,
Other:	xDSL

Interoffice:

To Mountain View	Digital microwave
To Rock Springs	Digital microwave

LaGrange

Sprint Communications (Embarq)

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 RLCM (Digital, remote off Scottsbluff, NE)

NPA Code: 307, 308

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 834	United Telephone Company of the West dba Embarq	Independent

Switch Features Enabled:

Custom:	Call Waiting, Call Forwarding, Three-way Calling, Speed Calling 8, Speed Calling 30, Directory Number Transfer, Call Forwarding-Busy, Call Forwarding-No Answer, Remote Call Forwarding, Hot line/Warm line, Intercom, Signal Ring
CLASS:	Return Call, Caller ID with Name, Anonymous Call Rejection, Repeat Dialing, Selective Call Forward, Selective Call Rejection, Selective Call Ring
Options:	Business Premise Wiring, Channel Banks, Data Service Units, Data Terminals, Digital Data Service, DS0, DS1 Clear Channel, LAN Networks, Modems, Other LAN Equipment, Residential Premise Wiring, Routers, School Premise Wiring, T-1 Multiplexers, Telephone sets, Touch Tone Dialing, Fractional T1 and Term Discounts - Special Access Services, Internet, CCS7, Switched 56, Voice Mail, Centrex, ISDN
SYSTEM:	SONET OC48

EAS: Guernsey, Lingle, Torrington and West Lyman

Interoffice:

To Morrill, NE	Digital
To Scottsbluff, NE	Digital
To Torrington	Digital

Lake

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
242	Qwest Communications	RBOC

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron, Remote Call Forwarding
CLASS:	Caller Identification - Name and Number, Caller Identification Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Equal Access, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711

EAS: Mammoth and Old Faithful, Wyoming, and Montana exchanges of Belgrade, Bozeman, Clyde Park, Cooke City, Gallatin Gateway, Gardiner, Livingston, Manhattan, Three Forks, West Yellowstone, and Wilsall.

Interoffice:

to Mammoth	Digital
to Billings, MT	Digital

Lander

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100/RSC (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
332, 335	Qwest Communications	RBOC
526	Wyocom LLC dba Contact Communications	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
330,345,714	Union Cellular	Wireless Provider
	Duplicate Company delete	
349	Comnet Cellular, Inc. – Wy.	Wireless Provider
	VACANT	
438	Verizon Wireless	Wireless Provider

Switch Features Enabled:

Custom:	IntraCall, Custom Ringing, 3-Way Calling, Call Waiting, Call Forwarding, Remote Call Forwarding, Speed Call, Centron Service, Long Distance Alert
CLASS:	Caller Identification – Name & Number, Caller Identification – Number, Calling ID on Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured Rate Service, Flat Rate Service, Private Branch Exchange Trunks, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, PCS Wireless, 211, 311, 511, 711, Frame Relay
Other:	xDSL

Interoffice:

To Riverton	Digital Radio (1 DS3)
To Casper	Digital Radio
To Riverton	Digital Fiber
To Casper	Digital Fiber

Laramie

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital)

NPA Code: 307, 970

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 528	Wyocom LLC dba Contact Communications	CLEC
(307) 721, 742, 745, 755, 766	Qwest Communications	RBOC
(970) 435	Qwest Communications	RBOC
	VACANT	
(307) 460, 223	Level 3 Communications	CLEC
	VACANT	

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
399,760	Verizon	Wireless Provider
761	Western Wireless Corporation – Wy.	Wireless Provider
977, 703	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	IntraCall, Centron, Call Waiting, Call Forwarding, Speed Dialing, Custom Ringing, 3-Way Calling, Remote Call Forwarding, Remote Access Forwarding, Scheduled Forwarding, Long Distance Alert, Call Data Collection and Transmission, TrackLine Plus, Call Curfew
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, Frame Relay, 211, 311, 511, 711, E-911, ATM, ISDN PRI, ISDN BRI
Other:	xDSL

Interoffice:

To Cheyenne	Digital
To Rawlins	Digital

Leigh Canyon

Teton Telecom

Central Office:

Switch Manufacturer: Nortel

Switch Model: **CS-1500 Softswitch**

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
576	Columbine Telephone dba Teton Telecom	Independent– EAS (Driggs, ID)

Switch Features Enabled:

Custom:	Short List Speed Calling, Long List Speed Calling, Call Forwarding, Toll Call Forwarding, Remote Call Forwarding, Call Waiting, 3-Way Calling, 2-Party Custom Calling Features, Cancel Call Waiting, Integrated Business Service (Small Centrex), Enhanced Business Service (Large Centrex)
Options:	Equal Access Feature Group A, Equal Access,
System:	Internet Service, Multiple PIC, World Line Card, Switched 56, DS-1, DS-3
Other:	xDSL, I. P. Video

Interoffice:

To Freedom	OC-48
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Lingle

Sprint Communications (Embarq)

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 RSC (Digital, remote off Scottsbluff, NE)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
837	United Telephone Company of the West – WY.	Independent

Switch Features Enabled:

Custom:	Call Waiting; Call Forwarding, Three-way Calling, Speed Calling 8, Speed Calling 30, Directory Number Transfer, Call Forwarding-Busy, Call Forwarding-No Answer, Remote Call Forwarding, Hot line/Warm Line, Intercom, Signal Ring
CLASS:	Return Call, Caller ID with Name, Anonymous Call Rejection, Repeat Dialing, Selective Call Forward, Selective Call Rejection, Selective Call Ring
Options:	911, Business Premise Wiring, CCS7, Channel Banks, Data Service Units, Data Terminals, Digital Central Office, Digital Data Service, DS0, DS1 Clear Channel, LAN Networks, Modems, Other LAN Equipment, Residential Premise Wiring, Routers, School Premise Wiring, Switched 56, T-1 Multiplexers, Telephone sets, Touch Tone Dialing, UCD, Voice Mail, Centrex, Internet, ISDN
SYSTEM:	SONET OC48
Other:	xDSL

EAS: Guernsey, LaGrange, Torrington and West Lyman

Interoffice:

To Morrill, NE	Digital
To Scottsbluff, NE	Digital
To Torrington	Digital

Lovell (includes Byron, Cowley)

TCT West, Inc.

Central Office:

Switch Manufacturer: Lucent Technologies

Switch Model: 5ESS-2000

Switch Location: Basin, WY, via digital line carrier from Lovell

NPA Codes: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 548	TCT West, Inc.	Independent
(406) 484	TCT West, Inc.	Independent
(307) 731	Union Telephone Company	Wireless

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, CallBridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, Video.
Other:	xDSL

Interoffice:

To Basin	Digital
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Lusk

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100/RSC (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
334	Qwest Communications	RBOC
785	WyoCom LLC dba Contact Communications	CLEC
481	360NTWS (USA), Inc, - WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
340	Verizon	Wireless Provider
216	Western Wireless	Wireless Provider
759	Union Telephone Company	Wireless Provider

Switch Features Enabled:

Custom:	Call Forwarding, IntraCall, Speed Calling, Call Waiting, Centron Services, 3- Way Calling, Remote Call Forwarding, Custom Ringing, Long Distance Alert
CLASS:	Caller Identification - Name & Number, Calling ID On Call Waiting, Caller Identification - Number, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Flat Rate Service, Measured Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Toll Restriction, Direct Inward Dialing, Digital connectivity, 911, 211, 311, 511, 711
Other:	xDSL

Interoffice:

To Douglas	Digital
To Glendo	Digital
To Casper	Digital

Lyman

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: DMS-100/200 RSC

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
787	Union Telephone Company – Wy.	Independent
788	United Telephone Company of the West dba Embarq – NE	Independent

Switch Features Enabled:

Custom:	PBX Trunks, 911 enabled, Tone Dialing, Automatic Call Distribution, Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7 Enabled, Enhanced 800.
CLASS:	Cancel Call Waiting, Call Waiting, Call Forward, 3-Way Calling, Speed Calling , Transfer, Call Forward Busy, Call Forward No Answer, Caller ID, Remote Call Forward, Selective Call Forward and Rejection, Caller ID Blocking.
Options:	Internet Access by Union, Voice Mail.
Other:	xDSL

Interoffice:

To Mountain View	Digital cable
To Rock Springs	Digital cable/microwave

(Serving Wyoming, West Lyman NE)

Sprint Communications (Embarq)

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 RLCM (Digital, remote off Scottsbluff, NE)

NPA Code: 307

NNX Code: 788

Switch Features Enabled:

Custom:	Call Waiting; Call Forwarding, Three-way Calling, Speed Calling 8, Speed Calling 30, Directory Number Transfer, Call Forwarding-Busy, Call Forwarding-No Answer, Remote call forwarding, Hot line/Warm Line, Intercom, Signal Ring
CLASS:	Return Call, Caller ID with Name, Anonymous Call Rejection, Repeat Dialing, Selective Call Forward, Selective Call Rejection, Selective Call Ring
Options:	911, ACD, Business Premise Wiring, CCS7, Channel Banks, Data Service Units, Data Terminals, Digital Central Office, Digital Data Service, DS0, DS1 Clear Channel, E-911, LAN Networks, Modems, OC12, Other LAN Equipment, Residential Premise Wiring, Routers, School Premise Wiring, SONET, Switched 56, T-1 Multiplexers, Telephone sets, Touch Tone Dialing, UCD, Voice Mail, Centrex, Internet, ISDN
SYSTEM:	SONET OC48

EAS: Guernsey, LaGrange, Lingle and Torrington

Interoffice:

To Morrill, NE	Digital
To Scottsbluff, NE	Digital

Mammoth

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
344	Qwest Communications	RBOC

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Calling ID On Call Waiting, Caller Identification - Number, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Equal Access, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711

EAS: Land and Old Faithful, Wyoming, and Montana exchanges of Belgrade, Bozeman, Clyde Park, Cooke City, Gallatin Gateway, Gardiner, Livingston, Manhattan, Three Forks, West Yellowstone, and Wilsall.

Interoffice:

To Gardner, MT	Digital
To Lake	Digital
To Old Faithful	Digital
To West Yellowstone, MT	Digital

Marbleton

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 remote off Big Piney Switch (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
276	CenturyTel of Wyoming, Inc. (Big Piney)	Independent

Switch Features Enabled:

Custom:	Short Speed Call, Long Speed Call, Call Forward, 3-Way Calling, Call Waiting, Cancel Call Waiting, Remote Call Forward, Toll Call Forward, Teen Service, Ring Again, Enhanced 800, Call Forward Remote Access, Centrex, Voice Mail;
Options:	Touch Tone Dialing, Toll Restriction, 1+ and 0+ Dialing, Trunk Hunting, Wire Maintenance Plan, Equal Access, Integrated Business Services, Enhanced Business Services
System:	Local T1, 280 IDS
Other:	xDSL

Interoffice:

To Pinedale	Digital
To Kemmerer	Digital

McKinnon (ROCK RIVER)

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: RLCM (digital) (Remote Line Concentrator Module)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
378	Union Telephone Company – WY.	Independent

Switch Features Enabled:

Custom:	PBX Trunks, 911 enabled, Tone Dialing, Automatic Call Distribution, Toll Restriction, DID, Multi-line Hunt, 900Access Blocking, Switched 56, Centrex, SS7 enabled, Enhanced 800
CLASS	Cancel Call Waiting, Call Waiting, Call Forward, 3 Way Calling, Speed Calling, Transfer, Call Forward Busy, Call Forward No Answer, Caller ID, Remote Call Forward, Selective Call Forward and Rejection, Caller ID Blocking.
Options:	Internet Access by Union, Voice Mail.
Other:	xDSL

Interoffice:

To Manila, UT	Digital Fiber / Microwave
To Mountain View	Digital microwave

Medicine Bow

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10, (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
379	CenturyTel of Wyoming, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
520	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	Short Speed Call, Long Speed Call, Call Forward, Call Waiting, 3-Way Calling, Remote Call Forward, Toll Call Forward, Cancel Call Waiting, Teen Service, Ring Again, Enhanced 800, Enhanced 888, Expanded International Dialing, Touch Tone Dialing, 911
Options:	Toll Restriction, 1+ and 0+ Dialing, Trunk Hunting, Wire Maintenance Plan, Equal Access, Centrex Including Integrated Business Service, Enhanced Business Service and Meridian Business Set
System:	Local T1, 280 IDS

Interoffice:

To Cheyenne	Digital
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Meeteetse

TCT West

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
868	TCT West, Inc.	Independent

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, and Video.
Other:	xDSL

Interoffice:

To Casper	Digital
To Basin	Digital

Midwest

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSC Remote off Worland DMS 100

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
437	RT Communications	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID Special Service Circuit- PRI - Switched 56, T1
Custom Calling/CLASS Features Enabled	(Services requiring SS7 local only) 3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Teleconference, xDSL, Local Internet Access and Call Answering.

Interoffice:

Worland	Digital
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Moorcroft

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSC Remote off Newcastle DMS 10

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
756	RT Communications	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
391	Verizon	Cellular

Switch Features/Services Enabled:

Services:	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, 911 Service, DID (E-911 capable), Special Service Circuit- PRI - Switched 56, T1, T3SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line, 711
Other	Voice Messaging, Call Answering, Local Internet Access, Teleconference, xDSL.

EAS To: Osage, Hulett, Upton, New Castle, Shoshoni.

Interoffice:

To Newcastle	Digital
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Moran

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100/RSC (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
543	Qwest Communications	RBOC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
541	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	IntraCall, 3-Way Calling, Call Waiting, Centron, Call Forwarding, Remote Call Forwarding, Speed Dialing, Custom Ringing, Long Distance Alert
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Caller ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Flat and Measured Rate Service, Private Branch Exchange Trunks, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, Frame Relay

EAS: Jackson

Interoffice:

To Jackson	Digital
To Casper	Digital

Mountain View

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: DMS-100/200 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
782	Union Telephone Company – WY.	Independent
786	Union Telephone Company – WY. (Urie)	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
747, 780	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	PBX Trunks, 911 enabled, Tone Dialing, Automatic Call Distribution,, Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7 Enabled, Enhanced 800.
CLASS:	Cancel Call Waiting, Call Waiting, Call Forward, 3-Way Calling, Speed Calling, Transfer, Call Forward Busy, Call Forward No Answer, Caller ID, Remote Call Forward, Selective Call Forward and Rejection, Caller ID Blocking.
Options:	Internet Access by Union, Voice Mail.
Other:	xDSL

Interoffice:

To Green River	Digital microwave
To Evanston	Digital microwave
To Lyman	Digital cable
To Rock Springs	Digital microwave
To Kemmerer	Digital microwave
To Manila, UT	Digital microwave
To Casper	Digital microwave
To Encampment	Digital microwave
To Cheyenne	Digital microwave
To Jackson	Digital microwave

Newcastle

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: **DMS 10**

NPA Codes: 307, 605

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 746	RT Communications	Independent
(605) 749	RT Communications	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
941, 949	Alltel Communications	Wireless Provider
629,	Verizon wireless	Wireless Provider
744	Union Telephone Company	Wireless Provider

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, 911 Service, DID (E911 capable) Special Service Circuit- PRI – Switched 56, T1, T3 SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other:	Voice Messaging, Call Answering, Local Internet Access, Teleconference, xDSL

EAS: The Osage, Upton, Moorcroft, Hulett, and Shoshoni.

Interoffice:

To Hulett	Digital
To Osage	Digital
To Upton	Digital
To Moorcroft	Digital

Old Faithful

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
545	Qwest Communications	RBOC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
549	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, continuous Redial, SS-7
Options:	Measured or Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity; 211, 311, 511, 711

EAS: Lake and Mammoth, Wyoming, and the Montana exchanges of Belgrade, Bozeman, Clyde Park, Cooke City, Gallatin Gateway, Gardiner, Livingston, Manhattan, Three Forks, West Yellowstone, and Wilsall.

Interoffice:

To Mammoth	Digital
To Billings, MT	Digital

Osage

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RLCM Remote off Newcastle DMS 10

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
465	RT Communications	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, 911 Service, DID (E-911 capable) Special Service Circuit- PRI – Switched 56, T1, T3 SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Local Internet Access, Teleconference and xDSL.

EAS To: Newcastle, Upton, Moorcroft, Hulett, and Shoshoni.

Interoffice:

To Newcastle	Digital
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Pine Bluffs

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital)

NPA Codes: 307, 308

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 245	RT Communications	Independent
(308) 244	RT Communications	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID Special Service Circuit- PRI – Switched 56, T1, T3, SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Teleconference, xDSL

EAS: Cheyenne, Burns, Carpenter and Albin

Interoffice:

To Albin	Digital
To Burns	Digital
To Carpenter	Digital
To Cheyenne	Digital

Pinedale

CenturyTel of Wyoming, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital), 502.0 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
367, 537, 859	CenturyTel of Wyoming, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
231	Comnet Cellular, Inc. – WY.	Wireless Provider
360	Union Cellular	Wireless Provider
749	Union Telephone Company	Wireless Provider

Switch Features Enabled:

Custom:	Short Speed Call, Long Speed Call, Call Forward, 3-Way Calling, Call Waiting, Cancel Call Waiting, Remote Call Forward, Toll Call Forward, Teen Service, Ring Again, Enhanced 800, Call Forward Remote Access, Centrex, Voice Mail
Options:	Touch Tone Dialing, Toll Restriction, 1+ and 0+ Dialing, Trunk Hunting, Wire Maintenance Plan, Equal Access, Integrated Business Services, Enhanced Business Services
System:	Local T1, 280 IDS
Other:	xDSL

Interoffice:

To Big Piney	Digital
To Cheyenne	Digital

Powell

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307, 406

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 754	Qwest Communications	RBOC
(406) 574	Qwest Communications	RBOC
	VACANT	
764	Tri Tel, Inc	CLEC
271	Level 3 Communications	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
(307) 769	Wyocom LLC dba Contact Communications	Wireless
(307) 254	Comnet Cellular	Wireless
(307) 202	Western Wireless	Wireless

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification – Name & Number, Caller Identification – Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 911 Service, 211, 311, 511, 711, ATM, Frame Relay
Other:	xDSL

Interoffice:

To Casper	Digital
To Cody	Digital

Rawlins

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
324, 328	Qwest Communications	RBOC
729	Wyocom LLC dba Contact Communications	CLEC
	VACANT	
	NOT HERE (Rock Springs)	
417	Level 3 Communications	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
320,710	Union Cellular	Wireless Provider
321, , 370	Comnet Cellular, Inc. – WY.	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Remote Call Forwarding, Speed Call, Centron Service, Custom Ringing, Intracall, Long Distance Alert
CLASS:	Caller Identification-Name and Number, Caller Identification Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, 911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, ATM, 211, 311, 511, 711
Other:	xDSL

Interoffice:

To Laramie	Digital
To Rock Springs	Digital
To Cheyenne	Digital

Riverton

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
748	Wyocom LLC dba Contact Communications	CLEC
855, 856, 857	Qwest Communications	RBOC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
240	TW Wireless, LLC	Wireless Provider
840, 851,	Comnet Cellular, Inc. – WY.	Wireless Provider
709,850,858	Union Cellular	Wireless Provider
	Duplicate provider delete	

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Remote Call Forwarding, Centron Service, Custom Ring, Intracall, Long Distance Alert
CLASS:	Caller Identification - Name and Number, Caller Identification Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, E-911, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, ISDN-PRI, 211, 311, 511, 711, Frame Relay, ATM
Other:	xDSL

Interoffice:

To Lander	Digital Radio
To Casper	Digital Radio (3 DS3's)
To Lander	Digital Fiber
To Casper	Digital Fiber

Rock River

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: RLCM (digital) (Remote Line Concentrator Module)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
378	Union Telephone Company – WY.	Independent

Switch Features Enabled:

Custom:	PBX Trunks, 911 enabled, Tone Dialing, Automatic Call Distribution, Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7 enable, Enhanced 800.
CLASS	Call Waiting, Cancel Call Waiting, Call Forward, 3-Way Calling, Speed Calling, Call Forward No Answer, Caller ID, Remote Call Forward, Selective Call Forward and Rejection, Caller ID Blocking.
Options:	Internet Access by Union, Voice Mail.
Other:	xDSL

Interoffice:

To Laramie	Digital (via - Network) microwave
To Encampment	Digital microwave

Rock Springs

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
252	Uintah Basin Electric	Independent
352, 362, 382	Qwest Communications	RBOC
768	Wyocom LLC dba Contact Communications	CLEC
922	AT&T Local – Wy.	CLEC
	VACANT	
212	Level 3	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
350, 354, 705	Union Cellular	Wireless Provider
371, , 389	Comnet Cellular, Inc. – Wy.	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Call, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Caller Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, E-911, Frame Relay, Digital Connectivity, Multi-line Hunting, Toll Restriction, 211, 311, 511, 711, ATM
Other:	xDSL

Interoffice:

To Green River	Digital
To Kemmerer	Digital
To Rawlins	Digital
To Cheyenne	Digital
To Evanston	Digital Fiber OC48

Saratoga

Union Telephone Company

Central Office:

Switch Manufacturer: Nortel (Northern Telecom)

Switch Model: RSCS (Remote Switching Center-Sonet)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
326	Union Telephone Company – WY.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
329	Union Cellular	Wireless Provider

Switch Features Enabled:

Custom:	ling, Toll Restriction, DID, Multi-line Hunt, 900 Access Blocking, Switched 56, Centrex, SS7 Enable, Enhanced 800.
CLASS	Cancel Call Waiting, Call Forwarding, 3-Way Calling, Speed Calling, Call Forward No Answer, Caller ID, Remote Call Forward, Selective Call Forward, and Rejection, Caller ID Blocking.
Enabled:	Cancel Wall Waiting, Tone Dialing, Flat Rate Calling, PBX Trunks, 911 Enabled
Options:	Internet Access by Union, Voice Mail.
Other:	xDSL

Interoffice:

To Encampment	Digital Fiber
To Hanna	Digital Fiber/microwave
To Mountain View	Digital Fiber/microwave
To Rawlins	Digital Fiber/microwave

SE Sheridan

Range Telephone Cooperative, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
737	Range Telephone Cooperative, Inc.	Independent

Switch Features Enabled:

Custom:	Touch Tone Dialing, Centrex, Call Forwarding, Call Waiting, 3-Way Calling, Speed Calling, Teen Service, Voice Mail, Usage Sensitive Custom Calling, Common Channel Signaling 7, Enhanced 800 Dialing, Call Forward Remote Access, User Programmable Call Forward Don't Answer, E-911, Sw 56, Calling Name and Number Delivery, Call Forward Busy, Remote Call Forward, Selective Call Forward, Digital PBX, Caller ID Blocking, Customer Originated Trace, Automatic Call Back, Automatic Recall, Selective Call Acceptance, Selective Call Rejection, Anonymous Call Rejection, User Transfer, Selective Distinctive Ringing
Other:	xDSL

Interoffice:

To Decker	Digital
To Sheridan	Digital
To Clearmont	Digital
To Arvada	Digital
To Casper	Digital

Sheridan

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE 10 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
655, 672, 673, 674, 683	Qwest Communications	RBOC
743	Wyocom LLC dba Contact Communications	CLEC
	VACANT	
461	Level 3	CLEC
675	Advance Communications Technology	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
751	Western Wireless Corporation – WY.	Wireless Provider
752, , , 763	Comnet Cellular, Inc – WY.	Wireless Provider
488	3 Rivers PCS, Inc.	Wireless Provider
533	MTPCS, LLC	Wireless Provider
706	Union Telephone Company	Wireless Provider

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, 911, Frame Relay, ATM
Other:	xDSL

EAS: Story, Dayton-Ranchester, and SE Sheridan (Range Telephone - Independent)

Interoffice:

To Casper	Digital
To Buffalo	Digital
To Dayton- Ranchester	Digital
To Story	Digital

Shoshoni

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: **RSC** Remote off Worland DMS 100

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
876	RT Communications	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
728	Union Cellular	Wireless Provider

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID Special Service Circuit- PRI – Switched 56, T1, T3 SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Local Internet Access, Teleconference, xDSL

Interoffice:

To Worland	Digital
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Story

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Ericsson

Switch Model: AXE/RSS (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
683	Qwest Communications	RBOC

Switch Features Enabled:

Custom:	3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Centron Service, Remote Call Forwarding
CLASS:	Caller Identification – Name & Number, Caller Identification – Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured & Flat Rate Service, Touch Tone Dialing, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, 911, Frame Relay

EAS: Sheridan, Dayton-Ranchester and SE Sheridan (Range Telephone – Independent)

Interoffice:

To Sheridan	Digital
To Casper	Digital

Sundance

Range Telephone Cooperative, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-10 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
283	Range Telephone Cooperative, Inc.	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
281, 282,	Comnet Cellular Inc. – WY.	Wireless
290	Western Wireless Corporation – WY.	Wireless
790	Union Telephone Company	Wireless

Switch Features Enabled:

Custom:	Touch Tone Dialing, Centrex, Call Forwarding, Call Waiting, 3-Way Calling, Speed Calling, Teen Service, Voice Mail, Usage Sensitive Custom Calling, Common Channel Signaling 7, Enhanced 800 Dialing, Call Forward Remote Access, User Programmable Call Forward Don't Answer, Sw 56, E-911, Calling Name and Number Delivery, Call Forward Busy, Remote Call Forward, Selective Call Forward, Digital PBX, Caller ID Blocking, Customer Originated Trace, Automatic Call Back, Automatic Recall, Selective Call Acceptance, Selective Call Rejection, Anonymous Call Rejection, User Transfer, Selective Distinctive Ringing
Other:	xDSL

Interoffice:

To Casper	Digital
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Ten Sleep

Tri County Telephone Association, Inc.

Central Office:

Switch Manufacturer: Metaswitch

Switch Model: VP3510

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
366	Tri-County Telephone Association, Inc.	Independent
469	Tri-County Telephone Association, Inc. (Hyattville)	Independent

Switch Features Enabled:

Options:	Automatic Call back, Automatic Route Selection, Advanced Services Platform, Call Forwarding all, Automatic Call Distribution, Call Trace customer originated, Call Park, Code Calling answer, Directed Call Pickup, Call Waiting & Cancel, ISDN, Distinctive Ringing Call, Home Intercom, Line Identification name and number, Circular Hunt, Multiple Hunt, Three-way calling, Six way analog conference calling, Consult, Call Transfer, Call Bridging, Attendant Recall, Line Queue, Speed Calling all, Selective Call Rejection, Selective Call acceptance, Restricted Originating, Time, Local Internet Access
SYSTEM:	Full SONET (ring bus), ATM, TV, Video, Fiber to the Home.
Other:	xDSL

EAS: Hyattville

Interoffice:

To Casper	Digital
To Hyattville	Digital
To Basin	Digital

Thermopolis

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSC Remote off Worland DMS 100

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
864	RT Communications	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
921	Verizon	Wireless
722	Union Telephone Company	Wireless Provider
480	Western Wireless Company	Wireless Provider

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, 911 Service, E-911 Service, DID Special Service Circuit- PRI – Switched 56, T1, T3, SS7 equipped
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Local Internet, Teleconference, xDSL

EAS: Hamilton Dome

Interoffice:

To Hamilton Dome	Digital
To Worland	Digital

Torrington

Sprint Communications (Embarq)

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 SRSC (Digital, remote off Scottsbluff, NE)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
532, 534	United Telephone Co. of the West dba Embarq	Independent

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
401	Western Wireless Corporation – Wy.	Wireless Provider
557	Cellular, Inc.	Wireless Provider
715	Union Telephone Company	Wireless Provider

Switch Features Enabled:

Custom:	Call Waiting; Call Forwarding, Three-way Calling, Speed Calling 8, Speed Calling 30, Directory Number Transfer, Call Forwarding-Busy, Call Forwarding-No Answer, Remote call forwarding, Hot line/Warm Line, Intercom, Signal Ring
CLASS:	Return Call, Caller ID with Name, Anonymous Call Rejection, Repeat Dialing, Selective Call Forward, Selective Call Rejection, Selective Call Ring
Options:	911, Business Premise Wiring, Channel Banks, Data Service Units, Data Terminals, Digital Central Office, Digital Data Service, DS0, DS1 Clear Channel, E-911, LAN Networks, Modems, Other LAN Equipment, Residential Premise Wiring, Routers, School Premise Wiring, T-1 Multiplexers, Telephone sets, Touch Tone Dialing, Centrex capability, Internet, ISDN
SYSTEM:	SONET OC48
Other:	xDSL

EAS: Lingle, Guernsey, LaGrange and West Lyman

Interoffice:

To Lingle	Digital
To Morrill	Digital
To Scottsbluff, NE	Digital

Upton

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: RSC Remote off Newcastle DMS 10

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
468	RT Communications	Independent

Switch Features/Services Enabled:

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, 911 Service, DID (E-911 capable) Special Service Circuit- PRI – Switched 56, T1, T3, SS7
Custom Calling/CLASS Features Enabled	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other	Voice Messaging, Call Answering, Local Internet Access, Teleconference, xDSL

EAS To: Osage, Hulett, Moorcroft, New Castle, and Shoshoni.

Interoffice:

To Newcastle	Digital
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Wheatland

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: AT&T

Switch Model: 5ESS/RSM (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
322	Qwest Communications	RBOC
943	Wyocom LLC dba Contact Communications	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
241	Western Wireless Corporations – WY.	Wireless Provider
331	Verizon	Wireless Provider

Switch Features Enabled:

Custom:	IntraCall, Custom Ringing, 3-Way Calling, Call Waiting, Call Forwarding, Speed Calling, Centron Service, Single Number Service, Remote Call Forwarding, Remote Access Forwarding, Scheduled Forwarding, Call Curfew, Long Distance Alert, Call Data Collection and Transmission, TrackLine Plus
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Flat Rate Service, Measured Service, Touch Tone Dialing, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, 911
Other:	xDSL

EAS: Glendo, Chugwater

Interoffice:

To Cheyenne	Digital
To Glendo	Digital

Worland

RT Communications

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100 (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
347, 375	RT Communications, Inc.	Independent
269	Commpartners, LLC – WY	CLEC

Wireless NNX Codes:

NNX	Telephone Company	TelCo Type
431	Verizon Wireless	Wireless Provider
388	Alltel Communications	Wireless Provider
718, 720, 779	Union Telephone Company	Wireless Provider

Switch Features/Services Enabled

Services	Flat Rate Service, Flat Rate Trunks, Touch Tone Dialing, E-911 Service, DID, Special Service Circuit -PRI- Switched 56, T1, T3, SS7 Equipped and PRI.
Custom Calling/CLASS Features Enabled (Wireline)	3-Way Calling, 8 Speed Calling, Automatic Call Back, Automatic Recall, Anonymous Call Rejection, Call Forward, Call Forward Busy, Caller ID Per Call Blocking, Call Forward No Answer, Call Forward Remote Access, Calling Name Delivery, Calling Number Delivery, Call Waiting, Centrex, Customer Originated Trace, Distinctive Ringing, Remote Call Forward, Selective Call Acceptance, Selective Call Forward, Selective Call Rejection, 30 Speed Calling, Caller ID Per Line Blocking, Teen Line, Ring Again, Call Transfer, Warm Line
Other:	Voice Messaging, Local Internet Access, Call Answering, Teleconference, xDSL.

Interoffice:

To Thermopolis	Digital
To Shoshoni	Digital
To Jeffery City	Digital
To Medicine Bow	Digital
To Kaycee	Digital
To Gas Hills	Digital

Wright

Qwest Communications, Inc.

Central Office:

Switch Manufacturer: Northern Telecom

Switch Model: DMS-100/RSC (Digital)

NPA Code: 307

Landline NNX Codes:

NNX	Telephone Company	TelCo Type
464, 939	Qwest Communications	RBOC

Switch Features Enabled:

Custom:	Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Remote Call Forwarding, IntraCall, Centron, Custom Ringing, Long Distance Alert
CLASS:	Caller Identification - Name & Number, Caller Identification - Number, Calling ID On Call Waiting, Call Rejection, Priority Call, Selective Call Forwarding, Last Call Return, Continuous Redial, SS-7
Options:	Measured and Flat Rate Service, Private Branch Exchange Trunks, Multi-line Hunting, Direct Inward Dialing, Toll Restriction, Digital Connectivity, 211, 311, 511, 711, 911
Other:	xDSL

EAS: Gillette

Interoffice:

To Casper	Digital
To Gillette	Digital

Note to these tables:

On the Internet: NNX numbers per listing on primeris.com/fonefind. Search NNA's: 208, 307, 308, 406, 435, 605, 801, and 970. BTA's for wireless applications may extend beyond areas listed. Contact local providers for wireless availability in your area.

Appendix F
Joint Reply Comments on Universal Service Reform, June 2008

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45

**REPLY COMMENTS OF THE VERMONT PSB, VERMONT DPS, MAINE PUC,
CONNECTME AUTHORITY AND WYOMING PUC AND RESPONSE TO QWEST
PROPOSAL TO REVISE THE NON-RURAL MECHANISM**

I. Introduction

The Vermont Public Service Board ("Vermont"), the Vermont Department of Public Service ("VtDPS"), the Maine Public Utilities Commission ("Maine"), the ConnectME Authority ("ConnectME"), and the Wyoming Public Service Commission ("Wyoming") (collectively, "Commenting States"), submit this reply to initial comments on the Notices of Proposed Rulemaking, released January 29, 2008, proposing reform of the universal service program.¹ The Commenting States strongly support initial comments urging that the Commission respond to the 10th Circuit's decision in *Qwest Communications v. FCC*² before it

¹ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-22 (rel. January 29, 2008) ("*RD NPRM*"); *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-5 (rel. January 29, 2008) ("*Auctions NPRM*"); *In the Matter of High Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-4 (rel. January 29, 2008) ("*ISR NPRM*").

² *Qwest Communications Int'l, Inc. v. FCC*, 398 F.3d 1222 (10th Cir. 2005) ("*Qwest II*").

adopts specific long term reform.³ Also, the Commenting States recommend that the Commission reject the proposal filed on May 5, 2008, by Qwest Communications International Inc. ("Qwest"), for implementing the 10th Circuit case to the extent it proposes, once again, that statewide cost averaging be eliminated.⁴ The Qwest proposal does not meet the *Qwest II* standard. The Commenting States support revising the non-rural mechanism as soon as the Commission adopts definitions for the Section 254 terms that are consistent with the Act's principles.

II. The Commission Should Adopt Definitions for Section 254 Terms before it Evaluates Long Term Reform Proposals

The Commenting States agree with initial comments recommending the Commission adopt definitions for Section 254's key terms "reasonably comparable" and "sufficiently" that are consistent with the statute, as the 10th Circuit Court has directed. It should evaluate reform proposals based on these more properly defined goals.

In *Qwest Corp. v. FCC* ("*Qwest I*"),⁵ the 10th Circuit Court of Appeals reversed and remanded the Commission's mechanism for providing universal service support to non-rural

³ Maine, VtDPS, ConnectME, and Wyoming, in Joint Initial Comments, showed that the Commission must make a legal finding as to what constitutes "reasonably comparable" rates and services, and what constitutes "sufficient" support before it proceeds to make the functional and legal findings necessary to implement the Joint Board Recommendation. *In the Matter of Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Comments of Maine Public Utilities Commission, ConnectME Authority, Wyoming Public Service Commission, and Vermont Department of Public Service (April 17, 2008)

⁴ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Qwest Communications International, Inc., *ex parte* (filed May 5, 2008) ("*Qwest ex parte*").

⁵ *Qwest Corp. v. FCC*, 258 F.3d 1191 (10th Cir. 2001) ("*Qwest I*").

carriers.⁶ The Court directed the Commission to more precisely define the terms “sufficiently” and “reasonably comparable” in sections 254(e) and 254(b) of the Act, respectively, “in a way that can be reasonably related to the statutory principles.”⁷

In 2003, the Commission responded to *Qwest I* with an Order on Remand.⁸ The Commission defined “sufficient” as “enough federal support to enable states to achieve reasonable comparability of rural and urban rates in high-cost areas served by non-rural carriers.”⁹ It also defined “reasonably comparable” rural rates as rates within two standard deviations, or roughly 138%, of the national urban average.¹⁰

In a second appeal, *Qwest II*, the 10th Circuit held that the Commission had “failed to reasonably define” both statutory terms and once again remanded the matter to the Commission.¹¹ The Court rejected the new definition of “sufficient” because it focused exclusively on reasonable comparability without acknowledging any of the six other statutory principles.¹² The Court rejected the reasonable comparability standard because it was based on an impermissible construction of the underlying statute.¹³ Due to the importance of these basic

⁶ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Ninth Report & Order and Eighteenth Order on Reconsideration, FCC 99-306, (rel. Nov. 2, 1999) (“*Ninth Report & Order*”).

⁷ *Qwest I*, 258 F.3d at 1202.

⁸ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order on Remand, Further Notice of Proposed Rulemaking and Memorandum Opinion and Order, FCC 03-249, (rel. Oct. 27, 2003) (“*Order on Remand*”).

⁹ *Order on Remand* ¶ 4.

¹⁰ *Order on Remand* ¶ 41.

¹¹ *Qwest II*, 348 F.3d at 1233.

¹² *Id.* at 1234.

¹³ *Id.* at 1235-7. The Court concluded that the comparability benchmark was based on the unsupported conclusion that Congress used the terms “preserve” and “preservation” in the Act because it was satisfied with the existing disparity between rural and urban rates in 1996.

definitions, the Court required the Commission “to comply with our decision in an expeditious manner.”¹⁴ **Despite the Court’s mandate, the remand has been pending since 2005, and the Commission has yet to issue an Order establishing new definitions for these fundamental statutory terms.**

Parties representing diverse interests and groups have all urged that the Commission revise its standards and definitions pursuant to the *Qwest II* remand before evaluating long-term reform proposals.¹⁵ NASUCA commented that the three recent NPRMs jump to specific solutions without first settling underlying issues and argued that the Commission has been “easily distracted by new or peripheral issues while older and more fundamental issues remain unresolved.”¹⁶ As NASUCA said, these terms “are the underpinnings and the purpose of the universal service programs” and must not remain undefined.¹⁷ SouthernLinc Wireless also argued that “[t]he Commission cannot adequately consider any reform proposal until it has adopted objective, measurable goals for universal service support.”¹⁸ The New Jersey Division of Rate Counsel cited the pending remand and stated that “[t]his unresolved issue bears directly

¹⁴ *Id.* at 1239.

¹⁵ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45; Comments of AT&T at p. 29; Comments of CTIA at pp. 20-21; Comments of NASUCA at p. 9; Comments of the New Jersey Division of Rate Counsel at p. 46; Comments of the North Dakota Public Service Commission at p. 7; Comments of SouthernLinc Wireless at p. 5 (filed April 17, 2008).

¹⁶ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Comments of NASUCA at p. 9 (filed April 17, 2008).

¹⁷ *Id.*

¹⁸ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Comments of SouthernLinc Wireless at p. 5 (filed April 17, 2008).

on the issues under investigation in the proceeding.”¹⁹ Similarly, the North Dakota Public Service Commission cited to *Qwest II* as part of its argument against the since-enacted interim cap on high-cost support, arguing that the Commission “must address issues related to the *Qwest II* decision.”²⁰

The Vermont, Wyoming, and Maine state commissions, and commissions and related agencies from Nebraska, South Dakota, Kentucky and West Virginia, have pressed the Commission to resolve the 10th Circuit remand issues for many months, and several carriers have requested waivers of universal service rules to provide company-specific fixes. The Commenting States attach a Chronology at Exhibit A, summarizing some of these efforts. For example, Hawaiian Telcom, which does not receive any support when its costs are averaged statewide, asked for a waiver of the universal service rules so that it could receive support for its high cost wire centers.²¹ Vermont, Maine and other states strongly opposed Hawaiian Telcom’s request and have repeatedly asked the Commission to address the 10th Circuit case before granting any company-specific solutions. It is imperative that the Commission adopt proper definitions and standards now to guide long term reform.

¹⁹ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Comments of the New Jersey Division of Rate Counsel at p. 46 (filed April 17, 2008).

²⁰ *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Comments of the North Dakota Public Service Commission at p. 7 (filed April 17, 2008).

²¹ *In the Matter of Hawaiian Telcom, Inc. Petition For Waiver of Sections 54.309 and 54.313(d)(vi) of the Commission’s Rules*, WC Docket No. 08-4 (Dec. 31, 2007). The relief Hawaiian Telecom requested is similar to Qwest’s request in its May 5, 2008 *ex parte* proposal.

Wyoming has pursued a remedy for residential rate disparity since 2004 and is still awaiting Commission action.²² This proceeding is still pending before the Commission. Rural residential customers served by the Wyoming non-rural incumbent local exchange carrier (Qwest) pay a monthly rate of \$44.07, or 127 percent of the \$34.83 nationwide urban rate benchmark. Wyoming has concluded that its rural residential rates are not reasonably comparable to the nationwide urban rate benchmark.

III. The Commission Should Revise the Non-Rural Mechanism after it Adopts Definitions, but Not Adopt Qwest's Proposal to Eliminate Statewide Averaging

In its May 5, 2008 *ex parte* letter, Qwest makes two requests. Like many initial commenters, it asks the Commission to immediately adopt rules that address the 10th Circuit's mandate.²³ The Commenting States concur with these views.

Second, Qwest asks that the Commission replace its current non-rural support mechanism with federal support targeted to the highest cost wire centers (*i.e.*, those with a cost per line of more than 125% of the national average urban rate).²⁴ Qwest says this proposal will implement *Qwest II*.²⁵ The Commenting States strongly disagree with this approach to the extent it eliminates statewide averaging of costs. The only way to provide sufficient support under the *Qwest II* standard, and have a Fund that is not astronomical in size, is to base support on statewide average costs.

²² On December 21, 2004, Wyoming, along with the Wyoming Office of Consumer Advocate, filed a *Joint Petition for Supplemental Federal Universal Service Funds for Customers of Wyoming's Non-Rural Incumbent Local Exchange Carrier (Joint Petition)*, with the Commission.

²³ *Qwest ex parte* at p. 1.

²⁴ *Qwest ex parte* at p. 2.

²⁵ *Qwest ex parte* proposal attached to *ex parte*, p. 1

The FCC adopted the statewide average policy when it first designed its non-rural cost mechanism, and both the *Qwest I* and *Qwest II* courts affirmed this policy as fundamental to achieving universal service goals.²⁶ As the FCC described in its 2003 *Remand Order*, statewide cost averaging ensures a proper division of federal and state responsibility for USF support:

The general framework of the non-rural mechanism, through the use of statewide average costs, *reflects the appropriate division of Federal and state responsibility for determining high-cost support for non-rural carriers.* The non-rural mechanism estimates costs by determining the average cost in each wire center...and...averaging the wire center costs at the state level. States with high average costs do not have enough low-cost lines to support their high-cost areas. High-cost states receive Federal non-rural support, which is targeted to their high-cost wire centers. This is the most reasonable way to identify the states that do not have enough non-rural carrier low-cost lines to keep their rural rates reasonably comparable to urban rates in most other states. *Statewide averaging effectively enables the state to support its high-cost wire centers with funds from its low-cost wire centers through implicit or explicit support mechanisms, rather than unnecessarily shifting funds from other states.*²⁷

The FCC's holding in its *Remand Order* followed the *Qwest I* decision affirming the shared federal/state responsibility for universal service goals.²⁸ The *Qwest I* Court rejected Qwest's similar effort to shift its cost of serving high-cost wire centers to the federal USF, concluding that the Commission and the federal USF could not practically shoulder this massive support burden alone.²⁹

Qwest's current proposal to eliminate statewide averaging makes this same losing argument and that principle should be immediately and summarily rejected to avoid ballooning the Fund. However, the Commission should move forward to revise its non-rural mechanism, as soon as it can adopt statutory term definitions.

²⁶ See *Qwest I*, 258 F.3d 1203; *Qwest II*, 398 F.3d 1237.

²⁷ *Order on Remand* ¶ 24 (emphasis added).

²⁸ *Qwest I*, 258 F.3d 1203.

²⁹ *Id.*

Dated this 2nd day of June, 2008.

/s/ George Young

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45

EXHIBIT A

CHRONOLOGY

CHRONOLOGY

1996	Congress passes Telecommunications Act, adopting as universal service principle, that consumers in rural areas should have access to telecommunications services at rates that are reasonably comparable to rates charged for similar services in urban areas. Section 254(b)(3).
Nov. 1999	FCC issues 9th Report and Order implementing non-rural carrier USF mechanism.
2001	<i>Qwest Corp. v. FCC</i> : 10th Circuit Court reverses and remands Order No. 9. (Court found FCC, among other things, had failed to define key statutory terms, failed to justify cost 135% benchmark, and failed to evaluate data in the record comparing rural and urban costs under the proposed funding mechanism. Court directed FCC to define relevant statutory terms; assess whether funding mechanism will be sufficient to make rates reasonably comparable; provide adequate record support and reasoning for support level determined; and develop mechanisms to induce state action to assist in implementing USF goals.)
Oct. 2003	FCC issues Remand Order. Chairman Martin criticizes the order in a separate statement: "I believe that today's effort . . . falls short in meeting our obligation to ensure that consumers living in rural and high cost areas have access to similar telecommunications services at rates that are reasonably comparable to rates paid by urban consumers....Today's recommendation falls short in its response to the court mandate that we define the statutory term 'reasonably comparable' for purposes of the cost-based support mechanism and fails to demonstrate, with any degree of specificity, how the proposed secondary mechanism will satisfy the statutory requirement that universal service support be 'specific, predictable and sufficient.'"
Feb. 2005	<i>Qwest Communications Intl. v. FCC</i> : 10th Circuit Court reverses Remand Order in part. (Court found FCC, among other things, had not properly defined statutory terms, its comparability benchmark still allowed significant variance between urban and rural rates to continue unabated; and support not shown to be sufficient to make rates reasonably comparable. Court states expectation that FCC will act in "an expeditious manner.")
Dec. 2005	FCC seeks comment on remand issues
March 2006	Comment cycle closes

Mid-March 2007	Vermont conducts meetings at the FCC to discuss timetable for resolving remand issues
March 15, 2007 (approx.)	Chairman Martin states in response to questions posed by Senator Snowe in a February 7, 2007 Senate Commerce Committee hearing that he intends to circulate an order resolving this issue before the end of the year.
March 19, 2007	The Maine, Wyoming, Vermont, Kentucky, Montana, Nebraska and South Dakota state commissions, and related state agencies, send letters to Chairman Martin asking that the FCC establish an early timetable for resolution of remand issues.
May 31, 2007	The Nebraska, Maine, South Dakota, Vermont and Kentucky state commissions and related agencies files an <i>ex parte</i> letter objecting to grant of Iowa Telcom Petition for Interim Waiver of the Commission's Universal Service High Cost Loop Support mechanisms (WC Docket No. 05-337), and Petition for Forbearance under 47 U.S.C. 160(c) from the Universal Service High Cost Loop Support Mechanism (WC Docket No. 05-337), on grounds, among other things, that FCC should first resolve issues remanded by 10th Circuit.
December 11, 2007	Vermont files an <i>ex parte</i> letter reporting telephone conference with Ian Dillner, Legal Advisor to Chairman Kevin Martin, in which Vermont expresses concern that the FCC move forward expeditiously with its remand, as the Court directed.
February 19, 2008	Vermont, Maine, Nebraska, South Dakota State Commissions and related agencies and West Virginia Consumer Advocate Division, files Opposition to Petition of Hawaiian Telcom, Inc. for Waiver of Sections 54.309 and 54.313 (d)(vi) of the Commission's rules (WC Docket 08-4), on grounds, among other things, that Commission must first resolve fundamental definitional and conceptual issues in the 10 th Circuit remand case.

Appendix G
**November 26, 2008, Comments on Intercarrier Compensation and Universal
Service Reform**



THE STATE

OF WYOMING

DAVE FREUDENTHAL
GOVERNOR

Public Service Commission

HANSEN BUILDING, SUITE 300

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COMMISSIONERS

KATHLEEN "CINDY" LEWIS, Chairman

STEVE OXLEY, Deputy Chairman

ALAN B. MINIER, Commissioner

HARRY IVEY

Commission Administrator

CHRISTOPHER PETRIE

Secretary and Chief Counsel

November 26, 2008

The Honorable Kevin Martin, Chairman
The Honorable Deborah Taylor Tate, Commissioner
The Honorable Michael Copps, Commissioner
The Honorable Jonathan Adelstein, Commissioner
The Honorable Robert McDowell, Commissioner

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: COMMENTS IN THE MATTER OF INTERCARRIER COMPENSATION
REFORM, CC Docket Nos. 96-45, 96-98, 99-68, 99-200, 01-92 and WC
Docket Nos. 03-109, 04-36, 05-337, and 06-122.**

Dear Chairman and Commissioners:

We urge the Commission not to approve the proposal to reform intercarrier compensation and universal service released on November 5, 2008. A number of negative and disruptive effects are to be expected if the proposal is allowed to go forward. For example, we expect the proposal would fail to create a regime that would provide reasonable comparability of rural and urban rates, or a sufficient universal service fund -- especially for carriers providing service in rural Wyoming whose cost of service is already high. Unifying intercarrier compensation charges among the state and interstate jurisdictions will disrupt the Wyoming Public Service Commission's (WyPSC) statutory jurisdiction over intrastate access charges (W.S. § 37-15-203(j)) and directly harm Wyoming subscribers whose local basic service rates must, by statute, be rebalanced to cover the shortfall in access revenues. It would also drive up subscriber line charges, and would still fail to fulfill -- or even address -- the promise to rural, high-cost areas of the nation for reasonable rate comparability made by Congress in 47 U.S.C. § 254(b)(3) of the Telecommunications Act of 1996. Finally, the very low proposed price for access appears to give interexchange carriers a windfall that would be difficult, if not impossible, to pass on to end use customers.

The WyPSC has commented many times about Wyoming's high cost of service, the resulting high local service rates and the insufficiency of the federal universal service fund. (Please see Exhibit A for a brief chronology of our efforts in this regard.) Wyoming is very rural with small, widely dispersed population centers typified by durably high costs for basic universal service. On September 29, 2008, we certified that, due to the high cost of providing universal service non-rural residential rates in Wyoming are not comparable to rates in urban areas.¹ We said the same thing in certifying rate comparability in 2007 and prior years. Many rural residential customers served by the Wyoming non-rural incumbent local exchange carrier (Qwest Corporation hereinafter "Qwest") pay a monthly rate of \$49.50, or 132% of the nationwide urban rate benchmark. The residential rate for Embarq in the Lingle, Wyoming, exchange is \$71.34, 191% above the nationwide urban average. These facts reflect the truly high cost, rural nature of much of Wyoming.

Wyoming has eradicated implicit subsidies from telecommunications rates in Wyoming and has ensured that the retail rate for each service covers its own total service long run incremental cost. Wyoming has implemented an explicit subsidy program in the form of the Wyoming Universal Service Fund. This has been done as required by Wyoming law (the Wyoming Telecommunications Act of 1995 and its comprehensive 2007 revision). The basic service rates paid by our retail consumers are not artificially high. Each ILEC operating in Wyoming has had to prove its costs before the WyPSC. Thus, when we say that a drastic, universal and very lightly examined reduction in access charges could harm Wyoming telecommunications service providers and their customers, our opinions are firmly grounded in fact.

The size of the federal universal service fund has been an issue for the Commission for some time now. In its First Remand Order, the Commission determined that the non-rural high-cost fund must be "only as large as necessary."² The Tenth Circuit, however, held that the Commission had failed to appropriately consider the range of universal service principles in 47 U.S.C. § 254(b).³ When the Tenth Circuit criticized gratuitous subsidies, it was a criticism of excessive support, *not* an argument against sufficient support.⁴ The Tenth Circuit did not encourage the Commission to find that the sufficiency requirement conflicted with the affordability principle. It did not suggest that the requirement to provide sufficient support is "balanced" by notions of affordability. Section 254(d) and (e) obligate the Commission to provide sufficient support, and no concept of "excessive subsidization" can undermine that duty.

¹ RE: Residential Rate Comparability Certification for Wyoming's Non-Rural Incumbent Local Exchange Carrier Serving in Rural Areas within Wyoming Pursuant to 47 C.F.R. § 54.316 (CC Docket No. 96-45).

² See First Remand Order, CC Docket No. 96-45 (Oct. 27, 2003) at ¶ 30.

³ See *Qwest Communications International, Inc. v. FCC* 398 F.3d 1222, 1234 (10th Circuit, 2005) (Qwest II).


⁴ See Qwest II at 1234 citing Qwest I at 1200 ("as we explained in our previous decision, excessive subsidization arguably may affect the affordability of telecommunications services, thus violating the principle in § 254(b)(1). The FCC is compelled to balance the § 254(b) principles to the extent they conflict").

The WyPSC pursued a remedy for this residential rate disparity through its request for further federal action, provided to state commissions in Part IV.D.2.e. of the First *Remand Order*. On December 21, 2004, the WyPSC, along with the Wyoming Office of Consumer Advocate, filed with the Commission a *Joint Petition for Supplemental Federal Universal Service Funds for Customers of Wyoming's Non-Rural Incumbent Local Exchange Carrier (Joint Petition)*. In response to the *Joint Petition*, the FCC opened a proceeding and established a pleading cycle on February 14, 2005, in CC Docket 96-45, to address the issues raised by the WyPSC. That proceeding is still pending before the Commission.

Again, we urge the Commission not to implement the intercarrier compensation and universal service reform proposals without first addressing the issues of sufficiency of support for local rates and their affordability. The WyPSC looks forward to working with the Commission and all other interested parties in addressing the 10th Circuit's decision, the universal service goals and principles of Section 254 of the federal Telecommunications Act of 1996 and in achieving residential rate comparability in Wyoming.

Sincerely,


KATHLEEN A. LEWIS, Chairman


STEVE OXLEY, Deputy Chairman


ALAN B. MINIER, Commissioner

Exhibit A
Chronology

- 1996 Congress passes the Telecommunications Act of 1996, adopting as a universal service principle, that consumers in rural areas should have access to telecommunications services at rates that are reasonably comparable to rates charged for similar services in urban areas. 47 U.S.C. §254(b)(3).
- 11/99 FCC issues *Ninth Report and Order* in Docket No. CC 96-45 implementing non-rural carrier universal service funding mechanism.
- 2001 Qwest Corp. v. FCC: U.S. Court of Appeals for the 10th Circuit reverses and remands the FCC's Ninth Report and Order. The 10th Circuit found that the FCC, among other things, had failed to define key statutory terms, failed to justify the 135 percent cost benchmark, and failed to evaluate data in the record comparing rural and urban costs under the proposed funding mechanism. The Court directed the FCC to define relevant statutory terms; assess whether funding mechanism will be sufficient to make rates reasonably comparable; provide adequate record support and reasoning for support level determined; and develop mechanisms to induce state action to assist in implementing universal service goals.
- 10/03 FCC issues *Remand Order*. Chairman Martin criticizes the order in a separate statement: "I believe that today's effort . . . falls short in meeting our obligation to ensure that consumers living in rural and high cost areas have access to similar telecommunications services at rates that are reasonably comparable to rates paid by urban consumers Today's recommendation falls short in its response to the court mandate that we define the statutory term "reasonably comparable" for purposes of the cost-based support mechanism and fails to demonstrate, with any degree of specificity, how the proposed secondary mechanism will satisfy the statutory requirement that universal service support be "specific, predictable, and sufficient."
- 2/05 *Qwest Communications Intl. v. FCC*: 10th Circuit reverses *Remand Order* in part. (Court found FCC, among other things, had not properly defined statutory terms, its comparability benchmark still allowed significant variance between urban and rural rates to continue unabated; and support was not shown to be sufficient to make rates reasonably comparable. Court states expectation that the FCC will act in "an expeditious manner."
- 9/05 "The WPSC pursued a remedy to this residential rate disparity through its request for further federal action, provided to state commissions in Part IV.D.2.e. of the *Remand Order*. On December 21, 2004, the WPSC, along with the Wyoming Office of Consumer Advocate, filed a *Joint Petition for Supplemental Federal Universal Service Funds for Customers of Wyoming's Non-Rural Incumbent Local Exchange Carrier (Joint Petition)*, with the FCC. In the *Joint Petition*, the WPSC provided a summary of the background,

circumstances and history of the WPSC's request for additional federal universal service funds. The *Joint Petition* clearly demonstrates Wyoming has taken all necessary steps to achieve reasonable comparability through our actions and the application of existing federal support. In response to the *Joint Petition*, the FCC opened a proceeding and established a pleading cycle on February 14, 2005, in CC Docket 96-45, to address the issues raised by the WPSC. That proceeding is currently pending before the FCC.” (Residential Rate Comparability Certification for Wyoming’s Non-Rural Incumbent Local Exchange Carrier Serving in Rural Areas within Wyoming Pursuant to 47 C.F.R. § 54.316 (CC Docket No. 96-45)) At pages 2, 3.

- 12/05 FCC seeks comment on Remand Issues.
- 3/06 – “The courts and the Act support the WPSC position and we hope that the Commission will also support fair treatment for the described rural exchange customers.” (In the matter of Federal State Joint Board on Universal Service High Cost Universal Service Support, WC Docket No. 05-337, CC Docket No. CC 96-45, Comments of the Wyoming PSC.) At page 7.
- 3/06 Comment Cycle closes.
- 2/07 Chairman Martin states in response to questions posed by Senator Snowe in a Senate Commerce Committee hearing that he intends to circulate an order resolving this issue before the end of the year.
- 3/07 The Maine, Wyoming, Vermont, Kentucky, Montana, Nebraska, and South Dakota state commissions, and related state agencies, send letters to Chairman Martin asking that the FCC establish an early timetable for resolution of remand issues.
- 12/07 “. . . That proceeding is currently pending before the FCC.” (Residential Rate Comparability Certification for Wyoming’s Non-Rural Incumbent Local Exchange Carrier Serving in Rural Areas within Wyoming Pursuant to 47 C.F.R. § 54.316 (CC Docket No. 96-45)) At page 3.
- 4/08 “This Commission also must determine what “reasonably comparable” means pursuant to the remand of its decision to *Qwest II*. The Commission has yet to issue an order responding to the Tenth Circuit Court of Appeals’ decision in *Qwest II*. It has now been over three years since the Court directed the Commission to revise key elements of its non-rural carrier high cost commenter support rules so that sufficient support would be provided to non-rural carriers. Consumers in rural states have been waiting too long for the Commission to correct its misinterpretation of the statute and provide sufficient support to those states. A legal finding as to what constitutes “reasonably comparable” rates and service and what constitutes “sufficient” support must be made before the Commission proceeds to make the functional and legal findings” (Joint Board Recommendation in the Matter of High Cost Support, WC Docket No. 05-337, CC Docket No. CC 96-45, Comments of Maine PUC, ConnectME Authority, Wyoming PSC, and Vermont DPS) At page 15.

- 6/08 **“The Vermont, Wyoming, and Maine state commissions, and commissions and related agencies from Nebraska, South Dakota, Kentucky, and West Virginia, have pressed the Commission to resolve the 10th Circuit remand issues for many months, and several carriers have requested waivers of universal service rules to provide company-specific fixes . . . It is imperative that the Commission adopt proper definitions and standards now to guide long term reform.” (Joint Board Recommendation in the Matter of High Cost Support, WC Docket No. 05-337, CC Docket No. CC 96-45, Reply Comments of Vermont PSB, Vermont DPS, Maine PUC, ConnectME Authority, Wyoming PSC) At page 5.**
- 9/08 **“ . . . That proceeding is currently pending before the FCC.” (Residential Rate Comparability Certification for Wyoming’s Non-Rural Incumbent Local Exchange Carrier Serving in Rural Areas within Wyoming Pursuant to 47 C.F.R. § 54.316 (CC Docket No. 96-45)) At page 3.**

Appendix H

December 22, 2008, Joint Reply Comments on Intercarrier Compensation and Universal Service Reform by Wyoming PSC and the regulatory utility commissions from Vermont, Nebraska, Iowa, and Maine.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	
High – Cost Universal Service Support)	WC Docket 05-337
)	
Federal – State Joint Board on)	CC Docket 96-45
Universal Service)	
)	
Lifeline and Link Up)	WC Docket 03-109
)	
Universal Service Contribution)	WC Docket 06-122
Methodology)	
)	
Numbering Resource Optimization)	CC Docket 99-200
)	
Implementation of the Local Competition)	
Provisions in the Telecommunications)	CC Docket 96-98
Act of 1996)	
)	
Developing a Unified Inter-carrier)	CC Docket 01-92
Compensation Regime)	
)	
Inter-carrier Compensation for ISP-Bound)	CC Docket 99-68
Traffic)	
)	
IP-Enabled Services)	WC Docket 04-36

Comments by a Coalition of States

The following comments are respectfully submitted in the above referenced dockets by a coalition of states with similar concerns (the Joint Commenters), which are served by similarly-situated telephone carriers serving our high cost areas, including some mid-size carriers that receive no universal service funding despite the rural nature of many of their exchanges.

First, the Joint Commenters express their strong support for the comments filed by NARUC in this proceeding. The Joint Commenters strongly agree with

NARUC that the proposed plans, in particular, Appendices A and C, would unlawfully constrain state rate design by preempting intrastate access charges and further supports NARUC opposition to the Commission's treatment of VoIP as an information service although it clearly fits Congress's functional definition of telecommunications service. Before undertaking further intercarrier compensation or universal service reform, the FCC must take into account the affordability of rates and the sufficiency of universal service funds to ensure that rates and service quality among states, as well as in rural and urban areas, are reasonably comparable.¹ The Joint Commenters oppose reform that ignores or penalizes consumers in states where access charge reductions have been already offset by state universal service contributions and/or local rate increases.² For example, Wyoming, New Mexico, Maine and Nebraska have already undertaken significant access reform and local rate rebalancing, and implemented state universal service funds.

Rural areas in our states are often very costly to serve with plain old telephone service, let alone venturing into broadband investment and deployment. Given the national economic situation today, we urge the FCC to carefully consider the effects of its reform proposals on consumers located in very high cost, rural, insular, and low-revenue areas. It can be demonstrated clearly that the cost of providing universal service throughout the rural areas of many states is high and is likely to stay high for a number of demographic, geographic, and economic reasons which are unlikely to change. Larger ILECs serve

¹ See *Qwest Communications International, Inc. v. FCC* 398 F.3d 1222, 1234 (10th Circuit, 2005) (Qwest II).

² See *Reply Comments of the Early Adopter State Commissions, Maine Public Utilities Commission; Nebraska Public Service Commission; Vermont Department of Public Service; and Vermont Public Service Board*, CC Docket No. 01-92 (February 1, 2007).

high-cost areas and have the added pressure of competition in the urban markets. In many instances, these carriers are the furthest behind in broadband deployment. Under current policies, the competitive pressures faced by larger ILECs will continue to result in delaying broadband deployment to rural customers. Universal service reform measures adopted by the FCC must recognize the cost of providing service in the rural areas, regardless of the size of the carrier.

The Chairman's Draft order includes a brief discussion regarding the fact that certain actions taken to reform intercarrier compensation will result in reduced revenues for many carriers, particularly mid-size price cap carriers that pay dividends to their shareholders. The Draft also notes that these carriers are using a common network, supported by federal universal service funding, to provide both regulated and non-regulated services. Significant portions of the rural areas common to the Joint Commenter states are served by mid-size telecommunications carriers that are the focus of the Commission's deliberations concerning replacement of lost revenues arising from comprehensive universal service and intercarrier compensation reform. Consistent with the positions taken by many of the Joint Commenter states, mid-size carriers have played a crucial role in extending telecommunications services to rural areas. Sufficient universal service funding and adequate intercarrier compensation revenues are critical for mid-size carriers to be able to provide broadband access in high cost areas.

The proposed orders assert that, over the course of the Commission's comprehensive reform proceedings, certain commenters have identified the returns, operating margins, dividends, and other measures of financial performance of such carriers as a "concern" to be weighed carefully when evaluating the need for access to continued universal service

support.

The Joint Commenters believe that these alleged “concerns” are based on the faulty and misguided premise that simply because a company pays dividends to its shareholders, somehow it does not need access to continued or new universal service support for the rural areas that it serves. For many publicly traded companies, a central component of the cost of doing business is the cost associated with providing a reasonable return to investors in order to attract and retain the capital investment necessary to operate, support, and expand operations. Dividends are what shareholders demand in order to be willing to provide equity funds to a company and dividend payouts are important to attracting investment in telecommunications companies.

Regardless of the size of a carrier or its federal regulatory status (rate of return or price cap), the Joint Commenters strongly believe that the presence of dividends paid by a telecommunications carrier does not negate the need for continued universal service support or the need for some form of revenue replacement mechanism for those carriers whose present operating territory includes extensive service to rural and high-cost areas. On the contrary, it is more likely that the reality and continuation of federal universal service support is a major factor in enabling such companies to serve areas of the country that would otherwise be uneconomic to serve.

Carriers, particularly ILECs facing increasing access line losses and access charge revenue reductions, must be able to rely on dividends to secure capital necessary to invest in their networks and provide service in these areas. Reducing access to universal service support for certain “dividend-paying” companies would be unreasonable and highly counterproductive. It would serve only to reduce investment and discourage broadband

deployment, especially in rural areas.

The Joint Commenters agree that any reform should take into account, the importance of wireless networks. Support under the existing system, based on ILEC costs, is problematic and should be phased out. However, it is also important that some type of support mechanism be developed for the wireless industry, similar to those being proposed for incumbent carriers and broadband services, so that wireless services will be more ubiquitously available in rural and high-cost areas.

Dated this 22nd Day of December, 2008.

The Nebraska Public Service Commission

By: /s/ Shana Knutson

Shana Knutson

Staff Attorney

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Appendix I
September 29, 2008, Annual Certification of Eligible Telecommunications Carriers



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STEVE OXLEY, Deputy Chairman

MARY BYRNES

September 29, 2008

HARRY IVEY

Commission Administrator

CHRISTOPHER PETRIE

Secretary and Chief Counsel

The Honorable Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Ms. Karen Majcher
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: Certification of Federal High Cost Support for Wyoming's Rural Local Exchange Carriers and Eligible Telecommunications Carriers (ETCs) Serving Lines in the Areas of Rural Local Exchange Carriers Pursuant to 47 C.F.R. § 54.314 (CC Docket No. 96-45)

Dear Secretary Dortch and Ms. Majcher:

The Wyoming Public Service Commission (WyPSC) hereby submits, pursuant to 47 C.F.R. § 54.314, its annual certification to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC). 47 C.F.R. § 54.314 requires the appropriate state regulatory authority to annually certify those rural incumbent local exchange carriers and eligible telecommunications carriers serving lines in the areas of rural incumbent local exchange carriers within their jurisdiction for purposes of receiving federal universal service support.

For the 2008 annual certification process, the WyPSC applied the requirements and guidelines of WyPSC Rule Section 514 to the ETCs in Wyoming jurisdictional to it. The annual reporting requirements and guidelines of WyPSC Rule Section 514 are modeled after the FCC's *ETC Report and Order* adopted February 25, 2005, in CC Docket 96-45, FCC 05-46, and the WyPSC's own annual certification processes and rulemaking proceedings conducted during 2004, 2005 and 2006 for Wyoming's ETCs. The annual reporting requirements for previously designated ETCs in Wyoming became effective August 17, 2006.

Attached to this submission is a letter (PSC Letter Number 08-152) that staff of the WyPSC sent to each ETC subject to its jurisdiction for 2008. The letter and its attachments describe the requirements and responsibilities placed upon the WyPSC in conducting the annual certification process for each previously designated ETC serving

designated areas within Wyoming. Rule Section 514 gives each carrier the opportunity to verify that it continues to offer the nine supported services and functionalities required for designation as an ETC under the federal Telecommunications Act of 1996 and the Code of Federal Regulations, throughout its designated service areas within Wyoming. The WyPSC has also obtained from its jurisdictional rural incumbent local exchange carriers and ETCs serving lines in the areas of rural incumbent local exchange carriers their respective signed affidavits setting forth how federal universal service support funds have been used in the past and how they will be used during the applicable 12-month period for which support funds are being requested. Additionally, the data provided by each applicant was the subject of hearings before the WyPSC. The respective affidavits, additional documentation and detailed support from each ETC jurisdictional to the WyPSC will be made available to you upon request.

As the state regulatory authority with jurisdiction to regulate, *inter alia*, the intrastate activities of telecommunications companies serving in Wyoming, the WyPSC hereby certifies the following rural incumbent local exchange carriers and ETCs serving lines in the service areas of rural incumbent local exchange carriers as being eligible to receive federal universal service support funds for the upcoming program year:

Carrier	Study Area Code
All West Communications	512290
CenturyTel of Wyoming	512299
Chugwater Telephone Company	512289
Dubois Telephone Exchange	512291
Range Telephone Cooperative (includes RT Communications)	512251
Silver Star Communications	512295
Tri County Telephone Association (includes TCT WEST)	512296
Union Telephone Company	512297
United Telephone Company of the West/Embarq	511595
Alltel Communications (formerly Western Wireless)	519002
Alltel Communications (formerly Western Wireless)	519007
Union Telephone Company d/b/a Union Cellular	519905

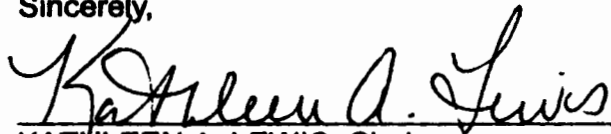
The WyPSC finds these certifications to be in the public interest.


Western Wireless (WWC Holding Company), now known as Alltel Communications, was previously designated by the FCC as an ETC in certain rural service areas within Wyoming in the FCC's *Memorandum Opinion and Order* in CC Docket 96-45, DA 00-2896, adopted December 22, 2000. ETC status was granted to Western Wireless by the FCC in that proceeding (SAC 519002) because the WyPSC did not, at that time, have the requisite authority to grant ETC status to wireless providers. The WyPSC now has the statutory authority to designate wireless providers as ETCs and did so during 2005 in the case of the petition filed by Western Wireless for ETC designation by the WyPSC (SAC 519007) in additional rural service areas of Project Telephone – the Clark, Wyoming exchange (wire center), TCT WEST – the

Basin, Frannie, Greybull, Lovell and Meeteetse, Wyoming exchanges (wire centers) and Tri County Telephone Association – the Burlington, Hyattville, Ten Sleep and Hamilton Dome, Wyoming exchanges (wire centers).

Based upon the representations in the affidavits submitted by these carriers and the WyPSC's review and examination of the additional documentation and support required by WyPSC Rule Section 514 to be filed by the carriers this year and the WyPSC staff analysis, the WyPSC certifies the above-identified carriers will use the federal universal service support funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 214(e) and the requirements and mandates of Part 54 of the Code of Federal Regulations. This includes High Cost Loop support (HCL), Local Switching Support (LSS) and high cost support received pursuant to the purchase of exchanges.

Sincerely,


KATHLEEN A. LEWIS, Chairman


STEVE OXLEY, Deputy Chairman


MARY BYRNES, Commissioner



THE STATE

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MARY BYRNES

HARRY IVEY

Commission Administrator

CHRISTOPHER PETRIE

Secretary and Chief Counsel

September 29, 2008

The Honorable Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Ms. Karen Majcher
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

RE: Certification of Federal High Cost Support for Wyoming's Non-Rural Local Exchange Carriers and Eligible Telecommunications Carriers (ETCs) Serving Lines in the Areas of Non-Rural Local Exchange Carriers Pursuant to 47 C.F.R. § 54.313 (CC Docket No. 96-45)

Dear Secretary Dortch and Ms. Majcher:

The Wyoming Public Service Commission (WyPSC) hereby submits, pursuant to 47 C.F.R. § 54.313, its annual certification to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC). 47 C.F.R. § 54.313 requires the appropriate state regulatory authority to annually certify those non-rural incumbent local exchange carriers and eligible telecommunications carriers serving lines in the areas of non-rural incumbent local exchange carriers within their jurisdiction for purposes of receiving federal universal service support.

For the 2008 annual certification process, the WyPSC applied the requirements and guidelines of WyPSC Rule Section 514 to the ETCs in Wyoming jurisdictional to it. The annual reporting requirements and guidelines contained in WyPSC Rule Section 514 were modeled after the FCC's *ETC Report and Order* adopted February 25, 2005, in CC Docket 96-45, FCC 05-46 and the WyPSC's own annual certification processes and rulemaking proceedings conducted during 2004, 2005 and 2006 for Wyoming's ETCs. The annual reporting requirements for previously designated ETCs in Wyoming became effective August 17, 2006.

Attached to this submission is a letter (PSC Letter Number 08-152) that staff of the WyPSC sent to each ETC subject to its jurisdiction for 2008. This letter and its attachments describe the requirements and responsibilities placed upon the WyPSC in

conducting the annual certification process for each previously designated ETC serving designated areas within Wyoming. Rule Section 514 gives each carrier the opportunity to verify that it continues to offer the nine supported services and functionalities required for designation as an ETC under the federal Telecommunications Act of 1996 and the Code of Federal Regulations, throughout its designated service areas within Wyoming. The WyPSC has also obtained from its jurisdictional non-rural incumbent local exchange carriers and ETCs serving lines in the areas of non-rural incumbent local exchange carriers their respective signed affidavits setting forth how federal universal service support funds have been used, and how they will be used during the applicable 12-month period for which support funds are being requested. Additionally, the data provided by each applicant was the subject of hearings before the WyPSC. The respective affidavits, additional documentation and detailed support from each ETC jurisdictional to the WyPSC will be made available to you upon request.

As the state regulatory authority with jurisdiction to regulate, *inter alia*, the intrastate activities of telecommunications companies serving in Wyoming, the WyPSC hereby certifies the following non-rural incumbent local exchange carriers and ETCs serving lines in the service areas of non-rural incumbent local exchange carriers as being eligible to receive federal universal service support funds for the upcoming program year:

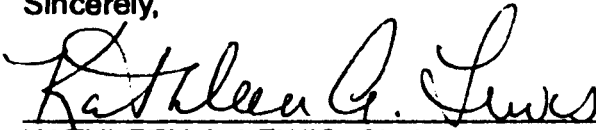
Carrier	Study Area Code
Advanced Communications Technology	519004
Qwest Corporation	515108
Silver Star Communications	519001
Union Telephone Company d/b/a Union Cellular	519905
VCI Company (Lifeline and Linkup Programs only)	519006
Alltel Communications (formerly Western Wireless)	519002
Alltel Communications (formerly Western Wireless)	519007

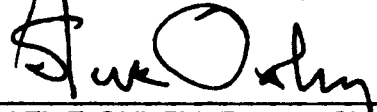
The WyPSC finds these certifications to be in the public interest.

Western Wireless (WWC Holding Company), now known as Alltel Communications, was previously designated by the FCC as an ETC in certain non-rural service areas of Qwest Corporation within Wyoming in the FCC's *Memorandum Opinion and Order* in CC Docket 96-45, DA 00-2896, adopted December 22, 2000. ETC status was granted to Western Wireless by the FCC in that proceeding (SAC 519002) because the WyPSC did not, at that time, have the requisite authority to grant ETC status to wireless providers. The WyPSC now has the statutory authority to designate wireless providers as ETCs and did so during 2005 in the case of the petition filed by Western Wireless for ETC designation by the WyPSC (SAC 519007) in additional non-rural service areas of Qwest Corporation in Wyoming – the Cody and Powell, Wyoming exchanges (wire centers).

Based upon the representations in the affidavits submitted by these carriers, the review and examination of the additional documentation and support required by WyPSC Rule Section 514 to be filed by carriers and the WyPSC staff analysis, the WyPSC certifies that the above-identified carriers will use the federal universal service support funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 214(e) and the requirements and mandates of Part 54 of the Code of Federal Regulations. This includes all elements and components of High Cost Model (HCM) support. Based on the affidavit and other documentation filed by VCI Company, VCI only utilizes its designation as an ETC to participate in federal low income support programs (Lifeline and Linkup). VCI does not seek or receive federal high cost support with respect to its operations in Wyoming.

Sincerely,


KATHLEEN A. LEWIS, Chairman


STEVE OXLEY, Deputy Chairman


MARY BYRNES, Commissioner

Appendix J
Annual Certification of Non-Rural Rate Comparability



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MARY BYRNES

September 29, 2008

HARRY IVEY
Commission Administrator
CHRISTOPHER PETRIE
Secretary and Chief Counsel

The Honorable, Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Ms. Karen Majcher – Vice President
Universal Service Administrative
Company
2000 L Street, NW, Suite 200
Washington, DC 20036

RE: Residential Rate Comparability Certification for Wyoming's Non-Rural
Incumbent Local Exchange Carrier Serving in Rural Areas within Wyoming
Pursuant to 47 C.F.R. § 54.316
(CC Docket No. 96-45)

Dear Secretary Dortch and Ms. Majcher:

The Wyoming Public Service Commission (WyPSC) hereby submits, pursuant to 47 C.F.R. § 54.316, its residential rate comparability certification to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC). 47 C.F.R. § 54.316, *Rate comparability review and certification for areas served by non-rural carriers*, requires state commissions to annually review the comparability of residential rates in rural areas of the state served by non-rural incumbent local exchange carriers to urban rates nationwide. Qwest Corporation (Study Area Code 515108) is the only non-rural incumbent local exchange carrier in Wyoming; and Qwest also serves in the rural areas of the state. 47 C.F.R. § 54.316 further requires the WYPSC to certify to the FCC and the USAC whether rates are reasonably comparable pursuant to the universal service principles contained in section 254(b)(3) of the federal Telecommunications Act of 1996.

This residential rate review and certification is pursuant to the FCC's expanded certification process contained in the FCC's *Order on Remand, Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order*, CC Docket No. 96-45, FCC 03-249 released October 27, 2003 (commonly referred to as the *Remand Order*). The nationwide urban rate benchmark equals the most recent average urban rate plus two weighted average standard deviations. The average urban rate and standard deviation are found in the most recent *Reference Book of Rates, Price Indices, and Expenditures for Telephone Service* published by the

Wireline Competition Bureau of the FCC. For this certification, the nationwide urban rate benchmark is \$37.36 per month.

Exhibit 1 to this filing is a presentation of the Basic Service Rate Template for Wyoming as more fully described in the Joint Board's Recommended Decision, in ¶ 86 of the FCC's *Remand Order* and as contained in Appendix F to the *Remand Order*. This Exhibit presents, in detail, the residential rate data for the most rural areas (Rural Zone 3) in Wyoming as required by the *Remand Order* and 47 C.F.R. § 54.316. This Exhibit shows these rural residential customers served by the Wyoming non-rural incumbent local exchange carrier pay a monthly rate of \$49.50, or 132 percent (132%) of the nationwide urban rate benchmark. Because of the manner in which federal support is targeted, residential customers located in Rural Zone 1 and Rural Zone 2 also pay the monthly rate of \$49.50. One hundred percent (100%) of the federal high cost support received by Qwest in Wyoming is reflected as an explicit and direct bill credit to its rural customers. Based on these facts, the methods in which the average urban rate was calculated and the rate comparison requirements of the *Remand Order*, the Wyoming Commission concludes that its rural residential rates are not reasonably comparable to the nationwide urban rate benchmark. Another factor influencing the rate comparison is the continued presence of substantial amounts of implicit subsidies in local rates constituting the average urban rate and the nationwide urban rate benchmark.

There are several reasons why the rates are not reasonably comparable, with the main factor being that Wyoming has cost-based rates for its rural areas and no other state does (a fact recognized several times by the FCC in the *Remand Order*). The WYPSC has fully implemented the pro-competitive statutory mandates of the Wyoming Telecommunications Act of 1995 (W.S. §§ 37-15-101, *et seq.*). In the 1995 Wyoming Act, W.S. § 37-15-402 required cost-based pricing for all retail telecommunications services in Wyoming; W.S. § 37-15-403 prohibited cross subsidies and eliminated implicit subsidies; and W.S. § 37-15-501 established the Wyoming Universal Service Fund. Qwest now has in place de-averaged cost-based residential rates with all implicit subsidies removed from residential rates and the WYPSC has fully implemented the explicit subsidy support program – the Wyoming Universal Service Fund. The residential rate shown on Exhibit 1 to this certification reflects the truly high cost, rural nature of much of Wyoming.

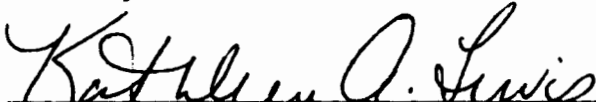
Wyoming's telecommunications statutes were significantly amended in 2007 and are now referred to as the Wyoming Telecommunications Act. The cost-based pricing requirements (W.S. § 37-15-402), and the cross subsidization prohibitions (W.S. § 37-15-403) were repealed, largely to allow companies more pricing freedom to respond to competition. Other safeguards were put into place, and Qwest's pricing plan has not been changed. Its rates are without implicit subsidies, remain de-averaged and are still cost-based. Our conclusions therefore remain correct and the disparity described above remains accurate.

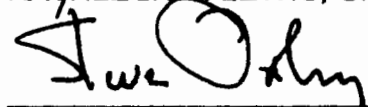
The WYPSC pursued a remedy for this residential rate disparity through its

request for further federal action, provided to state commissions in Part IV.D.2.e. of the *Remand Order*. On December 21, 2004, the WYPSC, along with the Wyoming Office of Consumer Advocate, filed with the FCC a *Joint Petition for Supplemental Federal Universal Service Funds for Customers of Wyoming's Non-Rural Incumbent Local Exchange Carrier (Joint Petition)*. In the *Joint Petition*, the WYPSC provided a summary of the background, circumstances and history of the WYPSC's request for additional federal universal service funds. The *Joint Petition* clearly demonstrates Wyoming has taken all necessary steps to achieve reasonable comparability through our actions and the application of existing federal support. In response to the *Joint Petition*, the FCC opened a proceeding and established a pleading cycle on February 14, 2005, in CC Docket 96-45, to address the issues raised by the WYPSC. That proceeding is currently pending before the FCC.

The WYPSC looks forward to working with the FCC, the USAC and all other interested parties in maintaining the universal service goals and principles of Section 254 of the federal Telecommunications Act of 1996 and in achieving residential rate comparability in Wyoming.

Sincerely,


KATHLEEN A. LEWIS, Chairman


STEVE OXLEY, Deputy Chairman


MARY BYRNES, Commissioner

Exhibit 1

**Wyoming Public Service Commission
Rate Comparability Analysis
Residential Rate Data**

Pursuant to 47 C.F.R. § 54.316

**Residential Customers in Rural Areas of Wyoming Served by the
Non-Rural Incumbent Local Exchange Carrier (Qwest Corp.)**

Rate, Surcharges, Credits and Taxes as of July 2008:

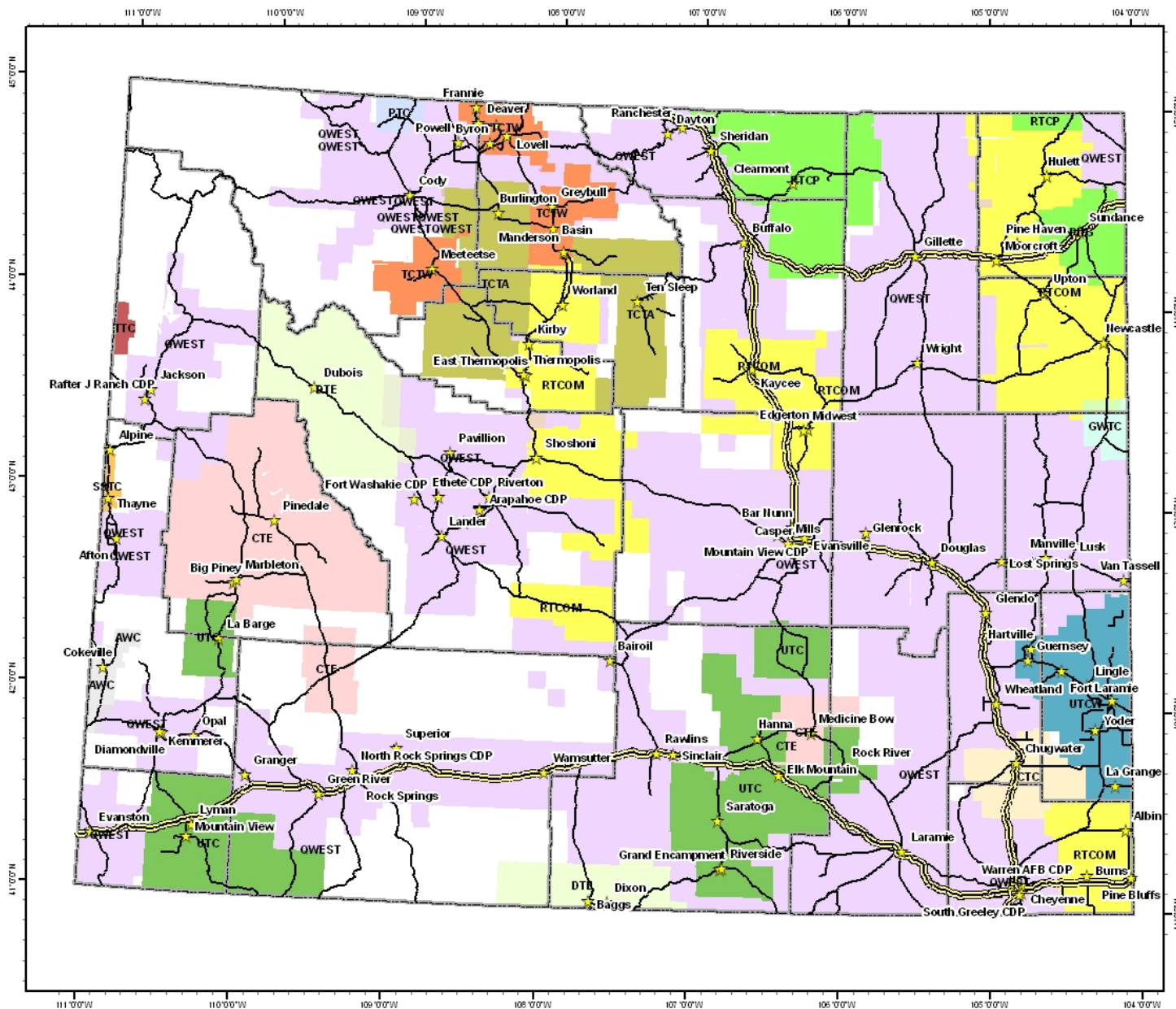
Basic Residential Access Line Rate	\$69.35
Federal Universal Service Fund Credit	(\$28.70)
Wyoming Universal Service Fund Credit	<u>(\$5.55)</u>
Net Residential Rate Subject to Mandatory Surcharges and Taxes	\$35.10
Federal Subscriber Line Charge	\$6.50
Federal Universal Service Fund Surcharge	\$3.51
Wyoming Universal Service Fund Surcharge	\$0.69
Telecommunications Relay System Surcharge	\$0.06
Wyoming Lifeline Program Surcharge	\$0.15
E911 Emergency Calling System Tax	\$0.75
Federal Excise Tax	\$1.05
Wyoming State Sales Tax	<u>\$1.68</u>
Total Basic Residential Service Rate to Customer	<u>\$49.50</u>

Appendix K

Wyoming Telephone Service Territory Map

Full-color copies of the Wyoming telephone service territory map are available for download at the Commission's Web site.

<http://psc.state.wy.us/>

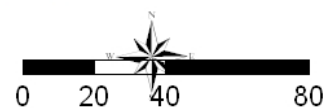


**WYOMING
PUBLIC
SERVICE
COMMISSION**

Wyoming Certificated Areas

Explanation:

- ★ Cities
- Interstate
- Highways
- Counties
- All West Communications
- Century Telephone
- Chugwater Telephone
- Dubois Telephone Exchange
- Embarq
- Golden West Telephone
- Project Telephone
- Qwest
- Range Telephone
- RT Communications
- Silver Star Telephone
- TCT West
- Teton Telecom
- Tri-County Telephone
- Union Telephone Co.



Miles

Printed January 26, 2009
Note: Item s are not 100% accurate