



Montana Public Service Commission

Greg Jergeson, Chairman
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September 27, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 - 12th Street, S.W., Room TW - A306
Washington, D.C. 20554

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Karen M. Majcher
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

RE: Certification of Rate Comparability Pursuant to
47 C.F.R. § 54.316, CC Docket No. 96-45

Dear Ms. Dortch and Ms. Majcher:

The Montana Public Service Commission (PSC) hereby certifies that the residential rates of Montana's one non-rural ILEC ETC, Qwest Corporation (SAC 485104), and Montana's two wireline CLEC ETCs serving in one or more wire centers within the ILEC ETC (Qwest) study area, Mid-Rivers Telephone Cooperative, Inc. (SAC 489001), and 3 Rivers Telephone Cooperative, Inc. (SAC 489003), are within (below) the safe harbor benchmark. The only remaining CLEC ETC serving in one or more wire centers within the ILEC ETC (Qwest) study area, WWC Holding Co., Inc. (formerly Western Wireless), is a wireless CLEC ETC whose rates do not appear to be readily adaptable to the basic service rate template and need not be formally compared to the nationwide urban rate benchmark. ¶ 88, FCC's *Order on Remand, Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order*, CC Docket No. 96-45, FCC 03-249, Release Date, October 27, 2004.

This certification is pursuant to the FCC expanded rate certification requirements, as provided 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, Release Date, October 27, 2004, and 47 C.F.R. § 54.316.

The Montana PSC interprets the requirement for rate comparability certification to extend to all non-rural ETCs and CETCs designated to serve a non-rural carrier's study areas. Each of the above-identified wireline carrier's rates are exceeded by the benchmark threshold for this year. That the benchmark exceeds each carrier's rates does not mean that the Montana PSC

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agrees with either the benchmark or the template used for this purpose. Also, as for the choice of rural areas, because Qwest's and the two wireline CETC's residential rates are invariant with respect to wire centers or other political boundaries it appears unnecessary to make any further geographic refinement. The FCC allows states to expand upon the template to take into account for quality of service and scope of calling parameters. Just as the FCC chose not to tackle these adjustments because of the alleged "difficulty to quantify" the Montana PSC is also unable, based upon time and resource constraints, to quantify these parameters. The Montana PSC remains convinced that a proper comparison would include these and other parameters in any rate/benchmark comparison. If and when the Montana PSC chooses to take steps to modify the filings, made pursuant to the FCC's template, it will include changes that reflect, in part, scope of calling and quality of service variations between rural and urban areas and may also attempt to analyze the rates of ETC-designated wireless carriers to enable a reasonable rate comparison.

Sincerely,

A handwritten signature in black ink that reads "Greg Jergeson". The signature is written in a cursive style with a large, prominent "G" and "J".

Greg Jergeson
Chairman, Montana PSC



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RE: Certification of High Cost Support for Rural Carriers Pursuant to 47 C.F.R.
Section 54.314, CC Docket No. 96-45

Dear Ms. Dortch and Ms. Majcher:

The Public Service Commission of Montana (PSC) hereby certifies that all federal high cost support provided to rural carriers in this state will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with section 254(e) of the Communications Act of 1934, as amended. This includes High Cost Loop support, Local Switching Support, and high cost support received pursuant to the purchase of exchanges.

Attached is a list of rural carriers certified by the Montana PSC pursuant to section 54.314 of the FCC's rules (47 C.F.R. § 314), which requires states to establish an annual certification process for rural carriers receiving federal high cost support. As requested by the Universal Service Administrative Company, listed beside each carrier is its assigned study area code (SAC).

Sincerely,

A handwritten signature in black ink that reads "Greg Jergeson".

Greg Jergeson
Chairman, Montana PSC

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Montana PSC 2005 Certification for 2006 Support

Rural ETCs

1. Blackfoot Telephone Cooperative, Inc. -- 482235 and 483308
2. Cable and Communications Corporation -- 489005
3. Central Montana Communications, Inc. -- 483310
4. CenturyTel of Montana, Inc. -- 482249
5. Citizens Telecommunications Company of Montana, dba Frontier Communications of Montana -- 484322
6. Hot Springs Telephone Company -- 482241
7. InterBel Telephone Cooperative, Inc. -- 482242
8. Lincoln Telephone Company, Inc. -- 482244
9. Mid-Rivers Telephone Cooperative, Inc. -- 482246
10. Nemont Telephone Cooperative, Inc. -- 482247
11. Northern Telephone Cooperative, Inc. -- 482248
12. Project Telephone Company -- 482250
13. Range Telephone Cooperative, Inc. -- 482251
14. Reservation Telephone Cooperative -- 381632
15. Ronan Telephone Company -- 482252
16. RT Communications, Inc. -- 512251
17. Southern Montana Telephone Company -- 482254
18. 3 Rivers Telephone Cooperative, Inc. -- 482255
19. Tri County Telephone Association, Inc. (TCT West, Inc.) -- 512296
20. Triangle Telephone Cooperative Association, Inc. -- 482257
21. West River Cooperative Telephone Company -- 391689