

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Rural Telephone Service Company, Inc.;) CC Docket No. 96-45
Nex-Tech, Inc.;)
United Telephone Company of Kansas; and)
United Telephone Company of Eastern Kansas)
)
Joint Petition for Waiver of the Definition of)
“Study Area” Contained in Part 36, Appendix-)
Glossary of the Commission’s Rules; Petition)
for Waiver of Section 69.3(e)(11) of the)
Commission’s Rules)

**SUPPORTING COMMENTS OF
THE WESTERN TELECOMMUNICATIONS ALLIANCE**

The Western Telecommunications Alliance (“WTA”) hereby supports the “Joint Petition For Waiver” submitted by Rural Telephone Service Company, Inc. (“RTSC”); Nex-Tech, Inc. (“NTI”); United Telephone Company of Kansas (“UTC-Kansas”); and United Telephone Company of Eastern Kansas (“UTC-Eastern Kansas”) on or about April 7, 2006. The Joint Petition requests waivers: (1) to add twelve exchanges purchased by RTSC from the UTC companies to RTSC’s Kansas study area and delete them from the UTC Kansas study areas; (2) to remove NTI’s lines in the Osborne, Kansas exchange from NTI’s CLEC “study area” and add them to its parent company RTSC’s Kansas study area; and (3) to allow use of the National Exchange Carrier Association as the tariff pool administrator for the acquired exchanges.

The Western Telecommunications Alliance

The Western Telecommunications Alliance is a trade association that represents approximately 250 rural telephone companies, including RTSC, that operate in the twenty-four

states located west of the Mississippi River. Like RTSC, WTA members are generally small independent local exchange carriers ("ILECs") serving sparsely populated rural areas.

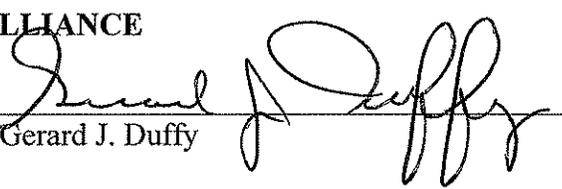
The Requested Waivers Should Be Granted

RTSC and the other Joint Petitioners have met their burden of proving that the proposed study area waivers: (a) will not adversely affect the Universal Service Fund; (b) are not likely to be opposed by the Kansas Corporation Commission, the state commission that has regulatory authority over the subject Kansas study areas; and (c) will be in the public interest. RTSC, which presently is an Issuing Carrier in the NECA tariffs with respect to its existing 29 exchanges, has also shown that it would be unduly burdensome, confusing and inefficient for it to issue a separate new tariff for the 12 acquired exchanges rather than including them in the NECA tariffs and pools. Therefore, WTA urges that the waivers requested by RTSC and the other petitioners be granted as soon as possible.

At the time that it initially froze study area boundaries, the Commission expressly stated that it did not intend to "discourage the acquisition of high cost exchanges or the expansion of service to high cost areas." Amendment of Part 67, 49 Fed. Reg. 48325, 48337 (Dec. 12, 1984). Over the last decade or two, rural telephone companies like RTSC have demonstrated the willingness to invest in the upgrade and expansion of their networks to bring state-of-the-art facilities and services to rural communities and customers. RTSC has an exemplary record of investment and service, and can be relied upon to fulfill its promises to upgrade and improve the rural exchanges that it asks to be added to its Kansas study area.

Blooston, Mordkofsky, Dickens,
Duffy & Prendergast
2120 L Street, NW (Suite 300)
Washington, DC 20037
Phone: (202) 659-0830
Facsimile: (202) 828-5568
Email: gjd@bloostonlaw.com
Dated: May 10, 2006

Respectfully submitted,
**THE WESTERN TELECOMMUNICATIONS
ALLIANCE**

By 
Gerard J. Duffy