

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Petition of South Slope Cooperative	)	
Telephone Company, Inc. For an Order and	)	
Rule Pursuant to Section 251(h)(2) of the	)	WC Docket No. 04-347
Communications Act Declaring that South	)	
Slope Cooperative Telephone Company, Inc.	)	
Shall Be Treated as an Incumbent Local	)	
Exchange Carrier in the Iowa Exchanges of	)	
Oxford, Tiffin and Solon	)	

**COMMENTS OF IOWA TELECOMMUNICATIONS SERVICES, INC.  
(D/B/A IOWA TELECOM)**

Iowa Telecommunications Services, Inc. (d/b/a Iowa Telecom) (“Iowa Telecom”) hereby submits the following Comments on the Federal Communications Commission’s (“Commission’s”) Notice of Proposed Rulemaking (“Notice”) in the above-referenced docket.<sup>1</sup>

**INTRODUCTION AND SUMMARY**

The Telecommunications Act of 1996 (“1996 Act”)<sup>2</sup> included the term “incumbent local exchange carrier” (“ILEC”) to serve as the lynchpin behind the legislation’s market-opening provisions. Under the Communications Act of 1934, as amended (the “Act”), there are two potential types of ILECs for a particular geographic area. The first could be termed a “Section 251(h)(1) ILEC,” a carrier that, as of February 8, 1996, provided local exchange service in the area in question and was also a member of the National Exchange Carrier Association (“NECA”)

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<sup>1</sup> *Petition of South Slope Cooperative Telephone Company, Inc. For an Order and Rule Pursuant to Section 251(h)(2) of the Communications Act Declaring that South Slope Cooperative Telephone Company, Inc. Shall Be Treated as an Incumbent Local Exchange Carrier in the Iowa Exchanges of Oxford, Tiffin and Solon*, Notice of Proposed Rulemaking, 23 FCC Rcd 15146 (2008)(“Notice”).

<sup>2</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. § 151 et seq. (“1996 Act”).

with respect to the geographic area at the time.<sup>3</sup> This definition extends to the successors or assigns of such carriers. Pursuant to this definition, at the time of the 1996 Act, GTE Midwest Incorporated was the ILEC in the Oxford, Solon, and Tiffin, Iowa exchanges under both the new federal law and an earlier state law. Effective July 1, 2000, Iowa Telecom acquired these exchanges from GTE Midwest Incorporated.<sup>4</sup> Thus, Iowa Telecom, as the successor to GTE Midwest Incorporated, is the ILEC in these exchanges pursuant to the Act.

The second type of ILEC, which could be termed a “Section 251(h)(2) ILEC,” is a carrier that the Commission has, through a rulemaking, found it appropriate to treat as an ILEC.

Specifically, the Act provides as follows:

The Commission may, by rule, provide for the treatment of a local exchange carrier (or class or category thereof) as an incumbent local exchange carrier for purposes of this section if –

- (A) such carrier occupies a position in the market for telephone exchange service within an area that is comparable to the position occupied by a carrier described in paragraph (1);
- (B) such carrier has substantially replaced an incumbent local exchange carrier described in paragraph (1); and
- (C) such treatment is consistent with the public interest, convenience, and necessity and the purposes of this section.

In the *Local Competition Order*, the Commission stated that it “will not impose incumbent LEC obligations on non-incumbent LECs absent a clear and convincing showing” that the provisions of Section 251(h)(2) were met.<sup>5</sup> The instant Notice is the result of a “Petition

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<sup>3</sup> 47 U.S.C. § 251(h)(1).

<sup>4</sup> See *GTE Discontinuance of Interstate Services in Iowa and Missouri-Applications Granted, Comments Noted*, Public Notice, DA 00-507 (rel. Mar. 6, 2000).

<sup>5</sup> *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, 11 FCC Rcd 15499, ¶ 1248 (1996)(“*Local Competition Order*”)(significant unrelated subsequent history omitted).

For Order Declaring South Slope Incumbent Local Exchange Carrier In Iowa Exchanges Of Oxford, Tiffin, and Solon” filed August 24, 2004 (“Petition”).

After first providing a history of South Slope’s competitive entry in the Oxford, Solon and Tiffin exchanges, these comments discuss the narrow issue of whether the conditions of Section 251(h)(2) are applicable to South Slope in the Oxford, Solon, and Tiffin exchanges. In particular, Iowa Telecom discusses why the public interest requires certain immediate enforcement conditions be placed on granting relief that South Slope is seeking in the instant docket. Iowa Telecom also discusses why Iowa Telecom should no longer be regulated as a dominant carrier for interstate access purposes in the exchanges. Finally, Iowa Telecom discusses why the Commission should not automatically permit South Slope to assess ILEC interstate access charges in the Oxford, Solon, and Tiffin exchanges and receive Interstate Common Line Support in such exchanges, the latter presumably through a change to South Slope’s LEC study area boundary.

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## I. BACKGROUND ON SOUTH SLOPE'S COMPETITIVE ENTRY IN EASTERN IOWA

South Slope has historically operated several exchanges in Eastern Iowa as an ILEC and currently serves approximately 12,500 access lines through such operations.<sup>6</sup> When South Slope chose to begin competitive operations in Qwest's Iowa City<sup>7</sup> and Cedar Rapids exchanges, as well as in GTE's (Iowa Telecom's predecessor in interest) Oxford, Solon, and Tiffin exchanges, South Slope decided to structure its operations so that rather than entering as a non-incumbent local exchange carrier, that is, a CLEC, it was entering as an ILEC – supposedly by “expanding” its North Liberty exchange ILEC territory to include portions, and in some cases the entirety, of these five exchanges in which it was, in fact and as a legal matter, entering as a CLEC.<sup>8</sup>

South Slope's novel and unlawful theory manifested itself in a variety of ways. First, South Slope associated the numbering resources that it uses to serve its competitive territories with its ILEC North Liberty rate center (a map of the pertinent area is attached hereto as Attachment B).<sup>9</sup> Because Iowa Telecom does not hold a certificate of public convenience and necessity (“CPCN”) to serve the North Liberty rate center, Iowa Telecom was unable to lawfully

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<sup>6</sup> See Comments of Public Service Telephone Company, Inc., South Slope Cooperative Telephone Company, Inc., Townes Telecommunications, Inc., and Venture Communications Cooperative filed in CC Docket No. 01-92, Nov. 26, 2008, at 2.

<sup>7</sup> In particular, the community of Coralville, which is included in the Iowa City exchange.

<sup>8</sup> See Attachment A (pages from transcript of deposition of South Slope Chief Executive Officer J.R. Brumley taken as part of Iowa Utilities Board Docket No. FCU-06-25). Iowa Telecom has included a map of the pertinent exchanges as Attachment B to these Comments.

<sup>9</sup> With respect to numbering resources used to serve the Oxford, Solon, and Tiffin rate centers, this is evidenced by multiple findings in *Iowa Telecommunications Services, Inc., d/b/a Iowa Telecom v. South Slope Cooperative Telephone Company*, Docket No. FCU-06-25, “Final Order” (Iowa Utils. Bd. Jan. 23, 2007) (“*IUB South Slope Complaint Order*”), discussed below. South Slope uses NPA-NXX 319-625 to serve portions of the Iowa City rate center (Coralville) and 319-632 to serve portions of the Cedar Rapids rate center (see Attachment C (<<http://www.southslope.com/callingarea.htm>>), <[http://www.localcallingguide.com/lca\\_exch.php?exch=041690](http://www.localcallingguide.com/lca_exch.php?exch=041690)>)) while still associating such numbers with its ILEC Operating Carrier Number (1298) and its North Liberty ILEC rate center. Iowa Telecom notes that while the HTML code title of the first document is “optional” calling plan in the first document in Attachment C, nothing in the content of the page or anywhere else on South Slope's website indicates that such calling is not included in all local exchange service sold by South Slope.

port the telephone numbers used to serve South Slope's Oxford, Solon, and Tiffin customers. Further, at least in the Oxford, Solon, and Tiffin exchanges, South Slope began assessing intrastate access charges on an ILEC, as opposed to CLEC basis, which pursuant to Iowa Utilities Board rules, permitted it to charge substantially higher rates that served to subsidize South Slope's entry.<sup>10</sup>

South Slope referenced its supposed ILEC operations in Oxford, Solon, and Tiffin in its Petition.<sup>11</sup> The Iowa Utilities Board filed Reply Comments stating clearly that South Slope's "expanded ILEC" theory had never been accepted and that South Slope was operating as a CLEC under state law in such exchanges.<sup>12</sup> Nevertheless, several months later, South Slope continued to tell trade press that it was operating as such a non-existent "expanded ILEC."<sup>13</sup>

After years of failed attempts to use reason with South Slope to untangle the regulatory chaos created by South Slope's invalid operational theory, Iowa Telecom was forced to bring a formal complaint against South Slope at the Iowa Utilities Board in early 2006, a complaint that Iowa Telecom prosecuted successfully. In its *South Slope Complaint Order*,<sup>14</sup> the Iowa Utilities Board found, among other things, that there is no legal basis for any "expanded ILEC" theory under Iowa law, that South Slope was, in fact, a CLEC in the Oxford, Solon, and Tiffin exchanges under state and federal law, and that South Slope's numbering practices unlawfully

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<sup>10</sup> *IUB South Slope Complaint Order*. In fact, South Slope has admitted that it is assessing its ILEC interstate access charges in such areas, as well. See Iowa Telecom Opposition to South Slope Petition at Att. C. Further, at one point in a relatively-recent Iowa Utilities Board proceeding, South Slope volunteered that its network was built as a result of revenue from this illegally-imposed charge. South Slope Reply and Resistance filed in Iowa Utilities Board Docket No. RPU-07-1 (Mar. 12, 2007).

<sup>11</sup> South Slope Petition at 2.

<sup>12</sup> Iowa Utilities Board Reply Comments on South Slope Petition, filed October 19, 2004 at 2.

<sup>13</sup> See Attachment D, attached hereto.

<sup>14</sup> South Slope submitted this Iowa Utilities Board order virtually without explanation into the record in the instant proceeding in a January 29, 2007 ex parte communication.

prevented Iowa Telecom from porting South Slope Oxford, Solon, and Tiffin telephone numbers to Iowa Telecom.<sup>15</sup> The Iowa Utilities Board also held that South Slope was assessing unlawfully high intrastate access rates given its CLEC status in the Oxford, Solon, and Tiffin exchanges.<sup>16</sup>

Since the Board issued the *South Slope Complaint Order* in January 2007, South Slope has remained intransigent on other matters that should not require resort to the formal Iowa Utilities Board or Commission formal complaint process. Iowa Telecom discusses such matters in detail below. Unfortunately, South Slope seems already to have received significant financial benefits by blatantly ignoring federal and state laws and rules as well as standard industry practices. If the Commission decides to grant the South Slope Petition, it should require South Slope to maintain separate study areas and not to consolidate its operations in these five exchanges into its existing ILEC study area.

## **II. REGULATORY TREATMENT OF SOUTH SLOPE IN THE OXFORD, SOLON, AND TIFFIN EXCHANGES**

As discussed below, Iowa Telecom believes that, without a doubt, if any local exchange carrier should be subject to the additional obligations of an ILEC pursuant to Section 251(c) in the Oxford, Solon, and Tiffin markets, it should be South Slope and only South Slope. South Slope continues, however, to engage in discriminatory practices taken under color of both ILEC and CLEC operations outside of the Oxford, Solon, and Tiffin exchanges that directly and unlawfully impede Iowa Telecom's ability to compete with South Slope within such exchanges, even while South Slope continues to operate as a CLEC therein. It would not be in the public

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<sup>15</sup> *IUB South Slope Complaint Order* at 10-14.

<sup>16</sup> *IUB South Slope Complaint Order* at 15-17.

interest for the Commission to place additional obligations on South Slope in such markets, particularly at South Slope's request, until South Slope ceases its currently-unlawful practices affecting the Oxford, Solon, and Tiffin exchanges.

Prior to turning to these public interest considerations, Iowa Telecom will first discuss the extent to which Sections 251(h)(2)(A) and (C) apply to South Slope in the Oxford, Solon, and Tiffin exchanges.

**A. South Slope Occupies a Position in the Market at Least Comparable to Iowa Telecom.**

Section 251(h)(2)(A) of the three-part test for treatment of a local exchange carrier as an ILEC for purposes of section 251 requires that "such carrier occup[y] a position in the market for telephone exchange service within an area that is comparable to the position occupied by [a legacy ILEC.]" Iowa Telecom supports the Commission's tentative conclusion that the Oxford, Solon, and Tiffin exchanges are the appropriate geographic market for determining market position and agrees that South Slope's market share in such geographic areas is at least comparable to that of Iowa Telecom.<sup>17</sup> As discussed below with regard to Section 251(h)(2)(C), however, Iowa Telecom believes it important to consider how South Slope has achieved and maintained this comparability.

**B. South Slope Has "Substantially Replaced" Iowa Telecom in the Relevant Markets.**

Iowa Telecom supports the Commission's tentative conclusion that South Slope's estimated 90% market share demonstrates that South Slope has more than substantially replaced Iowa Telecom. Iowa Telecom discusses important matters pertaining to how South Slope has

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<sup>17</sup> Of course, it is impossible for two carriers to serve a (super-)majority market share in the same market. Clearly, the comparability described in Section 251(h)(2)(A) was written as a minimum requirement – otherwise, the requirement of substantial replacement in Section 251(h)(2)(B) would make no sense.

achieved and maintained this substantial replacement with regard to Section 251(h)(2)(C) below and the implications of South Slope's substantial replacement to the continuing regulatory treatment of Iowa Telecom further below.

**C. The Commission Should Apply a Strict Standard of Relevance in Determining the Public Interest Benefits of Treating South Slope as an ILEC in the Oxford, Solon, and Tiffin Exchanges.**

In the Notice, the Commission correctly observes that the public interest inquiry under Section 251(h)(2)(C) should be limited to the public interest benefits of imposing Section 251(c) obligations on the CLEC – concerns relating to the extent to which the CLEC controls access to bottleneck facilities in the relevant geographic market necessary for the provision of local exchange service and the benefits derived from mandating cost-based competitive access to such facilities.

An example of an irrelevant public interest claim in a Section 251(h)(2) petition is the notion that treating a CLEC as an ILEC for purposes of Section 251 creates some sort of “reward” for that CLEC’s investment or “incentive” for that CLEC or other CLECs to invest further in rural areas. Presumably, these rewards and incentives are based on dramatically increased universal service support and interstate access charge receipts. Currently, South Slope receives universal service support based on the level of support received by the historic ILEC in the relevant study area – in this case, Interstate Access Support available to Iowa Telecom (\$5.07 per-line per-month in the Oxford and Solon exchanges and \$0.00 per-line per-month in the Tiffin exchange) and no High-Cost Loop, Safety Valve, or Safety Net support. Similarly, as discussed below, South Slope’s CLEC interstate access charge rates are limited to Iowa Telecom’s rather than South Slope’s significantly-higher ILEC (NECA) interstate access charges.

South Slope has achieved the level of market share claimed by South Slope by entering Iowa Telecom's markets through extending its affiliated ILEC network into the Oxford, Solon, and Tiffin exchanges. South Slope's ILEC operations receive significantly more universal service funding (\$8.44 total per-line per-month in High-Cost Loop, Safety Net, Safety Valve, Interstate Common Line, and Local Switching Support) and multiples of interstate access charges per minute than Iowa Telecom, particularly if South Slope's affiliated Iowa Network Services receipts are included. If South Slope were to successfully requests a waiver of the freeze on study area boundary modifications, however, it could "roll" its current CLEC customers into its own ILEC study area. This, coupled with any necessary changes to the Commission's definition of "ILEC" in Parts 54 and 69 of its rules (discussed above), would permit South Slope to receive its ILEC-level universal service funding and interstate access charges for its former affiliated CLEC lines – creating significant increases in revenue without incurring any additional cost.

The rewards resulting from the Commission granting a CLEC such as South Slope's Section 251(h)(2) petition and the incentives created from such a grant may be the primary public interest benefits claimed by such a Section 251(h)(2) petitioner. These expectations, however, flow from an assumption that requests for waiver of the freeze on study area boundary modifications and amendments to the definitions of ILEC found in Parts 54 and 69 are approved – requests which, as discussed above, are independent of a Section 251(h)(2) petition.

To be sure, encouraging investment in rural areas is an important policy matter for the Commission to consider and involves creating incentives both ILECs as well as CLECs – a matter that is the subject of ongoing proceedings before the Commission and the Joint Board in CC Docket Nos. 96-45 and 05-337. These concerns, however, are unrelated to the treatment of a

CLEC as an ILEC for purposes of Section 251. Given the fluidity of rural high-cost universal service policies, the Commission should not assume particular outcomes of unrelated proceedings, such as the request for waiver of the freeze on study area boundary modifications hinted at in South Slope's Petition and the potentially necessary alterations of definitions in the Commission's rules in considering Section 251(h)(2) petitions.

**D. The Iowa Utilities Board Has Never Found it to be in the Public Interest for South Slope to Serve as an ILEC in the Oxford, Solon, and Tiffin Exchanges.**

Although the matter should be settled at this point, contrary to South Slope's assertion in its Petition, the Iowa Utilities Board has never found it in the public interest for South Slope to serve as an ILEC in the Oxford, Solon, and Tiffin exchanges. Iowa Telecom's discussion of South Slope's current CLEC status in such exchanges under state law details Iowa Utilities Board adjudication of the issue, in which the Iowa Utilities Board concluded that it has never considered South Slope to be an ILEC in such exchanges. As discussed above, such litigation should never have been necessary as the Iowa Utilities Board made clear in its October 19, 2004 Reply Comments on South Slope's Petition that "Iowa Telecom is correct that the Board has not yet considered the merits of South Slope serving as an ILEC in the [Oxford, Solon, and Tiffin exchanges]."

**E. The Commission Should Apply Certain Conditions on South Slope if it is to Conclude that it is in the Public Interest to Classify South Slope as an ILEC in the Oxford, Solon, and Tiffin Exchanges.**

Section 251(h)(2)(C) requires that the Commission find that treating a LEC as an incumbent LEC for purposes of section 251 "is consistent with the public interest, convenience, and necessity and with the purposes of [section 251]." While Iowa Telecom has serious concerns regarding the implications of any decision with regard to South Slope's Section 251

status concerning future determinations, such as a possible study area waiver, Iowa Telecom will abide by the Commission's request in the Notice that such matters be left for separate discussion (see below). There are, however, certain issues pertaining to South Slope's current compliance with Section 251 and related provisions as it affects the Oxford, Solon, and Tiffin exchanges that Iowa Telecom believes are pertinent to considering South Slope's classification pursuant to Section 251(h)(2).

At the outset of any analysis of the public interest relating to South Slope's Petition, it is important to note that the Commission is considering whether South Slope should be classified as an ILEC under federal law in the Oxford, Solon, and Tiffin exchanges at South Slope's request. It is not as though a party other than South Slope saw that South Slope held a dominant position in the local telecommunications market in the Oxford, Solon, and Tiffin exchanges and believed that the failure of Section 251(c) to apply to South Slope as an ILEC in such markets was thwarting competition. Instead, the Commission is considering a bizarre seemingly philanthropic request by South Slope to undertake unbundling, resale, collocation, and negotiation/arbitration burdens heretofore inapplicable to South Slope as a CLEC.

South Slope is engaged in at least two numbering practices that unreasonably and unlawfully skew competition in the Oxford, Solon, and Tiffin markets in favor of itself. The first directly violates South Slope's dialing parity obligations pursuant to Section 251(b)(3) of the Act while the second, violates Qwest's rights under Section 251(b)(2) and also serves to discriminate against Iowa Telecom in the pertinent exchanges.

**1. South Slope Violates Its North Liberty Exchange Dialing Parity Obligations With Regard to Iowa Telecom Customers in the Oxford, Solon, and Tiffin Exchanges.**

As shown on Attachment B, the Oxford, Solon, and Tiffin exchanges are adjacent to the North Liberty exchange. There is no Extended Area Service (“EAS”) between the these Iowa Telecom exchanges and South Slope’s North Liberty exchange.<sup>18</sup> Therefore, dialing between these Iowa Telecom ILEC exchanges and the North Liberty exchange should be ten-digit toll dialing.

When a South Slope North Liberty customer calls an Iowa Telecom customer in Oxford, Tiffin, or Solon, this is a ten-digit toll call. As documented in Attachment C to these Comments, however, when a South Slope North Liberty customer calls a South Slope Oxford, Solon, or Tiffin customer, the call is treated as a seven-digit toll-free call. As described in Attachment E, Iowa Telecom’s numbering resources in the Oxford, Solon, and Tiffin exchanges are in the 319-628, 319-644, and 319-645 NPA-NXXs and South Slope’s are in the 319-828, 319-624, and 319-545 NPA-NXXs. According to South Slope, the seven-digit local calling area for South Slope’s ILEC North Liberty customer includes the South Slope Oxford, Solon, and Tiffin NPA-NXXs, but not Iowa Telecom’s Oxford, Solon, and Tiffin NPA-NXXs.

South Slope’s exclusion of Iowa Telecom’s Oxford, Solon, and Tiffin customers from what amounts to its Exclusive Calling Club Plan violates Section 251(b)(3) of Act, which requires all “local exchange carriers” (incumbent and non-incumbent) “to provide dialing parity to competing providers of telephone exchange service and telephone toll service . . . .” The Commission delineates two types of dialing parity – “local dialing parity” and “toll dialing

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<sup>18</sup> There is, however, EAS between the Oxford, Solon, and Tiffin exchanges.

parity.” With regard to the former, Commission rules state that “[a] LEC shall permit telephone exchange service customers within a local calling area to dial the same number of digits to make a local telephone call notwithstanding the identity of the customer's or the called party's telecommunications service provider.”<sup>19</sup> “Toll dialing parity” requires a local exchange carrier (incumbent or non-incumbent) to, among other things, to “not assign automatically a customer's intraLATA toll traffic to itself, to its subsidiaries or affiliates, to the customer's presubscribed interLATA or interstate toll carrier, or to any other carrier . . . .”<sup>20</sup>

One of these two primary sections of the Commission's rules that implements Section 251(b)(3) of the Act must apply to South Slope's Exclusive Calling Club Plan calls. One possibility is that South Slope can be considered to have expanded its local calling area, in which the local dialing parity provision, Section 51.207, applies. On the other hand, if South Slope can be considered to be providing zero-rated long distance with its Exclusive Calling Club Plan, then South Slope is acting as a toll provider subject to Section 51.209.

One interpretation of South Slope's dialing/calling arrangements between North Liberty and Oxford, Solon, and Tiffin is that South Slope has included the Oxford, Solon, and Tiffin exchanges in its North Liberty “local calling area.” Therefore, the requirements of 47 C.F.R. § 51.207 apply. In such a situation, South Slope would be requiring its customers in the North Liberty exchange to use a different local dialing pattern to call Iowa Telecom customers in the Oxford, Solon, and Tiffin exchanges than it permits its North Liberty exchange customers to dial when calling South Slope customers in such exchanges. Such discrimination would clearly violate Commission rules.

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<sup>19</sup> 47 C.F.R. § 51.207.

<sup>20</sup> 47 C.F.R. § 51.209(c).

If South Slope is, instead, operating under the creative theory that it is acting as a toll provider that is waiving toll charges to certain customers, the Commission should inquire into whether South Slope intends to permit its local customers in Swisher to “opt out” of such toll plan and, instead, presubscribe to a third-party IXC. If South Slope truly permits this, customers opting out of South Slope’s Exclusive Calling Club Plan should theoretically be required to use 1+ dialing and incur toll charges from the third-party IXC. In other words, if South Slope is, indeed, acting as a toll provider in waiving charges for calls to its own customers, then South Slope must treat calls from such customers as 1+ ten-digit toll calls, whether such customers are calling South Slope or Iowa Telecom customers in the Oxford, Solon, and Tiffin exchanges.

The South Slope Exclusive Calling Club Plan is notably different on a legal basis from its presumably-lawful commercial mobile radio service (“CMRS”) “calling circle/in-network calling” and historical interexchange carrier (“IXC”) service “friends and family” analogs. Most significantly, neither CMRS carriers nor IXCs are subject to the dialing parity provisions of Section 251(b)(2) of the Act because neither is a “local exchange carrier” under Section 3(26), which is a prerequisite to the obligations of Section 251(b) attaching. South Slope, on the other hand, is clearly acting as a local exchange carrier to the extent that it permits its local exchange customers to place seven-digit calls to any particular location. As discussed above, South Slope is either truly treating calls to its Oxford, Solon, and Tiffin customers as within the “local calling area” and therefore, as a local exchange carrier, violating 47 C.F.R. § 207, or selling a mandatory toll plan outside of federal and state equal access rules that happens to permit toll-free dialing to South Slope’s Oxford, Solon, and Tiffin customers.

While South Slope’s Exclusive Calling Club Plan may have certain benefits to South Slope’s customers, the manner in which South Slope has implemented its offering is

anticompetitive. To the extent that South Slope is permitted to continue to engage in illegal practices under the guise of providing supposed benefits to its customers, South Slope also happens to shield its overwhelmingly-dominant market share in the Oxford, Solon and Tiffin exchanges from competition by Iowa Telecom and in other exchanges such as Cedar Rapids and Iowa City from competition by Qwest. This calling plan results in South Slope offering artificially-lower rates to its Oxford, Solon, and Tiffin exchange customers who might otherwise be induced through price competition to switch to Iowa Telecom.

2. **By Continuing to Associate its CLEC Numbering Resources in Iowa City With Its North Liberty ILEC Operations, South Slope Inhibits Qwest's Ability to Port Numbers in Cedar Rapids and Iowa City from South Slope and Also Skews Competition in Oxford, Solon, and Tiffin.**

Just as South Slope used to associate its numbering resources used to serve the Oxford, Solon, and Tiffin rate centers with its ILEC North Liberty rate center, South Slope continues to improperly associate its Cedar Rapids and Iowa City numbering resources with its North Liberty rate center.<sup>21</sup> This improperly limits Qwest's ability to port numbers in its Cedar Rapids and Iowa City ILEC rate centers from South Slope and also skews competition in Oxford, Solon, and Tiffin.

The Commission firmly limits wireline-to-wireline LNP to porting within a rate center.<sup>22</sup> Industry standards also prohibit wireline number portability between rate centers.<sup>23</sup>

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<sup>21</sup> A printout of South Slope's LERG entries for such numbering resources is included as Attachment F to these Comments. Attachment G demonstrates how South Slope has, in fact, used these numbering resources in Cedar Rapids and Iowa City.

<sup>22</sup> See, e.g., *Telephone Number Portability*, Memorandum Opinion and Order, 18 FCC Rcd 23697, ¶ 7 (2003)(unrelated subsequent history omitted).

<sup>23</sup> See, e.g., Telcordia Technologies, *Telcordia's LERG Routing Guide – General Information*, at 4, Aug. 1, 2008, available at <[http://www.telcordia.com/products\\_services/trainfo/downloads/lerginfo.doc](http://www.telcordia.com/products_services/trainfo/downloads/lerginfo.doc)> (last visited Dec. 10, 2008)(“*LERG General Information*”)(“wireline subscribers can retain their telephone number ONLY if they remain (to be rated) within Rate Center boundaries – this concept is not changed under ‘portability’” (emphasis in

Telcordia's Local Exchange Routing Guide ("LERG") defines a "rate center" as "technically the approximate midpoint of what is usually called a Rate Exchange Area, although the term Rate Center has also been used synonymously with the geographic area itself. A Rate Center is a point within a uniquely defined Rate Exchange Area from which mileage measurements are determined."<sup>24</sup> Thus, the LERG, like Iowa's incumbent carrier certification scheme, envisions a single layer of mutually-exclusive rate centers. The telecommunications industry has relied on this assumption for decades. Ultimately, the location of the switch is not important, so long as the correct rate center is associated with the numbering resources. *See LERG General Information* at 33 ("Do not confuse Vertical and Horizontal Coordinates of a switch with those of a Rate Center . . . – they may sometimes be identical, sometimes may not.").

Because the NPA-NXXs that South Slope uses to serve the Cedar Rapids and Iowa City exchanges are associated with the North Liberty rate center, Qwest, the ILEC in such rate centers, cannot lawfully port such allegedly North Liberty numbers into its Cedar Rapids or Iowa City rate centers to serve customers wishing to convert their service from South Slope's to Qwest's due to the restrictions on wireline service provider number portability. Even if the location of the numbers were not considered to have been ported, Qwest would be violating its certificates of public convenience and necessity by serving customers geographically associated

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original)); Alliance for Telecommunications Industry Solutions, *Intercompany Responsibilities Within the Telecommunications Industry, Issue 4*, ATIS-0300037, July 2006, at 37 (available at <<http://www.atis.org/niif/Docs/atis0300037.pdf>> (last visited Dec. 10, 2008))("Service Provider portability [is] . . . the ability to change SPs (while at the same location / Rate Center) and retain the same number. . . . As of this writing [March 2007], Service Provider portability is the only type of portability in effect. Location portability requires a substantial number of issues to be addressed and resolved prior to its becoming a reality.").

<sup>24</sup> *LERG General Information* at 40.

with rate center with vertical and horizontal (“V&H”) coordinates located outside of Qwest’s certificated service area boundaries.

While South Slope’s continuing violation of its Section 251(b)(2) obligations with respect to Qwest does not pertain directly to the Oxford, Solon, and Tiffin exchanges, it serves as an example of South Slope’s continuing ILEC malfeasance and does have an indirect effect on competition in the Oxford, Solon, and Tiffin exchanges.<sup>25</sup>

Normally, Iowa Telecom customers in the Oxford, Solon, and Tiffin exchanges should be able to place calls on an EAS basis to the Iowa City exchange.<sup>26</sup> But, when they call South Slope customers in the Iowa City exchange, they have to place a toll call because South Slope has inappropriately associated the numbering resources that it uses to serve Iowa City with South Slope’s North Liberty exchange and there is no EAS between the exchanges of Oxford, Solon, and Tiffin and the North Liberty exchange.<sup>27</sup> At the same time, however, South Slope’s customers in the Oxford, Solon, and Tiffin exchanges are able to call South Slope customers in the Iowa City exchange without incurring toll charges.<sup>28</sup> And, of course, because there is EAS at least to the Qwest customers in the Iowa City exchange, all other Iowa City calls are also toll-free.<sup>29</sup>

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<sup>25</sup> Out of an abundance of caution, Iowa Telecom has discussed South Slope’s misassociation of its Cedar Rapids and Iowa City numbering resources in the context of a Section 251(b)(2) violation so as to ensure that it is raising a matter that is within the Commission’s jurisdiction. This is not to say, however, that Iowa Telecom could not fashion its own direct federal claim on such matter.

<sup>26</sup> Iowa Telecommunications Services, Inc. d/b/a Iowa Telecom, “Local Rates & Services Guide,” 55-57 (available at <<http://www.iowatelecom.com/PDFs/Local%20RSG%20100107.pdf>>. Prior to deregulation of Iowa Telecom’s local exchange rates in the Oxford, Solon, and Tiffin exchanges, Iowa Telecom’s EAS routes were described in Iowa Telecom’s Tariff Iowa No. 1.

<sup>27</sup> Id.

<sup>28</sup> See Attachment C.

<sup>29</sup> Qwest Iowa Tariff No. 1, Section 5.1.1.C, Sheet 7.

Ultimately, this set of call rating outcomes serves to unjustly limit the local calling scope of Iowa Telecom's Oxford, Solon, and Tiffin customers. This limitation is the result of South Slope misassociating its CLEC numbering resources in Iowa City with its ILEC North Liberty rate center – a practice no less improper than what the Iowa Utilities Board has already ordered South Slope to correct with regard to its CLEC numbering resources in Oxford, Solon, and Tiffin. Iowa Telecom cannot compete on a nondiscriminatory basis with South Slope in the Oxford, Solon, and Tiffin exchanges until this matter is resolved.

**3. South Slope's Malfeasance is Not a Matter Properly Left for Another Day.**

While it may be administratively expedient to leave the numbering resource concerns raised by Iowa Telecom to be dealt with in a future formal complaint before the Iowa Utilities Board or the Commission, Iowa Telecom does not believe that it should be forced to prosecute such a complaint to have these matters resolved. The issue in the instant proceeding is whether to place new obligations on South Slope, at South Slope's request. South Slope should not be given additional responsibility until it can demonstrate that it meets its present responsibilities. The issues raised by Iowa Telecom herein are plain and can be resolved by reference to the documentary evidenced submitted herein. History demonstrates that South Slope will not bring its operations within the law until forced to by an administrative agency. Iowa Telecom respectfully requests that the Commissions so force South Slope as a condition to granting any "relief" that South Slope appears to seek regarding the very same geographic markets.

**III. SUBSEQUENT REGULATION OF IOWA TELECOM AND SOUTH SLOPE IN THE OXFORD, SOLON, AND TIFFIN EXCHANGES**

In the Notice, the Commission also discusses subsequent regulatory treatment of Iowa Telecom and South Slope in the Oxford, Solon, and Tiffin exchanges. Specifically, the

Commission tentatively concludes that Iowa Telecom should be given non-dominant regulatory treatment for interstate purposes in the Oxford, Tiffin and Solon exchanges if South Slope is accorded incumbent LEC status for purposes of section 251.<sup>30</sup> Further, the Commission seeks comment on the long-term regulation of South Slope's interstate operations in the Oxford, Tiffin and Solon exchanges if South Slope is accorded section 251(h)(2) incumbent LEC status.<sup>31</sup> Specifically, the Commission asks what regulations should apply to South Slope's interstate service offerings, such as dominant carrier regulation.<sup>32</sup>

**A. Subsequent Regulation of Iowa Telecom**

As the Commission concluded with regard to Qwest in *Mid-Rivers*, the Commission should assess whether Iowa Telecom has market power in the Oxford, Solon and Tiffin, IA exchanges using the Commission's analytical framework set out in the *AT&T Reclassification Order*.<sup>33</sup> Such framework includes the following four factors: (1) market share; (2) supply elasticity; (3) demand elasticity; and (4) Qwest's cost structure, size, and resources.

Prior to turning to these four factors, Iowa Telecom notes that the Iowa Utilities Board concluded in December 2004 that Iowa Telecom's retail local exchange service offerings in Oxford, Solon, and Tiffin are subject to effective competition from a fully facilities-based provider.<sup>34</sup> Pursuant to Iowa statute, the Iowa Utilities Board found that South Slope offered comparable service to Iowa Telecom and that market forces are sufficient to assure just and

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<sup>30</sup> Notice at ¶ 11.

<sup>31</sup> *Id.* at ¶ 12.

<sup>32</sup> *Id.* at ¶ 12.

<sup>33</sup> *Id.* at ¶ 11.

<sup>34</sup> *Deregulation of Local Exchange Services in Competitive Markets*, Docket No. INU-04-1, "Final Order" (Iowa Utils. Bd. Dec. 23, 2004).

reasonable rates without regulation.<sup>35</sup> This included the requisite finding under Iowa Utilities Board rules that Iowa Telecom does not have the ability to determine or control prices.<sup>36</sup>

Against the backdrop of the Iowa Utilities Board's 2004 findings, as well as the facts presented to the Board in the instant proceeding, each of the four factors set out in the *AT&T Reclassification Order* clearly favor finding that Iowa Telecom should no longer be subject to dominant carrier regulation in the Oxford, Solon, and Tiffin exchanges.

Market Share. According to South Slope, Iowa Telecom has less than a ten percent market share. This is approximately the same market share upon which the Commission found Qwest to be non-dominant in the Terry, Montana exchange.

Supply Elasticity. South Slope claims to have built the same sort of new, technologically advanced facilities in the Oxford, Solon, and Tiffin exchanges as Mid-Rivers had built in the Terry, Montana exchange. Thus, South Slope, like Mid-Rivers, has enough readily available capacity on its network to constrain the legacy ILEC's pricing behavior in the pertinent exchange(s).

Demand Elasticity. The willingness of approximately 90 percent of customers in the Oxford, Solon, and Tiffin markets to leave Iowa Telecom's predecessor (GTE) and stay with South Slope is a testament to the willingness of customers in the Oxford, Solon, and Tiffin exchanges to switch service providers in order to obtain price reductions or supposedly better quality of service. Further, Iowa Telecom notes that South Slope provides facilities-based video service and fiber-optic based data transmission services to its customers, services that Iowa Telecom currently does not provide.

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<sup>35</sup> See Iowa Code § 476.1D.

<sup>36</sup> See 199 IAC 5.2(1).

Iowa Telecom's Cost Structure, Size, and Resources. South Slope has constructed a supposedly more modern and efficient competing network than Iowa Telecom's in the Oxford, Solon, and Tiffin exchanges despite Iowa Telecom's relative size compared to South Slope. Thus, Iowa Telecom's size, overall cost structure, and resources do not constitute evidence of market power in the Oxford, Solon, and Tiffin exchanges under the present circumstances such as to preclude the effective functioning of a competitive market.

Just as Qwest was given the right to elect to operate pursuant to dominant carrier regulation since such operation might be more convenient for administrative purposes given the very small number of lines involved, Iowa Telecom respectfully requests that the Commission afford the same flexibility in this proceeding. Iowa Telecom expects, like Qwest later did, to file a petition seeking forbearance from Section 251(c) obligations in the Oxford, Solon, and Tiffin exchanges if South Slope is eventually classified as an ILEC in such exchanges.

**B. Subsequent Regulation of South Slope**

It is highly unlikely that South Slope's motives in voluntarily seeking ILEC treatment under Section 251 of the Act are philanthropic – South Slope is clearly relying on the Commission classifying it as dominant in the Oxford, Solon, and Tiffin exchanges; thus, permitting South Slope to assess NECA access rates significantly higher than Iowa Telecom price cap access rates.<sup>37</sup> South Slope seems to also plan on collecting its \$8.44 per-line per-month universal service support in the Oxford, Solon, and Tiffin exchanges.

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<sup>37</sup> Because South Slope's CLEC territory includes Cedar Rapids and Iowa City, both communities of larger than 50,000, South Slope theoretically should be currently matching Iowa Telecom's interstate access rates rather than assessing the NECA rate permitted of rural CLECs pursuant to 47 C.F.R. § 61.26. Iowa Telecom has no means of determining whether South Slope is, in fact, assessing the non-rural CLEC access rate in the Oxford, Solon, and Tiffin exchanges.

The Commission should not “reward” South Slope’s ability to achieve market dominance in the Oxford, Solon, and Tiffin exchanges, albeit partially through illegally-structured operations, by granting it regulatory treatment that: (1) permits it to assess dramatically-higher interstate access charges despite the fact that its costs have not changed; and (2) permits it to increase its recovery of Interstate Common Line Support despite the fact that it never had previous ILEC access revenue in Oxford, Solon, and Tiffin that it lost as part of the *MAG Order*. South Slope achieved its current dominant market position without such “rewards” and should not necessarily be provided them at this time.

Iowa Telecom strongly recommends that the Commission, at minimum, delay reaching any conclusions that would permit South Slope to increase its access charges or universal service receipts in the Oxford, Solon, and Tiffin exchanges while Iowa Telecom continues to receive relatively-little Interstate Access Support and no high-cost loop support anywhere in its service territory.

### **CONCLUSION**

For the reasons described herein, the Commission should condition any finding that the criteria of Section 251(h)(2) of the Act apply to South Slope in the Oxford, Solon, and Tiffin exchanges on South Slope correcting certain of its LERG entries. Further, Iowa Telecom should be reclassified as non-dominant for interstate access charge purposes in the Oxford, Solon, and Tiffin exchanges. Finally, the Commission should reserve judgment on appropriate treatment of South Slope for interstate access charge and study area boundary purposes in the Oxford, Solon, and Tiffin exchanges.

Respectfully submitted,

**IOWA TELECOMMUNICATIONS  
SERVICES, INC. D/B/A IOWA TELECOM**

By: /s/ Donald G. Henry  
Donald G. Henry  
Edward B. Krachmer

403 W. 4<sup>th</sup> St. N.  
P.O. Box 1046  
Newton, Iowa 50208  
(641) 787-2000

Dated: December 10, 2008

## CERTIFICATE OF SERVICE

I hereby certify that, on this 10<sup>th</sup> day of December 2008, I caused copies of the foregoing Comments on the Petition of South Slope Cooperative Telephone Company, Inc. For an Order and Rule Pursuant to Section 251(h)(2) of the Communications Act Declaring that South Slope Cooperative Telephone Company, Inc. Shall Be Treated as an Incumbent Local Exchange Carrier in the Iowa Exchanges of Oxford, Tiffin and Solon to be served on the following parties by U.S. Mail, or, as indicated, by electronic mail.

/s/ Edward B. Krachmer  
Edward B. Krachmer

Competition Policy Division\*  
Wireline Competition Bureau  
Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, DC 20554

Best Copy and Printing, Inc.\*  
445 Twelfth St., S.W.  
Room CY-B402  
Washington, DC 20554

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky, Dickens, Duffy & Prendergast  
2120 L St., N.W.  
Washington, DC 20037

\* Served by electronic mail

**Iowa Telecommunications Services, Inc. d/b/a Iowa Telecom  
Comments  
WC Docket No. 04-347  
December 10, 2008**

**Attachment A**

STATE OF IOWA  
BEFORE THE IOWA UTILITIES BOARD

IN RE: )  
)  
IOWA TELECOMMUNICATIONS ) DOCKET NO. FCU-06-25  
SERVICES, INC., D/B/A ) DRU-06-1  
IOWA TELECOM, )  
)  
Complainant, ) DEPOSITION OF  
)  
vs. ) J.R. BRUMLEY  
)  
)  
SOUTH SLOPE COOPERATIVE )  
TELEPHONE COMPANY, )  
)  
Respondent. )  
)

Deposition of J.R. BRUMLEY, taken  
before Julie M. Kluber, Certified Shorthand  
Reporter, commencing at 9:33 a.m., August 4,  
2006, at 980 North Front Street, North Liberty,  
Iowa.

Julie M. Kluber, CSR, RMR  
3515 Lochwood Drive NE  
Cedar Rapids, IA 52402  
319-286-1717  
1-866-412-4766

APPEARANCES

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Complainant by: SHEILA K. TIPTON  
Attorney at Law  
666 Walnut Street  
Suite 2000  
Des Moines, Iowa

Respondent by: MICHAEL R. MAY  
Attorney at Law  
1216 E. Franklin Avenue  
Indianola, Iowa  
and  
SUSAN FRYE  
Attorney at Law  
321 E. Market Street  
Iowa City, Iowa  
and  
BENJAMIN DICKENS, JR.  
Attorney at Law  
2120 L Street NW  
Washington, DC  
(Via speakerphone)

Also present: Edward R. Krachmer

1       Could you specify in the question? Excuse me,  
2       the form of the question --

3               MS. TIPTON: Just a minute, just a minute.

4 Q. Section 476.96(5) of the Iowa Code.

5 A. I'm not aware of that. I may have been  
6       informed at the time, but at this time I don't  
7       know about that code.

8 Q. So you weren't aware that there was a statute  
9       that basically defined an ILEC as one that was  
10      in existence at a certain -- that was the  
11      company offering local exchange service at a  
12      certain point in time.

13              MR. MAY: I better object to the question  
14      as vague, ambiguous, and if you're going to  
15      paraphrase the statute, you've got the statute  
16      at hand, why don't you just read it.

17              MS. TIPTON: I don't have a statute at  
18      hand. Do you have it?

19              MR. KRACHMER: Do you have the complaint?

20              MS. TIPTON: Yes, I do.

21 Q. Backing up, Mr. Brumley, were you aware at the  
22      time that you filed your application with the  
23      Board for modification of your certificate that  
24      there was a statute in Iowa, and the correct  
25      citation is 476.96(3), which defined a local

1 exchange carrier as "Any person that was the  
2 incumbent and historical rate-regulated wire  
3 line provider of local exchange services, or  
4 any successor to such person that provides  
5 local exchange services under an authorized  
6 certificate of public convenience and necessity  
7 within a specific geographic area described in  
8 maps filed with and approved by the Board as of  
9 September 30, 1992."

10 A. I don't recall at that time.

11 Q. Do you recall whether your application for  
12 modification of your certificate which you  
13 filed in 1995 specifically asked the Board to  
14 name South Slope as an ILEC in the Oxford,  
15 Solon, and Tiffin exchanges, or communities, as  
16 you refer to them?

17 A. I don't recall at that time because I was not  
18 the CEO. Francis Kahle, which has passed away,  
19 was the CEO and he handled most of those  
20 things.

21 Q. All right. Do you know whether -- Well, were  
22 you involved in the filing of that application  
23 or the decision to file the 1999 application  
24 for modification of the certificate?

25 A. The 1999 I was.

1 Q. Okay. Was it South Slope's intention in filing  
2 that certificate to become an ILEC in the South  
3 Slope, Oxford, and Tiffin exchanges?

4 A. Yes.

5 Q. Was the company advised -- Let me rephrase.  
6 Who thought or who came up with the idea that  
7 South Slope could become an ILEC in Oxford,  
8 Solon, and Tiffin by simply expanding its  
9 certificate -- modifying its certificate to  
10 include Oxford, Solon, and Tiffin in its  
11 service territory?

12 A. I did.

13 Q. And you did that on your own or were you  
14 advised by someone that that would be a viable  
15 way to become an ILEC in those exchanges?

16 A. Francis Kahle was the CEO at the time when  
17 we -- we also expanded into part of Coralville,  
18 part of Tiffin, and he wanted to go in as a  
19 CLEC and I wanted to go in as expanded boundary  
20 because it appeared to me it would be better  
21 for the members or public to be part of the  
22 co-op, and so through discussions with Francis,  
23 I -- I'm not sure who he discussed it with. We  
24 had several discussions about it, and then he  
25 went to our Board and -- and our Board agreed

1 to let us expand our boundaries.

2 Q. Did you obtain any outside advice from  
3 consultants as to whether that would be a  
4 viable approach?

5 A. He was handling most of that. We did work with  
6 Don Lee a lot.

7 Q. All right. Did you obtain legal advice?

8 A. Well, I'm sure we did. I would think it would  
9 have been -- I think Mike May, I think.

10 Q. All right. Do you know if you had any written  
11 advice from anyone telling you that this would  
12 be a viable approach?

13 MR. MAY: Excuse me. That is absolutely  
14 objectionable as privileged information, plus  
15 this approach is very vague.

16 MS. TIPTON: Let me rephrase.

17 MR. MAY: Okay.

18 Q. Do you recall whether you had any written  
19 advice from any outside consultants other than  
20 legal counsel advising you that expansion of  
21 your service territory into Oxford, Solon, and  
22 Tiffin would be a viable way to become an ILEC  
23 in those exchanges?

24 MR. MAY: The -- that solves part of the  
25 privileged objection because there could have

1 MS. TIPTON: Yes.

2 Q. JRB-2 attached to your testimony that was filed  
3 in this matter, Mr. Brumley. You have that  
4 before you?

5 MR. MAY: One moment.

6 A. This was our original expansion.

7 Q. Yes.

8 A. Yes.

9 Q. And as a result of this original expansion,  
10 it's your belief that you became the ILEC in  
11 this particular portion of Tiffin as well?

12 A. An ILEC.

13 Q. An ILEC, yes. That's correct?

14 A. Yes. We had one other expansion on the south  
15 side of Cedar Rapids into the Qwest area, and  
16 we did an expansion there also.

17 Q. With the same result?

18 A. Yes.

19 Q. That being that you would be an ILEC in that  
20 portion of Cedar Rapids?

21 A. We expanded our North Liberty exchange.

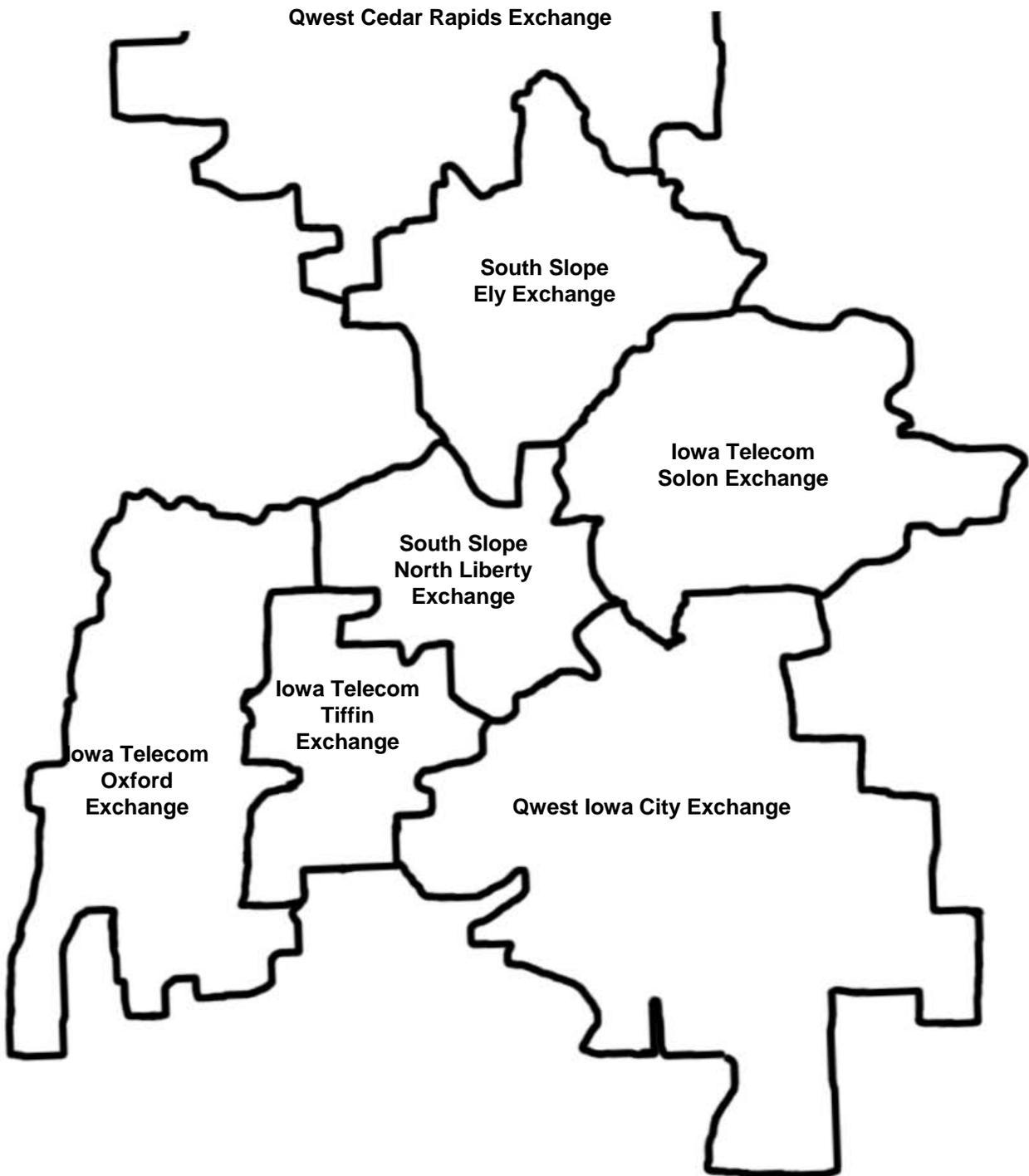
22 Q. Okay. Other than those examples that -- those  
23 situations that you've just told me about, have  
24 there been any other expansions?

25 A. No.

**Iowa Telecommunications Services, Inc. d/b/a Iowa Telecom  
Comments  
WC Docket No. 04-347  
December 10, 2008**

**Attachment B**

**Attachment B:  
Map of Pertinent Exchanges**



**Iowa Telecommunications Services, Inc. d/b/a Iowa Telecom**  
**Comments**  
**WC Docket No. 04-347**  
**December 10, 2008**

**Attachment C**



# South Slope Solutions

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 Residential Services  
 Business Services  
 Long Distance  
 Cabling Installation  
 Video Conferencing

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Residential Services  
 Voicemail  
 Call Blocking  
 Caller ID  
 Call Waiting  
 Call Forwarding  
 Additional Services

### Internet

Internet Services  
 High Speed  
 Internet  
 Dialup Connection  
 ISDN Connection  
 Direct Connection

### Products

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 Wireless  
 Long Distance  
 Travel Cards  
 800 Service  
 Phone Sales  
 Installations  
 Optional Calling  
 Plan

### Business

Business Services  
 Centrex  
 Video Conferencing  
 Long Distance  
 800 Service  
 Internet  
 Phone Sales  
 Cabling

### Data Networking

Cabling  
 Equipment  
 Fiber Optic Install

### Tech Support

Voicemail  
 Internet

## SOUTH SLOPE CALLING AREA BY EXCHANGE

**If dialed without operator assistance, there is no charge for long distance calls from your community to those listed below.**

### Amana Colonies (622) to:

Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Coralville - 625  
 Ely - 848, 841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

### Coralville (625) to:

Amana - 622  
 Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Ely - 848,841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Iowa City  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

### Ely (848, 841) to:

Amana - 622  
 Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Coralville - 625  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Ladora - 623  
 Newhall - 223

### Fairfax/Walford (846,845) to:

Amana - 622  
 Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Coralville - 625  
 Ely - 848, 841  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Ladora - 623  
 Newhall - 223

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North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Swisher - 857  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Swisher - 857  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

**Newhall (223) to:**

Amana - 622  
 Atkins - 446  
 Blainstown - 454  
 Cedar Rapids/Marion  
 Coralville - 625  
 Ely - 848, 841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Ladora - 623  
 North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Van Horne - 228  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

**Norway/Watkins (227) to:**

Amana - 622  
 Atkins - 446  
 Blainstown - 454  
 Cedar Rapids/Marion  
 Coralville - 625  
 Ely - 848, 841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626, 665  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

**North Liberty (626,665) to:**

Amana - 622  
 Atkins - 446  
 Blainstown - 454  
 Cedar Rapids/Marion  
 Ely - 848, 841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Iowa City/Coralville  
 Ladora - 623  
 Newhall - 223  
 Norway/Watkins - 227  
 Oxford - 828

**Oxford (828) to:**

Amana - 622  
 Atkins - 446  
 Blainstown - 454  
 Cedar Rapids/Marion  
 Ely - 848,841  
 Fairfax/Walford - 846,845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Iowa City/Coralville  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626,665  
 Norway/Watkins - 227

Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

Oxford - 628 (ITS)  
 Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

**Solon (624) to:**

Amana - 622  
 Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Ely - 848,841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Iowa City/Coralville  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 644 (ITS)  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

**South Side of**

**Cedar Rapids (632) to:**

Amana - 622  
 Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Ely - 848,841  
 Fairfax/Walford - 846, 845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Iowa City/Coralville  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624  
 Tiffin - 545  
 Victor - 647  
 Wellman - 646  
 West Branch - 643  
 West Liberty - 627

**Tiffin (545) to:**

Amana - 622  
 Atkins - 446  
 Blairstown - 454  
 Cedar Rapids/Marion  
 Ely - 848,841  
 Fairfax/Walford - 846,845  
 Guernsey - 685  
 Hartwick - 525  
 Hills - 679  
 Iowa City/Coralville  
 Ladora - 623  
 Newhall - 223  
 North Liberty - 626, 665  
 Norway/Watkins - 227  
 Oxford - 828  
 Sharon Center - 683  
 Solon - 624

Tiffin - 645 (ITS)  
Victor - 647  
Wellman - 646  
West Branch - 643  
West Liberty - 627

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# Local Calling Guide

## Rate centre information

[Search by rate centre \(exchange\) name, region, area code, LATA](#)

Rate centre: \_\_\_\_\_ Region (Province/State/Territory): \_\_\_\_\_ Area code: \_\_\_\_\_  
 LATA:

Last updated: **Sat, 29 Nov 2008 23:05:31 UTC**

North Liberty, IA [\[Prefix detail\]](#) [\[Map\]](#)

LATA: [635](#) CEDAR RAPIDS IA

V: 06301 H: 03989

ILEC: [1298](#) SOUTH SLOPE COOPERATIVE TELEPHONE CO., INC.

Includes all or part of:

- Cedar Rapids (SSCT), IA (1298 SOUTH SLOPE COOPERATIVE TELEPHONE CO., INC.)

NPA [319](#):

[626 665 853](#)

See all [\[Local Prefixes\]](#)

Local calling TO the following exchanges: [\[Reverse direction\]](#)

Rate centre	Plan type	Call type	Monthly limit (minutes)	Note	Effective date
<a href="#">Amana, IA</a>					
<a href="#">Atkins, IA</a>					
<a href="#">Blairstown, IA</a>					
<a href="#">Cedar Rapids, IA</a>					
<a href="#">Ely, IA</a>					
<a href="#">Fairfax, IA</a>					
<a href="#">Guernsey, IA</a>					
<a href="#">Hartwick, IA</a>					
<a href="#">Hills, IA</a>					
<a href="#">Iowa City, IA</a>					
<a href="#">Iowa City (SSCT), IA</a>					
<a href="#">Ladora, IA</a>					

[Newhall, IA](#)  
[Norway, IA](#)  
[Oxford \(SSCT\), IA](#)  
[Sharon Center, IA](#)  
[Solon \(SSCT\), IA](#)  
[Tiffin \(SSCT\), IA](#)  
[Victor, IA](#)  
[Wellman, IA](#)  
[West Branch, IA](#)  
[West Liberty, IA](#)

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Comments  
WC Docket No. 04-347  
December 10, 2008**

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# The Iowa Innovator

Jun 6, 2005 12:00 PM, [ by Vince Vittore ]

## more on the topic

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From his office at the North Liberty, Iowa, headquarters of South Slope Cooperative, J.R. Brumley can see the population wave coming. Off to the south, toward Iowa City and the University of Iowa campus about 10 miles away, the homes are multiplying like weeds in an untended lawn. And they keep sprouting up everywhere he looks.

Brumley and South Slope, which operates 19,000 access lines, are witnesses to an Iowa-style population boom. According to the 2000 census, North Liberty had 5387 residents; by July 2002, that number had jumped 13.3% to 6081. By September 2004, builders had added 500 residential units — mostly multifamily dwellings that people around town refer to as twelve-plexes in reference to the number of units per building they house. This year, the pace is even quicker, as growth continues coming from Iowa City and Cedar Rapids.

“There's just a lot of activity here, and we have a very aggressive economic development group,” Brumley said. “We think it's a very desirable part of the country.”

All that building is not just changing the population characteristics of South Slope's territory, it's also giving the telco an opportunity to get on the cutting edge of new technology deployments. Since March of last year, the company has been providing a triple-play bundle of voice, high-speed data and video to customers through a unique arrangement with Iowa Network Services, the statewide fiber network.

This isn't a story of a small telco made good, however, as much as it is the story of a small telco getting a jump on the future.

Brumley, not unlike his counterparts across the independent telco landscape, is driven to some extent by events in Washington, where decisions are being made that easily could bankrupt the traditional rural telco model.

“Right now, our big concern is access charge reform,” he said. “If they don't get it right ... there are 150 telcos in Iowa, and just about all of them will go broke.”

The impact of declining access charge revenue has been dramatic. Five years ago, revenue from IXC's and wireless carriers represented 79% of South Slope's income. Today it comprises 45%. At the same time, the company has been able to increase its cash flow from other areas, dramatically reducing its reliance on access charges.

Take fiber to the home, for instance. Like many independents, the company has jumped whole hog into that market.

"We have 494 square miles in territory," Brumley said. "If there's a new subdivision, it will be fiber to the home. And if it's not, you better talk to me and explain why it shouldn't be."

The company also has provided most of its copper-connected homes with a DSL option (3000-plus customers at last count) and acts the part of good citizen by contributing to the communities. What makes South Slope slightly different is the level of its aggressiveness.

South Slope has started an "edge out" strategy whereby it extends service into neighboring towns. But instead of creating a CLEC arm and targeting businesses in the new area, the telco simply widened its borders and treated the new territory like its existing ILEC turf, bumping into other independents and Qwest along the way. It's done it twice in the Tiffen/Coralville area and once into Cedar Rapids. It's contemplating others, too.

"We did things the old-fashioned way, by extending our boundaries and putting a drop to every home," said Natalie Stallman, manager of application technology for South Slope. "It's not about cherry-picking. It's about expanding our boundaries."

"People look at me all confused when I tell them about that," Brumley said. "There's nothing confusing about it. We're just expanding our boundaries. It's a natural thing to do."

Residential users in South Slope's newly claimed territory are given access to all of the company's services, including video. That includes one of the first deployments of video-on-demand (VOD), which is a result of South Slope's contract with INS. INS, which is owned by 135 Iowa telcos, signed an agreement last year to use Kasenna video servers and software and act as the master headend for any carrier wanting to offer VOD. Under that deal, South Slope is able to pull content from a video library that currently contains 150 movie titles but ultimately will expand to 700.

That video library, which collects content from TVN Entertainment, initially was supposed to have around 300 titles, but getting the rights to send content over an IP stream has proved time consuming, Brumley said. Content owners traditionally have been hesitant to sign off on such technologies unless they're certain premium content like newly released movies are securely encrypted. INS is working with Widevine and Myrio to ensure that lock down and gain the rights to expand its library, but it's taking some time.

"We have a really good service, but until this encryption issue gets taken care of, we just don't have enough content," Brumley said.

On the broadcast side, the company is using SkyStream MediaPlex 20 units to encode local content and take encoded national channels from INS. South Slope, which was one of the first telco wins for SkyStream, also turned into a learning experience for that vendor. During a

software upgrade earlier this year, the telco intermittently lost channels running through its MediaPlex.

According to Andy Lovit, vice president of field operations for SkyStream, the issue was resolved after the vendor sent one of its more experienced engineers out to South Slope. The lesson for SkyStream, Lovit said, was not to take on any project “unless I have the proper resources.”

Once into the South Slope network, video is sent through a series of fiber rings. In fact, in a world where bandwidth is a relatively cheap commodity, South Slope appears to be swimming in it with a series of rings that transmit bits at anywhere from OC-3 to OC-192 speeds.

The company also was an early adopter of Movaz DWDM equipment, which Brumley heaped praise upon, when given the opportunity: “It was almost plug-and-play,” he said. “They were wonderful to work with.”

At the end users' (or members, in co-op speak) homes, the company currently is using Amino's AmiNET 110 set-top boxes — but South Slope is itching to get the vendor's 500 series into the field because it offers personal video recorder (PVR) capabilities.

“We have a waiting list for them as soon as we can get them,” Stallman said.

Regardless of the box sitting in the home, video is multicast through either one of several Calix C7 Broadband Loop Carriers for copper-connected customers or via Optical Solutions' FiberPath platform for those with direct fiber connections. In either case, channel changes are handled upstream on one of the C7, using Calix's IP resource card, or IRC.

“That manages the flow of the content and acts as the intelligence of the content,” said Geoff Burke, video solutions marketing director for Calix. “The IRC actually manages the distribution through the other shelves in the network. The other interesting thing about that is one IRC card can handle 8000 or so customers.”

Assuming — and it's a relatively big assumption — that all of the pieces of the puzzle fall into place over the next few months, South Slope stands to be among the most advanced telco video providers in the country. From an outsider's perspective, it might seem a natural place, given the company's growing territory and past aggressiveness. But for Brumley, video has been among the most difficult transitions.

This also isn't the first time the company has ventured into video. About five years ago, when other independent telcos were experimenting with VDSL-based platforms, South Slope acquired two small analog systems. Those have since been shuttered. “We wanted to get in the business, but we didn't have any experience,” Brumley said.

That false start, though, taught the company that succeeding with a video service can't be done without a little outside help. For a company that Brumley proclaims, “doesn't work well with others,” it's a hard lesson.

“The hardest thing for South Slope to embrace about video is the outsourcing involved,”

Stallman said. "You're at the mercy of so many other people. We also have to be a lot more tactful with the information we're providing."

Video, however, isn't just a fancy option any more, given the competitive pressures the company is facing. Throughout its entire six-exchange territory, South Slope faces off with Mediacom, which has aggressively deployed high-speed Internet access and is in position for a significant telephony launch this year.

"We need the triple play," Brumley said, "because we need to keep what we have."

**Find this article at:**

[http://www.telephonyonline.com/mag/telecom\\_iowa\\_innovator/index.html](http://www.telephonyonline.com/mag/telecom_iowa_innovator/index.html)

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7 Records

NPA NXX	TBI	SW CLLI	NPA-NXX Place	Stat	Eff Date	OCN	Company Name
319 628	1	OXFRIAXPRS0	OXFORD	E	6/8/2005	1167	IOWA TELECOMM SVCS DBA IOWA TE
319 628	2	OXFRIAXPRS0	OXFORD	E	6/8/2005	1167	IOWA TELECOMM SVCS DBA IOWA TE
319 628	4	OXFRIAXPRS0	OXFORD	E	6/8/2005	1167	IOWA TELECOMM SVCS DBA IOWA TE
319 628	8	CDRRIADTJMD	OXFORD	M	12/5/2006	8939	SPRINT COMMUNICATIONS COMPANY,
319 628	9	OXFRIAXPRS0	OXFORD	E	6/8/2005	1167	IOWA TELECOMM SVCS DBA IOWA TE
319 628	A	OXFRIAXPRS0	OXFORD	M	11/15/2006	1167	IOWA TELECOMM SVCS DBA IOWA TE
319 828	A	NLBTIAXODS0	OXFORD	M	4/28/2007	562E	SOUTH SLOPE COOPERATIVE TELEPH

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NPA-NXX Search By: NPA: 319; Place: solon; State: ia;;

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9 Records

NPA NXX	TBI	SW CLLI	NPA-NXX Place	Stat	Eff Date	OCN	Company Name
319 543	0	CDRRIADTJMD SOLON		E	7/10/2007	8939	SPRINT COMMUNICATIONS COMPANY,
319 543	1	CDRRIADTJMD SOLON		E	7/10/2007	8939	SPRINT COMMUNICATIONS COMPANY,
319 543	A	CDRRIADTJMD SOLON		M	7/10/2007	8939	SPRINT COMMUNICATIONS COMPANY,
319 624	A	NLBTIAXODS0 SOLON		M	4/28/2007	562E	SOUTH SLOPE COOPERATIVE TELEPH
319 644	0	SOLNIAXORS0 SOLON		E	12/2/2006	1178	IOWA TELECOMM SVCS DBA IOWA TE
319 644	1	SOLNIAXORS0 SOLON		E	12/2/2006	1178	IOWA TELECOMM SVCS DBA IOWA TE
319 644	2	SOLNIAXORS0 SOLON		E	12/2/2006	1178	IOWA TELECOMM SVCS DBA IOWA TE
319 644	3	SOLNIAXORS0 SOLON		E	12/2/2006	1178	IOWA TELECOMM SVCS DBA IOWA TE
319 644	A	SOLNIAXORS0 SOLON		M	12/2/2006	1178	IOWA TELECOMM SVCS DBA IOWA TE

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7 Records

NPA NXX	TBI	SW CLLI	NPA-NXX Place	Stat	Eff Date	OCN	Company Name
319 625	A	NLBTIAXODS0	NORTH LIBERTY	M	1/17/2005	1298	SOUTH SLOPE COOPERATIVE TELEPH
319 626	A	NLBTIAXODS0	NORTH LIBERTY	M	1/17/2005	1298	SOUTH SLOPE COOPERATIVE TELEPH
319 632	A	NLBTIAXODS0	NORTH LIBERTY	M	1/17/2005	1298	SOUTH SLOPE COOPERATIVE TELEPH
319 665	A	NLBTIAXODS0	NORTH LIBERTY	M	1/17/2005	1298	SOUTH SLOPE COOPERATIVE TELEPH
319 853	0	CDRRIADTJMD	NORTH LIBERTY	E	7/10/2007	8939	SPRINT COMMUNICATIONS COMPANY,
319 853	1	CDRRIADTJMD	NORTH LIBERTY	E	7/10/2007	8939	SPRINT COMMUNICATIONS COMPANY,
319 853	A	CDRRIADTJMD	NORTH LIBERTY	M	7/10/2007	8939	SPRINT COMMUNICATIONS COMPANY,

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**WC Docket No. 04-347**  
**December 10, 2008**

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**NPA / NXX Record**

NPA: <b>319</b>	NXX: <b>632</b>	TBI: <b>A</b>	Status: <b>M</b>	Create Date: <b>9/21/1998</b>	Effective Date: <b>1/17/2005</b>
Switch CLLI: <b>NLBTIAXODS0</b>			SHAInd: <b>00</b>		
OCN: <b>1298</b>			OCN Name: <b>SOUTH SLOPE COOPERATIVE TELEPHONE CO., INC.</b>		
AOCN: <b>IINS</b>			AOCN Name: <b>IOWA NETWORK SERVICES</b>		
Place (abrv): <b>CEDAR RPDS</b>			Place Name: <b>CEDAR RAPIDS</b>		
Rate Center (abrv): <b>NO LIBERTY</b>			Rate Center Name: <b>NORTH LIBERTY</b>		
State: <b>IA</b>			State Name: <b>Iowa</b>		
RC LATA: <b>635</b>			LATA Name: <b>CEDAR RAPIDS IOWA</b>		
COC Type: <b>EOC</b>			COC Type Description: <b>End Office Company</b>		
SSC: <b>N</b>			SSC Description: <b>Not Applicable</b>		
NXX Type: <b>0</b>			NXX Type Description: <b>Regular</b>		
CO Type: <b>1</b>			CO Type Description: <b>Independent EC (incumbent LEC)</b>		
Time Zone: <b>6</b>			Time Zone Description: <b>Central Time</b>		
IDDD(Y/N): <b>Y</b>			Daylight Savings: <b>Y</b>		
RCVC: <b>6301</b>			RAO Code: <b>312</b>		
RGCH: <b>3989</b>	TRX DIG EO: <b>7</b>		AT: <b>10</b>	Portable(Y/N): <b>Y</b>	

**Switch and Switch Homing Arrangements**

Switch CLLI: <b>NLBTIAXODS0</b>	SHAInd: <b>00</b>	Status: <b>M</b>	Create Date: <b>11/6/1991</b>	Effective Date: <b>3/15/2007</b>
Equipment: <b>DMH</b>	Description: <b>NORTEL NETWORKS DMS-100 LOCAL</b>			
LATA: <b>635</b>	LATA Name: <b>CEDAR RAPIDS IOWA</b>			
OCN: <b>1298</b>	OCN Name: <b>SOUTH SLOPE COOPERATIVE TELEPHONE CO., INC.</b>			
AOCN: <b>IINS</b>	AOCN Name: <b>IOWA NETWORK SERVICES</b>			
WCVC: <b>6303</b>	Address: <b>245 N MAIN ST</b>			
WCHC: <b>3989</b>	City: <b>NORTH LIBERTY</b>			

IDDD: Y

State/Zip: IA 52317

LRN: 3195457009

**Originating Tandem CLLI**

Feature Group B:  
 Feature Group C:  
 Feature Group D: DESMIAIT01T  
 Op Svc: DESMIAIT01T  
 FG B Inter:  
 FG C Inter:  
 FG D Inter:  
 Local:  
 Intra LATA: CDRRIAAXGMD

**Terminating Tandem CLLI**

Feature Group B:  
 Feature Group C:  
 Feature Group D: DESMIAITKMD  
 Op Svc: DESMIAIT01T  
 FG B Inter:  
 FG C Inter:  
 FG D Inter:  
 Local:  
 Intra LATA: CDRRIAAXHMD

**Additional Switch CLLI**

Host Office:  
 STP 1: DESMIAIT02W  
 STP 2: PLMOMNBN02W  
 800 SSP: DESMIAIT01T  
 ISDN FS OFC:  
 Actual Switch ID:  
 Call Agent:  
 Trunk Gateway:

**Switching Entity - Office Functionalities (SOF)**

<----- OFFICE ----->	<----- TANDEM ----->	<-- ISDN PACKET -->	<----- SS7 ----->	<-- ADDITIONAL -->
End Office: <input checked="" type="checkbox"/>	FG B Tdm: <input type="checkbox"/>	BCR5: <input type="checkbox"/>	STP: <input type="checkbox"/>	SW56: <input type="checkbox"/>
Host Office: <input checked="" type="checkbox"/>	FG C Tdm: <input type="checkbox"/>	BCR6: <input type="checkbox"/>	CCS AC Ofc: <input checked="" type="checkbox"/>	FG D 56: <input type="checkbox"/>
Remote Ofc: <input type="checkbox"/>	FG D Tdm: <input type="checkbox"/>	Pri 64: <input type="checkbox"/>	: <input type="checkbox"/>	FG D 64: <input type="checkbox"/>
DA Ofc: <input type="checkbox"/>	OS Tdm: <input type="checkbox"/>	ISDN Multirate: <input type="checkbox"/>	800 SSP: <input type="checkbox"/>	Intra PreSub: <input checked="" type="checkbox"/>
Class 4/5 Ofc: <input type="checkbox"/>	Intermediate Ofc: <input type="checkbox"/>	ISDN FS Ofc: <input type="checkbox"/>	LNP Capable: <input checked="" type="checkbox"/>	Call Agent: <input type="checkbox"/>
Wireless Ofc: <input type="checkbox"/>	DA Tdm: <input type="checkbox"/>	X.75 Gateway: <input type="checkbox"/>	: <input type="checkbox"/>	Trunk Gateway: <input type="checkbox"/>
FG D Adj EO: <input type="checkbox"/>	911 Tdm: <input type="checkbox"/>	Packet X.121: <input type="checkbox"/>	: <input type="checkbox"/>	Access Gateway: <input type="checkbox"/>
: <input type="checkbox"/>	FG D Adj Tdm: <input type="checkbox"/>	Packet E.164: <input type="checkbox"/>	: <input type="checkbox"/>	: <input type="checkbox"/>
: <input type="checkbox"/>	Local Tdm: <input type="checkbox"/>	: <input type="checkbox"/>	CIP: <input checked="" type="checkbox"/>	: <input type="checkbox"/>
: <input type="checkbox"/>	IntraLATA Tdm: <input type="checkbox"/>	: <input type="checkbox"/>	CSP: <input checked="" type="checkbox"/>	: <input type="checkbox"/>
: <input type="checkbox"/>	CS Data Tdm: <input type="checkbox"/>	: <input type="checkbox"/>	: <input type="checkbox"/>	: <input type="checkbox"/>

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### NPA / NXX Record

NPA: **319** NXX: **625** TBI: **A**Status: **M** Create Date: **9/29/1996** Effective Date: **1/17/2005**Switch CLLI: **NLBTIAXODS0**SHAInd: **00**OCN: **1298**OCN Name: **SOUTH SLOPE COOPERATIVE TELEPHONE CO., INC.**AOCN: **IINS**AOCN Name: **IOWA NETWORK SERVICES**Place (abrv): **IOWA CITY**Place Name: **IOWA CITY**Rate Center (abrv): **NO LIBERTY**Rate Center Name: **NORTH LIBERTY**State: **IA**State Name: **Iowa**RC LATA: **635**LATA Name: **CEDAR RAPIDS IOWA**COC Type: **EOC**COC Type Description: **End Office Company**SSC: **N**SSC Description: **Not Applicable**NXX Type: **0**NXX Type Description: **Regular**CO Type: **1**CO Type Description: **Independent EC (incumbent LEC)**Time Zone: **6**Time Zone Description: **Central Time**IDDD(Y/N): **Y**Daylight Savings: **Y**RCVC: **6301**RAO Code: **312**RCHC: **3989**TRX DIG EO: **7**AT: **10**Portable(Y/N): **Y**

### Switch and Switch Homing Arrangements

Switch CLLI: **NLBTIAXODS0** SHAInd: **00**Status: **M** Create Date: **11/6/1991** Effective Date: **3/15/2007**Equipment: **DMH**Description: **NORTEL NETWORKS DMS-100 LOCAL**LATA: **635**LATA Name: **CEDAR RAPIDS IOWA**OCN: **1298**OCN Name: **SOUTH SLOPE COOPERATIVE TELEPHONE CO., INC.**AOCN: **IINS**AOCN Name: **IOWA NETWORK SERVICES**WCVC: **6303**Address: **245 N MAIN ST**WCHC: **3989**City: **NORTH LIBERTY**

IDDD: Y

State/Zip: IA 52317

LRN: 3195457009

**Originating Tandem CLLI**

Feature Group B:  
Feature Group C:  
Feature Group D: **DESMIAIT01T**  
Op Svc: **DESMIAIT01T**  
FG B Inter:  
FG C Inter:  
FG D Inter:  
Local:  
Intra LATA: **CDRRIAAXGMD**

**Terminating Tandem CLLI**

Feature Group B:  
Feature Group C:  
Feature Group D: **DESMIAITKMD**  
Op Svc: **DESMIAIT01T**  
FG B Inter:  
FG C Inter:  
FG D Inter:  
Local:  
Intra LATA: **CDRRIAAXHMD**

**Additional Switch CLLI**

Host Office:  
STP 1: **DESMIAIT02W**  
STP 2: **PLMOMNBN02W**  
800 SSP: **DESMIAIT01T**  
ISDN FS OFC:  
Actual Switch ID:  
Call Agent:  
Trunk Gateway:

**Switching Entity - Office Functionalities (SOF)**

<----- OFFICE ----->	<----- TANDEM ----->	<-- ISDN PACKET -->	<----- SS7 ----->	<-- ADDITIONAL -->
End Office: <input checked="" type="checkbox"/>	FG B Tdm: <input type="checkbox"/>	BCR5: <input type="checkbox"/>	STP: <input type="checkbox"/>	SW56: <input type="checkbox"/>
Host Office: <input checked="" type="checkbox"/>	FG C Tdm: <input type="checkbox"/>	BCR6: <input type="checkbox"/>	CCS AC Ofc: <input checked="" type="checkbox"/>	FG D 56: <input type="checkbox"/>
Remote Ofc: <input type="checkbox"/>	FG D Tdm: <input type="checkbox"/>	Pri 64: <input type="checkbox"/>	: <input type="checkbox"/>	FG D 64: <input type="checkbox"/>
DA Ofc: <input type="checkbox"/>	OS Tdm: <input type="checkbox"/>	ISDN Multirate: <input type="checkbox"/>	800 SSP: <input type="checkbox"/>	Intra PreSub: <input checked="" type="checkbox"/>
Class 4/5 Ofc: <input type="checkbox"/>	Intermediate Ofc: <input type="checkbox"/>	ISDN FS Ofc: <input type="checkbox"/>	LNP Capable: <input checked="" type="checkbox"/>	Call Agent: <input type="checkbox"/>
Wireless Ofc: <input type="checkbox"/>	DA Tdm: <input type="checkbox"/>	X.75 Gateway: <input type="checkbox"/>	: <input type="checkbox"/>	Trunk Gateway: <input type="checkbox"/>
FG D Adj EO: <input type="checkbox"/>	911 Tdm: <input type="checkbox"/>	Packet X.121: <input type="checkbox"/>	: <input type="checkbox"/>	Access Gateway: <input type="checkbox"/>
: <input type="checkbox"/>	FG D Adj Tdm: <input type="checkbox"/>	Packet E.164: <input type="checkbox"/>	: <input type="checkbox"/>	: <input type="checkbox"/>
: <input type="checkbox"/>	Local Tdm: <input type="checkbox"/>	: <input type="checkbox"/>	CIP: <input checked="" type="checkbox"/>	: <input type="checkbox"/>
: <input type="checkbox"/>	IntraLATA Tdm: <input type="checkbox"/>	: <input type="checkbox"/>	CSP: <input checked="" type="checkbox"/>	: <input type="checkbox"/>
: <input type="checkbox"/>	CS Data Tdm: <input type="checkbox"/>	: <input type="checkbox"/>	: <input type="checkbox"/>	: <input type="checkbox"/>

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**Iowa Telecommunications Services, Inc. d/b/a Iowa Telecom  
Comments  
WC Docket No. 04-347  
December 10, 2008**

**Attachment G**

City: coralville      State: **Select State**      Mile Radius: 25

Check in Date: 12/10/2008      Check out Date: 12/12/2008

Choose date:      Choose date:

Rooms: 1      Adults: 1      Children: -      Select Rate Program: Standard Rate

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Promo Code:      Travel Agent ID:

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