

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION**

|   |   |                             |
|---|---|-----------------------------|
| <b>In the Matter of</b>                                       | ) |                             |
|   | ) |                             |
| <b>Developing a Unified Intercarrier Compensation Regime;</b> | ) | <b>CC Docket No. 01-92</b>  |
|   | ) |                             |
| <b>High- Cost Universal Service Support,;</b>                 | ) | <b>WC Docket No. 05-337</b> |
|   | ) |                             |
| <b>A National Broadband Plan for Our future.</b>              | ) | <b>GN Docket No. 09-51</b>  |

**Comments of the Wyoming Public Service Commission and the Wyoming  
Telecommunications Association responding to AT&T Ex Parte Letter of October 25, 2010**

December 7, 2010

On behalf of the Wyoming Public Service Commission (WYPSC) and the Wyoming Telecommunications Association (WTA), we are writing to correct information contained in the *ex parte* communications AT&T had with FCC staff members on October 22, 2010, regarding the above referenced matter, with respect to the information AT&T provided about Wyoming access charge reform. AT&T incorrectly stated that there has not been any access charge reform in Wyoming. In fact, intrastate access charges have been decreasing through rate rebalancing efforts in Wyoming since the passage of *The 1995 Wyoming Telecommunications Act* and the subsequent establishment of the Wyoming Universal Service Fund (WYUSF). Most recently, the Wyoming Legislature mandated, via a bill signed into law in 2007, that “noncompetitive switched access shall not be priced above three cents (\$.03) per minute after January 1, 2010.” (W.S. § 37-15-203(j)).<sup>1</sup> Thus, with the exception of one carrier (see footnote 1), no LEC in Wyoming is authorized to charge originating or terminating intrastate switched access rates above three cents per minute.

While access rates have been decreasing in Wyoming, local service rates have simultaneously been increasing. The attached excerpt from the WYPSC’s 2010 Telecommunications Report shows the decreases in a switched access rates and the increases in local services rates for each Wyoming ILEC from 1995 to 2010. The WUSF is in place so that no customer in the state pays more than 130% of the statewide weighted average price for local service.

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<sup>1</sup> The statute allows a limited exemption to this mandate, specifically “[t]he commission may authorize noncompetitive switched access prices above three cents (\$.03) per minute for an additional transition period not to exceed two (2) years ending January 1, 2012, only upon a showing that access prices are supported by a current total long-run incremental cost study as defined by W.S. 37-15-103(a)(xiii) based upon data after January 1, 2008.” Only one LEC, Dubois Telephone Exchange, filed for, and received, the temporary exemption.

Wyoming has a long history of access charge reform and we are disappointed by AT&T's characterization that Wyoming has not undertaken any reform. We hope this letter sets the record straight. Should you wish to discuss this matter further, please don't hesitate to contact us.

Respectfully submitted December 7, 2010.



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| Company                           | Residential Rates |            |
|-----------------------------------|-------------------|------------|
|                                   | 1995              | 12/31/2009 |
| <b>Qwest</b>                      |                   |            |
| base rate area:                   | \$14.64           | \$23.10    |
| farthest from base area:          | \$24.54           | \$69.35*   |
| <b>Union Telephone</b>            |                   |            |
| base rate area:                   | \$8.49            | \$41.68    |
| farthest from base area:          | \$26.49           | \$89.20    |
| <b>CenturyTel of Wyoming</b>      |                   |            |
| base rate area:                   | \$10.00           | \$15.00    |
| farthest from base area:          | \$17.50           | \$28.00    |
| <b>Dubois Telephone</b>           | \$28.23           | \$33.05    |
| <b>Range Telephone</b>            | \$11.65           | \$17.50    |
| <b>RT Communications</b>          |                   |            |
| Shoshoni & central WY<br>exch:    | \$10.04           | \$23.99    |
| farthest from base area:          | \$19.94           | \$33.89    |
| Thermopolis &                     | \$10.78           | \$23.89    |
| farthest from base area:          | \$20.68           | \$33.89    |
| Worland exchange:                 | \$11.51           | \$23.99    |
| farthest from base area:          | \$21.41           | \$33.89    |
| Pine Bluffs, Burns,<br>Carpenter: | \$12.98           | \$23.99    |
| farthest from base area:          | \$22.88           | \$33.89    |
| <b>Embarq/United</b>              |                   |            |
| Guernsey exchange:                | \$7.94            | \$35.38    |
| LaGrange exchange:                | \$11.13           | \$71.34    |
| Lingle exchange:                  | \$11.13           | \$71.34    |
| West Lyman                        | \$11.13           | \$70.82    |
| Torrington exchange:              | \$11.13           | \$26.64    |
| <b>TCT West</b>                   |                   |            |
| Greybull exchange:                | \$10.14           | \$27.31    |
| Lovell exchange:                  | \$10.78           | \$30.63    |
| Basin exchange:                   | \$10.78           | \$31.42    |
| Frannie & Meeteetse:              | \$10.78           | \$45.08*   |
| <b>Tri County Telephone</b>       |                   |            |
| Burlington exchange:              | \$6.75            | \$44.86*   |
| all other exchanges:              | \$8.25            | \$45.08*   |
| <b>Teton Telecom **</b>           | \$29.65 **        | \$31.25    |
| <b>Silver Star</b>                | \$16.80           | \$26.45*** |
| <b>Chugwater Telephone</b>        | \$10.50           | \$80.76*   |
| <b>All West</b>                   | \$14.25           | \$59.52*   |

\* 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.

\*\*\* Effective March 1, 2010.

**Switched Access and Intrastate Toll Rates**

| Company                    | Switched Access Rates (¢ per minute) |            |
|----------------------------|--------------------------------------|------------|
|                            | 1995                                 | 31-Dec-09  |
| Qwest                      | \$0.0971                             | \$0.014698 |
| Tri County Telephone       | \$0.1653                             | \$0.015445 |
| TCT West                   | \$0.0971                             | \$0.015445 |
| Dubois Telephone           | \$0.1152                             | \$0.032000 |
| Union Telephone            | \$0.1060                             | \$0.030000 |
| Embarq/United              | \$0.1033                             | \$0.015000 |
| RT Communications          | \$0.0971                             | \$0.030000 |
| Range Telephone            | \$0.0908                             | \$0.030000 |
| CenturyTel                 | \$0.0660                             | \$0.030000 |
| All West                   | \$0.1478                             | \$0.015000 |
| Chugwater Telephone        | \$0.0899                             | \$0.030000 |
| Silver Star Communications | \$0.0971                             | \$0.030000 |
| Teton*                     | \$0.0659                             | \$0.030000 |