



Great Plains Communications Responses to  
AT&T Ex Parte filed May 13, 2011

June 15, 2011

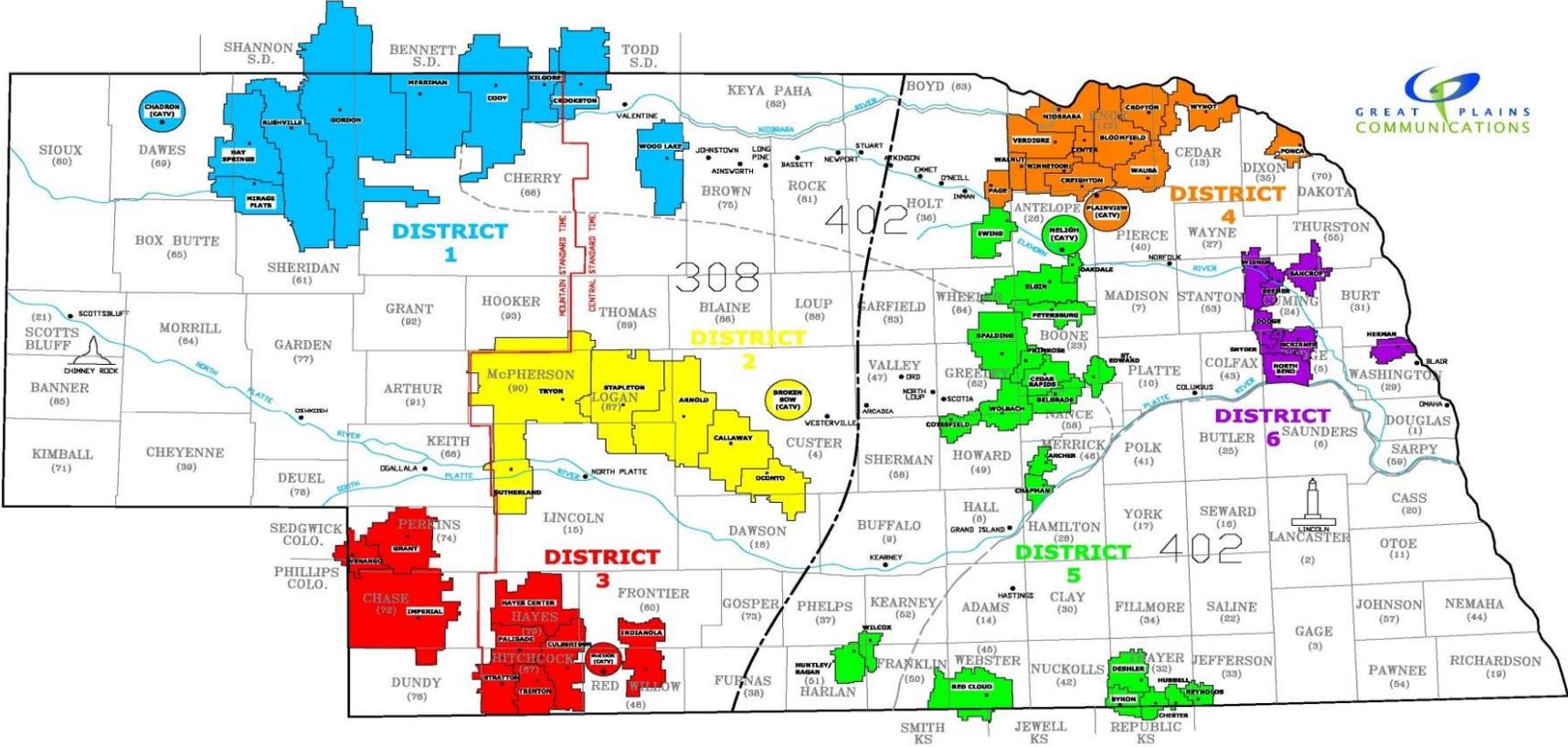
# AT&T Ex Parte References to Great Plains Network

- AT&T May 13, 2011 Ex Parte on Pages 6-7 suggests that Great Plains Communications, Inc. ("GPC") is somehow involved in AT&T's self-defined "Most Cost Routing."
- AT&T presents partial facts regarding GPC's Network Deployment Plan relating to only one of GPC's sixty-eight rate centers, the Gordon Exchange.
- Once all facts concerning GPC's Network Deployment Plan are understood, AT&T's innuendos regarding GPC's "Trying to Foist Construction and Transport Costs on to IXC's" are demonstrated to be without basis.
- In response to AT&T's initiation of a complaint before the Nebraska Public Service Commission ("NPSC") in formal Complaint No. FC-1348 in November 2010, GPC currently is litigating issues arising from its Network Deployment Plan.
- GPC respectfully submits that the issues related to GPC's Network Plan should properly be resolved at the NPSC for the reasons stated herein.

# Great Plains Background

- GPC is a rural incumbent local exchange carrier providing telecommunications services in the State Of Nebraska, including *Interstate And Intrastate* switched access services pursuant to issued and effective tariffs.
- GPC's expansive service area is dispersed throughout the State of Nebraska, covering approximately 14,000 square miles through 68 rate centers, serving approximately 25,000 voice customers and approximately 13,000 broadband customers.

# Great Plains serves 14,000 square miles, an area larger than Connecticut, New Jersey and Rhode Island combined, with about 2 customers per square mile



GREAT PLAINS COMMUNICATIONS EXCHANGE AREAS

# For The Last Decade, GPC Has Been Engaged in Planning and Implementing A Network Plan

- The Network Plan's Objective was, and continues to be, straightforward:
  - Provide high quality service to all of GPC's retail and wholesale customers by:
    - Progressively consolidating switching locations into more efficient host/remote configurations; and
    - Deploying inter-office fiber transport facilities for voice and Internet services.
    - By so doing, GPC's plan was and is to increase network capacity, to reduce switching costs and maintenance, and to provide a network platform with the flexibility to expand based on future customer needs.

## Specific Details of GPC's Network Plan

- To date, GPC has consolidated 22 host and 47 remote switches existing in its network in 2002 into 15 host and 55 remote switches today, with further reduction to 2 state-of-the-art Genband C15 host soft switches with Class 4 tandem capabilities to be implemented by October 2012.
- Further, GPC has constructed approximately 700 miles of inter-office fiber transport facilities over the last 10 years.
- As one of the interim steps in accomplishment of GPC's network plan, GPC determined that interconnection of its 68 rate centers to a single tandem was required.
- From March 2003 through May 2010 GPC transitioned its rate centers to the tandem switch operated by Cablevision, Inc. in Blair, Nebraska (the "Blair Tandem").
- Transport mileage for approximately 35% of GPC's exchanges was **reduced** by re-homing to the Blair tandem.

## GPC Network Plan-continued

- The redesign/rearrangement that is proceeding through GPC's network plan, including the process of re-homing to the Blair tandem, provides benefits to *all* GPC's customers including, but not limited to:
  1. Creating network redundancy to minimize network outages;
  2. Addressing and correcting deficiencies in the interoffice network jointly-provided with Qwest Communications (now CenturyLink) and in the tandem switching services provided by Qwest;
  3. Increasing availability, affordability and speeds of broadband to end user customers in GPC's service area;
  4. Increasing quality of service provided to all of GPC's customers, including wholesale customers; and
  5. Creating an operational structure to facilitate accomplishment of future network changes or upgrades in a more efficient and timely manner.

## GPC Traffic Re-homing History

- GPC has implemented and continues to implement its network plan in a manner consistent with GPC's tariffs.
- None of GPC's routing changes effected since 2003 were ever disputed by AT&T until August 2010, followed by AT&T's filing of its NPSC complaint in November 2010.
- In addition to timely updating of the LERG with tandem changes for all exchanges, all access customers were provided notice of GPC's re-homing to the Blair tandem and, in fact, at a date prior to commencement of GPC's re-homing to the Blair tandem in March 2003, AT&T established a point of presence at the Blair tandem which was a prerequisite for GPC to move to the Blair tandem.

## AT&T's Ex Parte is Intentionally Misleading

- AT&T's reference to the Gordon exchange as an example is selective, given Great Plains' widespread geographical territory.
- Based upon the reconfiguration of GPC's network completed to date, approximately 35% of the transport routes that AT&T utilizes within the GPC network involve fewer billed air miles to the Blair tandem than existed prior to the network reconfigurations.
- To the extent that AT&T has now disputed GPC's tandem switched access billings and objects to the amounts of such billings, AT&T possesses the option to request from GPC direct connection of AT&T's facilities with GPC's exchanges.

## Current Status of Great Plains-AT&T Disputes

- AT&T and GPC are currently litigating AT&T's refusal to pay the proper *intrastate* switched access charges assessed by GPC to AT&T. Great Plains filed counter-complaint at NPSC regarding AT&T's unlawful "self-help" withholding of access payments.
- AT&T has chosen its forum to resolve this matter – the NPSC – and that is where the issues should be resolved.
- The NPSC should be allowed to continue to engage in the fact-intensive examination that is being undertaken and that is required to resolve the existing disputes.
- In the interim, however, GPC has demonstrated that AT&T's selective recitation of the facts fails to present the *bona fide* long-term network re-design that GPC has legitimately pursued over the last decade to better serve its retail and wholesale customers.