

**IN THE MATTER OF THE PETITION OF  
INTELLIGENT COMMUNITY SERVICES, INC.**

**FOR DESIGNATION AS ELIGIBLE  
TELECOMMUNICATIONS CARRIER UNDER  
47 U.S.C. §214(e)(2)**

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**DOCKET NO. UT-053041**

**DIRECT TESTIMONY  
OF JAMES K. BROOKS  
ON BEHALF OF INLAND TELEPHONE COMPANY**

**July 18, 2008**

1 **Q: PLEASE STATE YOUR NAME AND GIVE YOUR BUSINESS**  
2 **ADDRESS FOR THE RECORD.**

3 A. James K. Brooks. My business address is 103 South Second Street, Roslyn,  
4 WA 98941.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Inland Telephone Company ("Inland"). I am the Controller  
7 and Treasurer for Inland.

8 **Q. PLEASE DESCRIBE THE ROSLYN EXCHANGE SERVED BY**  
9 **INLAND.**

10 A. Roslyn is located in the eastern foothills of the Cascade Mountains. The area  
11 was once a coal-mining center, which means the geography of the area is quite hilly.  
12 The Roslyn exchange consists of approximately 35 square miles. Inland serves  
13 approximately 1,300 access lines in the exchange. The Roslyn exchange consists of the  
14 town of Roslyn, which has about 700 access lines. The rest of the customers are widely  
15 scattered over the remainder of the exchange. The Roslyn exchange outside the  
16 Suncadia resort is a sparsely populated area compared to the higher density of the  
17 Suncadia resort when it is built out, with 4,000 access lines; the majority being on  
18 approximately 9 square miles within the Roslyn exchange.

19 **Q. DOES INLAND DESIRE TO PROVIDE SERVICE WITHIN THE**  
20 **SUNCADIA RESORT AREA?**

21 A. Yes. The Suncadia resort area is an area that presents an exciting opportunity  
22 for Inland if we can get access to the area in order to provide service on reasonable  
23 terms and conditions.

1 **Q. DID YOU HAVE AN INDICATION THAT THE OWNERS OF THE**  
2 **SUNCADIA RESORT WOULD BE RECEPTIVE TO INLAND PROVIDING**  
3 **SERVICE WITHIN THE RESORT AREA?**

4 A. No. As Mr. Coonan has pointed out, Inland made an offer to discuss ways to  
5 provide service and received no response from the Suncadia resort owners. We had not  
6 received any response at all until Mr. Eisenberg's Testimony was filed on May 23,  
7 2008. There, Mr. Eisenberg professes a desire to perhaps negotiate with Inland to  
8 provide service in the Suncadia resort. It remains to be seen whether there is something  
9 that can or will actually occur. It should be noted that Inland's officers and Board of  
10 Directors has not seen the terms and conditions of the agreement between ICS and  
11 Suncadia since the ICS contract is a confidential document.

12 **Q. HAVE YOU HAD AN OPPORTUNITY TO REVIEW THE CONTRACT**  
13 **BETWEEN SUNCADIA AND ICS?**

14 A. Yes, in part. However, I am not able to review the pricing because that is  
15 classified as highly confidential. Nor can I discuss the contract with other Board  
16 members or officers of Inland since I am the only officer at Inland allowed to see the  
17 contract. It may also be helpful if the technical portions of the contract could be  
18 discussed with technical staff. I do note that Inland can provide all of the  
19 telecommunications, cable TV and Internet services called for under the contract.  
20 However, without knowledge of pricing, I cannot reach a conclusion as to whether the  
21 agreement is reasonable.

22 **Q. ISSUE 4.8 ASKS "IS ICS VIOLATING NUMBER ASSIGNMENT**  
23 **RULES?" DO YOU HAVE ANY INFORMATION RELATED TO THIS ISSUE?**

1 A. Yes. It appears that ICS is assigning Cle Elum numbers in the Suncadia resort  
2 area, which of course is within the Roslyn exchange, not the Cle Elum exchange.

3 **Q. HOW DO YOU KNOW THAT THEY ARE ASSIGNING CLE ELUM**  
4 **NUMBERS?**

5 A. One of the customers within the Suncadia resort shared their bill from ICS with  
6 us. The number showed that the customer has a 674 prefix. The LERG or Local  
7 Exchange Routing Guide shows that 674 is associated with the Cle Elum rate center,  
8 not the Roslyn rate center. I recognize that the terms "rate center" and "exchange" can  
9 be confusing. In this case, there is no practical difference. The Cle Elum exchange and  
10 Cle Elum rate center are one and the same. The Roslyn exchange and Roslyn rate  
11 center are one and the same. It just so happens that numbers are assigned on a rate  
12 center basis. What this means is that rather than delivering traffic directly to us, ICS  
13 disguises the traffic as Cle Elum traffic and sends it to us on the EAS trunks we have  
14 for Qwest. At the very least we should be asked if the arrangement is acceptable.

15 **Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?**

16 A. For the present, it does.