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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

In the Matter of

Petition of Sprint Corporation to Amend Its
Certification as an Eligible
Telecommunications Carrier in Washington

Docket No. UT-043120

DECLARATION OF JAMES K. BROOKS

I, James K. Brooks, hereby declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct:

1. I am the Controller for Inland Telephone Company and make this Declaration in that capacity.

2. I have reviewed the Petition filed by Sprint in this docket. As part of that Petition, Sprint has filed a map showing its serving area compared to the rural telephone companies' service areas. See Exhibit B to the Petition.

3. Based upon my review of Exhibit B, it appears to me that Sprint is asking to be designated as an ETC only in the relatively more densely populated and lower cost areas of the Roslyn and Uniontown exchanges. For example, it appears that Sprint is asking to be designated as an ETC covering the City of Uniontown within the Uniontown exchange. However, the more sparsely populated and higher cost areas of Uniontown are not covered by Sprint's application. Further, it appears that for the Roslyn exchange, Sprint is asking to be designated for that portion of the exchange

DECLARATION OF JAMES BROOKS - 1

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1 that includes the City of Roslyn, but not the more heavily wooded, mountainous areas that are lower in
2 density and more costly to serve.

3 4. As Controller for Inland Telephone Company, I can attest that the cost of providing
4 service to subscribers in Inlands outlying areas of our exchanges is greater than that of our more
5 densely populated areas, such as the City of Roslyn or the City of Uniontown. The further the cables
6 run the greater the cost. Based upon my experience with Inland Telephone Company and my years of
7 experience as a telecommunications consultant, it is far less expensive, on a relative basis, to provide
8 service within a City, than it is in an outlying area; this is especially true for rural service providers
9 such as Inland that average Six (6) access lines per square mile served. Allowing Sprint to receive
10 universal service support in the more densely populated areas would overstate the support since they
11 are not asking to serve the lower density, high-cost areas of the Roslyn and Uniontown exchanges.

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13 Dated this 22 day of December, 2004.

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17 JAMES K. BROOKS
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26 DECLARATION OF JAMES BROOKS - 2

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