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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 JANA MANTEROLA**

I, Jana Manterola, 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 the Ellensburg Telephone Company and make this Declaration in that capacity.

2. I have reviewed the Petition of Sprint filed in this docket. I have focused my review on Exhibit B, but I have reviewed the rest of the Petition as well.

3. Based on my review of the Petition, it appears to me that Sprint is serving only the high-density, low-cost areas of the Ellensburg Telephone Company exchanges. For example, it appears that Sprint serves all, or at least most of the City of Selah, but not the outlying areas in the Selah exchange. It appears that Sprint serves the corridor along I-90, which includes the City of Ellensburg. However, it does not appear that Sprint serves the outlying areas of the Ellensburg exchange, nor anything other than small portions of the Lauderdale exchange. It appears that Sprint serves the Vantage area in the Vantage exchange, but not the outlying areas of that exchange. It also appears that Sprint serves the I-90 and I-82 portions of the Kittitas and Thorp exchanges, but not the outlying areas of those

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1 exchanges. All of this leads me to conclude that Sprint is serving the areas where population density is  
2 the highest and the costs are the lowest to serve. It does not appear that Sprint is serving any portion of  
3 the exchanges that are relatively low in density and of higher cost to serve.

4 4. As Controller for Ellensburg Telephone Company, I am very concerned with the  
5 financial well-being of Ellensburg. I did participate in the development of the costs associated with a  
6 two-zone disaggregation concept for Ellensburg Telephone Company in 1999. Under that two-zone  
7 concept, there was no universal support available for the City of Ellensburg and its surrounding area.  
8 However, within the Ellensburg exchange, but outside of the city, support was available. This was  
9 based, in part, upon the densities involved. It would appear that Sprint wants to serve only that more  
10 densely populated area and receive support for that area when a more finite analysis would show that  
11 no support should be provided.

12  
13 Dated this 27<sup>th</sup> day of December, 2004.

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17 JANA MANTEROLA  
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