

Law Office of
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March 9, 2005

VIA ELECTRONIC MAIL AND U.S. MAIL

Filing Center
Oregon Public Utility Commission
PO Box 2148
Salem, OR 97308-2148

Re: UM 1140 – Rate Center Consolidation

Dear Sir/Madam:

An issue that was left ambiguous at the hearing in this matter is the date that the LIS trunks between Qwest Corporation (Qwest) and Beaver Creek Cooperative Telephone Company (BCT) were (1) installed and (2) began receiving traffic. Attached is the Declaration of Nathan Halderman of BCT that provides the dates in question. The Declaration has been reviewed by Qwest and was modified to reflect Qwest's concerns prior to filing the Declaration with the Commission.

I am not aware whether the Commission desires to assign a separate exhibit number for this Declaration or not.

Sincerely,

s/Richard A. Finnigan

RICHARD A. FINNIGAN

RAF/km
Enclosures
cc: Tom Linstrom
Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

2 UM 1140

3 In the Matter of

4 BEAVER CREEK COOPERATIVE
5 TELEPHONE COMPANY

6 Petition to Consolidate the Beaver Creek Rate
7 Center with the Clackamas Rate Center.

DECLARATION OF NATHAN HALDERMAN

8
9 I, Nathan Halderman, hereby declare under penalty of perjury under the laws of the state of
10 Oregon that the following statements are true and correct:

- 11 1. I am the IT Development Manager for Beaver Creek Cooperative Telephone
12 Company (BCT) and make this Declaration in that capacity.
- 13
14 2. On behalf of BCT, I have developed a mechanism for measuring, analyzing and
15 reporting traffic that completes to BCT over any trunk group that is connected to
16 BCT's switch. BCT has routinely been measuring that traffic for the past two years.
17 When I say BCT's switch, I am referring to the switch capacity that BCT leases from
18 Western Independent Networks.
- 19
20 3. Approximately November 3rd, trunks that Qwest labels as LIS trunks were installed.
21 When those "LIS" trunks were installed, I began monitoring traffic on those trunks.
22 Qwest did not begin sending traffic over those trunks for quite some time. I checked
23 periodically to see if traffic was flowing, and did not find any traffic until January
24 25, 2005. I checked the database on January 28, 2005 as a result of testimony in
25 UM 1140 that traffic was being routed over those trunks. The database records

26 DECLARATION OF
NATHAN HALDERMAN - 1

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demonstrated that the first traffic from Qwest occurred late in the afternoon on
January 25, 2005.

RESPECTFULLY SUBMITTED, this 9th day of March, 2005.



NATHAN HALDERMAN

DECLARATION OF
NATHAN HALDERMAN - 2

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CERTIFICATE OF SERVICE
UM 1140

I hereby certify that I have served the attached Declaration of Nathan Halderman upon all parties of record in this proceeding by U.S. Mail and electronic mail pursuant to OAR 860-013-0070 to the following parties or attorneys of parties:

ALEX DUARTE
QWEST CORPORATION
421 SW OAK STREET, ROOM 810
PORTLAND, OR 97204
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JENNIFER NIEGEL
DUNCAN TIGER & NIEGEL PC
PO BOX 248
STAYTON OR 97383-0248
jennifer@staytonlaw.com

I further certify that I have sent the attached Declaration of Nathan Halderman by e-mail and U.S. mail to the following:

FILING CENTER
OREGON PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM, OR 97308-2148
PUC.FilingCenter@state.or.us

Dated this 9th day of March, 2005.

/s/ Richard A. Finnigan
Richard A. Finnigan, OSB No. 96535
Attorney for Beaver Creek
Cooperative Telephone Company