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September 8, 2006

**VIA ELECTRONIC MAIL AND U.S. MAIL**

Filing Center  
Oregon Public Utility Commission  
550 Capitol Street NE, Ste 215  
Salem, OR 97301-2551

Re: ARB 747 – Revised Reply Testimony of Tom A. Linstrom on Behalf  
of Beaver Creek Cooperative Telephone Company

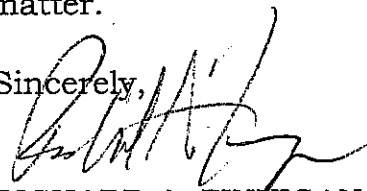
Dear Sir/Madam:

Based on further review in responding to some data requests issued by Qwest in this matter, BCT feels that one statement contained in Mr. Linstrom's Testimony is not one hundred percent accurate as written. As a result, BCT committed to Qwest to filing a revision to that testimony. In fact, BCT has done additional work since responding to Qwest's data request and the revised testimony reflects what BCT believes is the most accurate statement it can make.

The revision is to BCT/8, Linstrom/28 at lines 4-8. Enclosed are the original and five copies of this page and Certificate of Service.

Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/km  
Enclosures

cc: Service List (w/encl., via U.S. mail and e-mail)  
Tom Linstrom (w/encl., via U.S. mail and e-mail)  
ALJ Allan Arlow (w/encl., via U.S. mail and e-mail)

1 without a charge, why can't interLATA records be supplied without a charge as  
2 well?

3 I further note that Mr. Freeberg states that BCT's position may be premised on  
4 balanced traffic and that the traffic is not in balance. Historically, BCT's  
5 customers originate more toll than is terminated to BCT. However, in looking at  
6 the 2005 data, it is unclear whether BCT is originating or terminating more toll.  
7 This may be an artifact of the EAS traffic being routed to BCT over access trunks.  
8 If BCT originates more toll than is terminated to BCT, then from a record  
9 standpoint, this means that BCT would generate more records of interest to Qwest  
10 than Qwest would generate for BCT. The financial consequence is just the  
11 reverse of what happens with the termination of local traffic. Here it is the  
12 origination of toll traffic that is the reason for needing records.

13 **Q. ON PAGE 45 OF HIS TESTIMONY, MR. FREEBERG MAKES THE**  
14 **POINT THAT QWEST SHOULD BE ENTITLED TO COMPENSATION**  
15 **FOR TRANSITING RECORDS. WHAT IS YOUR RESPONSE?**

16 **A.** As I have explained before, the problem that arises is that Qwest places very large  
17 volumes of local/EAS traffic over the access trunks. Qwest is compensated by the  
18 originating carrier for doing so. Qwest will not provide records on a basis that  
19 sorts by toll and local traffic. Therefore, Qwest wants BCT to pay for all the  
20 records related to the EAS traffic flowing over the access tandem, which  
21 generally is not billable, in order to get a relatively smaller number of records that  
22 can be used to bill access. Thus, Qwest's position makes the payment for those  
23 records uneconomic.

CERTIFICATE OF SERVICE  
ARB 747

I hereby certify that I have served the attached revised BCT/8, Linstrom/28 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  
alex.duarte@qwest.com

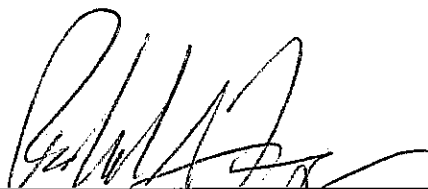
LAWRENCE REICHMAN  
PERKINS COIE LLP  
1120 NW COUCH ST FL 10  
PORTLAND, OR 97209-4125  
lreichman@perkinscoie.com

I further certify that I have sent the attached revised BCT/8, Linstrom/28 by e-mail and U.S. mail to the following:

FILING CENTER  
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ALLAN ARLOW, ADMINISTRATIVE LAW  
JUDGE  
OREGON PUBLIC UTILITY COMMISSION  
550 CAPITOL STREET NE, STE 215  
SALEM, OR 97301  
allan.arlow@state.or.us

Dated this 8th day of September, 2006.

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