

BEFORE THE PUBLIC UTILITIES COMMISSION

BEFORE THE STATE OF NEVADA

IN THE MATTER of the Joint Petition of)
Citizens Telecommunications Company of)
Nevada dba Frontier Communications of)
Nevada and AT&T Wireless Services of)
Nevada, Inc. Pursuant to Section 252(e) of the)
Telecommunications Act of 1996, for Approval)
of a Interconnection and Traffic Interchange)
Agreement for Commercial Mobile Radio)
Services)

)

Docket Number: 04-_____

JOINT PETITION FOR APPROVAL OF AN INTERCONNECTION AND TRAFFIC INTERCHANGE AGREEMENT FOR COMMERCIAL MOBILE RADIO SERVICES

COMES NOW, Citizens Telecommunications Company of Nevada dba Frontier Communications of Nevada (“CTC-Nevada”) and AT&T Wireless Services of Nevada, Inc., and hereby apply to this Commission for approval of an agreement regarding the interconnection and interchange of traffic for commercial mobile radio services. This Petition is made pursuant to §252 of the Telecommunications Act of 1996, and the Nevada Administrative Code (“NAC”). In support of this Petition, CTC-Nevada and AT&T Wireless Services of Nevada, Inc. state as follows:

I.

CTC-Nevada is a Delaware Corporation that provides local exchange service in Nevada. It is a wholly owned subsidiary of Citizens Communications Company (“Citizens”).

CTC-Nevada is a sister company of Citizens Telecommunications Company (“CTC”), which is registered with the Commission as a provider of long distance (interLATA and intraLATA) services in Nevada. CTC also is a wholly owned subsidiary of Citizens. All correspondence, pleadings and communications regarding this petition should be addressed to:

Richard G. Campbell, Jr.
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50 West Liberty Street, Suite 950
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And

Joseph D. Chicoine
Manager, State Government Affairs
FRONTIER COMMUNICATIONS
P.O. Box 340
Elk Grove, CA 95759
Telephone: (916) 686-3588
e-mail address: jchicoin@czn.com

II.

AT&T Wireless Services of Nevada, Inc. is an authorized telecommunications carrier by radio engaged in providing Commercial Mobile Radio Services in the State of Nevada. All correspondence, pleadings and communications regarding this Petition should be address to:

AT&T Wireless Services of Nevada, Inc.
Jill Mounsey
Director – Wireless Network Services
7277 164th Avenue NE
Redmond, WA 98052

III.

On March 15, 2004, CTC-Nevada and AT&T Wireless Services of Nevada, Inc. entered into an interconnection and traffic interchange agreement for commercial mobile radio services (“Agreement”). This Agreement was reached through voluntary negotiations without resort to mediation or arbitration and is submitted for approval pursuant to §252(e) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (“Act”) and the requirements of NAC. A copy of the Agreement is attached hereto and is incorporated here by reference as Exhibit “1”. An electronic version is available for viewing

at:

<http://carrier.frontiercorp.com/crtf/carrier/index.cfm?fuseaction=intercon&sctnID=3&subsectionid=40&ec=>.

The main provisions of the Agreement are as follows:

- Section 3 of the Agreement sets forth the use of facilities and services.
- The term of the Agreement is one (1) year from the first business day following the execution by both Parties and will continue thereafter in one (1) year periods subject to a ninety (90) day notice to terminate.

IV.

§252(e)(2) of the Act directs that a state commission may reject an agreement reached through voluntary negotiations only if the commission finds that:

- (1) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
- (2) the implementation of such agreement or portion is not consistent with the public interest, convenience and necessity.

V.

In accordance with §252(e) of the Act, CTC-Nevada and AT&T Wireless Services of Nevada, Inc. submit that the Agreement provides no basis for a finding of discrimination or contravention of the public interest.

First, the Agreement does not discriminate against any other telecommunications carrier. The provisions of the Agreement reflect federal and state laws for physical interconnection that apply to all telecommunications carriers.

Second, the Agreement is consistent with the public interest as identified in the pro-competitive policies of the Commission, the State of Nevada, the Federal Communications Commission, and the U.S. Congress.

The applicants request that the Commission approve the Agreement because: 1) it does not discriminate against any other telecommunications carrier; 2) it is consistent with the public interest, convenience and necessity; and 3) the terms of the Agreement are consistent with applicable state law and the rules of regulations of the Commission.

VI.

Because the Agreement was reached through voluntary negotiations, CTC-Nevada and AT&T Wireless Services of Nevada, Inc. request that the Commission issue its order summarily and without hearing at the earliest possible date.

CONCLUSION

WHEREFORE, CTC-Nevada and AT&T Wireless Services of Nevada, Inc. respectfully request that the Commission expeditiously process this matter without hearing and issue an Order granting the Application in its entirety.

DATED this ____ day of July, 2004.

Senn Meulemans LLP

By: _____
Richard G. Campbell, Jr.
50 West Liberty Street, Suite 950
Reno, NV 89501
(775) 322-7400
Attorneys for Applicant

CERTIFICATE OF SERVICE AND NOTICE OF FILING

I, Linda A. Knowlden, declare that:

I am over 18 years of age and not a party to, or interested in, the within entitled action.

I am an employee of SENN MEULEMANS, LLP, located at 50 West Liberty Street, Suite 950, Reno, Nevada 89501.

On July 21, 2004, I served the foregoing document described as follows:

JOINT PETITION FOR APPROVAL OF INTERCONNECTION AND TRAFFIC INTERCHANGE AGREEMENT FOR COMMERCIAL MOBILE RADIO SERVICES

by placing a true and correct copy thereof as follows:

VIA HAND DELIVERY:

Public Utilities Commission of Nevada
Crystal Jackson, Secretary (Orig + 3)
1150 E. William Street
Carson City, NV 89701

Public Utilities Commission of Nevada
Staff Counsel (1)
1150 E. William Street
Carson City, NV 89701

Bureau of Consumer Protection
Timothy Hay, Esq. (1)
1000 E. William Street, #200
Carson City, NV 89701

I hereby certify that I have this day served the foregoing documents upon other parties to negotiations by mailing via U.S. Mail with postage prepaid thereon to:

AT&T Wireless Services of Nevada, Inc.
Jill Mounsey
Director – Wireless Network Services
7277 164th Avenue NE
Redmond, WA 98052

I hereby certify that I have this day served Document Available Notice by electronic transmission to an acceptable location to the list established pursuant to NAC 703.296 as follows:

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I hereby certify the foregoing documents are available for inspection at website Internet address of:

<http://carrier.frontiercorp.com/crtf/carrier/index.cfm?fuseaction=intercon&sctnID=3&ubsectionid=40&ec=>

The foregoing documents are available in electronic or paper format by sending a request to:

Paper:

Richard G. Campbell, Jr., Esq.
Senn Meuelemans LLP
50 W. Liberty Street, Suite 950
Reno, NV 89501

Electronic:

ppitteng@czn.com

Dated at Reno, Nevada this 21st day of July, 2004.

Linda A. Knowlden