



## **INDIANA TELECOMMUNICATIONS ASSOCIATION, INC.**

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December 8, 2009

Ms. Pamela D. Taber  
Director – Communications Division  
IURC Communications Division  
National City Center  
101 West Washington Street  
Suite 1500 E  
Indianapolis, IN 46204-3407

RE: Indiana Telecommunications Association Response to the 170 I.A.C §7 Strawman

Dear Ms. Taber:

The Indiana Telecommunications Association, Inc. (“ITA”), a non-profit trade association representing Indiana's telecommunications industry, on behalf of its local competitive wireline and wireless company members,<sup>1</sup> respectfully responds to the Indiana Utility Regulatory Commission’s (“Commission”) proposed changes to Indiana Administrative Code 170 I.A.C §7 (“Strawman”), pursuant to the statutory directives of House Enrolled Act (“HEA”) 1279. The Commission Staff issued the Strawman to the industry on November 10, 2009 and requested comments by no later than December 8, 2009.

ITA appreciates Staff’s acceptance of “informal communications or workshops to discuss the strawman.” Consequently, ITA members met with Staff on December 3, 2009 to provide

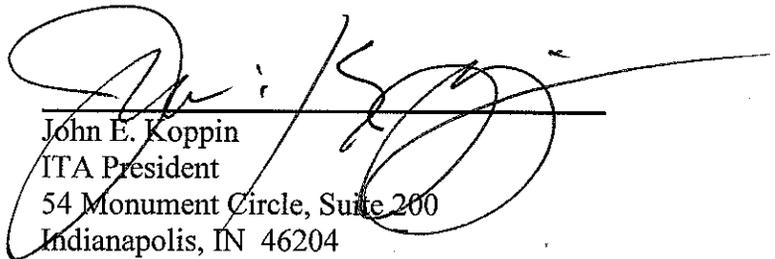
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<sup>1</sup> AT&T Indiana, CenturyTel of Central Indiana, d/b/a CenturyLink, CenturyTel of Odon, d/b/a CenturyLink, Cincinnati Bell Telephone, Citizens Telephone Corp., Craigville Telephone Company, Inc., Endeavor Communications, Enhanced Telecommunications, Frontier Communications of Indiana, Frontier Communications of Thorntown, Geetingsville Telephone Co. Inc., Ligonier Telephone Company, Monon Telephone Company Inc., Mulberry Cooperative Telephone Co., Inc., New Lisbon Telephone Company, New Paris Telephone Company, Northwestern Indiana Telephone Company, Inc., PSC, Pulaski White Rural Telephone Cooperative, Inc., Rochester Telephone Co., Inc., RTC Communications, Smithville Telephone Company, Southeastern Indiana Rural Telephone Cooperative (SEI), Swayzee Telephone Co. Inc., Sweetser Telephone Company, Inc., TDS Telecom – Camden, TDS Telecom – Hillsboro, TDS Telecom - New Richmond, TDS Telecom – Pittsboro, TDS Telecom – Poseyville, TDS Telecom – Roachdale, TDS Telecom – Sandborn, TDS Telecom – Tipton, TDS Telecom – Waldron, TDS Telecom – West point, Washington Country Rural Telephone Cooperative d/b/a Tele-Media Solutions, United Telephone Company of Indiana, Inc. d/b/a CenturyLink, Verizon, and Yeoman Telephone Company.

initial oral comments on the Strawman. At the meeting, ITA also indicated that there are threshold legal issues that it believes the Commission needs to resolve before ITA is able to make any additional substantive comments. Accordingly, ITA recommends an attorneys' conference with the Commission's General Counsel's office to discuss these threshold legal issues before formal publication of the Proposed Rule.

ITA believes it would be worthwhile for Staff to issue an updated Strawman that incorporates all oral and written comments provided by the December 8, 2009 deadline. In addition to an attorneys' conference, continued open dialogue with the industry to promote a better understanding of the rationale behind the proposed changes will aid in mutually beneficial attainment of HEA 1279 directives.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'John E. Koppin', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John E. Koppin  
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