

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS BELL TELEPHONE)	
COMPANY)	
)	09-_____
Application for an Order)	
(1) authorizing certain revisions)	
to the Aurora and Naperville)	
Exchanges, and (2) granting new)	
Certificates of Exchange Service)	
Authority for said exchanges.)	

APPLICATION

Illinois Bell Telephone Company (“AT&T Illinois”), pursuant to Section 13-405 of the Universal Telephone Protection Law of 1995, 220 ILCS 5/13-405 (2000), respectfully requests that this Commission enter an Order authorizing certain changes in the boundaries of its Aurora and Naperville exchanges and granting revised Certificates of Exchange Service Authority to AT&T Illinois for said exchanges. In support of its Application, AT&T Illinois states as follows:

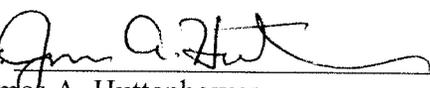
1. AT&T Illinois is a corporation organized under and existing by virtue of the laws of the State of Illinois and is a telecommunications carrier within the meaning of Section 13-202 of the Public Utilities Act authorized to do business in Illinois.
2. AT&T Illinois has operated and maintained telephone facilities, and has transacted a telephone public utility business continuously, in the Aurora and Naperville exchanges for many years. It possesses Certificates from this Commission to engage in said business within each exchange. AT&T Illinois’ most recent certificate for the Aurora exchange was issued in ICC Docket No. 88-0369; the most recent certificate for the Naperville exchange was issued in ICC Docket No. 94-0318.

3. AT&T Illinois is the principal provider of local exchange telecommunication services in these two exchanges.
4. Attached hereto as Exhibit 1 and incorporated herein is a map showing the relevant portions of the existing boundaries of the Aurora and Naperville exchanges. AT&T Illinois proposes to add to its Naperville Exchange, and to withdraw from its Aurora Exchange, certain territory designated as "Detail A" on Exhibit 1.
5. Attached hereto as Exhibit 2 and incorporated herein is a description of the area to be transferred between the exchanges.
6. The purpose of the change in boundary is to permit "Detail A," a tract of land in the Aurora Exchange, to be added to the Naperville exchange to which "Detail A" is adjacent.
7. There are no other telephone companies having a common exchange boundary line with the area to be transferred between the two exchanges.
8. The public convenience and necessity require the continued provision by AT&T Illinois of local exchange telecommunications services in the Aurora and Naperville exchanges.
9. To explain in more detail the basis for this Application, AT&T Illinois submits the testimony of Cheryl A. Giacomini, which is attached hereto as Exhibit 3.

WHEREFORE, AT&T ILLINOIS respectfully requests that the Commission enter an Order (i) authorizing certain changes in the boundaries of the Aurora and Naperville exchanges, (ii) granting new Certificates of Exchange Service Authority to AT&T Illinois for the Aurora and Naperville exchanges, and (iii) granting such further relief as may be appropriate.

Respectfully submitted,

ILLINOIS BELL TELEPHONE COMPANY

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March 12, 2009

STATE OF ILLINOIS)
): SS
COUNTY OF SANGAMON)

VERIFICATION

The undersigned, Cheryl Giacomini, being first duly sworn on oath, deposes and states that she is the Area Manager – Regulatory Relations for AT&T Illinois, that she has read the foregoing APPLICATION, and that the contents thereof are true and correct to the best of her information and belief.

Cheryl A. Giacomini

SUBSCRIBED and sworn to before me
this 13th day of March, 2009.

Suzanne Blackburn
Notary Public



Aurora Exchange Area Boundary Map Eleventh Revision

ICC DOCKET NO. _____

ORDER DATED _____

SQUARE MILES _____

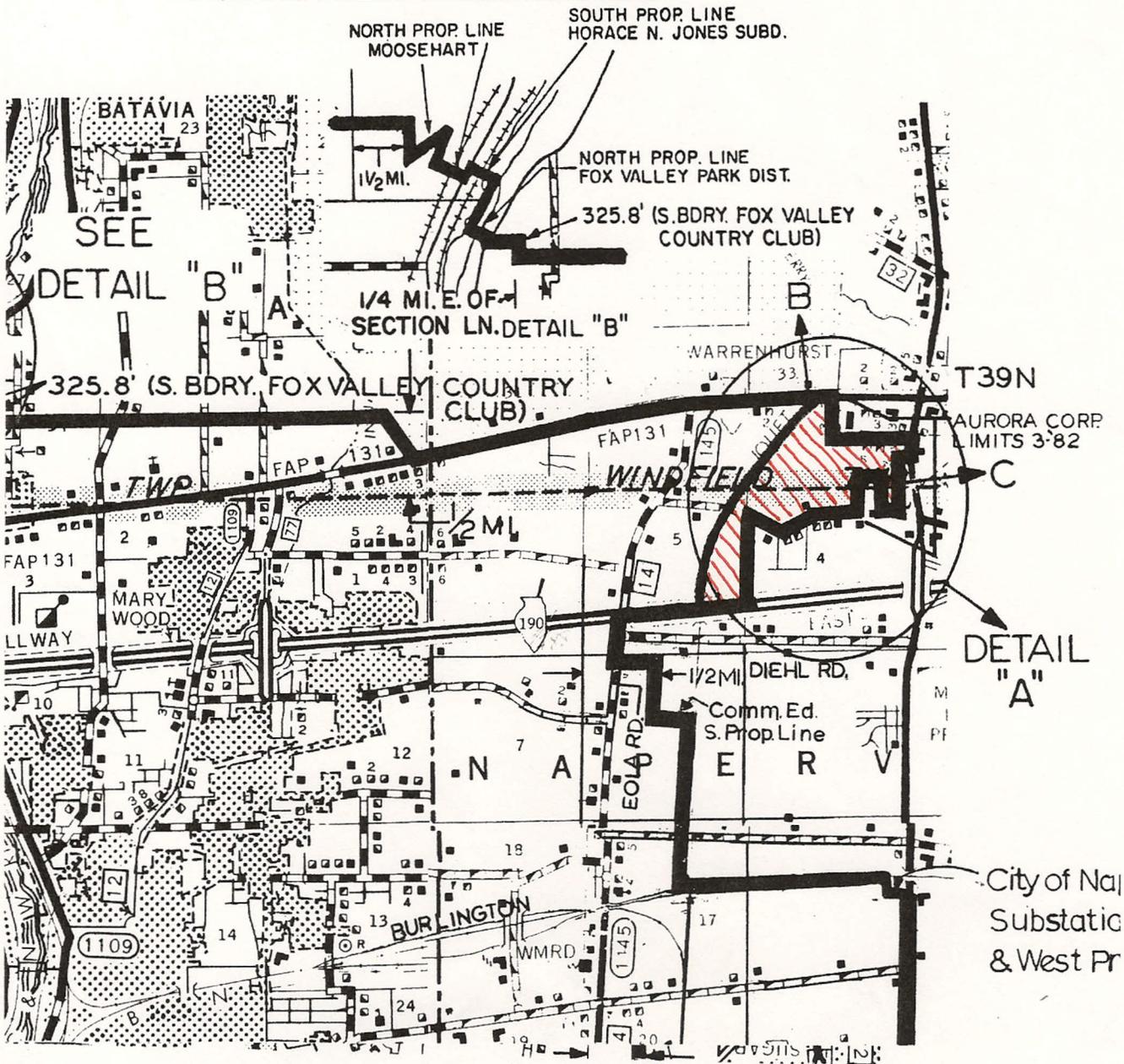


EXHIBIT 2 to AT&T Illinois application to revise Aurora and Naperville exchange boundaries:

The existing boundary between the Aurora East and Naperville Main wire centers will be moved as follows:

Winfield Township, Section 33: The existing boundary in the area south of Illinois Route 56, but north of the township line, will move west to the Elgin, Joliet & Eastern Railroad tracks.

Naperville Township, Section 4: The existing boundary in the area south of the township line, but north of I-88 (East West Tollway), will move west to the Elgin, Joliet & Eastern Railroad tracks.

AT&T ILLINOIS

EXHIBIT 3

**Direct Testimony of Cheryl A. Giacomini
On Behalf of AT&T Illinois**

1

2 **Q. WOULD YOU STATE YOUR NAME, BUSINESS ADDRESS, AND**
3 **POSITION WITH ILLINOIS BELL TELEPHONE COMPANY (“AT&T**
4 **ILLINOIS”)?**

5 A. My name is Cheryl A. Giacomini; my business address is 555 Cook Street,
6 Springfield, Illinois; and my current position is Area Manager – Regulatory
7 Relations in the regulatory group of AT&T Illinois.

8

9 **Q. PLEASE SUMMARIZE YOUR EDUCATION AND WORK**
10 **EXPERIENCE.**

11 A. I graduated from Glenwood High School in Chatham, Illinois, in 1979 and began
12 working for Illinois Bell Telephone Company -- now AT&T Illinois -- in June
13 1979. My initial positions were clerical in nature, but in 1987 I began working as
14 a drafter in the engineering group, drafting engineering work prints. In 1991, I
15 began working as a manager in the Plant Location Records group, overseeing the
16 conversion of the company’s records on its outside plant from a paper format to
17 an electronic format. I started in my current position in 1999.

18

19 **Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGER FOR**
20 **BOUNDARY AND COMPLAINT ISSUES?**

21 A. My responsibilities include responding to inquiries from the Commission Staff
22 regarding informal complaints from residential and business customers. I also am

23 responsible for caring for changes to exchange boundaries, for maintaining
24 exchange boundary maps, and for preparing all documents necessary to file such
25 maps with the Commission.

26

27 **Q. IS AT&T ILLINOIS AN ILLINOIS CORPORATION?**

28 A. Yes.

29

30 **Q. IS AT&T ILLINOIS A TELECOMMUNICATIONS CARRIER SUBJECT**
31 **TO THE JURISDICTION OF THE ILLINOIS COMMERCE**
32 **COMMISSION?**

33 A. Yes.

34

35 **Q. ARE YOU FAMILIAR WITH THE APPLICATION FILED IN THIS**
36 **CASE?**

37 A. Yes.

38

39 **Q. PLEASE SUMMARIZE THE AUTHORITY SOUGHT BY AT&T**
40 **ILLINOIS IN ITS APPLICATION.**

41 A. AT&T Illinois proposes to withdraw certain territory from its Aurora exchange
42 and to transfer that territory to its Naperville exchange. AT&T Illinois also seeks
43 to obtain a new Certificate of Exchange Service Authority, in the name of
44 "Illinois Bell Telephone Company," reflecting the revised boundary of the two
45 exchanges.

46

47 **Q. WOULD YOU PLEASE IDENTIFY EXHIBIT 1, ATTACHED TO THE**
48 **APPLICATION?**

49 A. Exhibit 1 to the Application are maps showing the northeast portion of the Aurora
50 exchange and the adjacent area of the Naperville exchange that is the subject of
51 this Application. The territory to be moved between the two exchanges is marked
52 by hash marks on Exhibit 1 and identified as "Detail A." That territory also is
53 described in Exhibit 2 to the Application.

54

55 **Q. DID YOU PREPARE, OR CAUSE TO BE PREPARED, EXHIBIT 1?**

56 A. Yes, Exhibit 1 was prepared under my supervision.

57

58 **Q. WHAT REASONS SUPPORT THE PROPOSAL TO REVISE THE**
59 **EXCHANGE AREA BOUNDARY AROUND DETAIL A, AS SHOWN ON**
60 **EXHIBIT 1 TO THE APPLICATION?**

61 A. Detail A is part of a new subdivision that is under construction. Most of the
62 subdivision is already within the boundaries of the Naperville Main wire center,
63 and it makes sense for the entire subdivision to be served from the same wire
64 center. In addition, it would be more cost effective to serve Detail A from
65 Naperville, since provisioning the service from Aurora would require putting in
66 facilities to cross the Elgin, Joliet & Eastern Railroad tracks.

67

68 **Q. WILL THE PROPOSED BOUNDARY ADJUSTMENT HAVE ANY**
69 **EFFECT ON ANY CURRENTLY ASSIGNED TELEPHONE NUMBERS**
70 **IN AT&T ILLINOIS' SERVICE TERRITORY?**

71 A. No.

72

73 **Q. WHAT EFFECT WILL THE PROPOSED BOUNDARY ADJUSTMENT**
74 **HAVE ON "9-1-1" SERVICE IN DETAIL A?**

75 A. There will be no effect on 911 service.

76

77 **Q. WILL THE EXCHANGE AREA BOUNDARY OF ANY OTHER**
78 **TELEPHONE COMPANY BE AFFECTED IF THIS PETITION IS**
79 **GRANTED?**

80 A. No. The revisions requested in this Application are only being made between
81 exchanges within AT&T Illinois' currently certified operating areas.

82

83 **Q. HAS THE COMMISSION PREVIOUSLY ISSUED CERTIFICATES TO**
84 **AT&T ILLINOIS WITH RESPECT TO THE AURORA AND**
85 **NAPERVILLE EXCHANGES?**

86 A. Yes. AT&T Illinois' most recent certificate for the Aurora Exchange was issued
87 in ICC Docket No. 88-0369 on Feb. 23, 1989; the most recent certificate for the
88 Naperville Exchange was issued in ICC Docket No. 94-0318 on Feb. 23, 1995.

89

90 **Q. IS IT YOUR OPINION THAT THIS APPLICATION IS IN THE PUBLIC**
91 **INTEREST?**

92 A. Yes.

93

94 **Q. WILL THE CONVENIENCE AND NECESSITY OF THE PUBLIC BE**
95 **BEST SERVED BY THE GRANTING OF NEW CERTIFICATES OF**
96 **EXCHANGE AUTHORITY, AS REQUESTED IN THIS APPLICATION?**

97 A. Yes.

98

99 **Q. WILL THE BOUNDARY REVISION DIMINISH IN ANY WAY AT&T**
100 **ILLINOIS' ABILITY TO PROVIDE ADEQUATE, RELIABLE,**
101 **EFFICIENT, SAFE AND LEAST-COST LOCAL EXCHANGE**
102 **TELECOMMUNICATIONS SERVICE TO THE AREAS SERVED BY**
103 **THE AURORA AND NAPERVILLE EXCHANGES?**

104 A. No.

105

106 **Q. DOES AT&T ILLINOIS POSSESS SUFFICIENT TECHNICAL,**
107 **FINANCIAL, AND MANAGERIAL RESOURCES AND ABILITIES TO**
108 **PROVIDE LOCAL EXCHANGE TELECOMMUNICATIONS SERVICE**
109 **IN THE TWO EXCHANGES?**

110 A. Yes. AT&T Illinois has been providing local exchange telephone service in the
111 Aurora and Naperville exchanges for a number of years. The 2007 annual report
112 that AT&T Illinois filed with the Commission in April 2008 provides more

113 information about the company's financial position. AT&T Illinois is part of
114 AT&T, Inc., one of the world's leading voice, data and Internet service providers.
115 The AT&T companies provide a full range of voice, data, networking and e-
116 business services, and are the largest providers of local and long distance voice
117 services and broadband DSL services in the United States. The AT&T companies
118 have more than 20,600 employees in Illinois. With these resources available,
119 AT&T Illinois will be able to continue to provide local exchange telephone
120 service in the Aurora and Naperville exchanges.

121

122 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

123 A. Yes.