

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**GALLATIN RIVER COMMUNICATIONS)
L.L.C. D/B/A CENTURLINK)
)
Petition for Arbitration Pursuant to)
Section 252(b) of the Communications Act)
of 1934, as amended by the)
Telecommunications Act of 1996)
To Establish the Rates, Terms, and)
Conditions of Interconnection with)
NTS Services Corp.)**

Docket No. 11-0567

POST-HEARING REPLY BRIEF OF NTS SERVICES CORP.

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April 19, 2012

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NTS Services Corp. (“NTS”), by and through its counsel, hereby provides this Reply Brief following the hearing held on February 21, 2012.

In its Initial Brief, CenturyLink fails to make any compelling arguments as to why the Commission should not rely on proxy rates, nor why the rates to be applied should diverge from those proposed by Commission Staff. Rather than continue with the same arguments made in NTS’ Initial Brief, NTS would like to simply draw the Commission’s attention to one issue that has not been fully addressed thus far.

NTS argues that the same logic that both NTS and Commission Staff has used to develop suggested rates for DS-0 loops in the Pekin exchange should also be extended to the rates to be charged in Band 2 and 3 exchanges. As Staff has noted, CenturyLink has brought no evidence to prove that its costs to provide services to any exchanges have increased. In fact, given that UNE prices have historically decreased, no increases are warranted. As such, the prevailing rates should be maintained going forward for all exchanges.

Conclusion

The Commission continues to maintain authority to set proxy rates under the Telecommunications Act of 1996. Given the lack of an approved TELRIC cost study, the Commission should find that the rates previously applied by Madison River Communications and Gallatin River Communications are a reasonable proxy for all exchanges. At the outer price limit, the Commission should consider the UNE rates set using an approved cost study for the former Verizon exchanges are a reasonable proxy for those that should be charged in CenturyLink's exchanges.

Respectfully submitted,



Kristopher E. Twomey
Counsel to NTS Services Corp.

April 19, 2012

CERTIFICATE OF SERVICE

The undersigned attorney for NTS Services Corp. hereby certifies that this Initial Brief was filed via the Illinois Commerce Commission's e-filing system with courtesy copies provided to the service list via email.



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