

2003  
ORIGINAL  
1:02  
CHIEF CLERK'S OFFICE

OFFICIAL FILE  
STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

Citizens Telecommunications Company of Illinois )  
and Cellco Partnership d/b/a Verizon Wireless )  
)  
)  
Joint Petition for Approval of Interconnection )  
Agreement pursuant to 47 U.S.C. § 252. )

03-0067  
Docket No. 03-

**JOINT PETITION FOR APPROVAL OF  
INTERCONNECTION AGREEMENT BETWEEN  
CITIZENS TELECOMMUNICATIONS COMPANY OF ILLINOIS  
AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS**

Citizens Telecommunications Company of Illinois ("Citizens") and Cellco Partnership d/b/a Verizon Wireless ("Verizon") hereby request that the Illinois Commerce Commission (the "Commission") review and approve the attached Agreement for Interconnection between Citizens Telecommunications Company of Illinois and Verizon Wireless (the "Agreement"), pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996, 47 U.S.C. § 252(a)(1) through 252(e) (the "Act"). In support thereof, the parties state as follows:

1. The Agreement was arrived at through good faith negotiations between the parties as contemplated by § 252(a) of the Act.

2. Pursuant to § 252(e) of the Act, the Commission may only reject a negotiated agreement if it finds that (1) the Agreement discriminates against another carrier, or (2) implementation of the Agreement would not be consistent with public interest, convenience, and necessity. Neither basis for rejection is present here.

3. As set forth in the attached Verification of David Ruhland, Citizens will make the Agreement available to any other telecommunications carrier operating within its territory.

Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

4. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.

5. Copies of the Agreement are available for public inspection in Citizens' and Verizon's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Verizon Wireless respectfully request that the Commission approve the attached Local Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

**CITIZENS TELECOMMUNICATIONS  
COMPANY OF ILLINOIS**

**CELLCO PARTNERSHIP D/B/A  
VERIZON WIRELESS**

By: \_\_\_\_\_

By: Mary Bacigalupi

David Ruhland

Mary Bacigalupi

Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

4. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.

5. Copies of the Agreement are available for public inspection in Citizens' and Verizon's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Verizon Wireless respectfully request that the Commission approve the attached Local Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

**CITIZENS TELECOMMUNICATIONS  
COMPANY OF ILLINOIS**

**CELLCO PARTNERSHIP D/B/A  
VERIZON WIRELESS**

By: David Ruhland

By: \_\_\_\_\_

David Ruhland

\_\_\_\_\_

VERIFICATION

I, Mary Bacigalupi do on oath depose and state that I am the contract negotiator for Cellco Partnership d/b/a Verizon Wireless, that I have read the foregoing Petition and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.

Mary Bacigalupi  
Mary Bacigalupi

STATE OF CALIFORNIA )

) ss.

COUNTY OF CONTRA COSTA

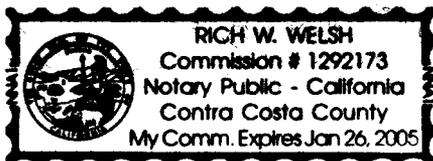
On January 22, 2005 before me, Rich W Welsh, personally appeared Mary Bacigalupi,

personally known to me

provided to me on the basis of satisfactory evidence

to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument.

WITNESS my name and official seal.



Rich W Welsh  
Signature of Notary Public

VERIFICATION

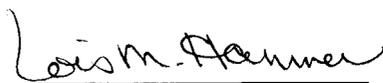
I, David Ruhland do on oath depose and state that that I am a Regulatory Manager for Citizens Telecommunications Company of Illinois, that I have read the foregoing Statement in Support of Joint Petition for Approval of Interconnection Agreement and the Joint Petition for Approval of Agreement for Local Interconnection and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.



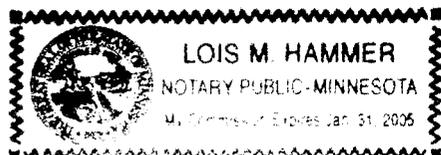
David Ruhland

SIGNED AND SWORN TO BEFORE ME THIS 28 DAY OF

October, 2002.



NOTARY PUBLIC



**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Citizens Telecommunications Company of Illinois	)	
and Cellco Partnership d/b/a Verizon Wireless	)	
	)	Docket No. 02-
Joint Petition for Approval of Interconnection	)	
Agreement pursuant to 47 U.S.C. § 252.	)	

**STATEMENT IN SUPPORT OF JOINT PETITION**  
**FOR APPROVAL OF INTERCONNECTION AGREEMENT**

1. I, David Ruhland, am a regulatory manager for Citizens Telecommunications Company of Illinois (“Citizens”), and submit this Statement in Support of the Joint Petition for Approval of the Interconnection Agreement between Citizens and Cellco Partnership d/b/a Verizon Wireless (“Verizon”).

2. The attached Interconnection and Traffic Interchange Agreement (the “Agreement”) between Citizens and Verizon was reached through voluntary negotiations between the parties. Accordingly, Citizens and Verizon request the approval of the Agreement by the Illinois Commerce Commission (the “Commission”) pursuant to § 252(a)(1) and 252(e) of the Telecommunications Act of 1996 (the “Act”).

3. Under § 252(e)(1) and (2) of the Act, the Commission may reject the Agreement only if the Agreement or a portion thereof “discriminates against a telecommunications carrier not a party to the agreement” or “...implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity.” Because the Agreement is the product of voluntary negotiations, it does not have to comply with the standards set forth in § 252(d).

4. The Agreement is not discriminatory. Citizens will make this Agreement available to any other telecommunication’s carrier who requests it and is operating within Citizens’ service

territory. Other telecommunications' carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

5. The Agreement is the product of good faith, arms-length negotiations between competitors. Overall, the Agreement is acceptable to both parties and it shows that two competitors, negotiating in good faith under the terms of the Act, can arrive at a mutually beneficial business arrangement that overall meets their individual business interests and furthers the cause of competition in the local exchange market. This is precisely the process Congress envisioned in crafting the Act. See S. Rep. No. 23, 104<sup>th</sup> Cong., 1<sup>st</sup> Sess. at p. 19. ("The Committee intends to encourage private negotiation of interconnection agreement.") (The Conference Committee on the Telecommunications Act of 1996 receded to the Senate on § 252(a) and (b), see Joint Explanatory Statement of the Committee of Conference at p. 125.)

6. The Agreement is consistent with the public interest, convenience and necessity, meets all the requirements of the Act and the Commission should approve it.



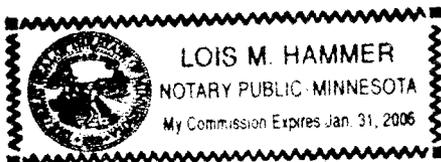
David Ruhland

Subscribed and sworn to before me

this 28 day of October, 2002.



Notary Public



**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Citizens Telecommunications Company	)	
of Illinois and Verizon Wireless	)	
	)	Docket No. 02-
Joint Petition for Approval of Agreement for	)	
Local Interconnection, pursuant to	)	
47 U.S.C. § 252.	)	

---

**NOTICE OF FILING**

**PLEASE TAKE NOTICE** that we have on this 27<sup>th</sup> day of January 2003, filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, the Joint Petition for Approval of the Interconnection Agreement between Citizens Telecommunications Company of Illinois and Verizon Wireless a copy of which is hereby served upon you.



---

Kevin Saville  
2378 Wilshire Blvd.  
Mound, MN 55364  
(952) 491-5564 Telephone  
(952) 491-5515 Fax  
Counsel for Citizens  
Telecommunications Company of Illinois

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that copies of the above Joint Petition, together with copies of the documents referred to therein, have been served upon the parties to whom the Joint Petition is directed by first-class mail, proper postage prepaid, from Mound, Minnesota, on the 27<sup>th</sup> day of January 2003.



---

Kevin Saville