

Bruce S. Asay
Associated Legal Group, LLC
1807 Capitol Avenue, Suite 203
Cheyenne, WY 82001
(307) 632-2888

Stephen F. Mecham
Callister, Nebeker & McCulloch
10 E. South Temple, Suite 900
Salt Lake City, UT 84133-1101
Telephone: (801) 530-7316

Attorneys for Union Telephone Company

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH**

IN THE MATTER OF THE PETITION OF)
QWEST CORPORATION FOR ARBITRATION OF)
AN INTERCONNECTION AGREEMENT WITH)
UNION TELEPHONE COMPANY d/b/a UNION) Docket No. 04-049-145
CELLULAR UNDER SECTION 252 OF THE)
FEDERAL TELECOMMUNICATIONS ACT)

AFFIDAVIT OF HENRY D. JACOBSEN

I, Henry D. Jacobsen, being first duly sworn, do depose and state as follows:

1. I am the Director of Engineering and Construction, for Union Telephone Company of Mountain View, Wyoming. I am familiar with the above captioned matter and have previously provided testimony which was filed with the Utah Public Service Commission. Most recently, I have been provided a copy of Qwest's Opposition to Union's Motion to Accept Post-Rebuttal Testimony of Henry D. Jacobsen or, in the alternative, Motion to Vacate Schedule and Motion for Sanctions. I would dispute the factual allegations and representations contained in the Motion and aver as I have maintained previously, that Union has only recently installed software to track traffic on its wireless system and that the allegations contained in the Motion are wholly inappropriate.

2. On or about March 8, 2007, I participated in a conference call with counsel

for Union in regard to certain testimony that had been filed by one Peter Copeland. In the conference call, I was advised of the substance of Mr. Copeland's testimony in regard to the manner in which Union monitored its traffic sensitive system. I indicated to those in the conference call, that Mr. Copeland's assertions were not consistent with the software which had just recently been installed. I noted that we had installed new software which addressed certain of the items referenced by Mr. Copeland and offered to provide a sample report that was just recently being developed. I provided the same to those on the conference call and later a copy to those participating in another conference call with representatives from the Department of Public Utilities. Following this meeting, it was decided that it would be appropriate to provide testimony in response to Mr. Copeland's position as his testimony was inaccurate. Accordingly, I assisted in the preparation of testimony that was ultimately filed with the Commission on or about March 15, 2007.

3. As to Qwest's allegations in its Opposition, I would state specifically that Union has not contended in the past that it had no underlying traffic collection methods, only that Union did not have the traffic reporting systems specifically required by Qwest's data requests. Union has monitored its traffic sensitive system in the past and particularly as it related to traffic congestion and exhaust. Nevertheless, Union did not have the specific system in place that would address the specific requirements required by Qwest until recently.

4. As to Union's new software which tracks system usage, in September 2006 Union lost a business account over its grade of service concern. Given this, Union determined that it would install a new system that would better track system outages and capacity usage. A contract for off-the-shelf software was signed with a vendor in October 2006. Union reconfigured an existing server, by increasing memory and disk space, which allowed the

