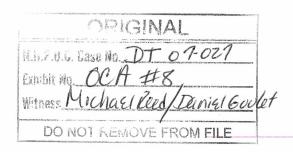
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Kearsarge Telephone Company Merrimack County Telephone Company Docket No. DT 07-027 Company Responses To OCA Phase II, Set 2 Data Requests PUBLIC June 19, 2009

OCA 2.9: Refer to OCA 1-14. Please define "generally accepted methodologies to determine wireless coverage" as used in this response.

RESPONSE: "Generally accepted methodologies to determine wireless coverage" was an excerpt from the NYPSC Order, Page 8, provided in response to Bailey 1.35. American Roamer states that all coverage represented is that marketed by the individual service providers. The patterns represented are based upon the predictions of the carriers themselves. The predictions represent a probability of being able to place or receive a call. Each carrier can set the cut-off point at which they no longer feel comfortable marketing their service. CoverageRight wraps all the most current marketed footprints into a convenient package offering all the files in the same compatible format. See excerpt below taken from American Roamer website for additional information.

"CoverageRight™ is a unique map database featuring the coverage patterns marketed by each wireless carrier. Hundreds of different files allow you to:

- View Marketed Build-outs
- Compare Wireless Coverage By Carrier
- Differentiate Affiliate Areas
- Project Roaming Coverage
- Analyze Customer Usage Patterns
- Demographic and Zip Code Analysis
- Target Holes in Your National Footprint
- Estimate the Impact of Acquisitions
- Provide Presentations of Service Offerings
- And Much More!

Simply put, CoverageRight™ is the most comprehensive collection of wireless coverage patterns in existence

We have a collection tailored to your needs, whether you need information on just one carrier or every service provider in just one state. If you need only the national carriers, order our "Tier One" package that includes AT&T, Sprint/Nextel, T-Mobile and Verizon Wireless. Perhaps you are interested in only CDMA or GSM technology. Voice and Advanced Services patterns can also be ordered separately. Click here to see our Package Options

(1)

Features:

Kearsarge Telephone Company Merrimack County Telephone Company Docket No. DT 07-027 Company Responses To OCA Phase II, Set 2 Data Requests PUBLIC June 19, 2009

- CoverageRight™ files are compatible with all major GIS programs (such as ArcGIS® or MapInfo®). View, query, or run reports using the powerful tools included in these popular programs.
- Detailed coverage polygons for commercially operating Cellular, PCS ESMR voice carriers in the United States or Canada. Aws and 700 MHz carriers are added as they launch.
- Quarterly updates can keep you informed of all the changes taking place throughout the wireless industry.
- National carrier patterns include both a high and low resolution version for better ease of use.
- Each file provides information describing the wireless carrier entity, marketing name, and wireless technology.

(2) Comprehensive Tools

Use CoverageRight™ in conjunction with our other file set MarketRight™ and get a complete picture of not only where each carrier is currently operating but also where they hold licenses that would allow them to launch service in the future.

We are confident that you will not find a more accurate and comprehensive picture of the wireless landscape from any other source."

Michael C. Reed is responsible for this response.