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August 20, 2008

Via Federal Express

DOCKET NO.

08-00152

Chairman Eddie Roberson
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

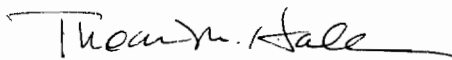
**Re: Petition by U.S. Cellular for the Authority's Concurrence to Proposed
Redefinition of Rural Service Area**

Dear Chairman Roberson:

On behalf of its subsidiary licensees, Tennessee RSA No. 3 Limited Partnership, United States Telephone Company (Greater Knoxville), L.P., and United States Cellular Operating Company of Knoxville d/b/a U.S. Cellular, United States Cellular Corporation ("U.S. Cellular") hereby petitions the Authority to take action, as necessary, to concur with the Federal Communications Commission's ("FCC") proposed redefinition of a rural service area in Tennessee.

Enclosed for filing are an original and four (4) copies of this Petition. Each Petition includes, as Exhibits A and B, respectively, the FCC's order granting the petition of U.S. Cellular to be designated as an Eligible Telecommunications Carrier in portions of its licensed service area in Tennessee and seeking the Authority's concurrence to the proposed redefinition ("Redefinition Order"), as well as the FCC's Erratum to its *Redefinition Order*.

Respectfully submitted,



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TMH/pm
Enclosures

Chairman Eddie Roberson
August 20, 2008
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cc (w/encls.):

Todd B. Lantor, Esquire
Grant Spellmeyer, Esquire
Gary Hotvedt, Tennessee Regulatory Authority

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

In Re:)
)
Petition for Concurrence to Proposed) Docket No. _____
Redefinition of Rural Service Area)

PETITION FOR CONCURRENCE TO
PROPOSED REDEFINITION OF RURAL SERVICE AREA

United States Cellular Corporation (“U.S. Cellular”), on behalf of its subsidiary licensees, Tennessee RSA No. 3 Limited Partnership, United States Telephone Company (Greater Knoxville), L.P., and United States Cellular Operating Company of Knoxville d/b/a U.S. Cellular, hereby petitions the Authority to take action, as necessary, to concur with the Federal Communications Commission’s (“FCC”) proposal to redefine the following wire centers in the North Central Telephone Cooperative, Inc. study area:¹

WIRE CENTER	CLLI
BETHPAGE	BTHPTNXA
DEFEATED	DFTDTNXA
GREENGROVE	GNGVTNXA
HILLSDALE	HLDLTNXA
LAFAYETTE	LFYTTNXA
OAK GROVE	OKGVTNXA
PLEASASHAD	PLSHTNXA
RDBOLNGSPG	RBSPTNXA
WESTMORELD	WMLDTNXA

¹ See *In the Matter of High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Order, WC Docket No. 05-337, CC Docket No. 96-45, FCC 08-122 (rel. May 1, 2008), at Appendix B, ¶¶ 28-29, ¶¶43-44 & Exhibit 29 (“*Redefinition Order*”) (Exhibit A); see also *In the Matter of High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Erratum, WC Docket No. 05-337, CC Docket No. 96-45, DA 08-1836 (rel. June 10, 2008) (Exhibit B).

Section 54.207(d) of the FCC's rules states that the FCC may, on its own motion, initiate a proceeding to consider a definition of a service area served by a rural telephone company that is different from that company's study area.² The FCC has taken such action in proposing to redefine the North Central Telephone Cooperative, Inc. rural service area in Tennessee.

FCC rules state that if the FCC proposes a definition of a service area served by a rural telephone company different from that company's study area, the FCC "shall seek the agreement of the state commission..."³ In addition, FCC rules state that the FCC's proposed redefinition cannot take effect until both the state commission and the FCC agree upon the definition of a rural service area, in accordance with 54.207(b) and Section 214(e)(5) of the Communications Act.⁴

Pursuant to Section 54.207(d)(1) of the FCC's rules,⁵ the FCC states in its *Redefinition Order*, that it "submits [its] redefinition proposals to the relevant state commissions and request[s] that they examine [its] proposals based on their unique familiarity with the rural areas in question", thereby effectively petitioning the Authority for its concurrence to the FCC's proposed redefinition.⁶ In so doing, the FCC provides

² 47 C.F.R. § 54.207(d).

³ *Id.*

⁴ 47 C.F.R. § 54.207(d)(2).

⁵ 47 C.F.R. § 54.207(d)(1).

⁶ *Redefinition Order*, Appendix B, ¶ 29. The FCC also notes in its *Redefinition Order* that "[w]here redefined areas require the agreement of a state commission, [] ETC designations are effective upon the effective date of the agreement of the relevant state commission with [the FCC's] redefinition of the service area, but in no event prior to the effective date of [the *Redefinition Order*]." *Redefinition Order*, Appendix B, ¶ 44. The *Redefinition Order* becomes effective on August 1, 2008 (30 days after it is published in the Federal Register). *Redefinition Order*, ¶ 52; see also 73 FR 87882 (Federal Register publication of *Redefinition Order*).

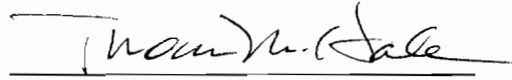
the Authority with its proposal for redefining the service areas in question and provides reasons for adopting the new definition, including an analysis that takes into account the recommendations of the Joint Board.⁷

Because interested parties had at least two opportunities to raise objections concerning the proposed redefinition with the FCC and to U.S. Cellular's knowledge no objection was raised, U.S. Cellular does not believe that the Authority needs to provide an additional opportunity for parties to comment on the proposed redefinition. Rather, if the Authority concurs with the FCC's proposed redefinition, the Authority can simply state its concurrence by letter or order.

⁷ *Redefinition Order*, Appendix B, ¶¶ 23, 28; *see also* 47 C.F.R. § 54.207(d)(1).

WHEREFORE, U.S. Cellular respectfully requests that the Authority concur to the proposed redefinition.

Respectfully submitted this 20th day of August, 2008.



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Attachment

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Alltel Communications, Inc., <i>et al.</i>	)	
Petitions for Designation as Eligible	)	
Telecommunications Carriers	)	
	)	
RCC Minnesota, Inc. and RCC Atlantic, Inc. New	)	
Hampshire ETC Designation Amendment	)	

ORDER

Adopted: April 29, 2008**Released: May 1, 2008**

By the Commission: Chairman Martin and Commissioners Tate and McDowell issuing separate statements; Commissioners Copps and Adelstein dissenting and issuing separate statements.

I. INTRODUCTION

1. In this Order, we take action to rein in the explosive growth in high-cost universal service support disbursements. As recommended by the Federal-State Joint Board on Universal Service (Joint Board), we adopt an interim, emergency cap on the amount of high-cost support that competitive eligible telecommunications carriers (ETCs) may receive.¹ Specifically, as of the effective date of this Order, total annual competitive ETC support for each state will be capped at the level of support that competitive ETCs in that state were eligible to receive during March 2008 on an annualized basis. We also adopt two limited exceptions from the specific application of the interim cap. First, a competitive ETC will not be subject to the interim cap to the extent it files cost data demonstrating that its costs meet the support threshold in the same manner as the incumbent local exchange carrier (LEC). Second, we adopt a limited exception for competitive ETCs serving tribal lands or Alaska Native regions. The interim cap will remain in place only until the Commission adopts comprehensive high-cost universal service reform.² The Commission plans to move forward on adopting comprehensive reform measures in an expeditious manner. The Commission commits to completing a final order on comprehensive reform as quickly as feasible after the comment cycle is completed on the pending Commission Notices regarding

¹ See *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Recommended Decision, 22 FCC Rcd 8998 (Fed.-State Jt. Bd. 2007) (*Recommended Decision*).

² The Commission is required by statute to act within one year after receiving a recommendation from the Joint Board. 47 U.S.C. § 254(a)(2).



comprehensive reform.³ Finally, we resolve most of the petitions for ETC designation currently pending before the Commission.⁴

II. BACKGROUND

2. For the past several years, the Joint Board has been exploring recommending modifications to the Commission's high-cost universal service support rules. In 2002, the Commission asked the Joint Board to review certain of the Commission's rules related to the high-cost universal service support mechanisms.⁵ Among other things, the Commission asked the Joint Board to review the Commission's rules relating to high-cost universal service support in study areas in which a competitive ETC provides service.⁶ In response, the Joint Board made a number of recommendations concerning the designation of ETCs in high-cost areas, but declined to recommend that the Commission modify the basis of support (i.e., the methodology used to calculate support) in study areas with multiple ETCs.⁷ Instead, the Joint Board recommended that it and the Commission continue to consider possible modifications to the basis of support for competitive ETCs as part of an overall review of the high-cost support mechanisms for rural and non-rural carriers.⁸

3. In 2004, the Commission asked the Joint Board to review the Commission's rules relating to the high-cost universal service support mechanisms for rural carriers and to determine the appropriate rural mechanism to succeed the plan adopted in the *Rural Task Force Order*.⁹ In August 2004, the Joint Board sought comment on issues the Commission referred to it related to the high-cost universal service support mechanisms for rural carriers.¹⁰ The Joint Board also specifically sought comment on the methodology for calculating support for ETCs in competitive study areas.¹¹ Since that time, the Joint Board has sought comment on a variety of specific proposals for addressing the issues of universal service support for rural carriers and the basis of support for competitive ETCs, including proposals developed by

³ See *infra* para. 4.

⁴ See *infra* para. 39, App. B.

⁵ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order, 17 FCC Rcd 22642 (2002).

⁶ *Id.*

⁷ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 19 FCC Rcd 4257 (Fed.-State Jt. Bd. 2004) (2004 Recommended Decision).

⁸ *Id.* at 4294, para. 88.

⁹ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order, 19 FCC Rcd 11538, para. 1 (2004) (*Rural Referral Order*); *Federal-State Joint Board on Universal Service; Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, 16 FCC Rcd 11244, 11268-70 (2001) (*Rural Task Force Order*); see also *Federal-State Joint Board on Universal Service; High-Cost Universal Service Support*, CC Docket No. 96-45, WC Docket No. 05-337, Order, 21 FCC Rcd 5514 (2006) (extending the *Rural Task Force Order* plan).

¹⁰ See *Federal-State Joint Board on Universal Service Seeks Comment on Certain of the Commission's Rules Relating to High-Cost Universal Service Support*, CC Docket No. 96-45, Public Notice, 19 FCC Rcd 16083 (Fed.-State Jt. Bd. 2004).

¹¹ See *id.* at 16094, paras. 36-37.

members and staff of the Joint Board, as well as the use of reverse auctions (competitive bidding) to determine high-cost universal service funding to ETCs.¹²

4. On May 1, 2007, the Joint Board recommended that the Commission adopt an interim cap on high-cost universal service support for competitive ETCs while the Joint Board considered proposals for comprehensive reform.¹³ Specifically, the Joint Board recommended that the Commission cap competitive ETC support at the amount of support received by competitive ETCs in 2006.¹⁴ The Joint Board recommended that the cap on competitive ETC support be applied at the state level.¹⁵ Finally, the Joint Board recommended that the interim cap apply until one year from the date that the Joint Board makes its recommendation regarding high-cost universal service reform.¹⁶ On May 14, 2007, the Commission released a Notice of Proposed Rulemaking, seeking comment on the Joint Board's recommendation.¹⁷ On November 19, 2007, the Joint Board submitted to the Commission recommendations for comprehensive reform of high-cost universal service support.¹⁸ On January 29, 2008, the Commission released three notices of proposed rulemaking addressing proposals for comprehensive reform of the high-cost universal service support program.¹⁹ Comments on the *Reform Notices* were due by April 17, 2008 and reply comments are due by May 19, 2008.²⁰

¹² See *Federal State Joint Board on Universal Service Seeks Comment on Proposals to Modify the Commission's Rules Relating to High-Cost Universal Service Support*, CC Docket No. 96-45, Public Notice, 20 FCC Rcd 14267 (Fed.-State Jt. Bd. 2005); *Federal-State Joint Board on Universal Service Seeks Comment on the Merits of Using Auctions to Determine High-Cost Universal Service Support*, WC Docket No. 05-337, CC Docket No. 96-45, Public Notice, 21 FCC Rcd 9292 (Fed.-State Jt. Bd. 2006). In February 2007, the Joint Board held an *en banc* hearing to discuss high-cost universal service support in rural areas, including the use of reverse auctions and geographic information systems to determine support for ETCs. See *Federal-State Joint Board on Universal Service to Hold En Banc Hearing on High-Cost Universal Service Support in Areas Served by Rural Carriers*, WC Docket No. 05-337, Public Notice, 22 FCC Rcd 2545 (Wireline Comp. Bur. 2007).

¹³ See *Recommended Decision*, 22 FCC Rcd at 8999-9001, paras. 4-7. The Joint Board committed to making recommendations on comprehensive reform within six months (i.e., by November 1, 2007), and sought comment on comprehensive reform in a public notice released on the same day as the *Recommended Decision*. See *id.* at 8; *Federal-State Joint Board on Universal Service Seeks Comment on Long Term Comprehensive High-Cost Universal Service Reform*, WC Docket No. 05-337, CC Docket No. 96-45, Public Notice, 22 FCC Rcd 9023 (Fed.-State Jt. Bd. 2007) (*Joint Board 2007 Public Notice*).

¹⁴ *Recommended Decision*, 22 FCC Rcd at 9003, para. 13.

¹⁵ *Id.* at 9002-03, paras. 9-12.

¹⁶ *Id.* at 9002, para. 8.

¹⁷ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 22 FCC Rcd 9705 (2007) (*Notice*).

¹⁸ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Recommended Decision, 22 FCC Rcd 20477 (2007) (*Comprehensive Reform Recommended Decision*).

¹⁹ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1467 (2008) (*Identical Support Rule NPRM*); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1495 (2008) (*Reverse Auctions NPRM*); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1531 (2008) (*Joint Board Comprehensive Reform NPRM*) (collectively *Reform Notices*).

²⁰ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; WC Docket No. 05-337, Order, DA 08-674 (rel. Mar. 24, 2008) (extending comment and reply comment dates).

III. DISCUSSION

5. We adopt, with limited modifications, the Joint Board's recommendation for an emergency, interim cap on high-cost support for competitive ETCs.²¹ This action is necessary to halt the rapid growth of high-cost support that threatens the sustainability of the universal service fund. As described below, annual support for competitive ETCs in each state will be capped at the level of support that competitive ETCs in that state were eligible to receive during March 2008, on an annualized basis. As further discussed below, we also create a limited exception to the cap to allow competitive ETCs that serve tribal lands or Alaska Native regions to continue to receive support at uncapped levels.²²

A. Need for a Cap on Competitive ETC Support

1. A Cap on Competitive ETC Support is Required to Preserve the Sustainability and Sufficiency of Universal Service

6. We agree with the Joint Board's assessment that the rapid growth in high-cost support places the federal universal service fund in dire jeopardy. In 2007, the universal service fund provided approximately \$4.3 billion per year in high-cost support.²³ In contrast, in 2001, high-cost universal service support totaled approximately \$2.6 billion.²⁴ In recent years, this growth has been due to increased support provided to competitive ETCs, which receive high-cost support based on the per-line support that the incumbent LECs receive, rather than on the competitive ETCs' own costs. While support to incumbent LECs has been flat since 2003,²⁵ competitive ETC support, in the seven years from 2001

²¹ The interim cap adopted in this Order supersedes the interim caps on high-cost, competitive ETC support adopted in the *ALLTEL-Atlantis Order* and the *AT&T-Dobson Order*. See *Applications of ALLTEL Corporation, Transferor, and Atlantis Holdings LLC, Transferee For Consent to Transfer Control of Licenses, Leases and Authorizations*, WT Docket No. 07-185, Memorandum Opinion and Order, 22 FCC Rcd 19517 (2007) (*ALLTEL-Atlantis Order*); *Applications of AT&T Inc. and Dobson Communications For Consent to Transfer Control of Licenses and Authorizations File Nos. 003092368 et al.*, WT Docket No. 07-153, Memorandum Opinion and Order, 22 FCC Rcd 20295 (2007) (*AT&T-Dobson Order*).

²² See Letter from Tina Pidgeon, Vice President, Federal Regulatory Affairs, General Communications Inc. (GCI), to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 05-337, CC Docket No. 96-45, at 2 (filed May 31, 2007) (GCI May 31 *Ex Parte* Letter).

²³ Universal Service Administrative Company, 2007 Annual Report 43 (2007), available at http://www.usac.org/_res/documents/about/pdf/usac-annual-report-2007.pdf (*USAC 2007 Annual Report*).

²⁴ See *Universal Service Monitoring Report*, CC Docket No. 98-202, Prepared by the Federal and State Staff for the Federal-State Joint Board on Universal Service in CC Docket No. 96-45, Table 3.2 (2007) (*Universal Service Monitoring Report*).

²⁵ Incumbent LECs received \$3.136 billion in high-cost support in 2003; \$3.153 billion in 2004; \$3.169 billion in 2005; \$3.116 billion in 2006; and \$3.108 billion in 2007. *Universal Service Monitoring Report*, Table 3.2 (for 2003, 2004, 2005, and 2006 data); *USAC 2007 Annual Report* at 41 (for 2007 data). In 2001, much of the growth in high-cost support was attributable to removing implicit subsidies from access charges and the inclusion of these amounts in explicit universal service mechanisms adopted in the *CALLS Order* and the *MAG Plan Order*. See *Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers; Low-Volume Long-Distance Users; Federal-State Joint Board on Universal Service*, Sixth Report and Order in CC Docket Nos. 96-262 and 94-1, Report and Order in CC Docket No. 99-249, Eleventh Report and Order in CC Docket No. 96-45, 15 FCC Rcd 12962 (2000) (*CALLS Order*); *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Federal-State Joint Board on Universal Service; Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation; Prescribing the Authorized Rate of Return From Interstate Services of Local Exchange Carriers*, Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No.

(continued....)

through 2007, has grown from under \$17 million to \$1.18 billion – an average annual growth rate of over 100 percent.²⁶ We find that the continued growth of the fund at this rate is not sustainable and would require excessive (and ever growing) contributions from consumers to pay for this fund growth.²⁷

7. We conclude that immediate action must be taken to stem the dramatic growth in high-cost support. Therefore, as recommended by the Joint Board, we immediately impose an interim cap on high-cost support provided to competitive ETCs until fundamental comprehensive reforms are adopted to address issues related to the distribution of support and to ensure that the universal service fund will be sustainable for future years.²⁸ The interim cap that we adopt herein limits the annual amount of high-cost support that competitive ETCs can receive in the interim period for each state to the amount competitive ETCs were eligible to receive in that state during March 2008, on an annualized basis.

(...continued from previous page)

96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, 16 FCC Rcd 19613 (2001) (*MAG Plan Order*), *recon. pending*.

²⁶ *Universal Service Monitoring Report*, Table 3.2; USAC 2007 Annual Report at 45.

²⁷ Support for the fund derives from assessments paid by providers of interstate telecommunications services and certain other providers of interstate telecommunications. See 47 C.F.R. § 54.706. Fund contributors are permitted to, and almost always do, pass those contribution assessments through to their end-user customers. See 47 C.F.R. § 54.712. Fund assessments paid by contributors are determined by applying the quarterly contribution factor to the contributors' contribution base revenues. In the second quarter of 2007, the contribution factor reached 11.7 percent, which is the highest level since its inception. See *Proposed Second Quarter 2007 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice, 22 FCC Rcd 5074 (Off. of Man. Dir. 2007). The contribution factor has since declined slightly to 11.3 percent in the second quarter of 2008. *Proposed Second Quarter 2008 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice, 23 FCC Rcd 4087 (Off. of Man. Dir. 2008).

²⁸ The interim cap received widespread support from commenters. See ATA Comments; Alexicon Comments; AT&T Comments; CenturyTel Comments; Blackfoot Comments; Comcast Comments; Embarq Comments; Fred Williamson & Associates Comments; Frontier Comments; GVNW Comments; ITTA Comments; Iowa Telecommunications Ass'n Comments; Iowa Utilities Board Comments; Minnesota Independent Coalition Comments; Montana Telecommunications Ass'n Comments; NASUCA Comments; NECA Comments; NTCA Comments; Nebraska Rural Independent Cos and South Dakota Telecommunications Ass'n Comments; New Jersey Board of Public Utilities Comments; New York Department of Public Service Comments; OPASTCO Comments; Rural Iowa Independent Telephone Ass'n Comments; Rural Telecommunications Group Comments; Small Company Committee of the Louisiana Telecommunications Ass'n Comments; State Independent Telephone Ass'n of Kansas and Independent Telecommunications Group; TCA Comments; TDS Comments; Telephone Ass'n of Maine Comments; Tennessee Telecommunications Ass'n; Texas Statewide Telephone Cooperative, Inc. Comments; Totah Communications, Inc. *et al.* Comments; USTelecom Comments; Valley Telephone Cooperative Comments; Verizon and Verizon Wireless Comments; Western Telecommunications Alliance Comments; Windstream Comments; Wisconsin State Telecommunications Ass'n Comments. Other commenters, however, opposed the cap. See Alltel Comments; Centennial Comments; Chinook Wireless Comments; ComspanUSA Comments; COMPTel Comments; CTIA Comments; DialToneServices Comments; Dobson Comments; GCI Comments; Kansas State Corporation Comm'n Comments; Rural Cellular Ass'n and Alliance of Rural CMRS Carriers Comments; South Carolina Office of Regulatory Staff Comments; SouthernLINC Comments; Sprint Nextel Comments; Surewest Comments; US Cellular and Rural Cellular Corp. Comments. In addition many individuals and public safety officials filed brief comments or *ex parte* letters, both in favor and in opposition to the interim cap. See, e.g., Letter from Senator J. Brian Bingman, Oklahoma State Senate, to Chairman Martin, Federal Communications Commission, WC Docket No. 05-337 (filed June 22, 2007) (urging the quick adoption of an interim cap); Letter from Lt. S.C. O'Dwyer, Commander of Communications, Office of the Sheriff of Effingham County, Georgia, to Kevin J. Martin, Chairman, Michael J. Copps, Commissioner, Jonathon S. Adelstein, Commissioner, Deborah Taylor Tate, Commissioner, and Robert M. McDowell, Commissioner, Federal Communications Commission, WC Docket No. 05-337 (filed July 11, 2007) (opposing the adoption of the interim cap). Appendix A contains a list of all commenters in this proceeding.

8. We find that adopting an interim cap is consistent with the requirement of section 254 of the Communications Act of 1934, as amended (the Act), that support be “sufficient” to meet the Act’s universal service purposes.²⁹ The Commission previously has concluded that the statutory principle of “sufficiency” proscribes support in excess of that necessary to achieve the Act’s universal service goals.³⁰ Notably, the Commission has previously adopted cost controls, including adopting an indexed cap on the high-cost loop support mechanism, which the U.S. Court of Appeals for the Fifth Circuit held to be consistent with the Act’s universal service mandate.³¹

9. Similarly, our action today applies interim cost controls to the aspect that most directly threatens the specificity, predictability, and sustainability of the fund: the rapid growth of competitive ETC support.³² A primary consequence of the existing competitive ETC support rules has been to promote the sale of multiple supported wireless handsets in given households.³³ We do not today make a final determination regarding the level of support to competitive ETCs that is sufficient, but not excessive, for achieving the Act’s universal service goals because we expect to take further action to enact fundamental reform.³⁴ Instead, today we take the reasonable, interim step of capping annual competitive ETC support for each state at the amount competitive ETCs in that state were eligible to receive during March 2008 on an annualized basis. Doing so will provide a necessary constraint on the growth of support until comprehensive reform is adopted.

10. We do not find it necessary to adopt additional caps on support provided to incumbent LECs at this time because, as the Joint Board noted in its *Recommended Decision*, high-cost support to incumbent LECs has been flat and is therefore exerting less pressure on the universal service fund.³⁵ Moreover, incumbent LEC high-cost loop support is already capped, and incumbent LEC interstate access support is subject to a targeted limit.³⁶ Incumbent LEC disbursements from other support mechanisms,

²⁹ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) (the Act). The 1996 Act amended the Communications Act of 1934. 47 U.S.C. §§ 151, *et seq.* 47 U.S.C. § 254(b)(5) (“There should be specific, predictable and sufficient Federal and State mechanisms to preserve and advance universal service.”), (e) (“any such [universal service] support should be predictable and sufficient to achieve the purposes of this section”).

³⁰ *MAG Plan Order*, 16 FCC Rcd at 19669-70, paras. 131-32; *Rural Task Force Order*, 16 FCC Rcd at 11257-58, para. 27; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order on Remand, Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order, 18 FCC Rcd 22559, 22581-82, paras. 36-37 (2003), *remanded*, *Qwest Corp. v. FCC*, 398 F.3d 1222 (10th Cir. 2005); 47 U.S.C. § 254(b).

³¹ *Alenco Communications, Inc. v. FCC*, 201 F.3d 608, 620-21 (5th Cir. 2000) (“[t]he agency’s broad discretion to provide sufficient universal service funding includes the decision to impose cost controls to avoid excessive expenditures that will detract from universal service”).

³² See 47 U.S.C. § 254(b)(5).

³³ See *Petition of Qwest Communications International Inc. for Forbearance from Enforcement of the Commission’s Dominant Carrier Rules As They Apply After Section 272 Sunsets*, WC Docket No. 05-333, Memorandum Opinion and Order, 22 FCC Rcd 5207, 5218, para. 17 (2007) (stating that a majority of presubscribed interexchange customers also subscribe to mobile wireless service); *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, WT Docket No. 07-71, Twelfth Report, 23 FCC Rcd 2241, at para. 246 (2008) (citing survey reporting that only approximately 11.8 percent of U.S. households relied exclusively on wireless phones in 2006) (2007 *Commercial Mobile Services Report*).

³⁴ See *Alenco*, 201 F.3d at 619 (“excessive funding may itself violate the sufficiency requirements of the Act”).

³⁵ *Recommended Decision*, 22 FCC Rcd at 9001, para. 5; see also *supra* para. 6.

³⁶ See 47 C.F.R. §§ 36.603, 54.801(a). We are unconvinced by Alltel’s arguments that the existing caps on incumbent LEC support also effectively cap competitive ETC support. Alltel Comments at 10-11. Competitive ETC support has grown rapidly while, during the same period, incumbent LEC support has not grown significantly.

(continued....)

like local switching support and interstate common line support, have been stable in recent years.³⁷ Further, although high-cost model support has no actual cap, it does have built-in restraints on growth, which derive from the fact that support is based on stable statewide average estimated costs. Accordingly, we limit the interim cap we adopt today to high-cost support provided to competitive ETCs.

11. Some parties argue that inefficiencies in high-cost support for incumbent LECs are the root cause of the high-cost support growth, and that the Commission must address these inefficiencies to stabilize the fund.³⁸ Although addressing inefficiencies in incumbent LEC support may be necessary for comprehensive reform, we disagree that such review of incumbent LEC support is necessary immediately to rein in the growth of high-cost support for an interim period. First, as we have noted, total incumbent LEC support has not grown in recent years and does not have the same potential for rapid explosive growth competitive ETC support does. Second, although increases in incumbent LEC high-cost support may contribute indirectly to growth in high-cost support for competitive ETCs, the interim cap on competitive ETC support we adopt today will eliminate that growth potential.³⁹ To the extent that there may be inefficiencies in incumbent LEC high-cost support, we anticipate addressing those in the context of comprehensive universal service reform.

2. An Interim Cap on Competitive ETC Support Is Consistent With the Act

12. We disagree with arguments that capping support for competitive ETCs violates the Act. As a general matter, the Commission's discretion to establish caps on high-cost support has been upheld.⁴⁰ Moreover, as we discuss further below, we find no merit in the arguments raised by commenters in this proceeding that this particular cap violates the Act.

13. We disagree with comments that this cap violates the Act's statutory principles. CTIA argues that the cap would violate the Act's requirements that rates in rural areas should be reasonably comparable to those in urban areas.⁴¹ CTIA, however, fails to provide any data demonstrating that, or analysis explaining why the cap would result in rural rates that are not comparable with those in urban areas. Instead, it merely asserts that "[t]he proposed cap will deny customers access to reasonably

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See *supra* para. 6. To the extent there are exceptions to the incumbent LEC caps (e.g., an index on high-cost loop support and the availability of the safety net additive), these exceptions are warranted due to the additional regulatory burdens faced by incumbent LECs. Competitive ETCs are able to raise their rates when necessary to recover their increased expenses, while many incumbent LECs are subject to rate regulation and cannot do so. Furthermore, we note that we are adopting a limited exception to the competitive ETC cap for carriers that serve tribal lands or Alaska Native regions. See *infra* paras. 31-34.

³⁷ Local switching support for incumbent LECs ranged between \$363 million and \$379 million annually from 2003 through 2007. Interstate common line support (including its predecessor, Long Term Support) for incumbent LECs ranged between \$877 million and \$985 million annually from 2003 through 2007. See *Universal Service Monitoring Report*, Table 3.2 (2007 support based on actual and projected data).

³⁸ See CTIA Comments at 5-6; Centennial Comments at 4-5.

³⁹ Because competitive ETCs receive the same per-line support as the incumbent LEC, any increase in the incumbent LEC's cost per loop, whether due to inefficiencies or line loss, could contribute to competitive ETC support growth rates. For example, if the underlying incumbent LEC per-line (but not total) support increases year over year (due to line loss, for example), the competitive ETC will receive both more per-line support and more total support, even in a service area where a competitive ETC's lines remain constant year over year.

⁴⁰ See *Alenco*, 201 F.3d at 620.

⁴¹ CTIA Comments at 21-22.

equivalent rates, and to reasonably equivalent services.”⁴² There simply is no support in the record for this contention. To the contrary, many wireless carriers that do not receive high-cost support compete against wireless competitive ETCs that do receive support, and many wireless competitive ETCs served high-cost territories before they were designated as eligible to receive support.

14. CTIA, along with Dobson, also contends that the cap violates the universal service principle of sufficiency.⁴³ Neither commenter, however, provides any support for its contentions. To the contrary, as we explain above, we believe that the statutory principle of sufficiency is not inconsistent with the interim “cost controls” we adopt herein.⁴⁴ We find that the interim cap we adopt is consistent with the principle of sufficiency as defined by the court in *Alenco* because it seeks to eliminate support in excess of that necessary to ensure the Act’s universal service goals.⁴⁵ Further, because competitive ETC support is based on the incumbent LEC’s costs, rather than on the competitive ETC’s own costs, there is no reason to believe – and no record data showing – that support subject to an interim cap would necessarily result in insufficient support levels.⁴⁶ Dobson also argues that the cap will violate the universal service principle of predictability because the effects of the cap “will be driven by factors that are not at all ‘predictable’.”⁴⁷ Adoption of the interim cap, however, makes competitive ETC support more predictable, in that it sets an upper, definitive bound on the amount of support available in a state. Moreover, Dobson ignores the fact that, as the court concluded in *Alenco*, the Act’s requirement of predictability requires only that the rules governing distribution, not the resulting funding amounts, must be predictable.⁴⁸

15. We are not persuaded by CTIA’s argument, citing *Alenco*, that the Act requires the promotion of competition in high-cost areas through the provision of equal per-line support amounts to all carriers.⁴⁹ Rather than requiring the use of universal service support to subsidize competition, the court in *Alenco* was concerned with the sustainability of universal service in a competitive environment. Specifically, the court found that “[t]he Commission therefore is responsible for making the changes necessary to its universal service program to ensure that it survives in the new world of competition.”⁵⁰ The court stated that the Commission “must see to it that *both* universal service and competition are

⁴² *Id.*

⁴³ CTIA Comments at 22, Dobson Comments at 4-5.

⁴⁴ See *supra* para. 8 (discussing the *Alenco* court’s conclusion that the Commission may adopt universal service cost controls).

⁴⁵ See *Alenco*, 201 F.3d at 619.

⁴⁶ See *id.* at 620 (“The Act only promises universal service, and that is a goal that requires sufficient funding of customers, not providers.”).

⁴⁷ Dobson Comments at 5.

⁴⁸ *Alenco*, 201 F.3d at 623. Further, we note that Dobson’s criticism is equally applicable to the cap on high-cost loop support, which was affirmed by the court in *Alenco*. *Id.* at 620.

⁴⁹ CTIA Comments at 19.

⁵⁰ *Alenco*, 201 F.3d at 615 (citing *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 8780-82, paras. 1-4, 8788, para. 20 (1997) (*Universal Service First Report and Order*) (stating that the Commission, through its work with the Joint Board, “ensure[s] that this system is sustainable in a competitive marketplace, thus ensuring that universal service is available at rates that are ‘just, unreasonable [sic], and affordable’ for all Americans”)).

realized; one cannot be sacrificed in favor of the other.”⁵¹ We therefore find that our action today is not only consistent with, but is supported by, the court’s holding in *Alenco*.

16. Similarly, we are not persuaded by Alltel’s argument that competitive ETCs and incumbent LECs must receive the same amount of support on a per-line basis.⁵² Although Alltel correctly notes that, in upholding the cap on high-cost loop support, the court in *Alenco* “rejected the premise that [incumbent LEC] revenue flows must be protected at all costs, and thus that any reductions in disbursements needed to prevent undue fund growth must be borne by [competitive ETCs] rather than [incumbent LECs],”⁵³ Alltel fails to explain why the court’s holding requires equal per-line support for all competitors. Put simply, while the court rejected the idea that any reductions in disbursements necessary to curtail fund growth had to be borne by competitive ETCs and not incumbent LECs, the court did not prohibit the Commission from imposing reductions or limits on competitive ETC disbursements.⁵⁴

17. CTIA argues that adoption of the interim cap would not comport with the court’s statement in *Alenco* that “the program must treat all market participants equally . . . so that the market, and not local or federal government regulators, determines who shall compete for and deliver service to customers.”⁵⁵ The cited language, however, does not require the Commission to continue to provide identical levels of support to all carriers. It merely requires that all ETCs must be eligible to receive support, an unremarkable conclusion given the plain text of the statute.⁵⁶

18. Alltel and CTIA both ignore key aspects of *Alenco*, in which the court expressly found that the Commission must ensure that all *customers* be able to receive affordable basic telecommunications services.

Competition necessarily brings the risk that some telephone service providers will be unable to compete. The Act only promises universal service, and that is a goal that requires sufficient funding of *customers*, not *providers*. So long as there is sufficient and competitively-neutral funding to enable all customers to receive basic telecommunications services, the FCC has satisfied the Act and is not further required to ensure sufficient funding of every local telephone provider as well. Moreover, excessive funding may itself violate the sufficiency requirements of the Act.⁵⁷

Nowhere in the court’s decision did it require that all *providers* must receive equal per-line support amounts.

⁵¹ See *Alenco*, 201 F.3d at 615.

⁵² Alltel Comments at 15-18.

⁵³ *Id.* at 15.

⁵⁴ Alltel also relies the court’s decision in *TOPUC* to support its argument that high-cost support must be portable on a per-line basis. *Id.* at 15-16 (citing *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 417-18 (5th Cir. 1999) (*TOPUC*)). Alltel, however, only cites *TOPUC*’s requirement that implicit subsidies be replaced with explicit universal service subsidies. *Id.* That requirement, however, does not require that universal service support continue on a per-line basis under the identical support rule.

⁵⁵ CTIA Comments at 20 (quoting *Alenco*, 201 F.3d at 616).

⁵⁶ The quotation that CTIA relies on specifically cites section 214(e)(1) of the Act, which requires that all “eligible telecommunications carriers . . . shall be eligible to receive universal service support.” 47 U.S.C. § 214(e)(1). See also *infra* para. 29.

⁵⁷ *Alenco*, 201 F.3d at 620.

19. In arguing that the interim cap would not comport with the identical support rule because it would disburse unequal support per line, Alltel also cites various Commission precedents related to the establishment and implementation of the identical support rule, which, at the time, the Commission found to be consistent with its principle of competitive neutrality.⁵⁸ In justifying this portability requirement, both the Joint Board and Commission made clear that they envisioned that competitive ETCs would compete directly against incumbent LECs and try to take existing customers from them.⁵⁹ The predictions of the Joint Board and the Commission have proven inaccurate, however.

20. First, they did not foresee that competitive ETCs might offer supported services that were not viewed by consumers as substitutes for the incumbent LEC's supported service.⁶⁰ Second, wireless carriers, rather than wireline competitive LECs, have received a majority of competitive ETC designations, serve a majority of competitive ETC lines, and have received a majority of competitive ETC support.⁶¹ These wireless competitive ETCs do not capture lines from the incumbent LEC to become a customer's sole service provider, except in a small portion of households.⁶² Thus, rather than providing a complete substitute for traditional wireline service, these wireless competitive ETCs largely provide mobile wireless telephony service in addition to a customer's existing wireline service.⁶³

⁵⁸ Alltel Comments at 16-17 (citing *Federal-State Joint Board on Universal Service*, Ninth Report and Order, 14 FCC Rcd 20432, 20480, para. 90 (1999)).

⁵⁹ See *Universal Service First Report and Order*, 12 FCC Rcd at 8932, para. 287, 8944, para. 311; *Federal-State Joint Board on Universal Service*, Recommended Decision, 12 FCC Rcd 87, 238, para. 296 (Fed-State Jt. Bd. 1996).

⁶⁰ SouthernLINC argues that "consumers in rural, insular and high-cost areas should also have access to competitive wireless services at reasonable rates in order to complement their wireline service." SouthernLINC Comments at 7-11. Essentially, SouthernLINC is arguing that mobility should be added to the list of supported services. We find that issue beyond the scope of the current proceeding.

⁶¹ See Letter from Jeffrey A. Eisenach, Chairman, Criterion Economics, LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45, WC Docket No. 05-337, Attach. The Effects of Providing Universal Service Subsidies to Wireless Carriers at 16-18, App. B (filed June 13, 2007) (Criterion Report) (claiming that, in 2006, 68 percent – 192 out of 281 – of all competitive ETC service areas were wireless service areas, and that 94 percent – \$770.5 million out of \$820.5 million – of all competitive ETC support went to wireless competitive ETCs).

⁶² See *2007 Commercial Mobile Services Report*, 23 FCC Rcd 2241, at para. 246 (citing survey reporting that only approximately 11.8 percent of U.S. households relied exclusively on wireless phones in 2006). Even the data on which CTIA relies show that less than 13 percent of households have replaced wireline with wireless service. CTIA Comments at 10.

⁶³ CTIA's reliance on a survey showing that less than 13 percent of households have replaced wireline with wireless service fails to demonstrate that wireless ETCs are a complete substitute for wireline ETCs. See CTIA Comments at 10. Nor does CTIA's second cited survey – in which respondents were asked to identify the single service, wireline or wireless, that they would retain if they could only retain one (a fictitious assumption) – demonstrate complete substitutability. See *id.* at 10-11.

In 2004, the Joint Board tried to address these developments by recommending that support be limited to "a single connection to the public telephone network." *2004 Recommended Decision*, 19 FCC Rcd at 4282, para. 62. Congress, however, has prohibited the Commission from implementing this recommendation. On December 8, 2004, Congress passed the 2005 Consolidated Appropriations Act, which prohibits the Commission from utilizing appropriated funds to "modify, amend, or change its rules or regulations for Universal Service support payments to implement the February 27, 2004 recommendations of the Federal-State Joint Board on Universal Service regarding single connection or primary line restrictions on universal service payments." Consolidated Appropriations Act, 2005, Pub. L. No. 108-447, § 634, 118 Stat. 2809 (2004) (2005 Consolidated Appropriations Act); Science, State, Justice, Commerce and Related Agencies Appropriations Act 2006, Pub. L. No. 109-108, § 622, 119 Stat. 2342 (2005) (extending prohibition until September 30, 2006); Revised Continuing Appropriations Resolution 2007, Pub. (continued....)

21. This has created a number of serious problems for the high-cost fund, and calls into question the rationale for the identical support rule. Instead of competitive ETCs competing against the incumbent LECs for a relatively fixed number of subscriber lines, the certification of wireless competitive ETCs has led to significant increases in the total number of supported lines.⁶⁴ Because the majority of households do not view wireline and wireless services to be direct substitutes,⁶⁵ many households subscribe to both services and receive support for multiple lines, which has led to a rapid increase in the size of the fund.⁶⁶ In addition, the identical support rule fails to create efficient investment incentives for competitive ETCs. Because a competitive ETC's per-line support is based solely on the per-line support received by the incumbent LEC, rather than its own network investments in an area, the competitive ETC has little incentive to invest in, or expand, its own facilities in areas with low population densities, thereby contravening the Act's universal service goal of improving the access to telecommunications services in rural, insular and high-cost areas.⁶⁷ Instead, competitive ETCs have a greater incentive to expand the number of subscribers, particularly those located in the lower-cost parts of high-cost areas, rather than to expand the geographic scope of their network. The Commission is currently considering eliminating the identical support rule.⁶⁸

22. We also find that the Commission's universal service principle of competitive neutrality does not preclude us from adopting an interim, limited cap under existing circumstances.⁶⁹ As discussed

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L. No. 110-5, § 105, 121 Stat. 9 (2007) (extending prohibition until September 30, 2007); Consolidated Appropriations Act, 2008, Pub. L. No. 110-161, § 511, 121 Stat. 1998 (2007) (extending prohibition until September 30, 2008).

⁶⁴ Between November 1, 2002, and February 1, 2008, the total number of lines served by all ETCs receiving interstate common line support or interstate access support, including competitive ETCs and incumbent LECs, increased by approximately 35.7 million. Competitive ETC line counts, which grew by approximately 31.7 million during that period, drove the increase. See Universal Service Administrative Company, *Federal Universal Service Support Mechanisms Fund Size Projections for the Second Quarter 2008*, App. HC09, HC12 (filed Feb. 1, 2008); Universal Service Administrative Company, *Federal Universal Service Support Mechanisms Fund Size Projections for the First Quarter 2003*, App. HC08, HC14 (filed Nov. 1, 2002).

⁶⁵ See *Petition of Qwest Communications International Inc. for Forbearance from Enforcement of the Commission's Dominant Carrier Rules As They Apply After Section 272 Sunsets*, WC Docket No. 05-333, Memorandum Opinion and Order, 22 FCC Rcd 5207, 5218, para. 17 (2007) (stating that a majority of presubscribed interexchange customers also subscribe to mobile wireless service); *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, WT Docket No. 06-17, Eleventh Report, 21 FCC Rcd 10947, 11027, para. 205 (2006) (citing survey reporting that approximately 8 percent of U.S. households relied exclusively on wireless phones in 2005).

⁶⁶ See Congressional Budget Office, *Factors that May Increase Future Spending from the Universal Service Fund* at 12 (2006) ("The fact that wireless entrants are providing additional telephone service rather than replacement service in many cases is part of the reason that total spending for support grows when wireless carriers enter a market covered by the USF.").

⁶⁷ See 47 U.S.C. § 254(b)(3).

⁶⁸ *Identical Support Rule NPRM*, 23 FCC Rcd 1467.

⁶⁹ *Universal Service First Report and Order*, 12 FCC Rcd at 8801-03, paras. 46-52 (subsequent history omitted) ("[W]e define this principle, in the context of determining universal service support, as: COMPETITIVE NEUTRALITY – Universal service support mechanisms and rules should be competitively neutral. In this context, competitive neutrality means that universal service support mechanisms and rules neither unfairly advantage nor disadvantage one provider over another, and neither unfairly favor nor disfavor one technology over another.").

above, high-cost support has increased by \$1.7 billion – more than 65 percent – from 2001 to 2007.⁷⁰ Continued growth at this rate would render the amount of high-cost support unsustainable and could cripple the universal service fund. To avert this crisis, it is necessary to place some temporary restraints on the fastest-growing portion of high-cost support, i.e., competitive ETC support. Moreover, as discussed above, it is not clear that identical support has, in reality, resulted in competitive neutrality. We therefore find that, rather than departing from the principle of competitive neutrality, as a matter of policy, we instead are temporarily prioritizing the immediate need to stabilize high-cost universal service support and ensure a specific, predictable, and sufficient fund.⁷¹

23. Finally, we reject arguments that the cap should not be adopted because it will not be truly interim in nature.⁷² The interim cap will remain in place only until the Commission adopts comprehensive, high-cost universal service reform.⁷³ Thus, we are satisfied that the interim cap's life will be of limited duration.

3. Cap on Competitive ETC Support Would Not Inhibit Broadband Deployment in Rural America

24. Several commenters argue that the interim cap on competitive ETC support will inhibit the deployment of broadband services.⁷⁴ With the exception of GCI, these commenters provide only anecdotal evidence of the possible effect of the interim cap on particular deployments, and do not systematically analyze the effect of the interim cap on broadband deployment.⁷⁵ Moreover, although high-cost support for rural incumbent LECs has been capped for many years, that does not appear to have inhibited the deployment of broadband service to areas served by rural incumbent LECs.⁷⁶ Indeed, high-cost universal service support may be used to invest in facilities to provide broadband service if those facilities are also necessary to provide voice grade access.⁷⁷

25. In light of the foregoing, we decline to adopt specific requirements for competitive ETCs regarding the provision of broadband Internet access services. Rather, we find that the role of high-cost support mechanisms in promoting broadband deployment is better addressed in a rulemaking of general applicability. In fact, the Commission currently is considering proposals to provide high-cost support for broadband service.⁷⁸

⁷⁰ See *supra* para. 6.

⁷¹ See 47 U.S.C. § 254(b)(5), (d). Moreover, as we explain below, the statute does not mandate that ETCs receive support, but rather that ETCs be eligible to receive support. See *infra* para. 29.

⁷² Alltel Comments at 7-9; CTIA Comments at 23.

⁷³ The Commission is required by statute to act within a year after receiving a recommendation by the Joint Board. 47 U.S.C. § 254(a)(2); see also *Recommended Decision*, 22 FCC Rcd at 8998, para. 1; *Joint Board 2007 Public Notice*, 22 FCC Rcd at 9023, para. 1.

⁷⁴ See, e.g., CTIA Comments at 6-9; ComspanUSA Comments at 9-11; MidRivers Comments at 7; SouthernLINC Comments at 16-17.

⁷⁵ See GCI May 31 *Ex Parte* Letter at 2.

⁷⁶ See *NTCA 2007 Broadband/Internet Availability Survey Report*, National Telecommunications Cooperative Association, 3 (Sept. 2007) (survey of NTCA member companies that serve primarily rural areas showed that 99 percent of 2007 respondents offer broadband to some parts of their customer base, compared with only 58 percent of respondents in 2000).

⁷⁷ See *Rural Task Force Order*, 16 FCC Rcd at 11321-23, paras. 199-201.

⁷⁸ See *supra* note 19.

B. Design and Implementation of the Cap

1. Operation of the Cap

26. We adopt a cap on competitive ETC support for each state, as recommended by the Joint Board, subject to two limited exceptions described below.⁷⁹ A competitive ETC cap applied at a state level will effectively curb growth, but, given a state's role in designating ETCs, will allow a state the flexibility to direct competitive ETC support to the areas in the state that it determines are most in need of such support.⁸⁰ An interim, state-based cap on competitive ETC support also will avoid creating an incentive for each state to designate as many new ETCs as possible for the sole purpose of increasing support to that state at the expense of other states, which could occur had we adopted a single, nationwide cap. A state-based cap will require newly-designated competitive ETCs to share funding with other competitive ETCs within the state.

27. Under the state-based cap, support will be calculated using a two-step approach. First, on a quarterly basis, the Universal Service Administrative Company (USAC) will calculate the support each competitive ETC would have received under the existing (uncapped) per-line identical support rule,⁸¹ and sum these amounts by state. Second, USAC will calculate a state reduction factor to reduce this amount to the competitive ETC cap amount. Specifically, USAC will compare the total amount of uncapped support to the cap amount for each state. Where the total state uncapped support is greater than the available state cap support amount, USAC will divide the state cap support amount by the total state uncapped amount to yield the state reduction factor. USAC will then apply the state-specific reduction factor to the uncapped amount for each competitive ETC within the state to arrive at the capped level of high-cost support. Where the state uncapped support is less than the available state capped support amount, no reduction will be required.

28. For example, if, in State A, the capped amount is \$90 million, and the total uncapped support is \$130 million, the reduction factor would be 69.2 percent (\$90/\$130). In State A, each competitive ETC's uncapped support would be multiplied by 69.2 percent to reduce support to the capped amount. If, in State B, however, the capped amount is \$100 million, and the total uncapped support is \$95 million, there would be no reduction factor because the uncapped amount is less than the capped amount. Finally, if, in State C the base period capped amount is \$0 (i.e., there were no competitive ETCs eligible to receive support in State C in March 2008), then no competitive ETCs would be eligible to receive support in that state during the interim cap. Each quarter, for the duration of the cap, a new reduction factor would be calculated for each state.

⁷⁹ See *infra* paras. 31-34.

⁸⁰ In addition to capping competitive ETC support by state, the Joint Board considered, but declined to recommend, capping competitive ETC support nationwide or by study area. The Joint Board felt that a nationwide cap would provide an incentive for states to designate additional competitive ETCs to increase their share of competitive ETC capped support and would result in competitive ETC support shifting to those states that aggressively designate competitive ETCs during the period of the interim cap. The Joint Board found that capping support at the study area level would foreclose the possibility of support for the duration of the cap for those study areas that currently have no competitive ETCs and would be administratively burdensome. The Joint Board noted that establishing the cap by any particular geographic area would not change the total amount of competitive ETC support available for all competitive ETCs in the nation, but the scope of the geographic territory for the cap affects the distribution of capped support and the administrative complexity of computing capped support. See *Recommended Decision*, 22 FCC Rcd at 9002, para. 9 n. 24. We agree with this analysis by the Joint Board.

⁸¹ See 47 C.F.R. § 54.307.

29. Some commenters argue that, in states where there currently are no competitive ETCs designated, subsequently designated competitive ETCs will receive no high-cost support while the interim cap remains in place.⁸² The Act does not, however, require that all ETCs must receive support, but rather only that carriers meeting certain requirements be *eligible* for support.⁸³ Section 214(e)(1) of the Act states, “A common carrier designated as an eligible telecommunications carrier . . . shall be *eligible* to receive universal service support in accordance with section 254[.]”⁸⁴ Likewise, section 254(e) of the Act states, “[O]nly an eligible telecommunications carrier designated under section 214(e) shall be *eligible* to receive specific Federal universal service support.”⁸⁵ This language indicates that designation as an ETC does not automatically entitle a carrier to receive universal service support.⁸⁶ Moreover, in section 254 of the Act, Congress distinguished between those who are merely “eligible” to receive support and those who are “entitled” to receive benefits.⁸⁷ We find that Congress’s careful delineation demonstrates an intention to ascribe different statutory rights. Accordingly, even if imposition of the interim cap results in no support for some competitive ETCs, this result is not inconsistent with the Act.⁸⁸

30. Moreover, there are advantages to obtaining and maintaining an ETC designation regardless of whether a competitive ETC receives high-cost support. In particular, the ability of competitive ETCs to receive low-income universal service support shows value in obtaining and maintaining ETC designation separate and apart from high-cost support. Indeed, TracFone Wireless, Inc. (TracFone) sought forbearance from section 214(e)(1) of the Act so that it could seek designation as an ETC eligible only to receive universal service Lifeline support.⁸⁹ TracFone took this step because “offering prepaid plans which make wireless service available to low income users . . . has been a critical component of TracFone’s business strategy since the company’s inception.”⁹⁰ Other ETCs may have

⁸² See, e.g., Alltel Comments at 17-18; Rural Cellular Ass’n Comments at 27; SC Off. of Reg. Staff Comments at 2.

⁸³ 47 U.S.C. §§ 214(e)(1); 254(e) (emphasis added).

⁸⁴ 47 U.S.C. § 214(e)(1) (emphasis added).

⁸⁵ 47 U.S.C. § 254(e) (emphasis added).

⁸⁶ See *Universal Service First Report and Order*, 12 FCC Rcd at 8853, para. 137 (“Indeed, the language of section 254(e), which states that ‘only an eligible telecommunications carrier designated under section 214(e) shall be *eligible* to receive’ universal service support, suggests that a carrier is not automatically entitled to receive universal service support once designated as eligible.”); *Alenco*, 201 F.3d at 620 (“The Act only promises universal service, and that is a goal that requires sufficient funding of *customers*, not *providers*.”).

⁸⁷ Compare 47 U.S.C. § 254(e) with 47 U.S.C. § 254(h)(1)(A) (providing that carriers offering certain services to rural health care providers “shall be entitled” to have the difference between the rates charged to health care providers and those charged to other customers in comparable rural areas treated as an offset to any universal service contribution obligation); see also *Transbrasil S.A. Linhas Aereas v. Dep’t of Transp.*, 791 F.2d 202, 205 (D.C. Cir. 1986) (“[W]here different terms are used in a single piece of legislation, the Court must presume that Congress intended the terms have different meanings.”).

⁸⁸ Some of the Commission’s current rules, including sections 54.307(a) and 54.309(a), provide that ETCs “shall receive” universal service support if certain conditions are met. See, e.g., 47 C.F.R. § 54.307(a), 54.309(a). But see 47 C.F.R. § 54.201(d) (“A common carrier designated as an eligible telecommunications carrier . . . shall be *eligible* to receive universal service support in accordance with section 254[.]”) (emphasis added). These rules, which were never intended to mandate support to all ETCs, unduly narrow the Commission’s discretion under the statute, which states merely that ETCs “shall be eligible” to receive such support. 47 U.S.C. § 214(e)(1).

⁸⁹ See TracFone Wireless, Inc. Petition for Forbearance, CC Docket No. 96-45 (filed June 8, 2004). Forbearance was granted in 2005. *Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005).

⁹⁰ TracFone Wireless, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee, CC Docket No. 96-45, 3 (filed Nov. 9, 2004) (Tennessee Petition). This petition was granted in an order (continued....)

similar business strategies. Further, by offering Lifeline and Link Up service, a competitive ETC may attract new subscribers that may not otherwise have taken telephone service.⁹¹ This would increase a competitive ETC's base of subscribers and, consequently, lower its average cost of serving all of its subscribers. Moreover, competitive ETCs may be eligible for separate universal service support at the state level.⁹²

31. We adopt two limited exceptions to the operation of the interim cap.⁹³ First, consistent with the *ALLTEL-Atlantis Order* and the *AT&T-Dobson Order*, we find it in the public interest to adopt a limited exception to the interim cap if a competitive ETC submits its own costs.⁹⁴ Specifically, a competitive ETC will not be subject to the interim cap to the extent that it files cost data demonstrating that its costs meet the support threshold in the same manner as the incumbent LEC.

32. Second, we also adopt a limited exception to the interim cap for competitive ETCs that serve tribal lands or Alaska Native regions (the Covered Locations).⁹⁵ We permit competitive ETCs serving Covered Locations to continue to receive uncapped high-cost support for lines served in those Covered Locations. Because many tribal lands have low penetration rates for basic telephone service, we do not believe that competitive ETCs are merely providing complementary services in most tribal lands, as they do generally.⁹⁶

33. Participation in this limited exception to the interim cap is voluntary and will be elected by the competitive ETC on a study area by study area basis. Therefore, any competitive ETC that does not or cannot opt into the limited exception, or that does not or cannot opt into the limited exception for a particular Covered Location, will remain subject to the interim cap as described herein. Support for competitive ETCs that do opt into the limited exception will continue to be provided pursuant to section

(...continued from previous page)

released on April 11, 2008. *Federal-State Joint Board on Universal Service, TracFone Wireless, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of New York et al.*, CC Docket No. 96-45, Order, FCC 08-100 (rel. April 11, 2008) (granting petitions for designation as an eligible telecommunication carrier for the purpose of low-income universal service support in 11 states and the District of Columbia).

⁹¹ See *id.* at 15.

⁹² See, e.g., KAN. STAT. ANN. § 66-2008 (2006) (providing for the creation of a Kansas universal service fund (KUSF) and requiring that carriers be designated as an ETC pursuant to section 214(e)(1) of the Act to receive support from the KUSF).

⁹³ Alaska Telephone Association (ATA) criticized proposals for a limited exception to the interim cap largely because ATA opposed the continued operation of the identical support rule. ATA Reply Comments at 3-4. This issue is better addressed in a rulemaking of general applicability.

⁹⁴ See *ALLTEL-Atlantis Order*, 22 FCC Rcd at 19521, paras 9-10; *AT&T-Dobson Order*, 22 FCC Rcd at 20329-30, paras. 70-72.

⁹⁵ Specifically, Covered Locations are tribal lands or Alaska Native regions as those terms are defined in section 54.400(e) of the Commission's rules. See 47 C.F.R. 54.400(e) (tribal lands or Alaska Native regions are "any federally recognized Indian tribe's reservation, pueblo, or colony, including former reservations in Oklahoma, Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688), and Indian allotments."); see also 47 C.F.R. §§ 54.403(a)(4), 54.409(c) (providing for additional Lifeline and Link Up support for eligible residents living in tribal lands or Alaska Native regions).

⁹⁶ See *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Report and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 11794, 11795, para. 2 (2000) (concluding that "existing universal service support mechanisms are not adequate to sustain telephone subscribership on tribal lands.").

54.307 of the Commission's rules, except that the uncapped per line support is limited to one payment per each residential account.⁹⁷ If a competitive ETC serves lines in both Covered Locations and non-Covered Locations (or only Covered Locations), the universal service administrator shall determine the amount of additional support – after application of the interim cap – necessary to ensure that a competitive ETC receives the same per-line support amount as the incumbent LEC for the lines qualifying for the exception.⁹⁸

34. Finally compliance with the terms of this limited exception will be verified through certification and reporting requirements.⁹⁹ Specifically, a competitive ETC seeking to receive high-cost support pursuant to this limited exception must certify the number of lines that meet the limited exception requirements.¹⁰⁰ The competitive ETC also must provide a specific description of how it confirmed that it had met the certification threshold.¹⁰¹

35. Even with the total amount of support provided to competitive ETCs being capped, continued growth in competitive ETC lines would have the effect of reducing the amount of interstate access support (IAS) received by incumbent LECs, due to the operation of the formula for calculating IAS.¹⁰² To prevent the implementation of the interim cap on competitive ETC support from having this unintended consequence on incumbent LEC support, we find it necessary to adjust the calculation of IAS for both incumbent LECs and competitive ETCs. Accordingly, we divide IAS into separate pools for incumbent LECs and competitive ETCs and separately cap the amount of IAS support for both types of carriers.¹⁰³ The annual amount of IAS available for incumbent LECs shall be set at the amount of IAS that incumbent LECs were eligible to receive in March 2008 on an annual basis.¹⁰⁴ This amount shall be indexed annually for line growth or loss by price cap incumbent LECs.¹⁰⁵ The annual amount of IAS available for competitive ETCs shall be set at the amount of IAS that competitive ETCs were eligible to receive in March 2008 on an annual basis.¹⁰⁶ Subject to these constraints, we direct USAC to calculate and distribute IAS for each pool to eligible carriers consistent with the existing IAS rules.¹⁰⁷

⁹⁷ 47 C.F.R. § 54.307.

⁹⁸ For example, if the uncapped per-line support amount in a competitive ETC's service area is \$10 per line, but the application of the interim cap reduces the per-line support amount to \$8 per line, the competitive ETC would receive an additional \$2 for each qualifying line in a Covered Location.

⁹⁹ See GCI May 31 *Ex Parte* Letter at 3.

¹⁰⁰ In order to qualify for the exception, the competitive ETC must certify the number of qualifying lines each time it files line count data with the universal service administrator.

¹⁰¹ Competitive ETCs must also comply with the document retention requirements for any such documentation. *Comprehensive Review of the Universal Service Fund Management, Administration, and Oversight*, WC Docket No. 05-195, Report and Order, 22 FCC Rcd 16372, 16383-84, para. 24. (2007).

¹⁰² See 47 C.F.R. §§ 54.800-54.808; see also Letter from David B. Cohen, Vice-President, Policy, USTelecom, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 05-337, CC Docket No. 96-45 (filed November 21, 2007) (USTelecom IAS Letter).

¹⁰³ See USTelecom IAS Letter at 1-2.

¹⁰⁴ See *infra* section III.B.3 (Base Period for the Cap).

¹⁰⁵ See USTelecom IAS Letter at 2.

¹⁰⁶ See *infra* section III.B.3 (Base Period for the Cap).

¹⁰⁷ Nothing in this order is intended, or shall be construed by USAC, to alter the annual IAS targeted cap amount of \$650 million. See 47 C.F.R. § 54.801(a).

2. Length of Time

36. In light of the harm to the sustainability of the universal service fund posed by the dramatic growth of support to competitive ETCs, we find that the cap we adopt today should become effective as soon as possible.¹⁰⁸ The cap will, therefore, commence as of the effective date of this Order.

37. We emphasize that the cap on competitive ETC support that we adopt here is only an interim measure to slow the current explosion of high-cost universal service support while the Commission considers further reform. We remain committed to comprehensive reform of the high-cost universal service support mechanisms. The Commission has three outstanding rulemaking proceedings that consider comprehensive reform of high-cost universal service support.¹⁰⁹ The Commission plans to move forward on adopting comprehensive reform measures in an expeditious manner. The Commission commits to completing a final order on comprehensive reform as quickly as feasible after the comment cycle is completed on the pending *Reform Notices*.¹¹⁰ We therefore do not believe that a fixed sunset date, as proposed by some commenters, is necessary or provides additional benefit.¹¹¹

3. Base Period for the Cap

38. Although we adopt the Joint Board's recommendation that the cap on competitive ETC support be set at the level of competitive ETC support actually distributed in each state, rather than set such a cap at the level of support actually distributed in 2006, we find it is more appropriate to set such a cap at the level of support competitive ETCs were eligible to receive during March 2008 on an annualized basis. Specifically, for each state, the annual interim cap shall be set at twelve times the level of support that all competitive ETCs were eligible to receive in that state for the month of March 2008. Using March 2008 data allows use of more recent actual support amounts than 2006. Use of March 2008 as the base period, moreover, will ensure that funding levels will not undermine the expectations underlying competitive ETC investment decisions or result in immediate funding reductions.¹¹² Further, consistent with our decision to cap competitive ETC support on an interim basis, we find it inappropriate and counterproductive to index the cap to a growth factor.

39. Although the interim cap that we adopt today applies only to the amount of support available to competitive ETCs, it does not restrict the number of competitive ETCs that may receive support. In fact, as part of this Order, we grant, to the extent described in Appendix B, numerous applications for ETC designation currently pending before the Commission. As described in more detail in Appendix B, we find that the applicants have met the Commission's requirements for designation. We also amend an ETC designation as described in Appendix C. These designations, however, do not affect the amount of support available to competitive ETCs, which is limited by the interim cap we adopt in this Order.

¹⁰⁸ Because the limited exception that we adopt herein will trigger additional Paperwork Reduction Act requirements, the limited exception will not become effective until the relevant reporting and recording requirements are approved by the Office of Management and Budget.

¹⁰⁹ See *infra* note 19.

¹¹⁰ See *infra* para. 4.

¹¹¹ See Alltel Comments at 21-23.

¹¹² See Dobson Comments at 14 ("The Commission should not disturb competitive ETCs' expectations by picking a point in the past as the base period for the cap."); see also Alltel Comments at 20-21; CTIA Comments at 28-29.

IV. PROCEDURAL MATTERS

A. Final Regulatory Flexibility Analysis

40. As required by the Regulatory Flexibility Act of 1980, the Commission has prepared a Final Regulatory Flexibility Analysis ("FRFA") of the possible significant economic impact on small entities of the policies and rules addressed in this Order.¹¹³ The FRFA is set forth in Appendix D.

B. Paperwork Reduction Act Analysis

41. This document contains new information collection requirements subject to the Paperwork Reduction Act of 1995 (PRA).¹¹⁴ It will be submitted to the Office of Management and Budget (OMB) for review under section 3507(d) of the PRA. OMB, the general public, and other federal agencies are invited to comment on the new information collection requirements contained in this proceeding. In addition, we note that, pursuant to the Small Business Paperwork Relief Act of 2002, we previously sought specific comment on how the Commission might "further reduce the information collection burden for small business concerns with fewer than 25 employees."¹¹⁵

42. In this present document, we have assessed the effects of demonstrating compliance with the exception to the interim cap, and find that there may be an increased administrative burden on businesses with fewer than 25 employees. We have taken steps to minimize the information collection burden for small business concerns, including those with fewer than 25 employees. First, we note that compliance with the exception is voluntary – small business concerns are not required to comply with the information collection. In addition, compliance with the exception will be elected by carriers on a study area by study area basis. Carriers need only provide additional information on the study areas for which they elect to rely on the exception to the interim cap.

C. Congressional Review Act

43. The Commission will send a copy of this Order in a report to be sent to Congress and the Government Accountability Office pursuant to the Congressional Review Act.¹¹⁶

V. ORDERING CLAUSES

44. Accordingly, IT IS ORDERED, pursuant to the authority contained in sections 1-4, 201-205, 214, 218-220, 254, 303(r), 403, 405, and 410 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151-154, 201-205, 214, 218-220, 254, 303(r), 403, 405, and 410, that this Order in CC Docket No. 96-45 and WC Docket No. 05-337 IS ADOPTED.

45. IT IS FURTHER ORDERED that, pursuant to the authority contained in section 214(e)(6) of the Communications Act, 47 U.S.C. § 214(e)(6), the petitions for eligible telecommunications carrier designation as set forth in Appendix B ARE GRANTED, DENIED, OR DISMISSED WITHOUT PREJUDICE to the extent described therein and, pursuant to section 1.103(a) of the Commission's rules, 47 C.F.R. § 1.103(a), SHALL BE effective thirty days after publication in the

¹¹³ See 5 U.S.C. § 604.

¹¹⁴ Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 109 Stat. 163 (1995).

¹¹⁵ Small Business Paperwork Relief Act of 2002, Pub. L. No. 107-198, 116 Stat. 729 (2002); 44 U.S.C. § 3506(c)(4).

¹¹⁶ See 5 U.S.C. § 801(a)(1)(A).

Federal Register, except where redefined service areas require the agreement of a state commission as described therein.

46. IT IS FURTHER ORDERED that, pursuant to the authority contained in section 214(e)(5) of the Communications Act, 47 U.S.C. § 214(e)(5), and sections 54.207(d) and (e) of the Commission's rules, 47 C.F.R. §§ 54.207(d) and (e), the requests to redefine the service areas of the rural telephone companies described in Appendix B, ARE GRANTED, DENIED, or GRANTED IN PART AND DENIED IN PART to the extent described therein and SUBJECT TO the agreement of the relevant state commissions with the Commission's redefinition of the relevant service areas, if not previously redefined as described therein.

47. IT IS FURTHER ORDERED that a copy of this order SHALL BE transmitted by the Office of the Secretary to the relevant state commissions and the Universal Service Administrative Company.

48. IT IS FURTHER ORDERED that the petitioners set forth in Appendix B SHALL SUBMIT additional information pursuant to sections 54.202(a) of the Commission's rules, 47 C.F.R. §§ 54.202(a).

49. IT IS FURTHER ORDERED that NEP Cellcorp, Inc.'s Motion to Strike IS DISMISSED AS MOOT as described in Appendix B.

50. IT IS FURTHER ORDERED that, pursuant to the authority contained in section 214(e)(6) of the Communications Act, 47 U.S.C. § 214(e)(6), RCC Minnesota, Inc. and RCC Atlantic, Inc.'s ETC designation in New Hampshire is amended as set forth in Appendix C.

51. IT IS FURTHER ORDERED that the Commission's Consumer and Governmental Affairs Bureau, Reference Information Center, SHALL SEND a copy of this Order, including the Final Regulatory Flexibility Analysis, to the Chief Counsel for Advocacy of the Small Business Administration.

52. IT IS FURTHER ORDERED, that this Order SHALL BE EFFECTIVE thirty days after publication in the Federal Register.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

APPENDIX A

List of Commenters

Initial Comments

<u>Commenter</u>	<u>Abbreviation</u>
Alaska Telephone Association	ATA
Alexicon Telecommunications Consulting	Alexicon
Alltel Communications, Inc.	Alltel
AT&T Inc.	AT&T
Blackfoot Telecommunications Group	Blackfoot
California Public Utilities Commission	CPUC
Centennial Communications Corp.	Centennial
CenturyTel, Inc.	CenturyTel
Chinook Wireless	
MTPCS, LLC d/b/a Chinook	Chinook Wireless
Comcast Corporation	Comcast
COMPTEL	COMPTEL
ComspanUSA	ComspanUSA
Corporation Commission of the State of Kansas	KCC
Corr Wireless Communications, LLC	Corr
CTIA – The Wireless Association®	CTIA
DialToneServices, L.P.	DialToneServices
Dobson Cellular Systems, Inc.	Dobson
Embarq Corporation	Embarq
ETS Telephone Company, Inc.	
f/k/a Kingsgate Telephone, Inc.	ETS
Fred Williamson and Associates	Fred Williamson & Associates
Frontier Communications	Frontier
General Communication, Inc.	GCI
GVNW Consulting, Inc.	GVNW
Idaho Public Utilities Commission	IPUC
Independent Telephone and Telecommunications Alliance	ITTA
Iowa Telecommunications Association	Iowa Telecommunications Ass'n
Iowa Utilities Board	IUB
Corporation Commission of the State of Kansas	Kansas State Corporation Comm'n
Maine Public Utilities Commission	MPUC
Midcontinent Communications	Midcontinent
Mid-Rivers Telephone Cooperative, Inc.	MRTC
Minnesota Independent Coalition	MIC
Montana Public Service Commission	MTPSC
Montana Telecommunications Association	MTA
National Association of State Utility Consumer Advocates	NASUCA
National Exchange Carrier Association, Inc.	NECA
National Telecommunications Cooperative Association	NTCA
Navajo Nation Telecommunications Regulatory	
Commission	NNTRC
Nebraska Public Service Commission	NPSC
Nebraska Rural Independent Telephone Companies	

and South Dakota Telecommunications Association	Nebraska Rural Independent Cos and South Dakota Telecommunications Ass'n
New Jersey Board of Public Utilities	New Jersey Board of Public Utilities
New York State Department of Public Service	New York Department of Public Service
Organization for the Promotion and Advancement of Small Telecommunications Companies	OPASTCO
Public Utilities Commission of Ohio	Ohio Commission
Rural Cellular Association and the Alliance of Rural CMRS Carriers	Rural Cellular Ass'n and Alliance of Rural CMRS Carriers
Rural Independent Competitive Alliance	RICA
Rural Iowa Independent Telephone Association	Rural Iowa Independent Telephone Ass'n
Rural Telecommunications Group, Inc.	Rural Telecommunications Group
Small Company Committee of the Louisiana Telecommunications Association (Louisiana Rural Telephone Companies)	Small Company Committee of the Louisiana Telecommunications Ass'n
South Carolina Office of Regulatory Staff	South Carolina Office of Regulatory Staff
Southern Communications Services, Inc. d/b/a SouthernLINC Wireless	SouthernLINC
Sprint Nextel Corporation	Sprint Nextel
State Independent Telephone Association of Kansas and Independent Telecommunications Group	State Independent Telephone Ass'n of Kansas and Independent Telecommunications Group
SureWest Communications	SureWest
TCA, Inc. – Telcom Consulting Associates	TCA
TDS Telecommunications Corp.	TDS
Telecommunications Association of Michigan	TAMI
Telephone Association of Maine	Telephone Ass'n of Maine
Tennessee Telecommunications Association	Tennessee Telecommunications Ass'n
Texas Statewide Telephone Cooperative, Inc.	Texas Statewide Telephone Cooperative, Inc.
Totah Communications, Inc.	Totah Communications, Inc. et al.
FairPoint Communications (formerly Chouteau Telephone Company)	TracFone
Pine Telephone Company, Inc.	Unicom
Pine Cellular Phones, Inc.	
Grand Telephone Company, Inc.	
TracFone Wireless, Inc.	
Unicom, Inc.	
United States Cellular Corporation and Rural Cellular Corporation	US Cellular and Rural Cellular Corp.
United States Telecom Association	USTelecom
Valley Telephone Cooperative, Inc.	Valley Telephone Cooperative
Verizon and Verizon Wireless	Verizon and Verizon Wireless
Western Telecommunications Alliance	Western Telecommunications Alliance
Windstream Communications, Inc.	Windstream

Wisconsin State Telecommunications Association

Wisconsin State Telecommunications
Ass'nReply CommentsCommenterAbbreviation

Alaska Telephone Association

ATA

Alltel Communications, Inc.

Alltel

Arizona Corporation Commission

Arizona Commission

CTIA – The Wireless Association

CTIA

DialToneServices, L.P.

DialToneServices

Dobson Cellular Systems, Inc.

Dobson

Embarq Corporation

Embarq

Five State Members of the Mid-Atlantic Conference
of Regulatory Utility Commissioners

Five MACRUC States

Florida Public Service Commission

FPSC

Fred Williamson and Associates, Inc.

Fred Williamson & Associates

General Communication, Inc.

GCI

Golden West Telecommunications Cooperative, Inc.

Golden West

GVNW Consulting, Inc.

GVNW

Independent Telephone and Telecommunications Alliance

ITTA

Missouri RSA No. 5 Partnership d/b/a

Chariton Valley Wireless Services and

Panhandle Telecommunication Systems, Inc.

Chariton

Montana Telecommunications Association

MTA

National Association of State Utility Consumer Advocates

NASUCA

National Telecommunications Cooperative Association

NTCA

Nebraska Rural Independent Telephone Companies

and South Dakota Telecommunications Association

Nebraska Rural Independent Cos and
South Dakota Telecommunications
Ass'n

New Jersey Division of Rate Counsel

NJ Rate Counsel

New York State Telecommunications Association, Inc.

NYSTA

Ohio Telecom Association

OTA

Oregon Telecommunications Association Small Company

Committee and Washington Independent Telephone

Association

WITA

Organization for the Promotion and Advancement

of Small Telecommunications Companies

OPASTCO

Pennsylvania Public Utility Commission

PaPUC

Qwest Communications International Inc.

Qwest

Rural Cellular Association and the

Alliance of Rural CMRS Carriers

Rural Cellular Ass'n and Alliance of
Rural CMRS Carriers

Rural Iowa Independent Telephone Association

Rural Iowa Independent Telephone
Ass'nScott Wallsten, Sr. Fellow and Director of Communications
Policy Studies at the Progress & Freedom Foundation

Wallsten

Small Company Committee of the Louisiana

Telecommunications Association

(Louisiana Rural Telephone Companies)	Small Company Committee of the Louisiana Telecommunications Ass'n SCTC
South Carolina Telephone Coalition	
Southern Communications Services, Inc. d/b/a SouthernLINC Wireless	SouthernLINC
Sprint Nextel Corporation	Sprint Nextel
State Independent Telephone Association of Kansas and Independent Telecommunications Group	State Independent Telephone Ass'n of Kansas and Independent Telecommunications Group
SureWest Communications	SureWest
TDS Telecommunications Corp.	TDS
Texas Statewide Telephone Cooperative, Inc.	Texas Statewide Telephone Cooperative, Inc.
T-Mobile U.S.A., Inc.	T-Mobile
Totah Communications, Inc.	
FairPoint Communications (formerly Chouteau Telephone Company)	
Pine Telephone Company, Inc.	
Pine Cellular Phones, Inc.	
Grand Telephone Company, Inc.	
TracFone Wireless, Inc.	Totah Communications, Inc. <i>et al.</i>
United States Cellular Corporation and Rural Cellular Corporation	TracFone
Verizon and Verizon Wireless	US Cellular and Rural Cellular Corp.
Western Telecommunications Alliance	Verizon and Verizon Wireless
	Western Telecommunications Alliance

APPENDIX B

Alltel Communications, Inc., et al.
Petitions for Designation as Eligible Telecommunications Carriers

I. INTRODUCTION

1. As stated in paragraph 44 of this Order, we grant, deny, or dismiss without prejudice as discussed below 22 petitions for designation as eligible telecommunications carriers (ETCs) filed by 14 entities pursuant to section 214(e)(6) of the Communications Act of 1934, as amended (the Act) (collectively, Petitions).¹ We also redefine the service areas of certain rural telephone companies to the extent described herein.

II. BACKGROUND**A. The Act**

2. Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support.”² Pursuant to section 214(e)(1) of the Act, a common carrier designated as an ETC must offer and advertise the services supported by the federal universal service mechanisms throughout the designated service area.³

3. Section 214(e)(2) of the Act gives state commissions the primary responsibility for performing ETC designations.⁴ Section 214(e)(6) directs the Commission, upon request, to designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject

¹ 47 U.S.C. § 214(e)(1). A list of the Petitions is set forth in Exhibit 1. We note that many of the Petitioners filed amendments and/or supplements to their petitions. The term Petitions, as used herein, includes any such amendments and supplemental filings. Exhibit 1 also provides abbreviations for the entities, petitions, amendments, and supplemental filings cited in this Order.

We note that AT&T Wireless Services, Inc. (AWS) initially filed a petition for designation as an ETC in the state of Alabama for itself and on behalf of AirCom PCS, Inc., Tritel C/F Holding Corp., Tritel A/B Holding Corp, AT&T Wireless PCS, LLC, and QuinComm, Inc. *See generally* AWS Alabama Petition. After its merger with AWS, Cingular Wireless LLC filed amendments to the petition to reflect the merger, remove all rural study areas, and amend the non-rural areas for which it requests designation. *See* Cingular Alabama Amendment. Cingular Wireless LLC now wholly owns or controls all of the licensees at issue in the instant matter: New Cingular Wireless PCS, LLC, Blue Licenses Holding, LLC, and Orange Licenses Holding, LLC. *See id.* at 2 and Exhibit D. We refer to Cingular Wireless LLC and any of the associated entities holding the licenses at issue herein collectively as Cingular. Based on Cingular’s representations, we evaluate the AWS petition and the Cingular amendments as unified pleadings.

We further note that U.S. Cellular acquired control of Tennessee RSA No. 3 Limited Partnership d/b/a Eloqui (Eloqui) after Eloqui filed its petition for designation as an ETC in the state of Tennessee. *See* U.S. Cellular Tennessee Amended Petition at 2. We evaluate the Eloqui Petition and the U.S. Cellular amendments thereto as unified pleadings.

² 47 U.S.C. § 254(e).

³ 47 U.S.C. § 214(e)(1); *see also* 47 C.F.R. § 54.201(d).

⁴ 47 U.S.C. § 214(e)(2); *see Promoting Deployment and Subscribership in Unserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12255, para. 93 (2000) (*Twelfth Report and Order*).

to the jurisdiction of a State commission.”⁵ Under section 214(e)(6), the Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience, and necessity, so long as the requesting carrier meets the requirements of section 214(e)(1).⁶ Before designating an additional ETC for an area served by a rural telephone company, the Commission must determine that the designation is in the public interest.⁷

B. Commission Requirements for ETC Designation

4. An ETC petition must contain the following: (1) a certification and brief statement of supporting facts demonstrating that the petitioner is not subject to the jurisdiction of a state commission; (2) a certification that the petitioner offers or intends to offer all services designated for support by the Commission pursuant to section 254(c) of the Act; (3) a certification that the petitioner offers or intends to offer the supported services “either using its own facilities or a combination of its own facilities and resale of another carrier’s services;” (4) a description of how the petitioner “advertise[s] the availability of the [supported] services and the charges therefor using media of general distribution;” and (5) if the petitioner meets the definition of a “rural telephone company” under section 3(37) of the Act, the identity of its study area, or, if the petitioner is not a “rural telephone company,” a detailed description of the geographic service area for which it requests an ETC designation from the Commission.⁸

5. In the *ETC Designation Order*, the Commission adopted additional requirements for ETC designation proceedings in which the Commission acts pursuant to section 214(e)(6) of the Act.⁹ Specifically, consistent with the recommendation of the Federal-State Joint Board on Universal Service (Joint Board), the Commission found that an ETC applicant must demonstrate: (1) a commitment and ability to provide services, including providing service to all customers within its proposed service area; (2) how it will remain functional in emergency situations; (3) that it will satisfy consumer protection and service quality standards; (4) that it offers local usage comparable to that offered by the incumbent LEC; and (5) an understanding that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to section 214(e)(4) of the Act.¹⁰ These additional requirements are mandatory for all ETCs designated by the Commission.¹¹ ETCs already

⁵ 47 U.S.C. § 214(e)(6).

⁶ *Id.*

⁷ *Id.*

⁸ See *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, Public Notice, 12 FCC Rcd 22947, 22948 (1997) (*Section 214(e)(6) Public Notice*); see also *Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion and Order, 19 FCC Rcd 1563, 1564, 1565, 1575-76, 1584-85, paras. 1, 4, 27, 28, 46 (2004) (*Virginia Cellular Order*); *Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion and Order, 19 FCC Rcd 6422, 6438, paras. 1, 33 (2004) (*Highland Cellular Order*).

⁹ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371 (2005) (*ETC Designation Order*).

¹⁰ See *ETC Designation Order*, 20 FCC Rcd at 6380, para. 20 (citing *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 19 FCC Rcd 4259, 4261, para. 5 (Fed-State Jt. Bd. 2004)).

¹¹ 47 C.F.R. § 54.202(a).

designated by the Commission or ETC applicants that submitted applications prior to the effective date of the *ETC Designation Order* must make such showings in their annual certification filings.¹²

6. In addition, prior to designating an ETC pursuant to section 214(e)(6) of the Act, the Commission determines whether such designation is in the public interest.¹³ In the *ETC Designation Order*, the Commission adopted one set of criteria for evaluating the public interest for ETC designations for both rural and non-rural areas.¹⁴ Specifically, in determining the public interest, the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering are considered.¹⁵ As the Commission noted in the *ETC Designation Order*, however, the same factors may be analyzed differently or may warrant a different outcome depending on the specifics of the proposed service area and whether it is rural or non-rural.¹⁶ In particular, the creamskimming analysis is limited to designations in rural service areas.¹⁷ Thus, when an ETC applicant seeks designation below the study area level of a rural telephone company, the Commission conducts a creamskimming analysis to compare the population density of the wire centers in which the ETC applicant seeks designation against that of the wire centers in the study area in which the ETC applicant does not seek designation.¹⁸

C. Requirements for Redefining Rural Telephone Company Service Areas

7. To designate ETCs in service areas that differ from the affected rural telephone companies' study areas, we must redefine the service areas of the rural telephone companies in accordance with section 214(e)(5) of the Act.¹⁹ Under section 214(e)(5), "[i]n the case of an area served by a rural telephone company, 'service area' means such company's 'study area' unless and until the Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company."²⁰ Under section 54.207(d)(1) of the Commission's rules, the Commission must petition a state commission with the proposed definition according to that state commission's procedures.²¹ In that petition, the Commission must provide its proposal for redefining the service area and its decision presenting reasons for adopting the new definition, including an analysis that takes into account the recommendations of the Joint Board.²² When the Joint Board recommended that the Commission retain the current study areas of

¹² 47 C.F.R. § 54.202(b).

¹³ 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(c); *see also ETC Designation Order*, 20 FCC Rcd at 6388-96, paras. 40-57; *Virginia Cellular Order*, 19 FCC Rcd at 1575, para. 27; *Highland Cellular Order*, 19 FCC Rcd at 6431-32, para. 21. The Commission places the burden on the ETC applicant to demonstrate that the public interest is served. *ETC Designation Order*, 20 FCC Rcd at 6390, para. 44.

¹⁴ *Id.* at 6389-90, paras. 42-43.

¹⁵ 47 C.F.R. § 54.202(c).

¹⁶ *ETC Designation Order*, 20 FCC Rcd at 6390, para. 43.

¹⁷ *Id.* at 6389-90, paras. 42-43. A carrier "creamskims" when it serves only the least expensive customers, thereby undermining the ability of the incumbent local exchange carrier (LEC) to provide service to the entire study area. *See Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, 12 FCC Rcd 8776, 8881-82, para. 189 (1997) (subsequent history omitted).

¹⁸ *ETC Designation Order*, 20 FCC Rcd at 6392-95, paras. 48-53.

¹⁹ 47 U.S.C. § 214(e)(5).

²⁰ *Id.*

²¹ 47 C.F.R. § 54.207(d)(1).

²² *Id.*

rural telephone companies as the service areas for the rural telephone companies, the Joint Board made the following observations: (1) the potential for creamskimming is minimized by retaining study areas because competitors, as a condition of eligibility, must provide services throughout the rural telephone company's study area; (2) the Act, in many respects, places rural telephone companies on a different competitive footing from other local telephone companies; and (3) there would be an administrative burden imposed on rural telephone companies by requiring them to calculate costs at something other than the study area level.²³

III. DISCUSSION

A. Commission Authority to Perform ETC Designations

8. Petitioners have demonstrated that, except for the Florida Public Service Commission, the Georgia Public Service Commission, and the U.S. Virgin Islands Public Services Commission, the relevant state commissions lack authority to perform the requested ETC designations and the Commission has authority to consider the Petitions under section 214(e)(6) of the Act.²⁴

9. In April 2007, the Florida Public Service Commission found that, due to a change in Florida state law, it “now ha[s] jurisdiction to consider CMRS applications for ETC designation.”²⁵ The Georgia Public Service Commission found in October 2007 that it has the authority to designate wireless carriers as ETCs.²⁶ Further, the U.S. Virgin Islands in February 2008 granted its Public Services Commission the authority to grant requests for ETC designation by wireless carriers.²⁷ In light of these developments, and because section 214(e)(2) of the Act gives state commissions the primary responsibility for performing ETC designations,²⁸ we dismiss without prejudice the petitions filed by SouthernLINC seeking designation as an ETC in Florida and Georgia and the petition filed by Choice seeking designation as an ETC in the U.S. Virgin Islands (the Dismissed Petitions). SouthernLINC may re-file its petitions with the Florida Public Service Commission and the Georgia Public Service Commission, respectively, and Choice may re-file its petition with the U.S. Virgin Islands Public Services Commission.

²³ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 12 FCC Rcd 87, 179-80, paras. 172-74 (1996) (*1996 Recommended Decision*).

²⁴ 47 U.S.C. § 214(e)(6).

²⁵ *Petition of Alltel Communications, Inc. for Designation as Eligible Telecommunications Carrier (ETC) in Certain Rural Telephone Company Study Areas Located Partially in Alltel's Licensed Area and for Redefinition of those Study Areas*, PSC-07-0288-PAA-TP, Notice of Proposed Agency Action Order Finding Authority to Consider Applications By CMRS Providers For ETC Designation, 2007 WL 1029436 (Fla. P.S.C. Apr. 3, 2007). This order was a proposed agency action, which was made final by a consummating order on June 7, 2007. See *Petition of Alltel Communications, Inc. for Designation as Eligible Telecommunications Carrier (ETC) in Certain Rural Telephone Company Study Areas Located Partially in Alltel's Licensed Area and for Redefinition of those Study Areas*, PSC-07-0481A-CO-TP, Amendatory Order, 2007 WL 1774614 (Fla. P.S.C. June 7, 2007).

²⁶ See Ga. Code Ann. § 46-5-222 (2007); *Application of Alltel Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, 10396-U, Order Granting ETC Status, 2007 WL 3119444 (Ga. P.S.C. Oct. 15, 2007).

²⁷ See 2007 V.I. Sess. Laws 6977; Letter from Joseph B. Boschulte, Chairman, U.S. Virgin Islands Public Services Commission, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-337, CC Docket No. 96-45 (dated Feb. 11, 2008).

²⁸ See 47 U.S.C. § 214(e)(2).

10. Each of the remaining Petitions includes an affirmative statement from the relevant state commission providing that ETC designation should be sought from the Commission.²⁹ Accordingly, we find that the relevant state commissions lack jurisdiction to designate Petitioners as ETCs and that this Commission therefore has authority to perform the requested ETC designations under section 214(e)(6).³⁰

B. Analysis of the Eligibility Requirements

11. Offering the Services Designated for Support. Petitioners have demonstrated through the required certifications and related filings that they now offer, or will offer upon designation as ETCs, the services supported by the federal universal service mechanisms.³¹

12. Offering the Supported Services Using a Carrier's Own Facilities. Petitioners have demonstrated that they offer, or will offer upon designation as ETCs, the supported services using either their own facilities or a combination of their own facilities and resale of another carrier's services.³²

²⁹ See generally Petitions. The term Petitions shall hereinafter be interpreted to exclude the Dismissed Petitions and the term Petitioners to exclude Choice and, with respect to its Florida and Georgia petitions, SouthernLINC.

³⁰ 47 U.S.C. § 214(e)(6).

We note that the Pennsylvania Public Utility Commission (Pennsylvania Commission) filed reply comments opposing NEP's petition. See *Petitions of NEP Cellcorp, Inc. for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania and Corr Wireless Communications, LLC for Designation as an Eligible Telecommunications Carrier in the State of Alabama*, CC Docket No. 96-45, Reply Comments of the Pennsylvania Public Utilities Commission (filed Sept. 5, 2007). The Pennsylvania Commission also, however, stated in a letter to NEP that the Pennsylvania Commission did not intend to exercise jurisdiction to consider NEP's petition, and that NEP should seek ETC designation at the federal level. See NEP Petition at Exh. B. We find that NEP has provided sufficient evidence to support the conclusion that we have jurisdiction to perform NEP's requested ETC designation under section 214(e)(6). 47 U.S.C. § 214(e)(6). NEP filed a motion to strike the Pennsylvania Commission's reply comments from the record. See NEP Cellcorp, Inc. Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania, CC Docket No. 96-45, Motion to Strike (filed Oct. 10, 2007). Because we grant NEP's petition here, we dismiss NEP's motion as moot.

The Commission previously has stated that "the Commission's authority to perform [an ETC designation under section 214(e)(6)] is no greater than that of the state that would have otherwise made the designation." *Petition for Reconsideration of Western Wireless Corporation's Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, Order on Reconsideration, 16 FCC Rcd 19144, 19147, para. 8 (2001) (*Western Wireless 2001 Order*), affirming *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 48 (Com. Carrier Bur. 2000) (*Western Wireless 2000 Order*).

With respect to U.S. Cellular's New Hampshire petition, the Commission stands in the place of the New Hampshire Public Utilities Commission (New Hampshire Commission). U.S. Cellular requested, however, designation for certain wire centers located in Vermont, which are served by Verizon New England, a non-rural incumbent LEC, and two wire centers located in Maine, which are served by Northland Telephone of Maine Inc., a rural incumbent LEC. U.S. Cellular New Hampshire Petition, Exhibits B and C. U.S. Cellular has not demonstrated that the Maine and Vermont Commissions do not have the authority to designate U.S. Cellular as an ETC in their states. As the New Hampshire Commission would not have the authority to perform an ETC designation for wire centers in Maine or Vermont, we exclude from our determination the wire centers of Verizon New England in Vermont and Northland Telephone of Maine Inc. in Maine. The Verizon New England wire centers in Vermont which we exclude are: Barnet, Bellows Falls, Brattleboro, Bradford, Fairlee, Newbury, Windsor, and White River Junction. The Northland Telephone of Maine Inc. wire centers in Maine which we exclude are Fryeburg and North Fryeburg.

³¹ 47 C.F.R. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1); 47 C.F.R. § 54.101(a) (listing the services supported by the federal universal service mechanisms); see generally Petitions.

³² 47 C.F.R. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1); see generally Petitions.

13. Advertising Supported Services. Petitioners have committed to advertise the availability of the supported services and the related charges using media of general distribution.³³ In addition, Petitioners have committed to advertising the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services.³⁴

14. Additional Eligibility Requirements. Petitioners also satisfy the eligibility requirements set forth in the *ETC Designation Order*, described above,³⁵ or must make such showings in their first annual reports under section 54.209 of the Commission's rules.³⁶

C. Public Interest Analysis

15. Cost-Benefit Analysis. We find that Petitioners' universal service offerings will provide a variety of benefits to consumers, including increased consumer choice, high-quality service offerings,³⁷ and mobility.³⁸ In addition, universal service support will enable Petitioners to construct facilities or accelerate planned construction.³⁹ This should improve quality of service and will, in some cases, extend telephone service to people who do not have access to a wireline telephone or do not have a choice of telephone providers.⁴⁰ On balance, and subject to our creamskimming analysis for rural study areas below, we find that the advantages of designating Petitioners as ETCs to the extent described herein outweigh any disadvantages.⁴¹

³³ 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2); *see generally* Petitions.

³⁴ 47 C.F.R. §§ 54.405, 54.411.

³⁵ *See supra* para. 5.

³⁶ *ETC Designation Order*, 20 FCC Rcd at 6380, para. 20; 47 C.F.R. §§ 54.202(a), 54.209; *see generally* Petitions.

³⁷ For example, Petitioners have committed to comply with the Consumer Code for Wireless Service of the Cellular Telecommunications Industry Association (CTIA). *See generally* Petitions.

³⁸ *See generally* Petitions. As noted in the *PSC Alabama Order*, the mobility of telecommunications assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other locations. *Public Service Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the States of Georgia and Alabama*, CC Docket No. 96-45, Order, 20 FCC Rcd 6854, 6861, para. 25 (Wireline Comp. Bur. 2005) (*PSC Alabama Order*). Moreover, the availability of a wireless universal service offering also provides access to emergency services that can mitigate the unique risks of geographic isolation associated with living in rural communities. *Id.*

³⁹ *See generally* Petitions.

⁴⁰ *See, e.g.*, Dobson First Petition at 17.

⁴¹ Although there may be disadvantages to designating Petitioners as ETCs, such as dropped calls or poor coverage in certain portions of these areas, our concerns about potential disadvantages are allayed by Petitioners' commitments to build out their facilities and to make service quality improvements. We note that Petitioners are required to report on service quality improvements and any problems associated with their coverage on October 1st of each year. 47 C.F.R. § 54.209. *See also ETC Designation Order*, 20 FCC Rcd at 6400-6402, paras. 68-69. We also note that all ETCs must report annually on the progress of their five-year network improvement plans. *See* 47 C.F.R. § 54.209.

In addition, some commenters argued that designation of multiple new ETCs may undermine the sustainability of the universal service fund (Fund). *See, e.g.*, Cingular Wireless Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, CC Docket No. 96-45, Opposition of Verizon, at 4 (filed Dec. 4, 2006). The interim cap on high-cost universal service support disbursements adopted in this order is sufficient to ensure the sustainability of the Fund. Further, the *ETC Designation Order* found that any impact on the Fund must be balanced against other objectives, such as providing access to services comparable to services offered

(continued....)

16. Creamskimming Analysis. Because Petitioners request ETC status in the entire study area of each of the rural telephone companies listed in Exhibits 2, 4-9, 11-13, 15-16, and 18-28, we are not concerned about the potential for creamskimming with regard to these companies.⁴² For this reason and for the reasons set forth in paragraph 15, we find that designation of Petitioners as ETCs in the areas stated in Exhibits 2, 4-9, 11-13, 15-16, and 18-28 is in the public interest.

17. Petitioners' service areas differ from the study areas of the rural telephone companies identified in Exhibits 3, 10, 14, 17 and 29. We therefore performed a creamskimming analysis for those service areas. Except as noted below, our analysis of the population density of each of the affected wire centers revealed that Petitioners will not be serving only low-cost areas to the exclusion of high-cost areas. Although there are other factors that define high-cost areas, a lower population density generally indicates a higher-cost area.⁴³ Therefore, except as noted below, we find that, for the reasons stated in paragraph 15 and because designating Petitioners below the study area level of the relevant rural telephone companies will not have the effect of creamskimming, such designations are in the public interest.

18. For the following study areas, we find designating Petitioners below the study area level raises creamskimming concerns based on analysis of population densities and therefore is not in the public interest.

19. *Alltel.* We find that designating Alltel as an ETC in the Butler Telephone Co., Inc. and Frontier Communications of the South study areas in Alabama, the Alltel Carolina-North Inc. and Sprint Mid Atlantic study areas in North Carolina, and the Central Telephone Co.-Virginia, NTELOS Telephone Inc., United Inter-Mountain Telephone, and Verizon South Inc.-VA study areas of Virginia would not be in the public interest.

20. *Dobson.* We find that designating Dobson as an ETC in the Citizens Telecom-NY and State Tel. Co. study areas would not be in the public interest. Designation of Dobson as an ETC in the Empire Tel. Corp. study area does not create creamskimming concerns because, consistent with Dobson's filing, we remove the East Pembroke wire center from the proposed service area.⁴⁴ We therefore designate Dobson as an ETC only in the Pulteney wire center in the Empire Tel. Corp. service area.

21. *U.S. Cellular.* We find that designating U.S. Cellular as an ETC in the CenturyTel of Claiborne, Inc., Citizens Communications Company Tennessee d/b/a Frontier Communications of Tennessee, LLC, and Twin Lakes Telephone Cooperative Corp. study areas would not be in the public interest.

(...continued from previous page)

in urban areas and competitive neutrality. See *ETC Designation Order*, 20 FCC Rcd at 6395-96, para. 56. We find that any impact on the Fund is outweighed by the benefits described above.

⁴² *ETC Designation Order*, 20 FCC Rcd at 6392, para. 49; *Virginia Cellular Order*, 19 FCC Rcd at 1578, para. 32; *Highland Cellular Order*, 19 FCC Rcd at 6434-35, para. 26. As noted above, the creamskimming analysis is limited to designations in rural service areas. See *supra* para. 6.

⁴³ *Advantage Cellular Systems Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, CC Docket No. 96-45, Order, 19 FCC Rcd 20994, n.67 (Wireline Comp. Bur. 2004).

⁴⁴ Dobson stated "in the event the Commission finds that the present disparity in population density between the served and unserved wire centers of the study area of Empire Telephone Corporation (SAC 150093) (Empire) is large enough to present cream skimming concerns, Dobson would withdraw from its proposed designated area the East Pembroke wire center (EPMBNYXA) to equalize the balance in population density." Dobson Second Amendment at 2.

22. Partial Wire Centers. In the *ETC Designation Order* and *Highland Cellular Order*, the Commission concluded that making designations for a portion of a rural telephone company's wire center would be inconsistent with the public interest.⁴⁵ Therefore, we find that designating NEP as an ETC in the North-Eastern Pennsylvania Telephone Co. study area in Pennsylvania would not be in the public interest because NEP only provides partial coverage in the wire centers of Clifford and Forest City. In addition, we find that designating NEP as an ETC in the Springville wire center in the Frontier study area in Pennsylvania would not be in the public interest because NEP only provides partial coverage in this wire center.⁴⁶

D. Redefinition Analysis

23. Consistent with prior rural service area redefinitions and with the recommendations of the Joint Board described above,⁴⁷ we redefine certain service areas as follows.

24. Alltel. We note that we previously redefined the service areas of Alltel Alabama Inc. and Millry Telephone Company in Alabama⁴⁸ and Central Telephone Co. and Surry Telephone Membership in North Carolina.⁴⁹

25. Dobson. We redefine the services areas of Citizens Tel. Co. of NY, Taconic Tel. Corp., and Middleburgh Tel. Co at the wire center level. We also redefine the revised Empire service area at the wire center level.⁵⁰

26. NEP. We redefine the requested wire centers in the study area of Frontier and Verizon North at the wire center level.⁵¹

27. NY RSA 2. We redefine the requested wire centers in the study area of Citizens Telecommunications of New York d/b/a Frontier Communications as a separate service area.

28. U.S. Cellular. We redefine the requested wire centers in the study area of North Central Telephone Cooperative, Inc. as a separate service area. We also redefine the requested wire centers in the study areas of NTELOS Telephone Inc., Peoples Mutual Telephone Co., Central Telephone Co.-VA and Verizon South Inc.-VA in Virginia as a separate service area. We also redefine the requested wire centers in the study areas of Alltel Carolina-North, Inc., Central Telephone Company-North Carolina, Randolph Telephone Membership Corporation, Skyline Telephone Membership Corporation, Sprint Mid-Atlantic, and Yadkin Valley Telephone Membership Corporation in North Carolina as a separate service area.

⁴⁵ *ETC Designation Order*, 20 FCC Rcd at 6378, para. 15; *Highland Cellular Order*, 19 FCC Rcd at 6438, para. 33.

⁴⁶ We note that NEP sought redefinition of the Frontier study area. See *infra* para. 26.

⁴⁷ See *supra* para. 7.

⁴⁸ *RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, CC Docket No. 96-45, Memorandum Opinion and Order, 17 FCC Rcd 23532, 23547, para. 38 (Wireline Comp. Bur. 2002).

⁴⁹ *North Carolina RSA 3 Cellular Telephone Company Petition for Designation as an Eligible Telecommunications Carrier in the State of North Carolina*, CC Docket No. 96-45, Order, 21 FCC Rcd 9151, 9159, para. 26 (Wireline Comp. Bur. 2006).

⁵⁰ See *supra* para. 20.

⁵¹ See *supra* para. 22 (declining to designate NEP in the Springville wire center). We note that NEP did not request redefinition of the Verizon Pennsylvania study area, and therefore decline to designate NEP in the Lake Como wire center. See *infra* para. 36.

Finally, we note that we previously redefined Granite State Telephone Inc.'s service area in New Hampshire⁵² and United Inter-Mountain Telephone Company's service area in Virginia.⁵³

29. Except where noted above, our redefinition proposals are subject to the agreement of the relevant state commissions. We therefore submit our redefinition proposals to the relevant state commissions and request that they examine such proposals based on their unique familiarity with the rural areas in question. If, after its review, a state commission determines that it does not agree with a redefinition proposal herein, we intend to reexamine the relevant petition with regard to redefining the service area.

E. Designated Service Areas

30. Based on the foregoing, we hereby designate Petitioners as ETCs as follows.

31. Alltel. We designate Alltel as an ETC for the entire study areas served by the rural telephone companies in Alabama, North Carolina, and Virginia listed in Exhibit 2. Subject to the agreement of the Alabama Public Service Commission, North Carolina Utilities Commission and Virginia Corporation Commission on our proposed redefinition of service areas, if not previously redefined,⁵⁴ we also designate Alltel as an ETC in the wire centers listed in Exhibit 3.

32. Cingular. We designate Cingular as an ETC in the requested areas served by the non-rural telephone companies in Alabama and Virginia listed in Exhibit 4. We designate Cingular as an ETC for the entire study areas served by the rural telephone companies in Virginia listed in Exhibit 5.

33. Corr. We designate Corr as an ETC in the entire study area served by the non-rural telephone company in Alabama listed in Exhibit 6. We designate Corr as an ETC in the entire study areas served by the rural telephone companies in Alabama listed in Exhibit 7.⁵⁵

34. Dobson. We designate Dobson as an ETC in the requested study areas in New York served by non-rural telephone companies, as listed in Exhibit 8. We designate Dobson as an ETC in the entire study areas served by the rural telephone companies in New York, as listed in Exhibit 9. Subject to the New York Department of Public Service's agreement on our proposed redefinition of service areas, we also designate Dobson as an ETC for the wire centers in Exhibit 10.

⁵² *RCC Minnesota Inc., and RCC Atlantic, Inc. Petition for Designation as an Eligible Telecommunications Carrier in New Hampshire*, CC Docket No. 96-45, Order, 20 FCC Rcd 15833, 15841, para. 25 (Wireline Comp. Bur. 2005) (*RCC Order*).

⁵³ *Highland Cellular Order*, 19 FCC Rcd at 6439, paras. 37-38.

⁵⁴ See *supra* para. 24.

⁵⁵ Corr requested designation for one study area, Ardmore Telephone Co., which extends beyond the state boundary of Alabama into Tennessee. The Commission previously has stated that "the Commission's authority to perform [an ETC designation under section 214(e)(6)] is no greater than that of the state that would have otherwise made the designation." *Western Wireless 2001 Order*, 16 FCC Rcd at 19147, para. 8. Corr did not seek ETC designation in Tennessee. Therefore, we designate Corr as an ETC only in the portion of Ardmore Telephone Co.'s study area that is contained within the boundaries of the state of Alabama. See *id.* at 19147-49, paras. 8-13, *affirming Western Wireless 2000 Order*, 16 FCC Rcd at 57-59, paras. 23-24 (designating Western Wireless as an ETC only in the study areas of telephone companies that are located in the state (Wyoming) that was the subject of Western Wireless' ETC petitions).

35. Farmers. We designate Farmers as an ETC in the requested areas served by the non-rural telephone companies in Alabama listed in Exhibit 11. We designate Farmers as an ETC for the entire study areas served by the rural telephone companies in Alabama listed in Exhibit 12.

36. NEP. We designate NEP as an ETC for the entire study areas served by the rural telephone companies in Pennsylvania listed in Exhibit 13. Subject to the Pennsylvania Public Utility Commission's agreement on our proposed redefinition of service areas, we also designate NEP as an ETC in the wire centers listed in Exhibit 14.

37. NY RSA 2. We designate NY RSA 2 as an ETC in the requested areas served by the non-rural telephone companies in New York listed in Exhibit 15. We designate NY RSA 2 as an ETC for the entire study areas served by the rural telephone companies in New York listed in Exhibit 16. Subject to the New York Department of Public Service's agreement on our proposed redefinition of service areas, we also designate NY RSA 2 as an ETC for the wire centers listed in Exhibit 17.

38. Pine Belt. We designate Pine Belt as an ETC for the entire study areas served by the rural telephone companies in Alabama listed in Exhibit 18.

39. RCC. We designate RCC as an ETC in the requested areas served by the non-rural telephone companies in Alabama listed in Exhibit 19. We designate RCC as an ETC for the entire study areas served by the rural telephone companies in Alabama listed in Exhibit 20.

40. SouthernLINC. We designate SouthernLINC as an ETC in the requested service areas in Alabama served by the non-rural telephone companies listed in Exhibit 21. We designate SouthernLINC as an ETC in the entire study areas served by the rural telephone companies in Alabama listed in Exhibit 22.⁵⁶

41. St. Lawrence Seaway. We designate St. Lawrence Seaway as an ETC in the requested areas served by the non-rural telephone companies in New York listed in Exhibit 23. We designate St. Lawrence Seaway as an ETC for the entire study areas served by the rural telephone companies in New York listed in Exhibit 24.

42. SunCom. We designate SunCom as an ETC in the requested areas served by the non-rural telephone companies in North Carolina, Tennessee, and Virginia listed in Exhibit 25. We designate SunCom as an ETC for the entire study areas served by the rural telephone companies in North Carolina, Tennessee, and Virginia listed in Exhibit 26.

43. U.S. Cellular. We designate U.S. Cellular as an ETC in the requested areas served by the non-rural telephone companies in North Carolina, New Hampshire, Tennessee, and Virginia listed in Exhibit 27.⁵⁷ We designate U.S. Cellular as an ETC for the entire study areas served by the rural telephone companies in North Carolina, New Hampshire, Tennessee, and Virginia listed in Exhibit 28.⁵⁸

⁵⁶ SouthernLINC requested designation for one wire center, West Point, which extends beyond the state boundary of Alabama into Georgia. See SouthernLINC December 29 Alabama Supplement at Ex. 1. As discussed above, the Commission does not have the authority to consider the SouthernLINC Georgia Petition. See *infra* para. 9. Therefore, we designate SouthernLINC in the West Point wire center only to the extent that the wire center is contained within the boundaries of the state of Alabama. See *Western Wireless 2001 Order*, 16 FCC Rcd at 19147-49, paras. 8-13, *affirming Western Wireless 2000 Order*, 16 FCC Rcd at 57-59, paras. 23-24.

⁵⁷ As noted above, we exclude the wire centers of the non-rural incumbent LEC Verizon New England in Vermont for purposes of U.S. Cellular's ETC designation. See *supra* note 30.

⁵⁸ As noted above, we exclude the wire centers of rural incumbent LEC Northland Telephone of Maine Inc. in Maine for purposes of U.S. Cellular's ETC designation. See *supra* note 30.

Subject to the agreement of the New Hampshire Public Utilities Commission, North Carolina Utilities Commission, Tennessee Regulatory Authority, and Virginia Corporation Commission on our proposed redefinition of service areas, if not previously redefined,⁵⁹ we also designate U.S. Cellular as an ETC for the wire centers listed in Exhibit 29.

44. Petitioners' ETC designations are effective thirty days after publication of this Order in the Federal Register, except where redefined service areas require the agreement of a state commission. Where redefined service areas require the agreement of a state commission, Petitioners' ETC designations are effective upon the effective date of the agreement of the relevant state commission with our redefinition of the service area, but in no event prior to the effective date of this order. We also note that a newly designated ETC shall be eligible to receive support as of the effective date of its designation as an ETC provided it submits the data required by sections 54.307, 54.313, and 54.314, as applicable, of our rules within 60 days of the effective date.⁶⁰ Therefore, if Petitioners file the required data within the 60-day period, they will receive support as of the effective date of their designations.

F. Regulatory Oversight

45. Petitioners are required under section 254(e) of the Act to use high-cost support "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended" and must, under sections 54.313 and 54.314 of the Commission's rules, certify annually that they are in compliance with this requirement.⁶¹ In addition, Petitioners must report certain information to the Commission and the Universal Service Administrative Company (USAC) for the areas in which they are designated as ETCs pursuant to section 54.209 of our rules.⁶²

46. We find that reliance on Petitioners' commitments to meet these requirements is reasonable and consistent with the public interest, the Act, and the Fifth Circuit decision in *Texas Office of Public Utility Counsel v. FCC*.⁶³ We conclude that these additional certification and reporting requirements will further the Commission's goal of ensuring that Petitioners satisfy their obligation under section 214(e) of the Act to provide supported services throughout their designated service areas.

47. We note that the Commission may institute an inquiry on its own motion to examine any ETC's records and documentation to ensure that the high-cost support it receives is being used "only for the provision, maintenance, and upgrading of facilities and services" in the areas where it is designated as

⁵⁹ See *supra* para. 28.

⁶⁰ See 47 C.F.R. §§ 54.307, 54.313, 54.314; *ETC Designation Order*, 20 FCC Rcd at 6411, para. 92.

⁶¹ 47 U.S.C. § 254(e); 47 C.F.R. §§ 54.313, 54.314.

⁶² See 47 C.F.R. § 54.209(a) (specifying the information to be included in the annual reports submitted by ETCs); *ETC Designation Order*, 20 FCC Rcd at 6400-6402, paras. 68-69. See also *Virginia Cellular Order*, 19 FCC Rcd at 1584, para. 46 & n.140 (anticipating that annual submissions will encompass only the ETC's designated service areas). We note that SouthernLINC requested that, if the Commission were to grant its petition prior to October 1, 2006, it be granted a waiver of the October 1, 2006 filing deadline. See Letter from Todd Daubert, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 96-45 (filed Aug. 15, 2006). Given the passage of time, we find that SouthernLINC's waiver request is moot.

⁶³ See generally *Petitions*. In *TOPUC*, the Fifth Circuit held that that nothing in section 214(e)(2) of the Act prohibits states from imposing additional eligibility conditions on ETCs as part of their designation process. See *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 417-18 (5th Cir. 1999) (*TOPUC*). Consistent with this holding, we find that nothing in section 214(e)(6) prohibits the Commission from imposing additional conditions on ETCs when such designations fall under our jurisdiction.

an ETC.⁶⁴ Petitioners will be required to provide such records and documentation to the Commission and USAC upon request. We further emphasize that if a Petitioner fails to fulfill the requirements of the statute, our rules, or the terms of this Order after it begins receiving universal service support, the Commission has authority to revoke its ETC designation.⁶⁵ The Commission also may assess forfeitures for violations of Commission rules and orders.⁶⁶

IV. ANTI-DRUG ABUSE ACT CERTIFICATION

48. Pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, no applicant is eligible for any new, modified, or renewed instrument of authorization from the Commission, including authorizations issued pursuant to section 214 of the Act, unless the applicant certifies that neither it, nor any party to its application, is subject to a denial of federal benefits, including Commission benefits.⁶⁷ Petitioners have provided a certification consistent with the requirements of the Anti-Drug Abuse Act of 1988.⁶⁸ We find that Petitioners have satisfied the requirements of the Anti-Drug Abuse Act of 1988, as codified in sections 1.2001-1.2003 of the Commission's rules.⁶⁹

⁶⁴ 47 U.S.C. §§ 220, 403.

⁶⁵ See *Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, CC Docket No. 96-45, Declaratory Ruling, 15 FCC Rcd, 15168, 15174, para. 15 (2000) (subsequent history omitted). See also 47 U.S.C. § 254(e).

⁶⁶ See 47 U.S.C. § 503(b).

⁶⁷ 21 U.S.C. § 862; 47 C.F.R. § 1.2002(a)-(b). Section 1.2002(b) provides that a "party to the application" shall include: "(1) If the applicant is an individual, that individual; (2) If the applicant is a corporation or unincorporated association, all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or nonvoting) of the petitioner; and (3) If the application is a partnership, all non-limited partners and any limited partners holding a 5% or more interest in the partnership." 47 C.F.R. § 1.2002(b). See *Section 214(e)(6) Public Notice*, 12 FCC Rcd at 22949.

⁶⁸ See generally *Petitions*.

⁶⁹ 47 C.F.R. §§ 1.2001-1.2003.

EXHIBIT 1

PENDING ETC DESIGNATION PETITIONS

Alltel Communications, Inc. Alabama Petition

Alltel Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, CC Docket No. 96-45 (filed Oct. 13, 2005) (Alltel Alabama Petition) (redacted).

Alltel Communications, Inc. North Carolina Petition

Alltel Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of North Carolina, CC Docket No. 96-45 (filed Oct. 13, 2005) (Alltel North Carolina Petition) (redacted).

Alltel Communications, Inc. Virginia Petition

Alltel Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, CC Docket No. 96-45 (filed Oct. 13, 2005) (Alltel Virginia Petition) (redacted).

Choice Communications LLC U.S. Virgin Islands Petition

Choice Communications LLC, Petition for Designation as an Eligible Telecommunications Carrier in the United States Virgin Islands, CC Docket No. 96-45 (filed Jan. 13, 2005) (Choice Petition) (redacted).

Letter from Jennifer M. Kashatus, Counsel for Choice, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Feb. 9, 2005) (Choice Supplement) (submitting additional information in support of its petition).

Letter from Jennifer M. Kashatus, Counsel for Choice, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Mar. 16, 2005) (Choice Second Supplement) (submitting maps of Choice's coverage area) (redacted).

Letter from Jennifer M. Kashatus, Counsel for Choice, to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed May 15, 2007) (Choice Third Supplement) (submitting a list of Choice's MMDS licenses and maps of its service area) (redacted).

Letter from Jennifer M. Kashatus, Counsel for Choice, to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Sept. 24, 2007) (Choice Fourth Supplement) (submitting additional information on Choice's service offerings).

Cingular Alabama Petition

Petition of AT&T Wireless Services, Inc. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act, Petition of AT&T Wireless Services, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Alabama, CC Docket No. 96-45 (filed Dec. 31, 2003) (AWS Alabama Petition) (redacted).

Supplement to the Petition of AT&T Wireless Services, Inc. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act, Petition of AT&T Wireless Services, Inc. for Designation as an Eligible Telecommunications Carrier in the state of Alabama, CC Docket No. 96-45 (filed May 11, 2004) (AWS Alabama Supplement).

Amendment to the Petition of AT&T Wireless Services, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Alabama, CC Docket No. 96-45 (filed Feb. 23, 2006) (Cingular Alabama Amendment) (redacted).

Minor Further Amendment to ETC Petition: Cingular Wireless LLC (f/k/a AT&T Wireless Services, Inc.), CC Docket No. 96-45 (filed April 28, 2006) (explaining that the request includes the Livingston wire center in the BellSouth SAC (255181) with whichever CLLI Code is applicable, noting that currently the Local Exchange Routing Guide and the Universal Service Administrative Company use different CLLI codes – LVTNALMA and LVTNALLA).

Cingular Virginia Petition

Cingular Wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, CC Docket No. 96-45 (filed Nov. 7, 2006) (Cingular Virginia Petition) (redacted).

Letter from Russell P. Hanser, Counsel for Cingular, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Sept. 4, 2007) (submitting maps of Cingular's coverage area) (redacted).

Corr Wireless Communications, LLC Alabama Petition

Corr Wireless Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, CC Docket No. 96-45 (filed June 14, 2007) (Corr Petition).

Dobson Cellular Systems, Inc. New York Petition

Dobson Cellular Systems, Inc. and American Cellular Corp. (Dobson) Joint Petition for Designation as Eligible Telecommunications Carriers in the State of New York (No Rural Redefinition Requested), CC Docket No. 96-45 (filed May 3, 2004) (Dobson First Petition).

Dobson Cellular Systems, Inc. and American Cellular Corp. Joint Petition for Designation as Eligible Telecommunications Carriers in the State of New York (Rural Redefinition Requested), CC Docket No. 96-45 (filed May 10, 2004) (Dobson Redefinition Petition).

Amendment of ETC Petition – Dobson Cellular Systems Inc. and American Cellular Corporation, New York, CC Docket No. 96-45 (filed Sept. 16, 2005) (Dobson Exhibit E (revised)) (correcting a wire center study area code).

Second Amendment of ETC Petition – Dobson, New York, CC Docket No. 96-45 (filed Oct. 11, 2005) (Dobson Second Amendment) (filing a revised list of rural wire centers that corrects some slight errors in population data and makes alternative proposals about service area boundaries).

Farmers Cellular Alabama Petition

Farmers Cellular Petition to Amend the Designated Service Area of Farmers Cellular Telephone, Inc., CC Docket No. 96-45 (filed Dec. 1, 2005) (seeking to amend its designated area to include additional wire centers in the state of Alabama) (Farmers Petition).

Letter from Gary Kirk, General Manager for Farmers, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Dec. 2, 2005) (submitting a chart and maps in support of Farmers' five-year plan) (redacted).

Supplement to Farmers Cellular Petition to Amend the Designated Service Area of Farmers Cellular Telephone, Inc., CC Docket No. 96-45 (filed Feb. 2, 2007) (Farmers February 2 Supplement).

NEP Cellcorp, Inc. Pennsylvania Petition

Petition of NEP Cellcorp, Inc. to be Designated as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania, CC Docket No. 96-45 (filed June 7, 2007) (NEP Petition).

New York RSA 2 Cellular Partnership New York Petition

New York RSA 2 Cellular Partnership Petition for Designation as an Eligible Telecommunications Carrier in the State of New York, CC Docket No. 96-45 (filed June 23, 2005) (NY RSA 2 Petition).

New York RSA 2 Cellular Partnership, Supplement for Designation as an Eligible Telecommunications Carrier in the State of New York, CC Docket No. 96-45 (filed July 19, 2005) (NY RSA 2 July 19 Supplement).

Pine Belt Cellular, Inc. Alabama Petition

Pine Belt Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, CC Docket No. 96-45 (filed Mar. 2, 2006) (Pine Belt Petition) (redacted).

RCC Minnesota, Inc. Alabama Petition

RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier in Additional Portions of the State of Alabama, CC Docket No. 96-45 (filed June 23, 2005) (RCC Petition) (seeking to extend its ETC designation in Alabama to include newly acquired portions of its service area).

Letter from B. Lynn F. Ratnavale, Counsel for RCC Minnesota, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Mar. 2, 2007) (notice of name change from RCC Holdings, Inc. to RCC Minnesota, Inc., and supplemental maps and licensing information).

SouthernLINC Alabama Petitions

Petition of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless for Designation as an Eligible Telecommunications Carrier in Alabama, CC Docket No. 96-45 (filed Sep. 14, 2004) (SouthernLINC Non-Rural Alabama Petition).

Petition of Southern Communications Services, Inc. d/b/a SouthernLINC for Designation as an Eligible Telecommunications Carrier in Alabama, CC Docket No. 96-45 (filed Sep. 14, 2004) (SouthernLINC Rural Alabama Petition).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 12, 2005) (January 12 Non-rural Alabama Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 12, 2005) (January 12 Rural Alabama Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 21, 2005) (January 21 Non-Rural Alabama Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 21, 2005) (January 21 Rural Alabama Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Mar. 2, 2005) (March 2 Alabama Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 16, 2005) (November 16 Supplement) (replacing January 21 Rural Alabama Supplement and March 2 Alabama Supplement) (noting also that the company had changed its name to "SouthernLINC Wireless").

Letter from Erin W. Emmott, Counsel for SouthernLINC Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Dec. 29, 2005) (December 29 Alabama Supplement).

Letter from Robert G. Dawson, SouthernLINC Wireless, to Kevin J. Martin, Chairman, Federal Communications Commission, CC Docket No. 96-45 (filed June 29, 2006) (June 29 Supplement).

SouthernLINC Florida Petition

Petition of Southern Communications Services, Inc. d/b/a SouthernLINC for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act, CC Docket No. 96-45 (filed Sep. 14, 2004) (SouthernLINC Florida Petition).

Letter from Erin W. Emmett, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 12, 2005) (January 12 Florida Supplement).

Letter from Erin W. Emmett, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 21, 2005) (January 21 Florida Supplement).

Letter from Erin W. Emmett, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Feb. 22, 2005) (February Florida Supplement).

Letter from Erin W. Emmett, Counsel for SouthernLINC Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 16, 2005) (November Florida Supplement) (noting that the company had changed its name to "SouthernLINC Wireless").

Letter from Erin W. Emmett, Counsel for SouthernLINC Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Dec. 29, 2005) (December Florida Supplement).

Letter from Robert G. Dawson, SouthernLINC Wireless, to Kevin J. Martin, Chairman, Federal Communications Commission, CC Docket No. 96-45 (filed June 29, 2006) (June 29 Supplement).

SouthernLINC Georgia Petitions

Petition of Southern Communications Services, Inc. d/b/a SouthernLINC for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act, CC Docket No. 96-45 (filed Sep. 14, 2004) (SouthernLINC Non-Rural Georgia Petition).

Petition of Southern Communications Services, Inc. d/b/a SouthernLINC for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act, CC Docket No. 96-45 (filed Sep. 14, 2004) (SouthernLINC Rural Georgia Petition).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 12, 2005) (January 12 Non-Rural Georgia Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission Petition, CC Docket No. 96-45 (filed Jan. 12, 2005) (January 12 Rural Georgia Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 21, 2005) (January 21 Georgia Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Mar. 2, 2005) (March 2 Georgia Supplement).

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 16, 2005) (November Georgia Supplement) (noting that the company had changed its name to "SouthernLINC Wireless").

Letter from Erin W. Emmott, Counsel for SouthernLINC, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Dec. 29, 2005) (December 29 Georgia Supplement).

Letter from Robert G. Dawson, SouthernLINC Wireless, to Kevin J. Martin, Chairman, Federal Communications Commission, CC Docket No. 96-45 (filed June 29, 2006) (June 29 Supplement).

St. Lawrence Seaway Cellular Partnership New York Petition

St. Lawrence Seaway Cellular Partnership Petition for Designation as an Eligible Telecommunications Carrier in the State of New York, CC Docket No. 96-45 (filed June 23, 2005) (St. Lawrence Seaway Petition).

Supplement to Petition for Designation as an Eligible Telecommunications Carrier in the State of New York, CC Docket No. 96-45 (filed July 19, 2005) (St. Lawrence Seaway July 19 Supplement).

SunCom Wireless, Inc. Petition

SunCom Wireless, Inc. Petition for Designation as an Eligible Telecommunications Carrier in Georgia, North Carolina, Tennessee and Virginia, CC Docket No. 96-45 (filed June 23, 2005) (SunCom Petition).

Letter from David L. Sieradzki, Counsel for SunCom, to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed May 4, 2007) (submitting call signs and maps of its license area).

Letter from David L. Sieradzki, Counsel for SunCom, to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 2, 2007) (submitting a list of wire centers and CLLI codes for which SunCom is seeking designation).

Letter from David L. Sieradzki, Counsel for SunCom, to Marlene Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Dec. 14, 2007) (withdrawing SunCom's petition for ETC designation in Georgia and withdrawing requests for designation in two study areas).

Letter from David L. Sieradzki, Counsel to SunCom, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Jan. 2, 2008) (clarifying the CLLI code for the Hartford wire center in North Carolina).

U.S. Cellular New Hampshire Petition

U.S. Cellular Petition for Designation as an Eligible Telecommunications Carrier in the State of New Hampshire, CC Docket No. 96-45 (filed April 13, 2004) (U.S. Cellular New Hampshire Petition).

Letter from David A. LaFuria, Counsel for U.S. Cellular, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 4, 2005) (U.S. Cellular New Hampshire Amendment) (amending its New Hampshire petition to demonstrate compliance with the *Virginia Cellular Order* and the *Highland Cellular Order*).

U.S. Cellular New Hampshire Amendment Erratum, CC Docket No. 96-45 (filed Nov. 7, 2005) (correcting a footnote).

U.S. Cellular North Carolina Petition

U.S. Cellular Petition for Designation as an Eligible Telecommunications Carrier in the State of North Carolina, CC Docket No. 96-45 (filed Oct. 14, 2004) (U.S. Cellular North Carolina Petition).

Letter from David A. LaFuria, Counsel for U.S. Cellular, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 4, 2005) (U.S. Cellular North Carolina Amendment) (amending its North Carolina petition to demonstrate compliance with the *Virginia Cellular Order* and the *Highland Cellular Order*, and, for each partial wire center listed in the original North

Carolina Petition, either withdrawing the request or committing to serve the entire wire center through a combination of its own facilities and resale or roaming).

U.S. Cellular North Carolina Amendment Erratum, CC Docket No. 96-45 (filed Nov. 7, 2005) (correcting a footnote and the signature block).

U.S. Cellular North Carolina Amendment Second Erratum, CC Docket No. 96-45 (filed Nov. 15, 2005) (correcting certain discrepancies between the list of requested wire centers and the population density analysis in the revised Exhibits D and I (hereinafter “Corrected Revised Exhibit D” and “Corrected Revised Exhibit I”)).

U.S. Cellular Tennessee Petition

Tennessee RSA No. 3 Limited Partnership d/b/a Eloqui Wireless, Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee, CC Docket No. 96-45 (filed June 23, 2005) (Eloqui Petition).

U.S. Cellular Corp. Amended Petition for Designation as an Eligible Telecommunications Carrier in Additional Areas in the State of Tennessee, CC Docket No. 96-45 (filed Sept. 7, 2007) (noting that U.S. Cellular now controls Eloqui, and extending its proposed ETC service area to include additional territory within U.S. Cellular’s FCC-licensed service area in Tennessee) (U.S. Cellular Tennessee Amended Petition).

U.S. Cellular Corp. Supplement to Amended Petition for Designation as an Eligible Telecommunications Carrier in Areas in the State of Tennessee, CC Docket No. 96-45 (filed Nov. 6, 2007) (submitting maps of combined licensed service areas of U.S. Cellular in Tennessee).

U.S. Cellular Virginia Petition

U.S. Cellular Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, CC Docket No. 96-45 (filed April 9, 2004) (U.S. Cellular Virginia Petition).

Letter from David A. LaFuria, Counsel for U.S. Cellular, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed Nov. 4, 2005) (U.S. Cellular Virginia Amendment) (amending its Virginia petition to demonstrate compliance with the *Virginia Cellular Order* and the *Highland Cellular Order*).

Letter from David LaFuria, Counsel for U.S. Cellular, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45 (filed June 14, 2006) (U.S. Cellular Virginia Second Amendment) (amending its Virginia petition to withdraw certain wire centers from the proposed ETC service area in the Central Telephone Co.-VA and Verizon South-VA study areas; in the alternative, removal of certain wire centers in the Verizon South-VA study area and removal of the Collinsville (COLLINSVL) wire center in the Central Telephone Co.-VA study area).

Letter from David LaFuria, Counsel for U.S. Cellular, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45, (filed July 28, 2006) (U.S. Cellular Virginia Third Amendment) (amending its Virginia petition to withdraw the Alta Vista (ALTVVAXA) and Buena Vista (BNVSVAXA) wire centers and to include the Brownsburg (BRBGVAXA) and Virgilina (VRGLVAXA) wire centers in its proposed service area for Central Telephone Co.-VA).

EXHIBIT 2

Rural Wire Centers for Inclusion in Alltel's ETC Service Area**Alabama:**

LEC NAME	WIRE CENTER	CLLI
Castleberry Telephone Co. Inc.	CASTLEBERRY	CSTLALXA
Frontier Communications of AL	BEATRICE	BTRCALXA
Frontier Communications of AL	MONROEVILLE	EXCLALXA
Frontier Communications of AL	FINCHBERG	FNBGALXA
Frontier Communications of AL	FRISCO CITY	FRCYALXA
Frontier Communications of AL	GOSPORT	GSPTALXA
Frontier Communications of AL	MONROEVILLE	MOVLALXA
Frontier Communications of AL	PINE APPLE	PNAPALXA
Frontier Communications of AL	PETERMAN	PTMNALXA
Frontier Communications of AL	REPTON	RPTNALXA
Frontier Communications of AL	URIAH	URIHALXA
Gulf Telephone Co.	BON SECOUR	BNSCALXA
Gulf Telephone Co.	ELBERTA	ELBTALXA
Gulf Telephone Co.	ELBERTA	ELBTALXB
Gulf Telephone Co.	FOLEY	FOLYALXA
Gulf Telephone Co.	FOLEY	FOLYALXB
Gulf Telephone Co.	FORT MORGAN	FTMRALXA
Gulf Telephone Co.	GULF SHORES	GLSHALXA
Gulf Telephone Co.	GULF SHRS	GLSHALXB
Gulf Telephone Co.	LILLIAN	LLNALXA
Gulf Telephone Co.	ELBERTA	LLNALXB
Gulf Telephone Co.	LOXLEY	LXLYALXA
Gulf Telephone Co.	LOXLEY	LXLYALXB
Gulf Telephone Co.	FOLEY	MGSPALXA
Gulf Telephone Co.	SUMMERDALE	MRLWALXA
Gulf Telephone Co.	ORANGE BEACH	ORBHALXA
Gulf Telephone Co.	ORANGE BCH	ORBHALXC
Gulf Telephone Co.	ROBERTSDALE	RBDLALXA
Gulf Telephone Co.	SILVERHILL	RBDLALXB
Gulf Telephone Co.	SEMINOLE	SMNLALXA
Gulf Telephone Co.	ROBERTSDALE	SMNLALXB
Gulf Telephone Co.	SUMMERDALE	SRDLALXA
Hayneville Telephone Co. Inc.	GORDONSVILLE	GOVLALXA
Hayneville Telephone Co. Inc.	HAYNEVILLE	HYVLALXA
Hayneville Telephone Co. Inc.	LOWNDESBORO	LWBOALXA
Mon – Cre Telephone Cooperative	RAMER	RAMRALXA
Union Springs Telephone Co. Inc.	FORT DAVIS	FTDVALXA
Union Springs Telephone Co. Inc.	MIDWAY	MDWYALXA
Union Springs Telephone Co. Inc.	PEROTE	PROTALXA
Union Springs Telephone Co. Inc.	UN SPGS	UNSPALXA

North Carolina:

LEC NAME	WIRE CENTER	CLLI CODE
Atlantic Telephone Membership Co	BOLIVIA	BOLVNCXA
Atlantic Telephone Membership Co	BOILING SPRING LAKES	BSLKNCXA
Atlantic Telephone Membership Co	SUPPLY	HLBHNCXB
Atlantic Telephone Membership Co	LONGWOOD	LGWDNCXA
Atlantic Telephone Membership Co	OCEAN IS BEACH	SESDNCXB
Atlantic Telephone Membership Co	SHALLOTTE	SHLTNCXA
Concord Telephone Co.	ALBEMARLE	ALBMNCXA
Concord Telephone Co.	BADIN	BADNNCXA
Concord Telephone Co.	CHINA GROVE	CHGVNCXA
Concord Telephone Co.	CONCORD	CNCRNCXA
Concord Telephone Co.	HARRISBURG	HRBGNCXA
Concord Telephone Co.	KANNAPOLIS	KNPLNCXA
Concord Telephone Co.	MT PLEASANT	MNPLNCXA
Concord Telephone Co.	NEW LONDON	NWLNNCXA
Concord Telephone Co.	OAKBORO	OKBONCXA
Ellerbe Telephone Co. Inc.	ELLERBE	ELRBNCXA
Lexcom Telephone Company	LEXINGTON	LXTNNCXA
Lexcom Telephone Company	LEXINGTON	LXTNNCXB
Lexcom Telephone Company	LEXINGTON	LXTNNCXC
Lexcom Telephone Company	LEXINGTON	LXTNNCXD
Lexcom Telephone Company	LEXINGTON	LXTNNCXE
Lexcom Telephone Company	SOUTHMONT	SMNTNCXA
Lexcom Telephone Company	WELCOME	WLCMNCXA
Mehtel Inc.	MEBANE	MEBNNCXA
Piedmont Telephone Membership Co	CHURCHLAND	CHLDNCXA
Piedmont Telephone Membership Co	LEXINGTON	REDSNCXA
Pineville Telephone Co.	PINEVILLE	PIVLNCXB
Randolph Telephone Co.	LIBERTY	LBRTNCXA
Randolph Telephone Membership Co.	BADIN LAKE	BDLKNCXA
Randolph Telephone Membership Co.	BENNETT	BNNTNCXA
Randolph Telephone Membership Co.	COLERIDGE	CLRGNCXA
Randolph Telephone Membership Co.	FARMER	FRMRNCXA
Randolph Telephone Membership Co.	HIGHFALLS	HGHFNCXA
Randolph Telephone Membership Co.	JACKSON CREEK	JKCKNCXA
Randolph Telephone Membership Co.	ASHEBORO	PSGHNCXA
Service Telephone Co.	FAIR BLUFF	FRBLNCXA
Star Telephone Membership Corp.	BLADENBORO	ABBGNCXA
Star Telephone Membership Corp.	DUNN	COHRNCXA
Star Telephone Membership Corp.	GARLAND	CYCKNCXA
Star Telephone Membership Corp.	HARRELLS	HRLSNCXA
Star Telephone Membership Corp.	CLINTON	HRNGNCXA
Star Telephone Membership Corp.	KELLY	KLLYNCXA
Star Telephone Membership Corp.	LISBON	LSBNNCXA
Star Telephone Membership Corp.	ROSEBORO	SORVNCXA
Star Telephone Membership Corp.	TURKEY	SXRNNCXA

LEC NAME	WIRE CENTER	CLLI CODE
Star Telephone Membership Corp.	WHITE OAK	WHOKNCXA
Tri-County Telephone Membership	PANTEGO	PKRDNCXA
Tri-County Telephone Membership	PINETOWN	PNTWNCXA
Tri-County Telephone Membership	BATH	SDNYNCXA
Yadkin Valley Telephone Membership	ADVANCE	ADVNNCXA
Yadkin Valley Telephone Membership	HAMPTONVILLE	BRKSNCXA
Yadkin Valley Telephone Membership	COOLEEMEE	COLMNCXA
Yadkin Valley Telephone Membership	YADKINVILLE	CRTYNCXA
Yadkin Valley Telephone Membership	EAST BEND	EBNDNCXA
Yadkin Valley Telephone Membership	FORBUSH	FRBSNCXB
Yadkin Valley Telephone Membership	HARMONY	HRMYNCXA
Yadkin Valley Telephone Membership	MOCKSVILLE	IJAMNCXA
Yadkin Valley Telephone Membership	UNION GROVE	UNGVNCXB
Yadkin Valley Telephone Membership	NEW HOPE	NWHPNCXA

Virginia:

LEC NAME	WIRE CENTER	CLLI CODE
Buggs Island Telephone Coop	LA CROSSE	BCRGVAXA
Buggs Island Telephone Coop	BAKERVILLE	BCWDVAXA
Burkes Garden Telephone Co. Inc	BURKES GARDEN	BRGRVAXA
New Hope Telephone Co.	FT DEFIANCE	NWHPVAXA
Peoples Mutual Telephone Co.	GRETNA	GRETVAXA
Peoples Mutual Telephone Co.	HURT	HURTVAXA
Peoples Mutual Telephone Co.	RENAN	RENNVAXA
Peoples Mutual Telephone Co.	SANDY LEVEL	SNLTVAXA
Scott County Telephone Coop	CLINCHPORT	CLPTVAXA
Scott County Telephone Coop	DUFFIELD	DDFDVAXA
Scott County Telephone Coop	DUNGANNON	DNGNVAXA
Scott County Telephone Coop	FORT BLACKMORE	FTBCVAXA
Scott County Telephone Coop	NICKELSVILLE	NCVLVAXA
Scott County Telephone Coop	WILLIAMS MILL	WLMLVAXA

EXHIBIT 3

Rural Service Areas Previously Reclassified
Along Wire Center Boundaries For Inclusion
In Alltel's ETC Service Area

Alabama:

LEC NAME	WIRE CENTER	CLLI
Alltel Alabama Inc.	ECLECTIC	ECLCALXA
Alltel Alabama Inc.	ECLECTIC	KWLGALXA
Millry Telephone Co.	CHATOM	CHTMLAXA

North Carolina:

LEC NAME	WIRE CENTER	CLLI
Central Telephone Co. – North Carolina	ASHEBORO	ASBONCXA
Central Telephone Co. – North Carolina	ASHEBORO	ASBONCXB
Central Telephone Co. – North Carolina	HICKORY	BHLHNCXA
Central Telephone Co. – North Carolina	BISCOE	BISCNCXA
Central Telephone Co. – North Carolina	BOONVILLE	BNVLNCXA
Central Telephone Co. – North Carolina	CANDOR	CNDRNCXA
Central Telephone Co. – North Carolina	CATAWBA	CTWBNCXA
Central Telephone Co. – North Carolina	EDEN	EDENNCXA
Central Telephone Co. – North Carolina	EDEN	EDENNCXB
Central Telephone Co. – North Carolina	ELKIN	ELKNNCXA
Central Telephone Co. – North Carolina	GRANITE FALLS	GRFLNCXA
Central Telephone Co. – North Carolina	HICKORY	HCKRNCXA
Central Telephone Co. – North Carolina	HICKORY	HCKRNCXB
Central Telephone Co. – North Carolina	HILLSBOROUGH	HLBONCXB
Central Telephone Co. – North Carolina	HILDEBRAN	HLDBNCXB
Central Telephone Co. – North Carolina	MADISON	MDSNNCXA
Central Telephone Co. – North Carolina	MOCKSVILLE	MKVLNCXA
Central Telephone Co. – North Carolina	MT GILEAD	MTGLNCXA
Central Telephone Co. – North Carolina	HICKORY	MTVWNCXA
Central Telephone Co. – North Carolina	PILOT MT	PLMTNCXA
Central Telephone Co. – North Carolina	PROSPECT HILL	PRHLNCXA
Central Telephone Co. – North Carolina	WALNUT COVE	QKGPNCXA
Central Telephone Co. – North Carolina	RAMSEUR	RMSRNCXA
Central Telephone Co. – North Carolina	ROXBORO	RXBONCXA
Central Telephone Co. – North Carolina	SEAGROVE	SEGVNCXA
Central Telephone Co. – North Carolina	SHERRILLS FORD	SHFRNCXA
Central Telephone Co. – North Carolina	STONEVILLE	STVLNCXA
Central Telephone Co. – North Carolina	ROUGEMONT	TMLKNCXA
Central Telephone Co. – North Carolina	TROY	TROYNCXA
Central Telephone Co. – North Carolina	VALDESE	VLDSNCXA
Central Telephone Co. – North Carolina	W END	WENDNCXB
Central Telephone Co. – North Carolina	WALKERTOWN	WKTWNCXA
Central Telephone Co. – North Carolina	WALNUT COVE	WLCVNCXA
Central Telephone Co. – North Carolina	YANCEYVILLE	YCVLNCXA
Central Telephone Co. – North Carolina	YADKINVILLE	YDVLNCXA
Surry Telephone Membership Corp.	SHOALS	SHLSNCXA

EXHIBIT 4

Non-Rural Wire Centers for Inclusion in Cingular's ETC Service Area

Alabama:

LEC NAME	WIRE CENTER	CLLI
BellSouth (Study Area Code 255181)	ALBERTVILLE-MAIN	ALVLALMA
BellSouth	ANNISTON-LENLOCK	ANTNALLE
BellSouth	ATHENS-ELK RIVER	ATHNALER
BellSouth	ATHENS-MAIN	ATHNALMA
BellSouth	ATTALLA-MAIN	ATTLALNM
BellSouth	BELLE FONTAINE	BLFNALMA
BellSouth	BOAZ-MAIN	BOAZALMA
BellSouth	BREWTON	BRTOALMA
BellSouth	BESSEMER-BUCKSVILLE	BSMRALBU
BellSouth	BAY MINETTE	BYMNALMA
BellSouth	CALERA	CALRALMA
BellSouth	CHELSEA	CHLSALMA
BellSouth	COLUMBIANA	CLMBALMA
BellSouth	CULLMAN-JONES CHAPEL	CLMNALJC
BellSouth	CORDOVA	CRDVALMA
BellSouth	CARBON HILL	CRHLALNM
BellSouth	COURTLAND	CRLDALMA
BellSouth	DORA	DORAALMA
BellSouth	EUTAW-BOLIGEE	EUTWALBO
BellSouth	EVERGREEN	EVRGALMA
BellSouth	FORT DEPOSIT	FTDPALMA
BellSouth	FORT PAYNE-MAIN	FTPYALMA
BellSouth	GADSDEN-HILLSIDE	GDSDALHS
BellSouth	GADSDEN-RAINBOW DRIVE	GDSDALRD
BellSouth	GARDENDALE	GRDLALNM
BellSouth	GURLEY-MAIN	GRLYALMA
BellSouth	GUNTERSVILLE-MAIN	GTVLALNM
BellSouth	GRAYSVILLE	GYVLALNM
BellSouth	HUNTSVILLE-REDSTONE ARSEN,	HNVIALRA
BellSouth	HANCEVILLE-BREMEN	HNVLALBR
BellSouth	HARTSELLE-MAIN	HRTSALNM
BellSouth	HARTSELLE-PENCE	HRTSALPE
BellSouth	HAZEL GREEN-MAIN	HZGRALMA
BellSouth	JACKSON	JCSNALNM
BellSouth	JACKSONVILLE-MAIN	JCVLALMA
BellSouth	JASPER	JSPRALMT
BellSouth	KILLEN	KLLNALMA
BellSouth	LEIGHTON	LGTNALMA
BellSouth	LIVINGSTON	LVTNALMA
BellSouth	MONTEVALLO	MNTVALNM

LEC NAME	WIRE CENTER	CLLI
BellSouth	MOBILE-SARALAND	MOBLALSA
BellSouth	MOBILE-SEMMES	MOBLALSE
BellSouth	MOBILE-THEODORE	MOBLALTH
BellSouth	MOULTON	MOLTALNM
BellSouth	MONTGOMERY-MILLBROOK	MTGMALMB
BellSouth	MONTGOMERY-NORMANDALE	MTGMALNO
BellSouth	MT VERNON	MTVRALMA
BellSouth	OHATCHEE-MAIN	OHTCALMA
BellSouth	PIEDMONT-MAIN	PDMTALMA
BellSouth	PINSON	PNSNALMA
BellSouth	PARRISH	PRSHALNM
BellSouth	PRATTVILLE	PRVLALMA
BellSouth	RED BAY	RDBAALMA
BellSouth	RUSSELLVILLE	RLVLALMA
BellSouth	ROGERSVILLE	RRVLALMA
BellSouth	SELMA	SELMALMT
BellSouth	STEVENSON-MAIN	STSNALMA
BellSouth	SYLACAUGA	SYLCALMT
BellSouth	THOMASVILLE	THVLALMA
BellSouth	TALLADEGA-MAIN	TLDGALMA
BellSouth	TUSCALOOSA-NORTHPORT	TSCLALNO
BellSouth	TUSKEGEE	TSKGALMA
BellSouth	TOWN CREEK	TWCKALMA
BellSouth	UNIONTOWN	UNTWALNM
BellSouth	VINCENT	VNCNALMA
BellSouth	WARRIOR	WRRRALNM
BellSouth	WETUMPKA	WTMPALMA
CenturyTel (Northern) (Study Area Code 259789)	BAYOU LA BATRE	BLBTALXA
CenturyTel (Northern)	BRILLIANT	BRILALXA
CenturyTel (Northern)	BERRY	BRRYALXA
CenturyTel (Northern)	CHULAFINNEE	CHLFALXA
CenturyTel (Northern)	CARROLLTON	CRTNALXA
CenturyTel (Northern)	DOUBLE SPRINGS	DBSPALXA
CenturyTel (Northern)	DELTA	DELTALXA
CenturyTel (Northern)	ETHELSTVILLE	ETVLALXA
CenturyTel (Northern)	FOWL RIVER	FWRVALXA
CenturyTel (Northern)	GRAND BAY	GDBAALXA
CenturyTel (Northern)	GORDO	GORDALXA
CenturyTel (Northern)	HACKLEBURG	HCBGALXA
CenturyTel (Northern)	HEFLIN	HFLNALXA
CenturyTel (Northern)	HALEYVILLE	HLVLALXA
CenturyTel (Northern)	HAMILTON	HMTNALXA
CenturyTel (Northern)	IRVINGTON	IRSEALXA
CenturyTel (Northern)	LECTA	LECTALXA
CenturyTel (Northern)	LINCOLN	LNCLALXA
CenturyTel (Northern)	MORRISONS XRDC12	MRCRALXA
CenturyTel (Northern)	PHIL CAMPBELL	PHBLALXA
CenturyTel (Northern)	PELL CITY	PLCYALXA

LEC NAME	WIRE CENTER	CLLI
CenturyTel (Northern)	THORSBY	THRSALXA
CenturyTel (Northern)	VERNON	VERNALXA
CenturyTel (Northern)	VALLEY HEAD	VYHDALXA
CenturyTel (Northern)	WEDOWEE	WEDWALXA
CenturyTel (Southern) (Study Area Code 259788)	BRUNDIDGE	BRNDALXA
CenturyTel (Southern)	GEORGIANA	GRGNALXA
CenturyTel (Southern)	MIDLAND CITY	MLCYALXA
CenturyTel (Southern)	SCOTTSBORO	SCBOALXA
CenturyTel (Southern)	WICKSBURG	WCBGALXA

Virginia:

LEC NAME	WIRE CENTER	CLLI
Verizon South Inc.-VA (Contel)	INDEPENDENT HILL	INHLVAXA
Verizon South Inc.-VA (Contel)	DALE CITY	DLCYVAXA
Verizon South Inc.-VA (Contel)	BOWLING GREEN	BWLGVAXA
Verizon South Inc.-VA (Contel)	COLONIAL BEACH	CLBHVAXA
Verizon South Inc.-VA (Contel)	DAWN	DAWNVAXA
Verizon South Inc.-VA (Contel)	KING GEORGE	KGGRVAXA
Verizon South Inc.-VA (Contel)	KING WILLIAM	KGWLVAXA
Verizon South Inc.-VA (Contel)	LORTON	LRTNVAXA
Verizon South Inc.-VA (Contel)	MANASSAS	MNSSVAXA
Verizon South Inc.-VA (Contel)	OCCOQUAN	OCQNVAXA
Verizon South Inc.-VA (Contel)	TAPPAHANNOCK	TPHNVAXA
Verizon South Inc.-VA (Contel)	WARSAW	WRSWVAXA
Verizon South Inc.-VA (Contel)	BROADWAY	BRWYVAXA
Verizon South Inc.-VA (Contel)	ELKTON	EKTNVAXA
Verizon South Inc.-VA (Contel)	GREAT BRIDGE	GRBRVAXA
Verizon South Inc.-VA (Contel)	BATTLEFIELD	GRBRVAXB
Verizon South Inc.-VA (Contel)	HICKORY	HCKRVAXA
Verizon South Inc.-VA (Contel)	HARRISONBURG	HRBGVAXA
Verizon South Inc.-VA (Contel)	MCGAHEYSVILLE	MGVLVAXA
Verizon South Inc.-VA (Contel)	PRINCESS ANNE	PRANVAXA
Verizon South Inc.-VA (Contel)	PUNGO	PUNGVAXA
Verizon South Inc.-VA (Contel)	SMITHFIELD	SMFDVAXA
Verizon Virginia Inc.	ASHBURN	ASBNVAAS
Verizon Virginia Inc.	STEPHENS CITY	STCYVASC
Verizon Virginia Inc.	HARTWOOD	HRWDVAHW
Verizon Virginia Inc.	BERRYVILLE	BEVLVABV
Verizon Virginia Inc.	CAPE CHARLES	CPCHVACC
Verizon Virginia Inc.	CULPEPER	CLPPVACU
Verizon Virginia Inc.	GORDONSVILLE	GOVLVAGV
Verizon Virginia Inc.	LIGNUM	CLPPVALI
Verizon Virginia Inc.	LOUISA	LOUSVALU
Verizon Virginia Inc.	MARSHALL	MRSHVAMA
Verizon Virginia Inc.	ONANCOCK	ONNCVAON
Verizon Virginia Inc.	ORANGE	ORNGVAOR

LEC NAME	WIRE CENTER	CLLI
Verizon Virginia Inc.	PARKSLEY	PRKSVAPK
Verizon Virginia Inc.	REVA	CLPPVARV
Verizon Virginia Inc.	SPERRYVILLE	SRVLVASP
Verizon Virginia Inc.	SPOTSYLVANIA	SPTSVASP
Verizon Virginia Inc.	TEMPERANCEVILLE	TMVLVATV
Verizon Virginia Inc.	WARRENTOWN	WRTNVAWR
Verizon Virginia Inc.	EXMORE	EXMRVAEX
Verizon Virginia Inc.	BEDFORD	BDFRVABD
Verizon Virginia Inc.	BETHIA	BTHIVABT
Verizon Virginia Inc.	NEW LONDON ROAD	LYBGVANL
Verizon Virginia Inc.	POWHATAN	PWHTVAPW
Verizon Virginia Inc.	BONSACK	RONKVABS
Verizon Virginia Inc.	STEWARTSVILLE	SWVLVASV

EXHIBIT 5**Rural Wire Centers for Inclusion in Cingular's ETC Service Area****Virginia:**

LEC NAME	WIRE CENTER	CLLI
Amelia Tel. Corp.	AMELIA COURT HOUSE	AMELVAXA
Citizens Tel. Coop.-VA	ALUM RIDGE	ALRGVAXA
Citizens Tel. Coop.-VA	BALLARD	BLLRVAXA
Citizens Tel. Coop.-VA	FLOYD	FLYDVAXA
Citizens Tel. Coop.-VA	LOCUST GRV	LCGVVAXA
Citizens Tel. Coop.-VA	WILLIS	WILSVAXA
NTELOS, Inc.	CLIFTON FORGE	CFFRVAXA
NTELOS, Inc.	COVINGTON	CVTNVAXA
NTELOS, Inc.	POTTSCREEK	PTCKVAXA
NTELOS, Inc.	WAYNESBORO	WYBOVAXA
Pembroke Tel. Coop.	NEWPORT,VA	NWPTVAXA
Pembroke Tel. Coop.	PEMBROKE	PMBRVAXA
Peoples Mutual Tel. Co.-VA	GRETNA	GRETVAXA
Peoples Mutual Tel. Co.-VA	HURT	HURTVAXA
Peoples Mutual Tel. Co.-VA	RENAN	RENNVAXA
Peoples Mutual Tel. Co.-VA	SANDYLEVEL	SNLVVAXA
Roanoke & Botetourt Tel. Co.	EAGLE ROCK	EGRKVAXA
Roanoke & Botetourt Tel. Co.	FINCASTLE	FNCVAXA
Roanoke & Botetourt Tel. Co.	ORISKANY	ORSKVAXA
Roanoke & Botetourt Tel. Co.	TROUTVILLE	TRVLVAXA
Central Tel. Co. of VA	ALTAVISTA	ALTVVAXA
Central Tel. Co. of VA	ARARAT	ARRTVAXA
Central Tel. Co. of VA	ARVONIA	ARVNVAXA
Central Tel. Co. of VA	AXTON	AXTNVAXA
Central Tel. Co. of VA	BACHESHALL	BCHLVAXA
Central Tel. Co. of VA	BUCKINGHAM	BCHMVAXA
Central Tel. Co. of VA	BLACKSTONE	BLCSVAXA
Central Tel. Co. of VA	BOONESMILL	BNMLVAXA
Central Tel. Co. of VA	BUENAVISTA	BNVSVAXA
Central Tel. Co. of VA	BROWNSBURG	BRBGVAXA
Central Tel. Co. of VA	BRODNAX	BRDNVAXA
Central Tel. Co. of VA	BROOKNEAL	BRKNVAXA
Central Tel. Co. of VA	BURKEVILLE	BRVLVAXA
Central Tel. Co. of VA	BASSETT	BSSTVAXA
Central Tel. Co. of VA	BURNTCHMNY	BTCHVAXA
Central Tel. Co. of VA	BEAVERDAM	BVRDVAXA
Central Tel. Co. of VA	CHARLOTSVL	CHVLVAXA
Central Tel. Co. of VA	CHARLOTSVL	CHVLVAXB
Central Tel. Co. of VA	COLLINSVL	COVLVAXA
Central Tel. Co. of VA	CREWE	CREWVAXA
Central Tel. Co. of VA	CROZET	CRZTVAXA
Central Tel. Co. of VA	DILLWYN	DLWYVAXA

LEC NAME	WIRE CENTER	CLLI
Central Tel. Co. of VA	FORK UNION	FKUNVAXA
Central Tel. Co. of VA	FIELDALE	FLDLVAXA
Central Tel. Co. of VA	FERRUM	FRRMVAXA
Central Tel. Co. of VA	FRONTROYAL	FRRYVAXA
Central Tel. Co. of VA	FARMVILLE	FRVLVAXA
Central Tel. Co. of VA	GLADYS	GLDYVAXA
Central Tel. Co. of VA	GLASGOW	GLSGVAXA
Central Tel. Co. of VA	GUM TREE	GMTRVAXA
Central Tel. Co. of VA	HALIFAX	HLFXVAXA
Central Tel. Co. of VA	HAMPDESDNY	HMSYVAXA
Central Tel. Co. of VA	KENBRIDGE	KNBRVAXA
Central Tel. Co. of VA	LA CROSSE	LACRVAXA
Central Tel. Co. of VA	LURAY	LURYVAXA
Central Tel. Co. of VA	LEXINGTON	LXTNVAXA
Central Tel. Co. of VA	MEADOWSDAN	MDDNVAXA
Central Tel. Co. of VA	MONTPELIER	MTPLVAXA
Central Tel. Co. of VA	BOONESMILL	MTVIVAXA
Central Tel. Co. of VA	NATURALBDG	NTBRVAXA
Central Tel. Co. of VA	PALMYRA	PLMYVAXA
Central Tel. Co. of VA	PROSPECT	PRSPVAXA
Central Tel. Co. of VA	ROCKYMOUNT	RCMTVAXA
Central Tel. Co. of VA	RIDGEWAY	RDWYVAXA
Central Tel. Co. of VA	RUSTBURG	RSBGVAXA
Central Tel. Co. of VA	SO BOSTON	SBTNVAXA
Central Tel. Co. of VA	SCHUYLER	SCHLVAXA
Central Tel. Co. of VA	SCOTTSVL	SCVLVAXA
Central Tel. Co. of VA	STANARDSVL	SDVLVAXA
Central Tel. Co. of VA	SHENANDOAH	SHNDVAXA
Central Tel. Co. of VA	SPENCER	SPNCVAXA
Central Tel. Co. of VA	SOUTH HILL	STHLVAXA
Central Tel. Co. of VA	STANLEY	STNLVAXA
Central Tel. Co. of VA	STUART	STRTVAXA
Central Tel. Co. of VA	TURBEVILLE	TBVLVAXA
Central Tel. Co. of VA	UNION HALL	UNHLVAXA
Central Tel. Co. of VA	VICTORIA	VCTAVAXA
Central Tel. Co. of VA	VOLENS	VLNSVAXA
Central Tel. Co. of VA	VIRGILINA	VRGLVAXA
Central Tel. Co. of VA	WASHINGTON	WASHVAXA
Central Tel. Co. of VA	WHITMELL	WHTMVAXA
Central Tel. Co. of VA	WOOLWINE	WLWNVAXA
United Inter-Mountain Tel. Co.-VA	ABINGDON	ABNGVAXA
United Inter-Mountain Tel. Co.-VA	AUSTINVL	ATVLVAXA
United Inter-Mountain Tel. Co.-VA	BLAND	BLNDVAXA
United Inter-Mountain Tel. Co.-VA	BRISTOL	BRSTVAXA
United Inter-Mountain Tel. Co.-VA	CANA	CANAVAXA
United Inter-Mountain Tel. Co.-VA	CERES	CERSVAXA
United Inter-Mountain Tel. Co.-VA	CHILHOWIE	CHLHVAXA
United Inter-Mountain Tel. Co.-VA	CMSRKELCRK	CMRKVAXA

LEC NAME	WIRE CENTER	CLLI
United Inter-Mountain Tel. Co.-VA	CRIPPLECRK	CRCKVAXA
United Inter-Mountain Tel. Co.-VA	DAMASCUS	DMSCVAXA
United Inter-Mountain Tel. Co.-VA	FRIES	FRISVAXA
United Inter-Mountain Tel. Co.-VA	GALAX	GALXVAXA
United Inter-Mountain Tel. Co.-VA	GLADE SPG	GDSPVAXA
United Inter-Mountain Tel. Co.-VA	GATE CITY	GTCYVAXA
United Inter-Mountain Tel. Co.-VA	HILLSVILLE	HLVLVAXA
United Inter-Mountain Tel. Co.-VA	INDEPNCE	INDPVAXA
United Inter-Mountain Tel. Co.-VA	KONNAROCK	KNRKVAXA
United Inter-Mountain Tel. Co.-VA	LAURELFORK	LRFKVAXA
United Inter-Mountain Tel. Co.-VA	MARION	MARNVAXA
United Inter-Mountain Tel. Co.-VA	MEADOWVIEW	MDVWVAXA
United Inter-Mountain Tel. Co.-VA	MOUTHWILSN	MTWL VAXA
United Inter-Mountain Tel. Co.-VA	MAXMEADOWS	MXMDVAXA
United Inter-Mountain Tel. Co.-VA	RICHVALLEY	RCVYVAXA
United Inter-Mountain Tel. Co.-VA	RURALRTRET	RRRTVAXA
United Inter-Mountain Tel. Co.-VA	SUGARGROVE	SGGVVAXA
United Inter-Mountain Tel. Co.-VA	SALTVILLE	SLVLVAXA
United Inter-Mountain Tel. Co.-VA	SYLVATUS	SYLVVAXA
United Inter-Mountain Tel. Co.-VA	WYTHEVILLE	WYVLVAXA

EXHIBIT 6**Non-Rural Wire Centers for Inclusion in Corr's Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
BellSouth Telecommunications, Inc. d/b/a South Central Bell	ANNISTON-LENLOCK	ANTNALLE
BellSouth Telecommunications, Inc. d/b/a South Central Bell	ANNISTON-MAIN	ANTNALMT
BellSouth Telecommunications, Inc. d/b/a South Central Bell	ANNISTON-OXFORD	ANTNALOX
BellSouth Telecommunications, Inc. d/b/a South Central Bell	BOWDEN	BWDNGAMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	BRIDGEPORT-MAIN	BRPTALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	COURTLAND	CRLDALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	FORT PAYNE-MAIN	FTPYALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	GADSDEN-HILLSIDE	GDSDALHS
BellSouth Telecommunications, Inc. d/b/a South Central Bell	GOODWATER	GDWRALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	GURLEY-MAIN	GRLYALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	JACKSONVILLE-MAIN	JCVLALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	MOULTON	MOLTALNM
BellSouth Telecommunications, Inc. d/b/a South Central Bell	OHATCHEE-MAIN	OHTCALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	PIEDMONT-MAIN	PDMTALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	STEVENSON-MAIN	STSNALMA
BellSouth Telecommunications, Inc. d/b/a South Central Bell	TALLAPOSSA	TLLPGAES
BellSouth Telecommunications, Inc. d/b/a South Central Bell	TOWN CREEK	TWCKALMA

EXHIBIT 7**Rural Wire Centers for Inclusion in Corr's Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Roanoke Telephone Co., Inc.	ROANOKE	RONKALXA
Roanoke Telephone Co., Inc.	ROCK MILLS	RCMLALXA
Ardmore Telephone Co.	ARDMORE	ARMRALXA
Ardmore Telephone Co.	ELKMONT	ELMTALXA
Ardmore Telephone Co.	NEW MARKET	NWMRALXA

EXHIBIT 8

Non-Rural Wire Centers for Inclusion in Dobson's New York ETC Service Area

LEC NAME	WIRE CENTER	CLLI
Frontier Telephone of Rochester (Study Area Code 150121)	COHOCTON	CHCNXYXA
Frontier Telephone of Rochester	CASTILE	CSTLNYXA
Frontier Telephone of Rochester	LEROY	LROYNXYA
Frontier Telephone of Rochester	PAVILION	PVLNNXYA
Frontier Telephone of Rochester	WARSAW	WRSWNYXA
Frontier Telephone of Rochester	WYOMING	WYNGNYXA
Verizon - New York Inc. (Study Area Code 155130)	AMENIA	AMENNYAN
Verizon - New York Inc.	ANGELICA	ANGENYAG
Verizon - New York Inc.	ARKPORT	ARPTNYAR
Verizon - New York Inc.	ATTICA	ATTCNYAT
Verizon - New York Inc.	AVON	AVOCNYXA
Verizon - New York Inc.	BOOTH	BATHNYBH
Verizon - New York Inc.	BATAVIA	BATVNYBT
Verizon - New York Inc.	BEACON	BECNNYBE
Verizon - New York Inc.	BELFAST	BLFSNYBZ
Verizon - New York Inc.	BELMONT	BLMTNYBM
Verizon - New York Inc.	BLISS	BLSSNYBS
Verizon - New York Inc.	BOLIVAR	BLVRNYBX
Verizon - New York Inc.	CAIRO	CAIRNYCA
Verizon - New York Inc.	CANAAN	CANSNYXA
Verizon - New York Inc.	CHERRY CREEK	CHCKNYCE
Verizon - New York Inc.	CHERRY VALLEY	CHVYNYZV
Verizon - New York Inc.	CALLICOON	CLCNNYCN
Verizon - New York Inc.	CLINTON CORNERS	CLCRNYCC
Verizon - New York Inc.	CLAVERACK	CLVRNYCV
Verizon - New York Inc.	CAMPBELL	CMPBNYCP
Verizon - New York Inc.	CAMERON	CMRNNYCF
Verizon - New York Inc.	CLINTONDALE	CNDLNYCL
Verizon - New York Inc.	COOPERSTOWN	CPTWNYZW
Verizon - New York Inc.	CORNWALL	CRNWNVCW
Verizon - New York Inc.	CATON	CTONNYZN
Verizon - New York Inc.	CATTARAUGUS	CTRGNYSO
Verizon - New York Inc.	CATSKILL	CTSKNYCT
Verizon - New York Inc.	CUBA	CUBANYEM
Verizon - New York Inc.	DUNKIRK	DNKRNYDK
Verizon - New York Inc.	DOVER PLAINS	DVPLNYDP
Verizon - New York Inc.	DAVENPORT	DVPTNYDT
Verizon - New York Inc.	EDMESTON	EDTNNYET
Verizon - New York Inc.	ELLCOTTVILLE	ELCVNYEV
Verizon - New York Inc.	ELLENVILLE	ELVLNYEL
Verizon - New York Inc.	FRANKLINVILLE	FKVLNYFK
Verizon - New York Inc.	FALLSBURG	FLBGNYFB

LEC NAME	WIRE CENTER	CLLI
Verizon - New York Inc.	FLEISCHMANN	FLSCNYFM
Verizon - New York Inc.	FREEHOLD	FRHDNYFH
Verizon - New York Inc.	FRIENDSHIP	FRSHNYFS
Verizon - New York Inc.	FORESTVILLE	FSVLNYFL
Verizon - New York Inc.	GRAHAMSVILLE	GHVLNYGH
Verizon - New York Inc.	GRAND GORG	GRGRNYGG
Verizon - New York Inc.	GREENWOOD LAKE	GRLKNYGL
Verizon - New York Inc.	HOBART	HBRTNYHZ
Verizon - New York Inc.	HUDSON	HDSNNYHD
Verizon - New York Inc.	HIGHLAND	HGLDNYHG
Verizon - New York Inc.	HIGHLAND FALLS	HHFLNYHF
Verizon - New York Inc.	HIGH FALLS	HIFLNYHF
Verizon - New York Inc.	HINSDALE	HNDLNYHI
Verizon - New York Inc.	HUNTER	HNTRNYHN
Verizon - New York Inc.	HORNELL	HRNLNYHL
Verizon - New York Inc.	HARTWICK	HRWKNYHW
Verizon - New York Inc.	HYDE PARK	HYPKNYHK
Verizon - New York Inc.	JEFFERSONVILLE	JFVLNYJF
Verizon - New York Inc.	KINGSTON	KGTNNYKG
Verizon - New York Inc.	KERHONKSON	KRHNNYKR
Verizon - New York Inc.	LIBERTY	LBRTNYLB
Verizon - New York Inc.	LAKE HUNTINGTON	LKHNNYLH
Verizon - New York Inc.	LAKE KATRINE	LKKTNYLK
Verizon - New York Inc.	LIMESTONE	LMSTNYLM
Verizon - New York Inc.	LINDLEY	LNDYNYLN
Verizon - New York Inc.	LITTLE VALLEY	LTVYNYLI
Verizon - New York Inc.	LIVINGSTON MANOR	LVMNNYLV
Verizon - New York Inc.	LEXINGTON	LXTNNYLX
Verizon - New York Inc.	MACHIAS	MCHSNYMA
Verizon - New York Inc.	MILLBROOK	MLBKNYML
Verizon - New York Inc.	MILFORD	MLFRNYMU
Verizon - New York Inc.	MILTON	MLTNNYMN
Verizon - New York Inc.	MONTICELLO	MNTINYMT
Verizon - New York Inc.	MARLBORO	MRBONYMB
Verizon - New York Inc.	NORTH CLOVE	NCLVNYNC
Verizon - New York Inc.	NEWBURGH	NWBRNYNW
Verizon - New York Inc.	NEWBURGH WEST	NWBRNYWT
Verizon - New York Inc.	NEW PALTZ	NWPLNYNP
Verizon - New York Inc.	NEW WINDSOR	NWWNNYNW
Verizon - New York Inc.	OLEAN	OLENNYHA
Verizon - New York Inc.	ONEONTA	ONNTNYOA
Verizon - New York Inc.	OTEGO	OTEGNYOT
Verizon - New York Inc.	POUGHKEEPSIE- SOUTH HAMILTON	PGHKNYSH
Verizon - New York Inc.	POUGHKEEPSIE- SPACKENKILL	PGHKNYSP
Verizon - New York Inc.	PHILMONT	PHMTNYPM
Verizon - New York Inc.	PHOENICIA	PHNCNYPH

LEC NAME	WIRE CENTER	CLLI
Verizon - New York Inc.	PALENVILLE	PLVLNYPL
Verizon - New York Inc.	PORTVILLE	PRTVNYPV
Verizon - New York Inc.	PRATTSVILLE	PRVINYPR
Verizon - New York Inc.	PLEASANT VALLEY	PVYDNYPD
Verizon - New York Inc.	PAWLING	PWNGNYSS
Verizon - New York Inc.	RICHMONDVILLE	RCVLNYRH
Verizon - New York Inc.	ROSENDALE	RODLNYRD
Verizon - New York Inc.	RUSHFORD	RSFRNYRF
Verizon - New York Inc.	ROXBURY	RXBYNYRX
Verizon - New York Inc.	SCHENEVUS	SCHVNYQN
Verizon - New York Inc.	SOUTH DAYTON	SDTNNYPI
Verizon - New York Inc.	SAUGERTIES	SGRTNYSG
Verizon - New York Inc.	SHOKAN	SHKNYYSK
Verizon - New York Inc.	SHARON SPRINGS	SHSPNYQS
Verizon - New York Inc.	SALAMANCA	SLMNNYWW
Verizon - New York Inc.	STAMFORD	SMFRNYQM
Verizon - New York Inc.	STANFORDVILLE	STNVNYST
Verizon - New York Inc.	TANNERSVILLE	TNVLNYTN
Verizon - New York Inc.	TUXEDO	TUXDNYTX
Verizon - New York Inc.	VARYSBURG	VRBGNYVB
Verizon - New York Inc.	WOODSTOCK	WDSTNYWS
Verizon - New York Inc.	WHITE LAKE	WHLKNYWH
Verizon - New York Inc.	WELLSVILLE	WLVLNYNM
Verizon - New York Inc.	WINGDALE	WNDLNYWD
Verizon - New York Inc.	WINDHAM	WNHMNYWM
Verizon - New York Inc.	WAPPINGERS FALLS	WPFLNYWF
Verizon - New York Inc.	WORCESTER	WRCSNYUC

EXHIBIT 9**Rural Study Areas for Inclusion in Dobson's New York ETC Service Area**

Armstrong Tel. Co. – NY (Study Area Code 150071)
 Berkshire Tel. Co. (Study Area Code 150073)
 Cassadaga Tel. Corp. (Study Area Code 150076)
 Chautauqua & Erie Tel. Corp. (Study Area Code 150078)
 Citizens-Red Hook (Study Area Code 154533)
 Delhi Tel. Co. (Study Area Code 150088)
 Dunkirk & Fredonia Tel. Co. (Study Area Code 150091)
 FC of New York, Inc. (Study Area Code 150100)
 FC of Sylvan Lake, Inc. (Study Area Code 150128)
 Germantown Tel. Co., Inc. (Study Area Code 150097)
 Hancock Tel. Co. NY (Study Area Code 150099)
 Jamestown Tel. Co. (Study Area Code 150109)
 Margaretville Tel. Co., Inc. (Study Area Code 150104)
 Warwick Valley – NY (Study Area Code 150135)

EXHIBIT 10

Rural Service Areas Requiring Reclassification
Along Wire Center Boundaries for Inclusion
In Dobson's New York ETC Service Area

LEC NAME	WIRE CENTER	CLLI
Citizens Tel. Co. of NY (Study Area Code 154534)	CORFO	CORFNYXA
Citizens Tel. Co. of NY	DARIEN	DARNNYXA
Citizens Tel. Co. of NY	DOWNSVILLE	DSVLNYXA
Citizens Tel. Co. of NY	NARROWSBURG	NRBGNYXB
Citizens Tel. Co. of NY	ROSCOE	ROSCNYXA
Citizens Tel. Co. of NY	WALTON	WLTNNYXA
Empire Tel. Corp. (Study Area Code 150093)	PULTENEY	PLTNNYXA
Taconic Tel. Corp. (Study Area Code 150084)	CANAAN	CANNNYXA
Taconic Tel. Corp.	CHATHAM	CHHMNYXA
Taconic Tel. Corp.	COPAKE	COPKNYXA
Taconic Tel. Corp.	HILLSDALE	HLDLNYXA
Taconic Tel. Corp.	MILLERTON	MLLTNYXA
Taconic Tel. Corp.	PINE PLAINS	PNPLNYXA
Taconic Tel. Corp.	WEST LEBANON	WLBNNYXA
The Middleburgh Telephone Company (Study Area Code 150105)	BRAMANVILLE	BRMVNYXA
The Middleburgh Telephone Company	SUMMIT	SMMTNYXA

EXHIBIT 11**Non-Rural Wire Centers for Inclusion in Farmers' Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
BellSouth Telecommunications, Inc.	ALBERTVILLE	ALVLALMA
BellSouth Telecommunications, Inc.	BOAZ	BOAZALMA
BellSouth Telecommunications, Inc.	GUNTERSVILLE	GTVLALNM
BellSouth Telecommunications, Inc.	GURLEY	GRLYALMA
CenturyTel of Alabama, L.L.C.	MENTONE	MENTALXA
CenturyTel of Alabama, L.L.C.	SCOTTSBORO	SCBOALXA
CenturyTel of Alabama, L.L.C.	SECTION	SECTALXA
CenturyTel of Alabama, L.L.C.	SKYLINE	SKLNALXA
CenturyTel of Alabama, L.L.C.	VALLEY HEAD	VYHDALXA

EXHIBIT 12**Rural Wire Centers for Inclusion in Farmers' Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Farmers Telecommunications Coop. Inc.	BRYANT	BRYNALXA
Farmers Telecommunications Coop. Inc.	FLAT ROCK	FLRKALXA
Farmers Telecommunications Coop. Inc.	FYFFE	FYFFALXA
Farmers Telecommunications Coop. Inc.	GERALDINE	GLDNALXA
Farmers Telecommunications Coop. Inc.	HENAGAR	HNGRALXA
Farmers Telecommunications Coop. Inc.	PISGAH	PSGHALXA
Farmers Telecommunications Coop. Inc.	RAINSVILLE	RNVLALXA

EXHIBIT 13**Rural Wire Centers for Inclusion in NEP's Pennsylvania ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Deposit Telephone Co. Inc.	SHERMAN	DPSTNYXA
Hancock Telephone Co. NY	WINTERDALE	HNCCNYXA

EXHIBIT 14**Service Areas Requiring Reclassification
Along Wire Center Boundaries for Inclusion
In NEP's Pennsylvania ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	BROOKLYN	BRKLPAXB
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	HALLSTEAD	HLSTPAXH
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	LAWSVILLE	LYCNPAXL
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	LITTLE MEADOWS-PA	LTMDPAXL
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	MONTROSE	MTRSPAXM
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	QUAKER LAKE-PA	QKLKPAXQ
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	RUSH	RUSHPAXR
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	ST JOSEPH	STJSPAXS
Citizens Telecommunications Co. of NY d/b/a Frontier Communications of NY	SUSQUEHANNA	SSQHPAXS
Verizon North Inc.- Quaker State	GALILEE	GALLPAXG

EXHIBIT 15**Non-Rural Service Area for Inclusion in NY RSA 2's New York ETC Service Area**

Verizon New York, Inc. (Study Area Code 155130)

EXHIBIT 16**Rural Service Areas for Inclusion in NY RSA 2's New York ETC Service Area**

Champlain Telephone Company (Study Area Code 150077)

Chazy & Westport Telephone Corp. (Study Area Code 150079)

Crown Point Telephone Corp. (Study Area Code 150085)

Frontier Communications of Ausable Valley (Study Area Code 150072)

EXHIBIT 17**Service Areas Requiring Reclassification
Along Wire Center Boundaries for Inclusion
In NY RSA 2's New York ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ADAMS	ADMSNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ADAMS CENTER	ADCTNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ALFRED	ALFENYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ALMOND	ALMDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ANDOVER	ANDVNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	APALACHIN	APLCNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BAINBRIDGE	BNBRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BARRYVILLE	BYVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BELLEVILLE	BLVLNYXA
Citizens Telecommunications Co. of NY d/b/a	BERKSHIRE	BRKSNYXA

LEC NAME	WIRE CENTER	CLLI
Frontier Communications		
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BLOOMINGBURG	BMBGNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BLUE MOUNTAIN LAKE	BMLKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BOONVILLE	BNVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BRANCHPORT	BNPTNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BROADALBIN	BRDBNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	BROOKFIELD	BRFDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CANAJOHARIE	CNJHNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CANDOR	CNDRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CAROGA LAKE	CGLKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CATO	CATONYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CHEMUNG	CHMGNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CHENANGO BRIDGE	CHBRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CHESTERTOWN	CHRTNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CINCINNATUS	CNCNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CLAYVILLE	CYVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CONSTABLEVILLE	CSTVNYXB
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CORFU	CORFNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CORINTH	CRNTNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CROGHAN	CRGHNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DALTON	DLTNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DARIEN	DARNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DE RUYTER	DRTRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DENTON	DNTNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DOWNSVILLE	DSVLNYXA

LEC NAME	WIRE CENTER	CLLI
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DRYDEN	DRYDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	DUNDEE	DUNDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	EAGLE BAY	EGBANYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	EARLVILLE	ERVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ELIZAVILLE	EZVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ETNA	ETNANYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	FAIR HAVEN (CAYUGA)	FHNCNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	FONDA	FONDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	FORESTPORT	FOPTNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	FORT PLAIN	FTPLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	FRANKLIN	FKLNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GEORGETOWN	GRTWNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GILBERTSVILLE	GBVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GLEN	GLENNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GLOVERSVILLE	GLVNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GREENE	GRNENYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GREENWOOD	GNWDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	GUILFORD	GUFDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	HAMMONDSPORT	HMPTNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	HANNIBAL	HNBLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	HAWLEYTON	HWTNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	HENDERSON	HNSNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	INDIAN LAKE	INLKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	JASPER	JSPRNYXA
Citizens Telecommunications Co. of NY d/b/a	JOHNSTOWN	JHTWNYXA

LEC NAME	WIRE CENTER	CLLI
Frontier Communications		
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LUZERNE	LZRNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LAKE PLEASANT	LKPLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LEONARDSVILLE	LNRVNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LOCKWOOD	LCWDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LONG LAKE (HAMILTON)	LLKHNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LOWVILLE	LOWVNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LYONS FALLS	LYFLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	LYSANDER	LYSNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MADISON	MDSNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MANNSVILLE	MNVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MARATHON	MRTNHYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MASONVILLE	MSVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MAYFIELD	MYFDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MCDONOUGH	MCDNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MIDDLETOWN	MDTWNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MORRIS	MRRSNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MORRISVILLE	MRVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	MOUNT UPTON	MTUPNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NARROWSBURG	NRBGNYXB
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NEW BERLIN	NWBLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NEW WOODSTOCK	NWWDNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NEWARK VALLEY	NWVYNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NEWCOMB	NWCMNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NORTH BROOKFIELD	NBFDNYXA

LEC NAME	WIRE CENTER	CLLI
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NORTH CREEK	NRCKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NORTHVILLE	NRVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	NORWICH	NRWCNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	OLD FORGE	OLDFNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	OTISVILLE	OTVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	OXFORD	OXFRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	PORT JERVIS	PTJRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	PULASKI	PLSKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	RAQUETTE LAKE	RQLKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	RED HOOK	RDHKNYXB
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	REMSEN	REMSNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	RHINEBECK	RHNBNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ROSCOE	ROSCNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SANBORN	SNBRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SANDY CREEK	SNCKNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SCOTCHTOWN	SCTWNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SHERBURNE	SHBNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SIDNEY	SDNYNYXB
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SLATE HILL	SLHLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SLATERVILLE SPRINGS	SLSPNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SMYRNA	SMYRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SOUTH NEW BERLIN	SNBLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SOUTH OTSELIC	SOTSNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	SPENCER	SPNCNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	ST JOHNSVILLE	STJNNYXA

LEC NAME	WIRE CENTER	CLLI
Frontier Communications		
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	STAATSBURG	STATNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	TIVOLI	TIVONYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	TRIBES HILL	TRHLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	TRUXTON	TXTNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	UNADILLA	UNADNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	UNIONVILLE (ORANGE)	UVLONYXF
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	VIRGIL	VRGLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WALTON	WLTNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WATERVILLE	WTVLNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WAYNE	WAYNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WELLS	WLLSNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WEST VALLEY	WSVYNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WHITNEY POINT	WHPNNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WILLIAMSTOWN	WLTWNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	WURTSBORO	WRBONYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	FILLMORE	FLMRNYXA
Citizens Telecommunications Co. of NY d/b/a Frontier Communications	CIRCLEVILLE	CRVLNYXA

EXHIBIT 18

Rural Wire Centers for Inclusion in Pine Belt's Alabama ETC Service Area

LEC NAME	WIRE CENTER	CLLI
Butler Telephone Co. Inc. (Study Area Code 250284)	BUTLER	BTLRALXADS0
Butler Telephone Co. Inc.	LISMAN	LSMNALXADS0
Butler Telephone Co. Inc.	NEEDHAM	NDHMALXARS0
Butler Telephone Co. Inc.	PENNINGTON	PNTNALXARS0
Frontier CM – Alabama (Study Area Code 250306)	PINE APPLE	PNAPALXARS0
Frontier CM SO – AL (Study Area Code 250318)	CAMDEN	CMDNALXADS0
Frontier CM SO – AL	CATHERINE	CTHRALXARS0
Frontier CM SO – AL	THOMASTON	THMTALXARS0
Frontier CM SO – AL	VREDENBG	VRBGALXARS0
Millary Telephone (Study Area Code 250304)	GILBERTOWN	GLTWALXADS0
Millary Telephone	SILAS	MLRYALXADS0
Millary Telephone	FRANKVILLE	MLRYALXADS0
Pine Belt Telephone Co. Inc. (Study Area Code 250315)	ARLINGTON	ARTNALXARS0
Pine Belt Telephone Co. Inc.	DIXONS MILLS	DXMALXADS0
Pine Belt Telephone Co. Inc.	NANAFALIA	NNFLALXARS0
Pine Belt Telephone Co. Inc.	SWEETWATER	SWWRALXARS0

EXHIBIT 19**Non-Rural Wire Centers for Inclusion in RCC's Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	AUBURN	AUBNALUA
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	CLANTON	CLANALMA
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	GEORGETOWN	EUFLALMA
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	HURTSBORO	HRBOALOM
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	OPELIKA	OPLKALMT
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	PHENIXCITY (PHCYALFM)	PHCYALFM
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	PHENIXCITY (PHCYALMA)	PHCYALMA
BellSouth Telecom. Inc. d/b/a Central Bell Tel.	TROY	TROYALMA
Century Telephone of Alabama, LLC	ABBEVILLE	ABVLALXA
Century Telephone of Alabama, LLC	ARITON	ARITALXA
Century Telephone of Alabama, LLC	CLIO	CLIOALXA
Century Telephone of Alabama, LLC	COLUMBIA	CLMAALXA
Century Telephone of Alabama, LLC	DALEVILLE	DLVLALXA
Century Telephone of Alabama, LLC	DOTHAN	DTHNALXA
Century Telephone of Alabama, LLC	ECHO	ECHOALXA
Century Telephone of Alabama, LLC	HEADLAND	HDLDALXA
Century Telephone of Alabama, LLC	LOUISVILLE	LSVLALXA
Century Telephone of Alabama, LLC	MIDLAND CY	MLCYALXA
Century Telephone of Alabama, LLC	NEWTON	NWTNALXA
Century Telephone of Alabama, LLC	NEWVILLE	NWVIALXA
Century Telephone of Alabama, LLC	OZARK	OZRKALXA
Century Telephone of Alabama, LLC	WICKSBURG	WCBGALXA

EXHIBIT 20**Rural Wire Centers for Inclusion in RCC's Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Graceba Total Communications	GORDON	GRDNALXA
Valley Telephone Co., Inc.	LANGDALE	LNDLALXA

EXHIBIT 21**Non-Rural Service Areas for Inclusion in SouthernLINC's Alabama ETC Service Area**

BellSouth Telecommunications (Study Area Code 255181)

EXHIBIT 22**Rural Study Areas for Inclusion in SouthernLINC's Alabama ETC Service Area**

LEC NAME	WIRE CENTER	CLLI
Alltel Alabama, Inc.	ASHVILLE	AHVLALXA
Alltel Alabama, Inc.	CAMP HILL	CMPHALXA
Alltel Alabama, Inc.	ECLECTIC	ECLCALXA
Alltel Alabama, Inc.	KOWALIGA	KWLGALXA
Alltel Alabama, Inc.	LEEDS	LEDSALXA
Alltel Alabama, Inc.	LEEDS	LEDSALXB
Alltel Alabama, Inc.	ODENVILLE	ODVLALXA
Alltel Alabama, Inc.	SPRINGVL	SPVLALXA
Blountsville Telephone Company, Inc.	BLOUNTSVL	BUVLALXA
Blountsville Telephone Company, Inc.	NECTAR	NCTRALXA
Brindlee Mountain Telephone Company	MORGANCITY	MRCYALXA
Brindlee Mountain Telephone Company	UNIONGROVE	UNGVALXA
Butler Telephone Company, Inc.	BUTLER	BTLRALXA
Butler Telephone Company, Inc.	GOSHEN	GSHNALXA
Butler Telephone Company, Inc.	GROVE HILL	GVHLALXA
Butler Telephone Company, Inc.	LISMAN	LSMNALXA
Butler Telephone Company, Inc.	NEEDHAM	NDHMALXA
Butler Telephone Company, Inc.	PENNINGTON	PNTNALXA
Castleberry Telephone Company, Inc.	CASTLEBRY	CSTLALXA
CenturyTel of Alabama, LLC	ABBEVILLE	ABVLALXA
CenturyTel of Alabama, LLC	ALBERTA	ALBRALXA
CenturyTel of Alabama, LLC	ALICEVILLE	ACVLALXA
CenturyTel of Alabama, LLC	ANDALUSIA	ANDSALXA
CenturyTel of Alabama, LLC	ARITON	ARITALXA
CenturyTel of Alabama, LLC	ASHLAND	ASLDALXA
CenturyTel of Alabama, LLC	BANKS	BNKSALXA
CenturyTel of Alabama, LLC	BAYOUBATRE	BLBTALXA
CenturyTel of Alabama, LLC	BERRY	BRRYALXA
CenturyTel of Alabama, LLC	BRANTLEY	BTLYALXA
CenturyTel of Alabama, LLC	BRILLIANT	BRILALXA
CenturyTel of Alabama, LLC	BRUNDIDGE	BRNDALXA
CenturyTel of Alabama, LLC	CARROLLTON	CRTNALXA
CenturyTel of Alabama, LLC	CHULAFINNE	CHLFALXA
CenturyTel of Alabama, LLC	CLIO	CLIOALXA
CenturyTel of Alabama, LLC	COFFEEVL	CFVLALXA
CenturyTel of Alabama, LLC	COLUMBIA	CLMAALXA
CenturyTel of Alabama, LLC	DALEVILLE	DLVLALXA

LEC NAME	WIRE CENTER	CLLI
CenturyTel of Alabama, LLC	DAUPHIN IS	DPISALXA
CenturyTel of Alabama, LLC	DELTA	DELTALXA
CenturyTel of Alabama, LLC	DETROIT	DTRTALXA
CenturyTel of Alabama, LLC	DOTHAN	DTHNALXA
CenturyTel of Alabama, LLC	DOUBLE SPG	DBSPALXA
CenturyTel of Alabama, LLC	DOZIER	DOZRALXA
CenturyTel of Alabama, LLC	ECHO	ECHOALXA
CenturyTel of Alabama, LLC	ELBA	ELBAALXA
CenturyTel of Alabama, LLC	ENTERPRISE	ENTRALXA
CenturyTel of Alabama, LLC	ETHEL SVL	ETVLALXA
CenturyTel of Alabama, LLC	FALKVILLE	FLVLALXA
CenturyTel of Alabama, LLC	FAYETTE	FYTALXA
CenturyTel of Alabama, LLC	FORESTHOME	FRHMALXA
CenturyTel of Alabama, LLC	FOWL RIVER	FWRVALXA
CenturyTel of Alabama, LLC	GANTT	GNTTALXA
CenturyTel of Alabama, LLC	GENEVA	GENVALXA
CenturyTel of Alabama, LLC	GEORGIANA	GRGNALXA
CenturyTel of Alabama, LLC	GORDO	GORDALXA
CenturyTel of Alabama, LLC	GRAND BAY	GDBAALXA
CenturyTel of Alabama, LLC	GREENVILLE	GNVLALXA
CenturyTel of Alabama, LLC	GUIN	GUINALXA
CenturyTel of Alabama, LLC	HACKLEBURG	HCBGALXA
CenturyTel of Alabama, LLC	HALEYVILLE	HLVLALXA
CenturyTel of Alabama, LLC	HAMILTON	HMTNALXA
CenturyTel of Alabama, LLC	HARTFORD	HRFRALXA
CenturyTel of Alabama, LLC	HEADLAND	HDLDALXA
CenturyTel of Alabama, LLC	HEFLIN	HFLNALXA
CenturyTel of Alabama, LLC	IRNGTNSTEL	IRSEALXA
CenturyTel of Alabama, LLC	JEMISON	JMSNALXA
CenturyTel of Alabama, LLC	KINSTON	KNSTNALXA
CenturyTel of Alabama, LLC	LECTA	LECTALXA
CenturyTel of Alabama, LLC	LINCOLN	LNCLALXA
CenturyTel of Alabama, LLC	LINEVILLE	LNVLALXA
CenturyTel of Alabama, LLC	LOUISEVILLE	LSVLALXA
CenturyTel of Alabama, LLC	LUVERNE	LVRNALXA
CenturyTel of Alabama, LLC	MASSEY	MSSYALXA
CenturyTel of Alabama, LLC	MCKENZIE	MCKNALXA
CenturyTel of Alabama, LLC	MENTONE	MENTALXA
CenturyTel of Alabama, LLC	MIDLAND CY	DLCYALXA
CenturyTel of Alabama, LLC	MRNSCRSRDS	MRCRALXA
CenturyTel of Alabama, LLC	NEWBROCKTN	NWBCALXA
CenturyTel of Alabama, LLC	NEWTON	NWTNALXA
CenturyTel of Alabama, LLC	NEWVILLE	NWVIALXA
CenturyTel of Alabama, LLC	NOTASULGA	NTSLALXA
CenturyTel of Alabama, LLC	ODEN RIDGE	ODRGALXA
CenturyTel of Alabama, LLC	OPP	OPPALXA
CenturyTel of Alabama, LLC	ORRIVLLE	ORVLALXA
CenturyTel of Alabama, LLC	OZARK	OZRKALXA

LEC NAME	WIRE CENTER	CLLI
CenturyTel of Alabama, LLC	PANOLA	PANLALXA
CenturyTel of Alabama, LLC	PELL CITY	PLCYALXA
CenturyTel of Alabama, LLC	PHILCMPBLL	PHBLALXA
CenturyTel of Alabama, LLC	PINE HILL	PNHLALXA
CenturyTel of Alabama, LLC	RED LEVEL	RDLVALXA
CenturyTel of Alabama, LLC	REFORM	RFRMALXA
CenturyTel of Alabama, LLC	ROCKFORD	RCFRALXA
CenturyTel of Alabama, LLC	SAMSON	SMSNALXA
CenturyTel of Alabama, LLC	SCOTTSBORO	SCBOALXA
CenturyTel of Alabama, LLC	SECTION	SECTALXA
CenturyTel of Alabama, LLC	SKYLINE	SKLNALXA
CenturyTel of Alabama, LLC	SLOCOMB	SLCMALXA
CenturyTel of Alabama, LLC	SULLIGENT	SLGNALXA
CenturyTel of Alabama, LLC	SURFSIDE	PLCYALXA
CenturyTel of Alabama, LLC	TALLASSEE	TLLSALXA
CenturyTel of Alabama, LLC	THORSBY	THRSALXA
CenturyTel of Alabama, LLC	TRUSSVILLE	TSVLALXA
CenturyTel of Alabama, LLC	VALLEYHEAD	VYHDALXA
CenturyTel of Alabama, LLC	VERNON	VERNALXA
CenturyTel of Alabama, LLC	WADLEY	WDLYALXA
CenturyTel of Alabama, LLC	WEDOWEE	WEDWALXA
CenturyTel of Alabama, LLC	WICKSBURG	WCBGALXA
CenturyTel of Alabama, LLC	WINFIELD	WNFDALXA
CenturyTel of Alabama, LLC	WOODLAND	WDLDALXA
Farmers Telephone Cooperative, Inc.	BRYANT	BRYNALXA
Farmers Telephone Cooperative, Inc.	FLAT ROCK	FLRKALXA
Farmers Telephone Cooperative, Inc.	FYFFE	FYFFALXA
Farmers Telephone Cooperative, Inc.	GERALDINE	GLDNALXA
Farmers Telephone Cooperative, Inc.	HENAGAR	HNGRALXA
Farmers Telephone Cooperative, Inc.	PISGAH	PSGHALXA
Farmers Telephone Cooperative, Inc.	RAINSVILLE	RNVLALXA
Frontier Communications of Alabama, Inc.	BEATRICE	BTRCALXA
Frontier Communications of Alabama, Inc.	EXCEL	EXCLALXA
Frontier Communications of Alabama, Inc.	FINCHBURG	FNBGALXA
Frontier Communications of Alabama, Inc.	FRISCOCITY	FRCYALXA
Frontier Communications of Alabama, Inc.	GOSPORT	GSPTALXA
Frontier Communications of Alabama, Inc.	MONROEVL	MOVLALXA
Frontier Communications of Alabama, Inc.	PETERMAN	PTMNALXA
Frontier Communications of Alabama, Inc.	PINE APPLE	PNAPALXA
Frontier Communications of Alabama, Inc.	REPTON	RPTNALXA
Frontier Communications of Alabama, Inc.	URIAH	URIHALXA
Frontier Communications of Lamar County, Inc.	KENNEDY	KNDYALXA
Frontier Communications of Lamar County, Inc.	MILLPORT	MLPTALXA
Frontier Communications of the South, Inc. – AL	ATMORE	ATMRALXA
Frontier Communications of the South, Inc. – AL	CAMDEN	CMDNALXA
Frontier Communications of the South, Inc. – AL	CATHERINE	CTHRALXA
Frontier Communications of the South, Inc. – AL	HUXFORD	HXFRALXA
Frontier Communications of the South, Inc. – AL	MCCULLOUGH	MCCLALXA

LEC NAME	WIRE CENTER	CLLI
Frontier Communications of the South, Inc. – AL	THOMASTON	THMTALXA
Frontier Communications of the South, Inc. – AL	VREDENBG	VRBGALXA
Graceba Total Communications, Inc.	ASHFORD	ASFRALXA
Graceba Total Communications, Inc.	COTTONWOOD	CTWDALXA
Graceba Total Communications, Inc.	GORDON	GRDNALXA
GTC, Inc.	FLORALA	FLRLALXA
Gulf Telephone Company	BON SECOUR	BNSCALXA
Gulf Telephone Company	ELBERTA	ELBTALXA
Gulf Telephone Company	ELBERTA	ELBTALXB
Gulf Telephone Company	FOLEY	FOLYALXA
Gulf Telephone Company	FOLEY	FOLYALXB
Gulf Telephone Company	FOLEY	MRLWALXA
Gulf Telephone Company	FORTMORGAN	FTMRALXA
Gulf Telephone Company	FORTMORGAN	FTMRALXB
Gulf Telephone Company	GULFSHORES	GLSHALXA
Gulf Telephone Company	GULFSHORES	GLSHALXB
Gulf Telephone Company	LILLIAN	LLNALXA
Gulf Telephone Company	LILLIAN	LLNALXB
Gulf Telephone Company	LOXLEY	LXLYALXA
Gulf Telephone Company	LOXLEY	LXLYALXB
Gulf Telephone Company	MAGNOLISPG	MGSPALXA
Gulf Telephone Company	ORANGE BCH	ORBHALXA
Gulf Telephone Company	ORANGE BCH	ORBHALXC
Gulf Telephone Company	ORANGE BCH	ORBHALXD
Gulf Telephone Company	ROBERTSDL	RBDLALXA
Gulf Telephone Company	ROBERTSDL	RBDLALXB
Gulf Telephone Company	SEMINOLE	SMNLALXA
Gulf Telephone Company	SEMINOLE	SMNLALXB
Gulf Telephone Company	SUMMERDALE	SRDLALXA
Hayneville Telephone Company, Inc.	GORDONSVL	GOVLALXA
Hayneville Telephone Company, Inc.	HAYNEVILLE	HYVLALXA
Hayneville Telephone Company, Inc.	LOWNDESBO	LWBOALXA
Hopper Telecommunications Company	SNEAD	SNEDALXA
Hopper Telecommunications Company	WALNUT GRV	WLGVALXA
Interstate Telephone Company	FREDONIA	FRDNALXA
Interstate Telephone Company	HUGULEY	HGLYALXA
Interstate Telephone Company	SHAWMUT	SHWMALXA
Interstate Telephone Company	WEST POINT ¹	WSPNGAXA1
Millry Telephone Company, Inc.	CHATAM	CHTMALXA
Millry Telephone Company, Inc.	GILBERTOWN	GLTWALXA
Millry Telephone Company, Inc.	MILLRY	MLRYALXA
Mon-Cre Telephone Cooperative, Inc.	RAMER	RAMRALXA
Moundville Telephone Company	MOUNDVILLE	MNVLALXA
National Telephone Company of Alabama, Inc.	BART	BARTALXA
National Telephone Company of Alabama, Inc.	CHEROKEE	CHRKALXA

¹ As discussed above, designated only to the extent that the wire center is contained within Alabama.

LEC NAME	WIRE CENTER	CLLI
National Telephone Company of Alabama, Inc.	MONTGOMERY	MGRMALXA
New Hope Telephone Cooperative, Inc.	GRANT	GRNTALXA
New Hope Telephone Cooperative, Inc.	NEW HOPE	NWHPALXA
New Hope Telephone Cooperative, Inc.	OWNSCRSRDS	OCRDALXA
Oakman Telephone Company	FLATWOOD	FLWDALXA
Oakman Telephone Company	LYNN	LYNNALXA
Oakman Telephone Company	NAUVOO	NAUVALXA
Oakman Telephone Company	OAKMAN	OKMNALXA
Otelco Telephone LLC	ONEONTA	ONNTALXA
Peoples Telephone Company	ARONEY	ARNYALXA
Peoples Telephone Company	CEDARBLUFF	CDRBALXA
Peoples Telephone Company	CENTRE	CNTRALXE
Peoples Telephone Company	COLLINSVL	COVLALXA
Peoples Telephone Company	CROSSVILLE	CSVLALXA
Peoples Telephone Company	GAYLESVL	GLVLALXA
Peoples Telephone Company	GRAYSON	GYSNALXA
Peoples Telephone Company	LEESBURG	LSBGALXA
Peoples Telephone Company	RINEHART	RNHRALXA
Peoples Telephone Company	SAND ROCK	SNRCALXA
Peoples Telephone Company	WHORTON	WHTNALXA
Pine Belt Telephone Company, Inc.	ARLINGTON	ARTNALXA
Pine Belt Telephone Company, Inc.	DIXONS ML	DXMLALXA
Pine Belt Telephone Company, Inc.	NANAFALIA	NNFLALXA
Pine Belt Telephone Company, Inc.	SWEETWATER	SWWRALXA
Ragland Telephone Company, Inc.	RAGLAND	RGLDALXA
Union Springs Telephone Company, Inc.	FORT DAVIS	FTDVALXA
Union Springs Telephone Company, Inc.	MIDWAY	MDWYALXA
Union Springs Telephone Company, Inc.	PEROTE	PROTALXA
Union Springs Telephone Company, Inc.	UNION SPG	UNSPALXA
Valley Telephone Company LLC	LANGDALE	LNDLALXA

EXHIBIT 23

Non-Rural Service Area for Inclusion in St. Lawrence Seaway's New York ETC Service Area

Verizon New York, Inc. (Study Area Code 155130)

EXHIBIT 24

Rural Service Areas for Inclusion in St. Lawrence's New York ETC Service Area

Citizens Telecommunications of Hammond, Inc. (Study Area Code 150081)

Edwards Telephone Co. (Study Area Code 150092)

Nicholville Telephone Co., Inc. (Study Area Code 150108)

Township Telephone Co., Inc. (Study Area Code 150129)

EXHIBIT 25

Non-Rural Wire Centers for Inclusion in SunCom's ETC Service Area**North Carolina:**

LEC NAME	WIRE CENTER	CLLI
BELLSOUTH - NC	ACME	ACMENCMA
BELLSOUTH - NC	ALTAN	ALTNNCXA
BELLSOUTH - NC	APEX	APEXNCCE
BELLSOUTH - NC	ARDEN	AHVLNCOH
BELLSOUTH - NC	ARDEN	ARDNNCCE
BELLSOUTH - NC	ASHEVILLE	AHVLNCBI
BELLSOUTH - NC	ASHEVILLE	AHVLNCOT
BELLSOUTH - NC	ATKINSON	ATSNNCMA
BELLSOUTH - NC	BELMONT	BLMTNCCE
BELLSOUTH - NC	BESSEMER CITY	BSCYNCMA
BELLSOUTH - NC	BLACK MOUNTAIN	BCMTNCCE
BELLSOUTH - NC	BLOWING ROCK	BLRKNCE
BELLSOUTH - NC	BOONE	BOONNCKI
BELLSOUTH - NC	BURGAU	BRGWNCMA
BELLSOUTH - NC	BURLINGTON	BURLNCDA
BELLSOUTH - NC	BURLINGTON	BURLNCEL
BELLSOUTH - NC	BURLINGTON	BRVLNCXA
BELLSOUTH - NC	CANTON	CNTNNCMA
BELLSOUTH - NC	CAROLEEN	CRLNNCMA
BELLSOUTH - NC	CAROLINA BEACH	CRBHNCCE
BELLSOUTH - NC	CARY	CARYNCWS
BELLSOUTH - NC	CARY	MRVLNCCN
BELLSOUTH - NC	CASTLE HAYNE	CSHYNCMA
BELLSOUTH - NC	CHAPEL HILL	CPHLNCRO
BELLSOUTH - NC	CHAPEL HILL	RLGHNCMO
BELLSOUTH - NC	CHARLOTTE	CHRLNCBO
BELLSOUTH - NC	CHARLOTTE	CHRLNCCE
BELLSOUTH - NC	CHARLOTTE	CHRLNCCR
BELLSOUTH - NC	CHARLOTTE	CHRLNCDE
BELLSOUTH - NC	CHARLOTTE	CHRLNCER
BELLSOUTH - NC	CHARLOTTE	CHRLNCLP
BELLSOUTH - NC	CHARLOTTE	CHRLNCMI
BELLSOUTH - NC	CHARLOTTE	CHRLNCOD
BELLSOUTH - NC	CHARLOTTE	CHRLNCRE
BELLSOUTH - NC	CHARLOTTE	CHRLNCSE
BELLSOUTH - NC	CHARLOTTE	CHRLNCTH
BELLSOUTH - NC	CHARLOTTE	CHRLNCUN
BELLSOUTH - NC	CHARLOTTE	PIVLNCXB
BELLSOUTH - NC	CHARLOTTE	SLBRNCMA
BELLSOUTH - NC	CHERRYVILLE	CHVLNCCE
BELLSOUTH - NC	CLAREMONT	CLMTNCMA
BELLSOUTH - NC	CLEVELAND	CLEVNCMA
BELLSOUTH - NC	CLYDE	CLYDNCMA

LEC NAME	WIRE CENTER	CLLI
BELLSOUTH - NC	DAVIDSON	CHRLNCCA
BELLSOUTH - NC	DAVIDSON	DVSNNCPO
BELLSOUTH - NC	DENVER	DNVRNCMA
BELLSOUTH - NC	DURHAM	DRHMNCXH
BELLSOUTH - NC	ELLENBORO	ELBONCMA
BELLSOUTH - NC	ENKA-CANDLER	ENKANCMA
BELLSOUTH - NC	FAIRMONT	FAMTNCMA
BELLSOUTH - NC	FAIRVIEW	FRVWNCMA
BELLSOUTH - NC	FOREST CITY	FRCYNCCE
BELLSOUTH - NC	GASTONIA	GSTANCD A
BELLSOUTH - NC	GASTONIA	GSTANCSO
BELLSOUTH - NC	GIBSONNC	GBSNNCMA
BELLSOUTH - NC	GOLDSBORO	GLBONCAD
BELLSOUTH - NC	GOLDSBORO	GLBONCMA
BELLSOUTH - NC	GRANTHAM	GNHMNCMA
BELLSOUTH - NC	GREENSBORO	GNBONCAP
BELLSOUTH - NC	GREENSBORO	GNBONCAS
BELLSOUTH - NC	GREENSBORO	GNBONCHO
BELLSOUTH - NC	GREENSBORO	GNBONCLA
BELLSOUTH - NC	GREENSBORO	GNBONCMC
BELLSOUTH - NC	GREENSBORO	GNBONCPG
BELLSOUTH - NC	HAMLET	HMLTNCMA
BELLSOUTH - NC	HARTFORD	HRFRTNMA
BELLSOUTH - NC	HENDERSNVILLE	HNVLNCCH
BELLSOUTH - NC	HENDERSNVILLE	HNVLNCED
BELLSOUTH - NC	HENDERSNVILLE	HNVLNCMI
BELLSOUTH - NC	HUNTERSVILLE	HSVLNCCE
BELLSOUTH - NC	JULIAN	GNBONCEU
BELLSOUTH - NC	JULIAN	JULNNCMA
BELLSOUTH - NC	KINGS MT	KGMTNCMA
BELLSOUTH - NC	KNIGHTDALE	KNDLNCCE
BELLSOUTH - NC	LAKE LURE	LKLRNCCE
BELLSOUTH - NC	LATTIMORE	LTMRNCCE
BELLSOUTH - NC	LAURINBURG	LRBGNCMA
BELLSOUTH - NC	LAWNDALE	LWDLNCCE
BELLSOUTH - NC	LEICESTER	LCSRNCMA
BELLSOUTH - NC	LENOIR	LENRNCHA
BELLSOUTH - NC	LENOIR	LENRNCHU
BELLSOUTH - NC	LINCOLNNTON	LNTNNCMA
BELLSOUTH - NC	LINCOLNNTONB	LNTNNCVA
BELLSOUTH - NC	LOCUST	LCSTNCMA
BELLSOUTH - NC	LONG BEACH	LNBNHCMA
BELLSOUTH - NC	LOWELL	LWLLNCMA
BELLSOUTH - NC	LUMBERTON	LMTNNCMA
BELLSOUTH - NC	MAGGIE VALLEY	MGVANCCE
BELLSOUTH - NC	MAIDEN	MADNNCCE
BELLSOUTH - NC	MONTICELLO	MNTINCMA
BELLSOUTH - NC	MORGANTON	MGTNNCGL

LEC NAME	WIRE CENTER	CLLI
BELLSOUTH - NC	MORGANTON	MGTNNCGR
BELLSOUTH - NC	MOUNT HOLLY	MTHLNCMA
BELLSOUTH - NC	MOUNT OLIVE	MTOLNCCE
BELLSOUTH - NC	NEWLAND	NWLDNCCE
BELLSOUTH - NC	NEWTON	NWTNNCMA
BELLSOUTH - NC	PEMBROKE	PMBRNCCE
BELLSOUTH - NC	RALEIGH	RLGHNCGA
BELLSOUTH - NC	RALEIGH	RLGHNCGL
BELLSOUTH - NC	RALEIGH	RLGHNCHO
BELLSOUTH - NC	RALEIGH	RLGHNCJO
BELLSOUTH - NC	RALEIGH	RLGHNCSE
BELLSOUTH - NC	RALEIGH	RLGHNCSE
BELLSOUTH - NC	REIDSVILLE	RDVLNCMA
BELLSOUTH - NC	REIDSVILLE	RDVLNCSE
BELLSOUTH - NC	ROCKINGHAM	RCHMNCMA
BELLSOUTH - NC	ROWLANDNC	RWLDNCMA
BELLSOUTH - NC	RUFFIN	RFFNNCMA
BELLSOUTH - NC	RUTHERFORDTON	RTTNNCCE
BELLSOUTH - NC	SAXAPAHAW	SXPHNCMA
BELLSOUTH - NC	SCOTTS HILL1	SCHLNCHA
BELLSOUTH - NC	SCOTTS HILL2	SCHLNCMA
BELLSOUTH - NC	SELMA	SELMNCMA
BELLSOUTH - NC	SHELBY	SHLBNCMA
BELLSOUTH - NC	SOUTHPORT	SOPTNCCE
BELLSOUTH - NC	SPRUCE PINE	SPPNNCMA
BELLSOUTH - NC	STANLEY	STNLNCCE
BELLSOUTH - NC	STATESVILLE	SSVLNCJE
BELLSOUTH - NC	STATESVILLE	SSVLNCMA
BELLSOUTH - NC	STONY POINT	STPNNCMA
BELLSOUTH - NC	SUMMERFIELD	SRFDNCCE
BELLSOUTH - NC	SWANNANO	SWNNNCMA
BELLSOUTH - NC	TAYLORSVILLE	TYVLNCMA
BELLSOUTH - NC	TROUTMAN	TRMNNCMA
BELLSOUTH - NC	WAYNESVILLE	WYVLNCMA
BELLSOUTH - NC	WENDELL	WNDLNCPI
BELLSOUTH - NC	WILMINGTON	WLMGNCFO
BELLSOUTH - NC	WILMINGTON	WLMGNCLE
BELLSOUTH - NC	WILMINGTON	WLMGNCWI
BELLSOUTH - NC	WINSTON SALEM	WNSLNCAR
BELLSOUTH - NC	WINSTON SALEM	WNSLNCCL
BELLSOUTH - NC	WINSTON SALEM	WNSLNCFI
BELLSOUTH - NC	WINSTON SALEM	WNSLNCGL
BELLSOUTH - NC	WINSTON SALEM	WNSLNCLE
BELLSOUTH - NC	WINSTON SALEM	WNSLNCVI
BELLSOUTH - NC	WINSTON SALEM	WNSLNCWA
BELLSOUTH - NC	WINSTON SALEM	WNSLNCWH
BELLSOUTH - NC	WRIGHTSVILLE BEACH	WGVLCMA
BELLSOUTH - NC	ZEBULON	ZBLNNCCE

LEC NAME	WIRE CENTER	CLLI
North State Telephone Company	HIGH POINT	HGPNNCXA
North State Telephone Company	HIGH POINT	HGPNNCXB
North State Telephone Company	HIGH POINT	HGPNNCXC
North State Telephone Company	HIGH POINT	HGPNNCXD
North State Telephone Company	HIGH POINT	HGPNNCXE
North State Telephone Company	HIGH POINT	HGPNNCXF
North State Telephone Company	RANDLEMAN	RNMNNCXA
North State Telephone Company	THOMASVILLE	THVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	ANDREWS	ANDRNCXA
VERIZON SOUTH INC - NC (CONTEL)	BAKERSVILLE	BAVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	BRYSON CITY	BRCYNCA
VERIZON SOUTH INC - NC (CONTEL)	BURNSVILLE	BRVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	CASHIERS	CSHRNCXA
VERIZON SOUTH INC - NC (CONTEL)	CHEROKEE	CHRKNCXB
VERIZON SOUTH INC - NC (CONTEL)	FONTANA	FNVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	FRANKLIN	FKLNNCXA
VERIZON SOUTH INC - NC (CONTEL)	GARDEN CITY	GRCYNCA
VERIZON SOUTH INC - NC (CONTEL)	GLENWOOD- PROVIDENCE	GWPRNCXA
VERIZON SOUTH INC - NC (CONTEL)	GUNTERTOWN	GTTWNCXA
VERIZON SOUTH INC - NC (CONTEL)	HAYESVILLE	HYVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	HIGHLANDS	HGLNNCXA
VERIZON SOUTH INC - NC (CONTEL)	HIGHLANDS	SYLVNCXA
VERIZON SOUTH INC - NC (CONTEL)	HOT SPRINGS	HTSPNCXA
VERIZON SOUTH INC - NC (CONTEL)	MARION	MARNNCXB
VERIZON SOUTH INC - NC (CONTEL)	MARS HILL	MRHLNCXA
VERIZON SOUTH INC - NC (CONTEL)	MARS HILL	WVVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	MARSHALL	MRSHNCXA
VERIZON SOUTH INC - NC (CONTEL)	MICAVILLE	MIVLNCXA

LEC NAME	WIRE CENTER	CLLI
VERIZON SOUTH INC - NC (CONTEL)	MURPHY	MRPHNCXB
VERIZON SOUTH INC - NC (CONTEL)	OLD FORT	OLFTNCXA
VERIZON SOUTH INC - NC (CONTEL)	ROBBINSVILLE	ROVLNCXA
VERIZON SOUTH INC - NC (CONTEL)	SEVIER	SEVRNCXA
VERIZON SOUTH INC - NC (CONTEL)	SUIT	SUITNCXA
VERIZON SOUTH INC - NC (CONTEL)	CULLOWHEE	CLWHNCXA
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXB
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXT
VERIZON SOUTH INC. - NC	MONROE	MONRNCXA
VERIZON SOUTH INC. - NC	CREEDMOOR	CRDMNCXA
VERIZON SOUTH INC. - NC	CREEDMOOR	CRDMNCXM
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXA
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXC
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXD
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXE
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXG
VERIZON SOUTH INC. - NC	DURHAM	DRHMNCXM
VERIZON SOUTH INC. - NC	GOOSECREEK	GSCKNCXA

Tennessee:

LEC NAME	WIRE CENTER	CLLI
BELLSOUTH - TN	ROGERSVILLE	RRVLTNMA
BELLSOUTH - TN	SURGOINSVILLE	SRVLTNMA

Virginia:

LEC NAME	WIRE CENTER	CLLI
VERIZON-VIRGINIA, INC.	APPALACHIA	APLCVAAP
VERIZON-VIRGINIA, INC.	BIG STONE GAP	BSGPVABG
VERIZON-VIRGINIA, INC.	CLINCHCO	CLNCVACL
VERIZON-VIRGINIA, INC.	CLINTWOOD	CLWDVACW
VERIZON-VIRGINIA, INC.	COEBURN	COBNVACB
VERIZON-VIRGINIA, INC.	COEBURN	NRTNVANO
VERIZON-VIRGINIA, INC.	CUMBERLAND GAP	RSHLVALE
VERIZON-VIRGINIA, INC.	DANTE	DANTVADA
VERIZON-VIRGINIA, INC.	HAYSI	HYSIVAHY
VERIZON-VIRGINIA, INC.	HONAKER	HNKRVAHK
VERIZON-VIRGINIA, INC.	HONAKER	SWCKVASC
VERIZON-VIRGINIA, INC.	JONESVILLE	JNVLVAVJ
VERIZON-VIRGINIA, INC.	LEBANON	DCVLVADV
VERIZON-VIRGINIA, INC.	LEBANON	LBNNVALB
VERIZON-VIRGINIA, INC.	LEBANON	LBNNVARD

LEC NAME	WIRE CENTER	CLLI
VERIZON-VIRGINIA, INC.	PENNINGTON GAP	PNGPVAPG
VERIZON-VIRGINIA, INC.	POUND	PONDVAPO
VERIZON-VIRGINIA, INC.	ST CHARLES	STCHVASC
VERIZON-VIRGINIA, INC.	ST PAUL	STPLVASP
VERIZON-VIRGINIA, INC.	WISE	WISEVAWI

EXHIBIT 26

Rural Wire Centers for Inclusion in SunCom's ETC Service Area

North Carolina:

LEC NAME	WIRE CENTER	CLLI
ALLTEL CAROLINA INC. - NORTH	ABERDEEN	ABRDNCXA
ALLTEL CAROLINA INC. - NORTH	ANSONVILLE	ASVLNCXA
ALLTEL CAROLINA INC. - NORTH	BROADWAY	BRWYNCXA
ALLTEL CAROLINA INC. - NORTH	COLUMBUS	CLMBNCXA
ALLTEL CAROLINA INC. - NORTH	DENTON	DNTNNCXA
ALLTEL CAROLINA INC. - NORTH	GREENCREEK	GRCKNCXA
ALLTEL CAROLINA INC. - NORTH	HEMBY BRIDGE	HMBRNCXA
ALLTEL CAROLINA INC. - NORTH	INDIAN TRAIL	INTRNCXA
ALLTEL CAROLINA INC. - NORTH	KINGNC	KINGNCXA
ALLTEL CAROLINA INC. - NORTH	LAUREL HILL	LRHLNCXA
ALLTEL CAROLINA INC. - NORTH	LEWISVILLE	LWVLNCXA
ALLTEL CAROLINA INC. - NORTH	LILESVILLE	LLVLNCXA
ALLTEL CAROLINA INC. - NORTH	MARSHVILLE	MHVLNCXA
ALLTEL CAROLINA INC. - NORTH	MATTHEWS	MTHWNCXB
ALLTEL CAROLINA INC. - NORTH	MORVEN	MRVNNCXA
ALLTEL CAROLINA INC. - NORTH	NEW SALEM	NWSLNCXA
ALLTEL CAROLINA INC. - NORTH	NORWOOD	NRWDNCXA
ALLTEL CAROLINA INC. - NORTH	OLDTOWN	OLTWNCXA
ALLTEL CAROLINA INC. - NORTH	OLIVIA	OLIVNCXA
ALLTEL CAROLINA INC. - NORTH	PEACHLAND POLKTON	PCLDNCXA
ALLTEL CAROLINA INC. - NORTH	PINEBLUFF	PNBLNCXA
ALLTEL CAROLINA INC. - NORTH	RURAL HALL	RRHLNCXA
ALLTEL CAROLINA INC. - NORTH	SANFORD	SNFRNCXA
ALLTEL CAROLINA INC. - NORTH	STANLEYVILLE	SLVLNCXA
ALLTEL CAROLINA INC. - NORTH	TRYON	TRYNNCXA
ALLTEL CAROLINA INC. - NORTH	WADESBORO	MRVINCXA
ALLTEL CAROLINA INC. - NORTH	WAGRAM	WGRMNCXA
ALLTEL CAROLINA INC. - NORTH	WAXHAW	WXHWNCXA
ALLTEL CAROLINA INC. - NORTH	WINGATE	WNGTNCXA
ALLTEL CAROLINA INC. - NORTH	GRANITE QUARRY- ROCKWELL	GRQYNCXA
ALLTEL CAROLINA INC. - NORTH	WADESBORO	WDBONCXA
ATLANTIC TEL. MEMBERSHIP CORP.	BLNGSPGLKS	BSLKNCXA
ATLANTIC TEL. MEMBERSHIP CORP.	BOLIVIA	BOLVNCXA
ATLANTIC TEL. MEMBERSHIP CORP.	HOLDEN BEACH	HLBHNCXB
ATLANTIC TEL. MEMBERSHIP CORP.	LONGWOOD	LGWDNCXA
ATLANTIC TEL. MEMBERSHIP CORP.	SEASIDE	SESDNCXB
ATLANTIC TEL. MEMBERSHIP CORP.	SHALLOTTE	SHLTNCXA
BARNARDSVILLE TEL. CO. D/B/A TDS TELECOM	BARNARDSVL	BDVLNCXA
CAROLINA TELEPHONE & TELEGRAPH CO.	NEW BERN	NWBRNCXA

LEC NAME	WIRE CENTER	CLLI
CENTRAL TELEPHONE COMPANY - NC	ASHEBORO	ASBONCXA
CENTRAL TELEPHONE COMPANY - NC	BETHLEHEM	BHLHNCXA
CENTRAL TELEPHONE COMPANY - NC	BISCOE	BISCNCXA
CENTRAL TELEPHONE COMPANY - NC	BOONVILLE	BNVLNCXA
CENTRAL TELEPHONE COMPANY - NC	CANDOR	CNDRNCXA
CENTRAL TELEPHONE COMPANY - NC	CATAWBA	CTWBNCXA
CENTRAL TELEPHONE COMPANY - NC	DANBURY	DNBRNCXA
CENTRAL TELEPHONE COMPANY - NC	DOBSON	DBSNNCXB
CENTRAL TELEPHONE COMPANY - NC	EDENNC	EDENNCXA
CENTRAL TELEPHONE COMPANY - NC	ELKIN	ELKNNCXA
CENTRAL TELEPHONE COMPANY - NC	GRANITE FALLS	GRFLNCXA
CENTRAL TELEPHONE COMPANY - NC	HAYS	HAYSNCXA
CENTRAL TELEPHONE COMPANY - NC	HICKORY	HCKRNCXA
CENTRAL TELEPHONE COMPANY - NC	HILDEBRAN	HLDBNCXA
CENTRAL TELEPHONE COMPANY - NC	HILLSBOROUGH	HLBONCXB
CENTRAL TELEPHONE COMPANY - NC	MADISON	MDSNNCXA
CENTRAL TELEPHONE COMPANY - NC	MOUNT AIRY	MTARNCXA
CENTRAL TELEPHONE COMPANY - NC	MOUNT GILEAD	MTGLNCXA
CENTRAL TELEPHONE COMPANY - NC	MOUNTAIN VIEW	MTVWNCXA
CENTRAL TELEPHONE COMPANY - NC	MULBERRY	MLBYNCXB
CENTRAL TELEPHONE COMPANY - NC	NORTH WILKESBORO	NWBONCXA
CENTRAL TELEPHONE COMPANY - NC	PILOT MOUNTAIN	PLMTNCXA
CENTRAL TELEPHONE COMPANY - NC	QUAKER GAP	QKGPNCXA
CENTRAL TELEPHONE COMPANY - NC	RAMSEUR	RMSRNCXA
CENTRAL TELEPHONE COMPANY - NC	ROARING GAP	RNRPNXCA
CENTRAL TELEPHONE COMPANY - NC	SANDY RIDGE	SNRGNCXA
CENTRAL TELEPHONE COMPANY - NC	SEAGROVE	SEGVNCXA
CENTRAL TELEPHONE COMPANY - NC	SHERRILLS FORD	SHFRNCXA
CENTRAL TELEPHONE COMPANY - NC	STATE ROAD	STRDNCXA
CENTRAL TELEPHONE COMPANY - NC	STONEVILLE	STVLNCXA
CENTRAL TELEPHONE COMPANY - NC	TIMBERLAKE	TMLKNCXA
CENTRAL TELEPHONE COMPANY - NC	TROY	TROYNCXA
CENTRAL TELEPHONE COMPANY - NC	VALDESE	VLDSNCXA
CENTRAL TELEPHONE COMPANY - NC	WALKERTOWN	WKTWNCXA
CENTRAL TELEPHONE COMPANY - NC	WALNUT COVE	WLCVNCXA
CENTRAL TELEPHONE COMPANY - NC	WEST END	WENDNCXB
CENTRAL TELEPHONE COMPANY - NC	WEST JEFFERSON	WJSNNCXA
CENTRAL TELEPHONE COMPANY - NC	YADKINVILLE	CRTYNCXA
CENTRAL TELEPHONE COMPANY - NC	ASHEBORO	ASBONCXB
CENTRAL TELEPHONE COMPANY - NC	EDENNC	EDENNCXB
CENTRAL TELEPHONE COMPANY - NC	HICKORY	HCKRNCXB
CENTRAL TELEPHONE COMPANY - NC	YADKINVILLE	YDVLNCXA
CENTRAL TELEPHONE COMPANY NC	MOCKSVILLE	MKVLNCXA
CITIZENS TEL. CO.	BREVARD	BRVRNCXA
ELLERBE TELEPHONE COMPANY	ELLERBE	ELRBNCXA
LEXCOM TELEPHONE CO.	LEXINGTON	LXTNNCXA
LEXCOM TELEPHONE CO.	LEXINGTON	LXTNNCXB
LEXCOM TELEPHONE CO.	LEXINGTON	LXTNNCXC

LEC NAME	WIRE CENTER	CLLI
LEXCOM TELEPHONE CO.	LEXINGTON	LXTNNCXD
LEXCOM TELEPHONE CO.	LEXINGTON	LXTNNCXE
LEXCOM TELEPHONE CO.	SOUTHMONT	SMNTNCXA
LEXCOM TELEPHONE CO.	WELCOME	WLCMNCXA
MEBTel, INC.	MEBANE	MEBNNCXa
PIEDMONT TELEPHONE MEMBERSHIP CORP.	CHURCHLAND	CHLDNCXA
PIEDMONT TELEPHONE MEMBERSHIP CORP.	REEDS	REDSNCXA
RANDOLPH TEL. CO.	LIBERTY	LBRTNCXA
RANDOLPH TEL. MEMBERSHIP CORP.	BADIN LAKE	BDLKNcXA
RANDOLPH TEL. MEMBERSHIP CORP.	BENNETT	BNNTNCXA
RANDOLPH TEL. MEMBERSHIP CORP.	COLERIDGE	CLRGNCXA
RANDOLPH TEL. MEMBERSHIP CORP.	FARMER	FRMRNCXA
RANDOLPH TEL. MEMBERSHIP CORP.	HIGHFALLS	HGHFNCXA
RANDOLPH TEL. MEMBERSHIP CORP.	JACKSON CREEK	JKCKNCXA
RANDOLPH TEL. MEMBERSHIP CORP.	PISGAH	PSGHNCXA
SALUDA MOUNTAIN TEL. CO. D/B/A TDS TELECOM	SALUDA	SALDNCXA
SERVICE TEL. CO. D/B/A TDS TELECOM	FAIR BLUFF	FRBLNCXA
SKYLINE TEL. MEMBERSHIP CORP.	BALDWIN	BLDWNCXA
SKYLINE TEL. MEMBERSHIP CORP.	BANNER ELK	BNELNCXA
SKYLINE TEL. MEMBERSHIP CORP.	BEECH MOUNTAIN	BEMTNCXA
SKYLINE TEL. MEMBERSHIP CORP.	CRESTON	CETNNcXA
SKYLINE TEL. MEMBERSHIP CORP.	GLADECREEK	GLCKNCXA
SKYLINE TEL. MEMBERSHIP CORP.	LANSING	LNNGNCXA
SKYLINE TEL. MEMBERSHIP CORP.	NATHANSCRK	NTCKNCXA
SKYLINE TEL. MEMBERSHIP CORP.	SCOTTVILLE	SCVLNCXA
SKYLINE TEL. MEMBERSHIP CORP.	SPARTA	SPRTNCXA
SKYLINE TEL. MEMBERSHIP CORP.	SUGAR GROVE	SGGVNCXA
SKYLINE TEL. MEMBERSHIP CORP.	WATAUGA	WATGNCXA
STAR TEL. MEMBERSHIP CORP.	ABBOTTSBG	ABBGNCXA
STAR TEL. MEMBERSHIP CORP.	COHARIE	COHRNCXA
STAR TEL. MEMBERSHIP CORP.	CYPRESSCRK	CYCKNCXA
STAR TEL. MEMBERSHIP CORP.	HARRELLS	HRLSNCXA
STAR TEL. MEMBERSHIP CORP.	HERRING	HRNGNCXA
STAR TEL. MEMBERSHIP CORP.	KELLY	KLLYNCXA
STAR TEL. MEMBERSHIP CORP.	LISBON	LSBNNCXA
STAR TEL. MEMBERSHIP CORP.	SIX RUN	SXRNNXCA
STAR TEL. MEMBERSHIP CORP.	SOUTHRIVER	SORVNCXA
STAR TEL. MEMBERSHIP CORP.	WHITE OAK	WHOKNCXA
SURRY TEL. MEMBERSHIP CORP.	BEULAH	BELHNCXA
SURRY TEL. MEMBERSHIP CORP.	LEVELCROSS	LVCRNCXA
SURRY TEL. MEMBERSHIP CORP.	RED BRUSH	RDBSNCXA
SURRY TEL. MEMBERSHIP CORP.	SHOALS	SHLSNCXA
SURRY TEL. MEMBERSHIP CORP.	WESTFIELD	WSFDNCXA
SURRY TEL. MEMBERSHIP CORP.	ZEPHYR	ZPHYNCXA
THE CONCORD TELEPHONE COMPANY, INC.	ALBEMARLE	ALBMNCXA
THE CONCORD TELEPHONE COMPANY, INC.	BADIN	BADNNcXA

LEC NAME	WIRE CENTER	CLLI
THE CONCORD TELEPHONE COMPANY, INC.	CHINA GROVE-LANDIS	CHGVNCXA
THE CONCORD TELEPHONE COMPANY, INC.	CONCORD	CNCRNCXA
THE CONCORD TELEPHONE COMPANY, INC.	HARRISBURG	HRBGNCXA
THE CONCORD TELEPHONE COMPANY, INC.	KANNAPOLIS	KNPLNCXA
THE CONCORD TELEPHONE COMPANY, INC.	NEW LONDON	NWLNNCXA
THE CONCORD TELEPHONE COMPANY, INC.	OAKBORO	OKBONCXA
TRI-COUNTY TEL. MEMBERSHIP CORP.	PIKE ROAD	PKRDNCXA
TRI-COUNTY TEL. MEMBERSHIP CORP.	PINETOWN	PNTWNCXA
TRI-COUNTY TEL. MEMBERSHIP CORP.	SIDNEY	SDNYNCXA
WILKES TELEPHONE MEMBERSHIP CORPORATION	BOOMER	BOMRNXCA
WILKES TELEPHONE MEMBERSHIP CORPORATION	CHAMPION	CHMPNCXA
WILKES TELEPHONE MEMBERSHIP CORPORATION	CLINGMAN	CLNGNCXA
WILKES TELEPHONE MEMBERSHIP CORPORATION	LOMAX	LOMXNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	ADVANCE	ADVNNCXB
YADKIN VALLEY TEL. MEMBERSHIP CORP.	BROOKS	BRKSNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	COOLEEMEE	COLMNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	EAST BEND	EBNDNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	FORBUSH	FRBSNCXB
YADKIN VALLEY TEL. MEMBERSHIP CORP.	HARMONY	HRMYNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	IJAMES	IJAMNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	NEW HOPE	NWHPNCXA
YADKIN VALLEY TEL. MEMBERSHIP CORP.	UNIONGROVE	UNGVNCXB

Tennessee:

LEC NAME	WIRE CENTER	CLLI
UNITED TELEPHONE INTER-MOUNTAIN - TN	BAILEYTON	BLTNTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	BLOUNTVILLE	BUVLTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	BLUFF CITY-PINEY FLATS	BLCYTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	BRISTOL, TN	BRSTTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	BRISTOL, TN	BRSTTNXB
UNITED TELEPHONE INTER-MOUNTAIN - TN	BUTLER	BTLRTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	CHURCHHILL-MT CARMEL	CHHLTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	ELIZABETHTON	ELTNTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	ERWIN	ERWNTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	FALL BRANCH	FLBRTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	GREENEVILLE	GRVLTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	HAMPTON	HMPNTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	JONESBORO-SULPHUR SPR	JNBOTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	KINGSPORT	KGPTTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	KINGSPORT	KGPTTNXC

LEC NAME	WIRE CENTER	CLLI
UNITED TELEPHONE INTER-MOUNTAIN - TN	LIMESTONE	LMSTTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	MIDWAY (WASHINGTON CO)	MDWYTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	MOSHEIM	MOSHTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	MOUNTAIN CITY	MTCYTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	ROAN MOUNTAIN	RNMTTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	STONEY CREEK	STCKTNXA
UNITED TELEPHONE INTER-MOUNTAIN - TN	SULLIVAN GARDENS	SLGRTNXA

Virginia:

LEC NAME	WIRE CENTER	CLLI
SCOTT COUNTY TEL. COOP.	DUFFIELD	DFFDVAXA
SCOTT COUNTY TEL. COOP.	DUNGANNON	DNGNVAXA
SCOTT COUNTY TEL. COOP.	FT BLACKMR	FTBCVAXA
SCOTT COUNTY TEL. COOP.	NICKELSVL	NCVLVAXA
SCOTT COUNTY TEL. COOP.	WILLIAMSML	WLMLVAXA

EXHIBIT 27

Non-Rural Wire Centers for Inclusion in U.S. Cellular's ETC Service Area**New Hampshire:**

LEC NAME	WIRE CENTER	CLLI
Verizon New England Inc.	ALSTEAD	ALSTNHLIRS1
Verizon New England Inc.	ASHLAND	ASLDNHHIRS1
Verizon New England Inc.	ATKINSON	ATSNNHMARS1
Verizon New England Inc.	BEDFORD	BDFRNHAMRS1
Verizon New England Inc.	BETHLEHEM	BHLNHNCRS1
Verizon New England Inc.	BELMONT	BLMTNHMARS1
Verizon New England Inc.	BARRINGTON	BNTONHPRRS1
Verizon New England Inc.	BERLIN	BRLNNHHERS1
Verizon New England Inc.	BRISTOL	BRSTNHSPRS1
Verizon New England Inc.	BARTLETT	BRTLNHGERS1
Verizon New England Inc.	CANDIA	CANDNHDERS1
Verizon New England Inc.	CANAAN	CANNNHYARS1
Verizon New England Inc.	CHARLESTOWN	CHTWNHBRRS1
Verizon New England Inc.	COLEBROOK	CLBKNHMARS1
Verizon New England Inc.	CLAREMONT	CLMTNHBRRS1
Verizon New England Inc.	CAMPTON	CMTNNHOWRS1
Verizon New England Inc.	CONCORD	CNCRNHSODS1
Verizon New England Inc.	CENTER HARBOR	CNHRNHPLRS1
Verizon New England Inc.	CENTER OSSIPEE	CNOSNHFORs1
Verizon New England Inc.	CTR SANDWICH	CNSWNHSLRS1
Verizon New England Inc.	CANTERBURY	CNTRNHSHRS1
Verizon New England Inc.	N CONWAY	CNWNHNYARS1
Verizon New England Inc.	DUBLIN	DBLNNHMORS1
Verizon New England Inc.	DANBURY	DNBRNHDBRS1
Verizon New England Inc.	DEERFIELD	DRFDNHCCRS1
Verizon New England Inc.	DERRY	DRRYNHEBDS1
Verizon New England Inc.	ENFIELD	ENFDNHNMRs1
Verizon New England Inc.	EPPING	EPNGNHMARS1
Verizon New England Inc.	EPSOM	EPSMNBHRS1
Verizon New England Inc.	ERROL	ERRLNHYARS1
Verizon New England Inc.	FRANKLIN	FKLNNHFRRS1
Verizon New England Inc.	FRANCONIA	FRNCNHWHRs1
Verizon New England Inc.	FARMINGTON	FRTNNHMGRS1
Verizon New England Inc.	FITZWILLIAM	FTZWNHUTRS1
Verizon New England Inc.	GOFFSTOWN	GFTWNHWHRs1
Verizon New England Inc.	GLENDALE	GLDLNHABRS1
Verizon New England Inc.	GREENFIELD	GNFDNHMARS1
Verizon New England Inc.	GREENVILLE	GNVLNHADRS1
Verizon New England Inc.	GORHAM	GRHMNHLARS1
Verizon New England Inc.	GROVETON	GVTNNHSTRS1
Verizon New England Inc.	HAMPSTEAD	HMPSNHMARS1
Verizon New England Inc.	HANCOCK	HNCCNHSCRS1
Verizon New England Inc.	HINSDALE	HNDLNHMARS1

LEC NAME	WIRE CENTER	CLLI
Verizon New England Inc.	HANOVER	HNVRNHSCDS0
Verizon New England Inc.	HARRISVILLE	HRVLNHMARS1
Verizon New England Inc.	JACKSON	JCSNNHTHRS1
Verizon New England Inc.	JAFFREY	JFRYNHRIRS1
Verizon New England Inc.	JEFFERSON	JFSNNHYARS1
Verizon New England Inc.	KEENE	KEENNHWADS0
Verizon New England Inc.	LACONIA	LACNNHNMDSD0
Verizon New England Inc.	LEBANON	LBNNNHBBARS1
Verizon New England Inc.	LANCASTER	LNCSNNHHS1
Verizon New England Inc.	LISBON	LSBNNHMARS1
Verizon New England Inc.	LITTLETON	LTTNNHPLDS0
Verizon New England Inc.	LYME	LYMENHYARS1
Verizon New England Inc.	MADISON	MDSNNHYARS1
Verizon New England Inc.	MILAN	MILNNHPLRS1
Verizon New England Inc.	MOULTONBORO	MLBONHYARS1
Verizon New England Inc.	MILFORD	MLFRNHSODSD0
Verizon New England Inc.	MILTON	MLTNNHSIRS1
Verizon New England Inc.	MANCHESTER	MNCHNHCODS2
Verizon New England Inc.	MARLBORO	MRBONHYARS1
Verizon New England Inc.	MEREDITH	MRDTNHWARS1
Verizon New England Inc.	MARLOW	MRLWNHYARS1
Verizon New England Inc.	MERRIMACK	MRMCNHYADS1
Verizon New England Inc.	MILTON MILLS	MTMLNHWERS1
Verizon New England Inc.	NASHUA	NASHNHGRRS1
Verizon New England Inc.	NASHUA	NASHNHWPDS1
Verizon New England Inc.	NEW BOSTON	NBTNNHHPRS1
Verizon New England Inc.	NORTH CONWAY	NCWYNHKERS1
Verizon New England Inc.	NORTH STRATFORD	NSFRNHMARS1
Verizon New England Inc.	N WOODSTOCK	NWDSNHMARS1
Verizon New England Inc.	NORTHWOOD	NWODNHYARS1
Verizon New England Inc.	NEWPORT	NWPTNHMADS0
Verizon New England Inc.	PIKE	PIKENHPIRS1
Verizon New England Inc.	PELHAM	PLHMNHBRDS0
Verizon New England Inc.	PLYMOUTH	PLMONHLHRS1
Verizon New England Inc.	PLAISTOW	PLSTNHMADS0
Verizon New England Inc.	CONCORD	PNCKNHCHRS1
Verizon New England Inc.	PITTSFIELD	PTFDNHBRRS1
Verizon New England Inc.	PETERBOROUGH	PTRBNHCORS1
Verizon New England Inc.	RUMNEY	RMNYNHSLRS1
Verizon New England Inc.	RINDGE	RNDGNHCERS1
Verizon New England Inc.	ROCHESTER	ROCHNHWEDSD0
Verizon New England Inc.	RAYMOND	RYMNNHFLDS0
Verizon New England Inc.	SALEM	SALMNHNBDS1
Verizon New England Inc.	SANBORNVILLE	SBVLNHCSRS1
Verizon New England Inc.	SULLIVAN	SLLVNHYARS1
Verizon New England Inc.	SUNCOOK	SNCKNHPARS1
Verizon New England Inc.	SPOFFORD	SPFRNHMSRS1
Verizon New England Inc.	SUNAPEE	SUNPNHMCRS1

LEC NAME	WIRE CENTER	CLLI
Verizon New England Inc.	TILTON	TLTNNHPRRS1
Verizon New England Inc.	TAMWORTH	TMWONHWHRS1
Verizon New England Inc.	TROY	TROYNHPRRS1
Verizon New England Inc.	TWIN MOUNTAIN	TWMTNHYARS1
Verizon New England Inc.	WOODSVILLE	WDVLNHJLRS1
Verizon New England Inc.	WEIRS	WERSNHSTRS1
Verizon New England Inc.	WHITEFIELD	WHFDNHPLRS1
Verizon New England Inc.	WOLFEBORO	WLBONHGSRS1
Verizon New England Inc.	WALPOLE	WLPLNHWPERS1
Verizon New England Inc.	WESTMORELAND	WMLDNHWERS1
Verizon New England Inc.	WINCHESTER	WNCHNHMIRS1
Verizon New England Inc.	WARREN	WRRNNHMARS1
Verizon New England Inc.	WATERVILLE VALLEY	WVVYNHMRRS1

North Carolina:

LEC NAME	WIRE CENTER	CLLI
Central Telephone Co. - Virginia	Virgilina	VRGLVAXA
Verizon South, Inc. - NC	Durham	DRHMNCXB
Verizon South, Inc. - NC	Durham	DRHMNCXE
Verizon South, Inc. - NC	Durham	DRHMNCXM
Verizon South, Inc. - NC	Durham	DRHMNCXC
Verizon South, Inc. - NC	Durham	DRHMNCXT
Verizon South, Inc. - NC	Durham	DRHMNCXD
Verizon South, Inc. - NC	Butner	CRDMNCXA
Verizon South, Inc. - NC	Creedmoor	CRDMNCXM
Verizon South, Inc. - NC (Contel)	Hot Springs	HTSPNCXA
Verizon South, Inc. - NC (Contel)	Guntertown	GTTWNCXA
Verizon South, Inc. - NC (Contel)	Marshall	MRSHNCXA
Verizon South, Inc. - NC (Contel)	Mars Hill	MRHLNCXA
Verizon South, Inc. - NC (Contel)	Weaverville	WVVLNCXA
Verizon South, Inc. - NC (Contel)	Burnsville	BRVLNCXA
Verizon South, Inc. - NC (Contel)	Burnsville	MIVLNCXA
Verizon South, Inc. - NC (Contel)	Bakersville	BAVLNCXA
Verizon South, Inc. - NC (Contel)	Old Fort	OLFTNCXA
Verizon South, Inc. - NC (Contel)	Marion	GWPRNCXA
Verizon South, Inc. - NC (Contel)	Marion	GRCYNCXA
Verizon South, Inc. - NC (Contel)	Sevier	SEVRNCXA
Verizon South, Inc. - NC (Contel)	Marion	MARNNCXA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Clyde	CLYDNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Canton	CNTNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Candler	ENKANCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Horseshoe	HNVLNCMI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Hendersonville	HNVLNCCH
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Leicester	LCSRNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Asheville	AHVLNCOH
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Asheville	AHVLNCOT

LEC NAME	WIRE CENTER	CLLI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Asheville	AHVLNCBI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Hendersonville	HNVLNCED
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Fairview	FRVWNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Arden	ARDNNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Swannanoa	SWNNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Black Mount	BCMTNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Lake Lure	LKLRNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Spruce Pine	SPPNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Rutherfordton	RTTNNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Newland	NWLDNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Morganton	MGTNNCGL
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Morganton	MGTNNCGR
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Boone	BOONNCYI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Lenoir	LENRNCHA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	First City	FRCYNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Ellenboro	ELBONCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Caroleen	CRLNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Lattimore	LTMRNCCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Shelby	SHLBNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Lawndale	LWDLNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Grover	GRVRNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Cherryville	CHVLNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Vale	LNNNNCVA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Newton	NWTNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Taylorsville	TYVLNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Hamlet	HMLTNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Laurensburg	LRBGNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Rowland	RWLDNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Pembroke	PMBRNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Fairmont	FAMTNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Lumberton	LMTNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Acme	ACMENCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Atkinson	ATSNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Wilmington	WLMGNCLE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	South Point	SOPTNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Long Beach	LNBNHCMS
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Carolina Beach	CRBNHCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Wilmington	WGVLCNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Wilmington	WLMGNCFO
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Wilmington	WLMGNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Castle Hane	CSHYNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Burgaw	BRGWNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Hampsted	SCHLNCHA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Goldsboro	GNHMNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Mount Olive	MTOLNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Goldsboro	GLBONCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Goldsboro	GLBONCAD
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Selma	SELMNCMA

LEC NAME	WIRE CENTER	CLLI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Garner	RLGHNCGA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Apex	APEXNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Raleigh	RLGHNC
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Raleigh	RLGHNCAB
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Knight Dale	KNDLNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Wendell	WNDLNCPI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Zebulon	ZBLNNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Cary	CARYNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Chapel Hill	CPHLNCRO
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Graham	SXPHNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Raleigh	RLGHNC SI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Burlington	BURLNCDA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Burlington	BURLNCHA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Gibsonville	GBVLNCXA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Elon College	BURLNCEL
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Greensboro	GNBONCLA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Greensboro	GNBONCMC
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Monticello	MNTINCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Summerfield	SRFDNCCE
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Reidsville	RDVLNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Reidsville	RDVLNC SI
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Ruffin	RFFNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Anderson	ARSNNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Gatewood	GTWDNCMA
Bell South Telecomm, Inc. d/b/a Southern Bell Tel	Milton	MLTNNCMA

Tennessee:

LEC NAME	WIRE CENTER	CLLI
BellSouth Telecomm Inc d/b/a South Central Bell Tel	ATHENS	ATHNTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	BULLS GAP	BLGPTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	BENTON	BNTNTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	CARTHAGE	CRTHTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	CHARLESTON	CHTNTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	CLINTON	CLTNTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	COPPERBSIN	CRHLTN CB
BellSouth Telecomm Inc d/b/a South Central Bell Tel	CUMBERLDGP	CLDGTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	DANDRIDGE	DNRGTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	DAYTON	DYTNTNMA

LEC NAME	WIRE CENTER	CLLI
BellSouth Telecomm Inc d/b/a South Central Bell Tel	DECATUR	DCTRNTMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	ETOWAH	ETWHTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	FORK RIDGE	MDBOKYMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	FRIENDSVL	FIVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	GALLATIN	GALLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	GATLINBURG	GTBGTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	GEORGETOWN	CLEVTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	GREENBACK	GRNBTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	HARRIMAN	HIMNTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	HARTFORD	HRFRTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	HARTSVILLE	HTVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	JEFFERSNCY	JFCYTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	JELICO	JLLCTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	KINGSTON	KGTNTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	KNOXVILLE	KNVLTNBE
BellSouth Telecomm Inc d/b/a South Central Bell Tel	KNOXVILLE	KNVLTNFC
BellSouth Telecomm Inc d/b/a South Central Bell Tel	KNOXVILLE	KNVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	KNOXVILLE	KNVLTNWH
BellSouth Telecomm Inc d/b/a South Central Bell Tel	KNOXVILLE	KNVLTNYH
BellSouth Telecomm Inc d/b/a South Central Bell Tel	LAFOLLETTE	LFLTNTMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	LAKE CITY	LKCYTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	LEBANON	LBNNTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	LENOIRCITY	LNCYTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	LOUDON	LODNTNMA

LEC NAME	WIRE CENTER	CLLI
BellSouth Telecomm Inc d/b/a South Central Bell Tel	MARYVILLE	MAVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	MADISONVL	MDVITNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	MORRISTOWN	MRTWTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	MASCOT	MSCTTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	MAYNARDVL	MYVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	NORRIS	NRRSTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	NEWPORT	NWPTTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	OAK RIDGE	OKRGTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	OLIVER SPG	OLSPTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	ROCKWOOD	RKWDTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	ROGERSVL	RRVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	SNEEDVILLE	SNVLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	SPRINGCITY	SPCYTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	SEVIERVL	SVVLTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	SWEETWATER	SWTSTNMT
BellSouth Telecomm Inc d/b/a South Central Bell Tel	TOWNSEND	TWNSTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	WHITE PINE	WHPITNMA

Virginia:

LEC NAME	WIRE CENTER	CLLI
Verizon South Inc. – VA (Contel)	ALLWOOD	ALWDVAXA
Verizon South Inc. – VA (Contel)	AMHERST	AMHRVAXA
Verizon South Inc. – VA (Contel)	APPOMATTOX	APMTVAXA
Verizon South Inc. – VA (Contel)	BARNESVL	BRVIVAXA
Verizon South Inc. – VA (Contel)	CLARKSVL	CLVLVAXA
Verizon South Inc. – VA (Contel)	CHASE CITY	CSCYVAXA
Verizon South Inc. – VA (Contel)	DRAKESBRCH	DRBRVAXA
Verizon South Inc. – VA (Contel)	ELKTON	EKTNVAXA
Verizon South Inc. – VA (Contel)	GLADSTONE	GLDSVAXA
Verizon South Inc. – VA (Contel)	GROTTOES	GRTSVAXA

LEC NAME	WIRE CENTER	CLLI
Verizon South Inc. – VA (Contel)	KEYSVILLE	KYVLVAXA
Verizon South Inc. – VA (Contel)	RAPHINE	RPHNVAXA
Verizon Virginia, Inc.	BUCHANAN	BCHNVABH
Verizon Virginia	BEDFORD	BDFRVABD
Verizon Virginia	BIG ISLAND	BGISVABI
Verizon Virginia	BLACKSBURG	BLBGVABB
Verizon Virginia	CRIGLERSVL	CGVLVACL
Verizon Virginia	CHATHAM	CHHMOVACH
Verizon Virginia	MADISON	CLPPVARV
Verizon Virginia	CLOVER	CLVRVACL
Verizon Virginia	CUMBERLAND	CMLDVACU
Verizon Virginia	CHRISTISBG	CRBGVACB
Verizon Virginia	CRAIGSVL	CRVIVACV
Verizon Virginia	CARTERSVL	CRVLVACV
Verizon Virginia	DANVILLE	DAVLVADA
Verizon Virginia	DANVILLE	DAVLVAFP
Verizon Virginia	RINGGOLD	DAVLVAWE
Verizon Virginia	DUBLIN	DBLNVADU
Verizon Virginia	FIFE	FIFEVAFI
Verizon Virginia	GREENWOOD	GNWDVAGW
Verizon Virginia	GORDONSVL	GOVLVAGV
Verizon Virginia	HONAKER	HNKRVAHK
Verizon Virginia	W LEBANON	LBNNVALB
Verizon Virginia	LEBANON	LBNNVARD
Verizon Virginia	LOUISA	LOUSVALU
Verizon Virginia	LOVINGSTON	LVTNVALN
Verizon Virginia	LYNCHBURG	LYBGVACH
Verizon Virginia	LYNCHBURG	LYBGVACV
Verizon Virginia	LYNCHBURG	LYBGVAMH
Verizon Virginia	LYNCHBURG	LYBGVANL
Verizon Virginia	LYNCHBURG	LYBGVAOF
Verizon Virginia	LYNCHBURG	LYBGVATM
Verizon Virginia	LYNCHBURG	LYBGVAYB
Verizon Virginia	MADISON	MDSNVAMA
Verizon Virginia	NELLYSFORD	NLFRVANF
Verizon Virginia	NARROWS	NRWSVANA
Verizon Virginia	ORANGE	ORNGVAOR
Verizon Virginia	PULASKI	PLSKVAPU
Verizon Virginia	PINEYRIVER	PNRVVAPR
Verizon Virginia	PEARISBURG	PRBGVAPB
Verizon Virginia	POWHATAN	PWHTVAPW
Verizon Virginia	RADFORD	RDFRVARA
Verizon Virginia	ROANOKE	RONKVABK
Verizon Virginia	ROANOKE	RONKVABS
Verizon Virginia	ROANOKE	RONKVACS
Verizon Virginia	ROANOKE	RONKVACV

LEC NAME	WIRE CENTER	CLLI
Verizon Virginia	ROANOKE	RONKVAGC
Verizon Virginia	ROANOKE	RONKVALK
Verizon Virginia	SALEM	SALMVAFL
Verizon Virginia	SALEM	SALMVAMC
Verizon Virginia	SALEM	SALMVASA
Verizon Virginia	SHAWSVILLE	SHVLVASW
Verizon Virginia	STONE MT	SNMTVASM
Verizon Virginia	STAUNTON	STTNVAST
Verizon Virginia	SWORDS CRK	SWCKVASC
Verizon Virginia	ROANOKE	SWVLVASV
Verizon Virginia	LOVINGSTON	WNTRVAWG

EXHIBIT 28**Rural Wire Centers for Inclusion in U.S. Cellular's ETC Service Area****New Hampshire:**

LEC NAME	WIRE CENTER	CLLI
Bretton Woods Telephone Co.	BRETTON WOODS	BTWDNHXADS0
Dunbarton Telephone Co.	DUNBARTON	DNTNNHXADS0
Hollis Telephone Company Inc.	HOLLIS	HLLSNHXADS0
Kearsage Telephone Co.	ANDOVER	ANDVNHXARS1
Kearsage Telephone Co.	CONCORD	BSCWNHXARS1
Kearsage Telephone Co.	CHICHESTER	CHCHNHXADS1
Kearsage Telephone Co.	MERIDEN	MRDNNHXADS1
Kearsage Telephone Co.	NEW LONDON	NWLNNHXADS0
Kearsage Telephone Co.	SALISBURY	SLBRNHXARS1
Merrimack County Telephone Co. d/b/a Contoocook Valley	ANTRIM	ANTRNHXARS3
Merrimack County Telephone Co. d/b/a Contoocook Valley	HILLSBORO	HLBONHXADS0
Merrimack County Telephone Co. d/b/a Contoocook Valley	HENNIKER	HNKRNHXARS2
Merrimack County Telephone Co. d/b/a Contoocook Valley	MOULTONBOROUGH	MLVGNHXADS0
Merrimack County Telephone Co.	BRADFORD	BRFRNHXARS2
Merrimack County Telephone Co.	CONTOOCCOOK	CNTCNHXADS1
Merrimack County Telephone Co.	NEWBURY	STTNNHXARS2
Merrimack County Telephone Co.	WARNER	WRNRNHXARS2
Union Telephone Co. – New Hampshire	ALTON	ALTNNHXADS0
Union Telephone Co. – New Hampshire	BARNSTEAD	BRNSNHXADS0
Union Telephone Co. – New Hampshire	CENTER BARNSTEAD	CNBNNHXADS0

LEC NAME	WIRE CENTER	CLLI
Union Telephone Co. – New Hampshire	CTR SANDWICH	GLTNNHXADS0
Union Telephone Co. – New Hampshire	NEW DURHAM	NWDRNHXADS0
Wilton Telephone Co.	WILTON	WLTONHXADS0

North Carolina:

LEC NAME	WIRE CENTER	CLLI
Tri -County Telephone Membership Corporation	Pine Town	PNTWNCXA
Tri -County Telephone Membership Corporation	Pantego	PKRDNCXA
Tri -County Telephone Membership Corporation	Bath	SDNYNCXA
Atlantic Telephone Membership Corporation	Longwood	LGWDNCXA
Atlantic Telephone Membership Corporation	Ocean Island Beach	SESDNCXA
Atlantic Telephone Membership Corporation	Shallotte	SHLTNCXA
Atlantic Telephone Membership Corporation	Bolivia	BOLVNCXA
Atlantic Telephone Membership Corporation	Supply	HLBHNCXA
Atlantic Telephone Membership Corporation	Boiling Spring Lake	BSLKMOXA
Barnardsville Telephone Company	Barnardsville	BDVLNCXA
Saluda Mountain Telephone Company	Saluda	SALDNCXA
Star Telephone Membership Corporation	Bladenboro	ABBGNCXA
Star Telephone Membership Corporation	Lisbon	LSBNNCXA
Star Telephone Membership Corporation	Kelly	KLLYNCXA
Star Telephone Membership Corporation	Harrells	HRLSNCXA
Star Telephone Membership Corporation	Cypress Creek	CYCKNCXA
Star Telephone Membership Corporation	White Oak	WHOKNCXA
Star Telephone Membership Corporation	Herring	HRNGNCXA
Star Telephone Membership Corporation	Turkey	SXRNNCXA
Star Telephone Membership Corporation	Dunn	COHRNCXA
Star Telephone Membership Corporation	Roseboro	SORVNCXA
Star Telephone Membership Corporation	South River	SORYNCXA
Service Telephone Company	Fair Bluff	FRBLNCXA
Surry Telephone Membership Corporation	Beulah	BELHNCXA
Surry Telephone Membership Corporation	Dobson	DBSNNCXA
Surry Telephone Membership Corporation	Level Cross	LVCRCXA
Surry Telephone Membership Corporation	Red Brush	RDBSNCXA
Surry Telephone Membership Corporation	Shoals	SHLSNCXA
Surry Telephone Membership Corporation	Westfield	WSFDNCXA
Surry Telephone Membership Corporation	Zephyr	ZPHYNCXA
Wilkes Telephone Membership Corp.	Boomer	BOMRNCXA
Wilkes Telephone Membership Corp.	Ferguson	CHMPNCXA
Wilkes Telephone Membership Corp.	Clingman	CLNGNCXA
Wilkes Telephone Membership Corp.	No. Wilkesboro	HAYSNCXA
Wilkes Telephone Membership Corp.	Lomax	LOMXNCXA
Wilkes Telephone Membership Corp.	No. Wilkesboro	MLBYNCXA
Wilkes Telephone Membership Corp.	No. Wilkesboro	NWBONCXA

Tennessee:

LEC NAME	WIRE CENTER	CLLI
Highland Telephone Coop., Inc. – TN	DEER LODGE	DRLDTNXXA
Highland Telephone Coop., Inc. – TN	HUNTSVILLE	HNVTNXXA
Highland Telephone Coop., Inc. – TN	OAKDALE	OKDLTNXXA
Highland Telephone Coop., Inc. – TN	ONEIDA	ONEDTNXXA
Highland Telephone Coop., Inc. – TN	PETROS	PTRSTNXXA
Highland Telephone Coop., Inc. – TN	ROBBINS	RBNSTNXXA
Highland Telephone Coop., Inc. – TN	SUNBRIGHT	SNBRTNXXA
Highland Telephone Coop., Inc. – TN	WARTBURG	WABGTNXXA

Virginia:

LEC NAME	WIRE CENTER	CLLI
Burke's Garden Telephone Co., Inc.	BURKESGRDN	BRGRVAXA
Citizens Telephone Cooperative	ALUM RIDGE	ALRGVAXA
Citizens Telephone Cooperative	BALLARD	BLLRVAXA
Citizens Telephone Cooperative	FLOYD	FLYDVAXA
Citizens Telephone Cooperative	LOCUST GRV	LCGVVAXA
Citizens Telephone Cooperative	WILLIS	WILSVAXA
New Castle Telephone Co.	NEW CASTLE	NWCSVAXA
New Castle Telephone Co.	PAINT BANK	PNBNVAXA
Pembroke Telephone Cooperative	NEWPORT	NWPTVAXA
Pembroke Telephone Cooperative	PEMBROKE	PMBRVAXA
Roanoke & Botetourt Telephone Co.	EAGLE ROCK	EGRKVAXA
Roanoke & Botetourt Telephone Co.	FINCASTLE	FNCSVAXA
Roanoke & Botetourt Telephone Co.	ORISKANY	ORSKVAXA
Roanoke & Botetourt Telephone Co.	TROUTVILLE	TRVLVAXA

EXHIBIT 29

Rural Service Areas Requiring Reclassification
Along Wire Center Boundaries For Inclusion
In U.S. Cellular's ETC Service Area

New Hampshire:²

LEC NAME	WIRE CENTER	CLLI
Granite State Telephone Inc.	Hillsboro Upper Village	HUVGNHXADS0
Granite State Telephone Inc.	Washington	WASHNHXADS0
Granite State Telephone Inc.	Weare	WEARNHXADS0

² Previously redefined, as discussed above.

North Carolina:

LEC NAME	WIRE CENTER	CLLI
Alltel Carolina - North, Inc.	Aberdeen	ABRDNCXA
Alltel Carolina - North, Inc.	Broadway	BRWYNCXA
Alltel Carolina - North, Inc.	Columbus	CLMBNCXA
Alltel Carolina - North, Inc.	Green Creek	GRCKNCXA
Alltel Carolina - North, Inc.	King	KINGNCXA
Alltel Carolina - North, Inc.	Olivia	OLIVNCXA
Alltel Carolina - North, Inc.	Pine Bluff	PNBLNCXA
Alltel Carolina - North, Inc.	Sanford	SNFRNCXA
Alltel Carolina - North, Inc.	Tryon	TRYNNCXA
Alltel Carolina - North, Inc.	Wagram	WGRNNCXA
Central Telephone Co. - North Carolina	Boonville	BNVLNCXA
Central Telephone Co. - North Carolina	Dobson	DBSNNCXB
Central Telephone Co. - North Carolina	Danbury	DNBRNCXA
Central Telephone Co. - North Carolina	Eden 1	EDENNCXA
Central Telephone Co. - North Carolina	Eden 2	EDENNCXB
Central Telephone Co. - North Carolina	Elkin	ELKNNCXA
Central Telephone Co. - North Carolina	Madison	MDSNNCXA
Central Telephone Co. - North Carolina	Mount Airy	MTARNCXA
Central Telephone Co. - North Carolina	Pilot Mt	PLMTNCXA
Central Telephone Co. - North Carolina	Prospect Hill	PRHLNCXA
Central Telephone Co. - North Carolina	Roaring Gap	RRGPNCXA
Central Telephone Co. - North Carolina	Roxboro	RXBONCXA
Central Telephone Co. - North Carolina	State Road	STRDNCXA
Central Telephone Co. - North Carolina	Stoneville	STVLNCXA
Central Telephone Co. - North Carolina	Rougemont	TMLKNCXA
Central Telephone Co. - North Carolina	Wend	WENDNCXA
Central Telephone Co. - North Carolina	W. Jefferson	WJSNNCXA
Central Telephone Co. - North Carolina	Walnut Cove 1	QKGPNCXA
Central Telephone Co. - North Carolina	Walnut Cove 2	WLCVNCXA
Central Telephone Co. - North Carolina	Yanceyville	YCVLNCXA
Central Telephone Co. - North Carolina	Yadkinville	YDVLNCXA
Randolph Telephone Membership Corp.	Bennett	BNNTNCXA
Randolph Telephone Membership Corp.	High Falls	HGHFNCXA
Skyline Telephone Membership Corporation	West Jefferson	BLDWNCXA
Skyline Telephone Membership Corporation	Creston	CETNNCXA
Skyline Telephone Membership Corporation	Glade Creek	GLCKNCXA
Skyline Telephone Membership Corporation	Lansing	LNNGNCXA
Skyline Telephone Membership Corporation	Nathans Creek	NTCKNCXA
Skyline Telephone Membership Corporation	Laurel Springs	SCVLNCXA
Skyline Telephone Membership Corporation	Sparta	SPRTNCXA
Sprint Mid-Atlantic	Ahoskie	AHSKNCXA
Sprint Mid-Atlantic	Aulander	ALNDNCXA
Sprint Mid-Atlantic	Angier	ANGRNCXA
Sprint Mid-Atlantic	Atlantic	ATLTNCXA
Sprint Mid-Atlantic	Aurora	AURRNCXA
Sprint Mid-Atlantic	Ayden	AYDNNCXA
Sprint Mid-Atlantic	Bailey	BALYNCXA

LEC NAME	WIRE CENTER	CLLI
Sprint Mid-Atlantic	Bath	BATHNCXA
Sprint Mid-Atlantic	Bethel	BETHNCXA
Sprint Mid-Atlantic	Beulaville	BEVLNCXA
Sprint Mid-Atlantic	Bladenboro	BLBONCXA
Sprint Mid-Atlantic	Belhaven	BLHNNCXA
Sprint Mid-Atlantic	Benson	BNSNNCXA
Sprint Mid-Atlantic	Bonlee	BONLNCXA
Sprint Mid-Atlantic	Beaufort	BUFTNCXA
Sprint Mid-Atlantic	Buxton 1	BXTNNCXA
Sprint Mid-Atlantic	Buxton 2	BXTNNCXB
Sprint Mid-Atlantic	Bayboro	BYBONCXA
Sprint Mid-Atlantic	Camden/Shiloh	SHLHNCXA
Sprint Mid-Atlantic	Chadbourn	CHDBNCXA
Sprint Mid-Atlantic	Clarkton	CKTNNCXA
Sprint Mid-Atlantic	Coinjock	CNJCNCXA
Sprint Mid-Atlantic	Columbia	CLMANCXA
Sprint Mid-Atlantic	Colerain	CLRNNCXA
Sprint Mid-Atlantic	Conway	CNWYNCXA
Sprint Mid-Atlantic	Carthage	CRTHNCXA
Sprint Mid-Atlantic	Creswell	CRWLNCXA
Sprint Mid-Atlantic	Clayton	CYTNNCXA
Sprint Mid-Atlantic	Dunn	DUNNNCXA
Sprint Mid-Atlantic	Erwin/Dunn	DUNNNCXB
Sprint Mid-Atlantic	Edenton	EDTNNCXA
Sprint Mid-Atlantic	Elizabeth City	ELCYNCXA
Sprint Mid-Atlantic	Enfield	ENFDNCXA
Sprint Mid-Atlantic	Engelhard	ENGLNCXA
Sprint Mid-Atlantic	Elizabethtown	EZTWNCXA
Sprint Mid-Atlantic	Faison	FASNNCXA
Sprint Mid-Atlantic	Fayetteville 1	FYVLNCXA
Sprint Mid-Atlantic	Fayetteville 2	FYVLNCXB
Sprint Mid-Atlantic	Fayetteville 3	FYCLNCXF
Sprint Mid-Atlantic	Fayetteville 4	FYVLNCXG
Sprint Mid-Atlantic	Franklinton	FKTNNCXA
Sprint Mid-Atlantic	Fountain	FONTNCXA
Sprint Mid-Atlantic	Fuquay Varina	FQVRNCXA
Sprint Mid-Atlantic	Fremont	FRMTNCXA
Sprint Mid-Atlantic	Four Oaks	FROKNCXA
Sprint Mid-Atlantic	Farmville	FRVLNCXA
Sprint Mid-Atlantic	Ft. Bragg	FYVLNCXD
Sprint Mid-Atlantic	Grafton	GFTNNCXA
Sprint Mid-Atlantic	Goldston	GLDSNCXA
Sprint Mid-Atlantic	Greenville 1	GNVLNCXA
Sprint Mid-Atlantic	Greenville 2	GNVLNCXB
Sprint Mid-Atlantic	Eure/Gatesville	GTVLNCXA
Sprint Mid-Atlantic	Halifax	HLFXNCXA
Sprint Mid-Atlantic	Hamilton	HMTNNCXA
Sprint Mid-Atlantic	Harbinger/Mamie	MAMINCXA

LEC NAME	WIRE CENTER	CLLI
Sprint Mid-Atlantic	Henderson	HNSNNCXA
Sprint Mid-Atlantic	Hertford	HRFRNCXA
Sprint Mid-Atlantic	Havelock	HVLCNCXA
Sprint Mid-Atlantic	Holly Ridge	HLRGNCXA
Sprint Mid-Atlantic	Jackson	JCSNNCXA
Sprint Mid-Atlantic	Jacksonville 1	JCVLNCXA
Sprint Mid-Atlantic	Kill Devil Hills	KDHLNCXA
Sprint Mid-Atlantic	Kitty Hawk	KDHLNCXB
Sprint Mid-Atlantic	Kenly	KNLYNCXA
Sprint Mid-Atlantic	Kenansville	KNVLNCXA
Sprint Mid-Atlantic	Kinston	KSTNNCXA
Sprint Mid-Atlantic	La Grange	LGRNNCXA
Sprint Mid-Atlantic	Lake Waccamaw	LKWCNCXA
Sprint Mid-Atlantic	Lillington	LLTNNCXA
Sprint Mid-Atlantic	Louisburg	LSBGNCXA
Sprint Mid-Atlantic	Louisburg	LSBGNCXB
Sprint Mid-Atlantic	Lewiston/Woodville	LSTNNCXA
Sprint Mid-Atlantic	Littleton	LTNNCXA
Sprint Mid-Atlantic	Lucama	LUCANCXA
Sprint Mid-Atlantic	Manteo	MANTNCXA
Sprint Mid-Atlantic	Moyock	MOYCNCXA
Sprint Mid-Atlantic	Moyock/Sligo	MOYCNCXB
Sprint Mid-Atlantic	Stacy/Marshallbg	MRBGNCXA
Sprint Mid-Atlantic	Murfreesboro	MRBONCXA
Sprint Mid-Atlantic	Morehead City	MRCYNCXA
Sprint Mid-Atlantic	Deep Run/Moss Hill	MSHLNCXA
Sprint Mid-Atlantic	Maxton	MSTNNCXA
Sprint Mid-Atlantic	Maysville	MYVLNCXA
Sprint Mid-Atlantic	Norlina	NRLNNCXA
Sprint Mid-Atlantic	Nashville	NSVLNCXA
Sprint Mid-Atlantic	New Bern	NWBRNCXA
Sprint Mid-Atlantic	Newton Grove	NWGVNCXA
Sprint Mid-Atlantic	Newport	NWPTNCXA
Sprint Mid-Atlantic	Orcracoke	OCRCNCXA
Sprint Mid-Atlantic	Oriental	ORNTNCXA
Sprint Mid-Atlantic	Oxford	OXFRNCXA
Sprint Mid-Atlantic	Pollocksville	PCVLNCXA
Sprint Mid-Atlantic	Pink Hill	PKHLNCXA
Sprint Mid-Atlantic	Parkton	PKTNNCXA
Sprint Mid-Atlantic	Plymouth	PLMONCXA
Sprint Mid-Atlantic	PineHurst	PNHRNCXA
Sprint Mid-Atlantic	Pinetops	PNTNNCXA
Sprint Mid-Atlantic	Princeton	PRTNNCXA
Sprint Mid-Atlantic	Pittsboro	PTBONCXA
Sprint Mid-Atlantic	Belvidere/Piney Wds	PYWDNCXA
Sprint Mid-Atlantic	Raeford	RAFDNCXA
Sprint Mid-Atlantic	Robbins	RBNXNCXA
Sprint Mid-Atlantic	Robersonville	RBVLNCXA

LEC NAME	WIRE CENTER	CLLI
Sprint Mid-Atlantic	Richlands	RCLDNCXA
Sprint Mid-Atlantic	Rocky Mt 1	RCMTNCXA
Sprint Mid-Atlantic	Rich Square	RCSQNCXA
Sprint Mid-Atlantic	Red Springs	RDSPNCXA
Sprint Mid-Atlantic	Roanoke Rapids	RNRPNCA
Sprint Mid-Atlantic	Roseboro	RSBONCXA
Sprint Mid-Atlantic	Rose Hill	RSHLNCXA
Sprint Mid-Atlantic	Roxobel	RXBLNCXA
Sprint Mid-Atlantic	Seaboard	SBRDNCXA
Sprint Mid-Atlantic	Scotland Neck	SCNKNCXA
Sprint Mid-Atlantic	Siler City	SLCYNCXA
Sprint Mid-Atlantic	Smithfield	SMFDNCXA
Sprint Mid-Atlantic	Sunbury	SNBYNCXA
Sprint Mid-Atlantic	Sneads Ferry	SNFYNCXA
Sprint Mid-Atlantic	Snow Hill	SNHLNCXA
Sprint Mid-Atlantic	Southern Pines	SPNSNCXA
Sprint Mid-Atlantic	Spring Hope	SPRHNCXA
Sprint Mid-Atlantic	Stantonsburg	STBGNCXA
Sprint Mid-Atlantic	South Mills	STMLNCXA
Sprint Mid-Atlantic	St. Pauls	STPLNCXA
Sprint Mid-Atlantic	Swan Quarter	SWNQNCXA
Sprint Mid-Atlantic	Emerald Isle	SWNSNCXA
Sprint Mid-Atlantic	Swanboro	SWNSNCXA
Sprint Mid-Atlantic	Tabor City	TBCYNCXA
Sprint Mid-Atlantic	Sneads/Top Sail	TPISNCXA
Sprint Mid-Atlantic	Tarboro	TRBONCXA
Sprint Mid-Atlantic	Trenton	TRENNCXA
Sprint Mid-Atlantic	Vass	VASSNCXA
Sprint Mid-Atlantic	Vanceboro	VNBONCXA
Sprint Mid-Atlantic	Washington	WASHNCXA
Sprint Mid-Atlantic	Waves	WAVENCXA
Sprint Mid-Atlantic	Woodland	WDLNCA
Sprint Mid-Atlantic	Woodville	WDVLNCXA
Sprint Mid-Atlantic	Carthage/Whisperpins	WHPNNCXA
Sprint Mid-Atlantic	Whitakers	WHTKNCXA
Sprint Mid-Atlantic	Whiteville	WHVLNCXA
Sprint Mid-Atlantic	Winton	WITNNCXA
Sprint Mid-Atlantic	Wake Forest	WKFSNCXA
Sprint Mid-Atlantic	Weeksville	WKVLNCXA
Sprint Mid-Atlantic	Tyner/Welch	WLCHNCXA
Sprint Mid-Atlantic	Weldon	WLDNNCXA
Sprint Mid-Atlantic	Wallace	WLLCNCXA
Sprint Mid-Atlantic	Wilson	WLSNNCXA
Sprint Mid-Atlantic	Williamston	WMTNNCXA
Sprint Mid-Atlantic	Warsaw	WRSWNCXA
Sprint Mid-Atlantic	Warrenton	WRTNNCXA
Yadkin Valley Telephone Membership Corp.	Hamptonville	BRKSNCXA
Yadkin Valley Telephone Membership Corp.	East Bend	EBNDNCXA

LEC NAME	WIRE CENTER	CLLI
Yadkin Valley Telephone Membership Corp.	Forbush	FRBSNCXA

Tennessee:

LEC NAME	WIRE CENTER	CLLI
North Central Telephone Coop., Inc. – TN	BETHPAGE	BTHPTNXA
North Central Telephone Coop., Inc. – TN	DEFEATED	DFTDTNXA
North Central Telephone Coop., Inc. – TN	GREENGROVE	GNGVTNXA
North Central Telephone Coop., Inc. – TN	HILLSDALE	HLDLTNXA
North Central Telephone Coop., Inc. – TN	LAFAYETTE	LFYTTNXA
North Central Telephone Coop., Inc. – TN	OAK GROVE	OKGVTNXA
North Central Telephone Coop., Inc. – TN	PLEASASHAD	PLSHTNXA
North Central Telephone Coop., Inc. – TN	RDBOLNGSPG	RBSPTNXA
North Central Telephone Coop., Inc. – TN	WESTMORELD	WMLDTNXA

Virginia:³

LEC NAME	WIRE CENTER	CLLI
NTELOS Telephone Inc.	CLIFTNFORG	CFFRVAXA
NTELOS Telephone Inc.	POTTSCREEK	PTCKVAXA
Peoples Mutual Telephone Co.	SANDYLEVEL	SNLVVAXA
Central Telephone Co. - Virginia	ARARAT	ARRTVAXA
Central Telephone Co.	ARVONIA	ARVNVAXA
Central Telephone Co.	AXTON	AXTNVAXA
Central Telephone Co.	BUCKINGHAM	BCHMVAXA
Central Telephone Co.	BOONESMILL	BNMLVAXA
Central Telephone Co.	BROWNSBURG	BRBGVAXA
Central Telephone Co.	BROOKNEAL	BRKNVAXA
Central Telephone Co.	BASSETT	BSSTVAXA
Central Telephone Co.	BURNTCHMNY	BTCHVAXA
Central Telephone Co.	CHARLOTSVL	CHVLVAXA
Central Telephone Co.	CROZET	CRZTVAXA
Central Telephone Co.	DILLWYN	DLWYVAXA
Central Telephone Co.	FORK UNION	FKUNVAXA
Central Telephone Co.	FIELDALE	FLDLVAXA
Central Telephone Co.	FERRUM	FRRMVAXA
Central Telephone Co.	FARMVILLE	FRVLVAXA
Central Telephone Co.	GLADYS	GLDYVAXA
Central Telephone Co.	GLASGOW	GLSGVAXA
Central Telephone Co.	HALIFAX	HLFXVAXA
Central Telephone Co.	HAMPDESDNY	HMSYVAXA
Central Telephone Co.	LEXINGTON	LXTNVAXA
Central Telephone Co.	MEADOWSDAN	MDDNVAXA
Central Telephone Co.	MARTINSVL	MTVIVAXA
Central Telephone Co.	NATURALBDG	NTBRVAXA
Central Telephone Co.	PALMYRA	PLMYVAXA

³ United Inter-Mountain Telephone's study area has been previously redefined, as discussed above.

Central Telephone Co.	PROSPECT	PRSPVAXA
Central Telephone Co.	ROCKYMOUNT	RCMTVAXA
Central Telephone Co.	RIDGEWAY	RDWYVAXA
Central Telephone Co.	RUSTBURG	RSBGVAXA
Central Telephone Co.	SO BOSTON	SBTNVAXA
Central Telephone Co.	SCHUYLER	SCHLVAXA
Central Telephone Co.	SCOTTSVL	SCVLVAXA
Central Telephone Co.	STANARDSVL	SDVLVAXA
Central Telephone Co.	SPENCER	SPNCVAXA
Central Telephone Co.	TURBEVILLE	TBVLVAXA
Central Telephone Co.	UNION HALL	UNHLVAXA
Central Telephone Co.	VOLENS	VLNSVAXA
Central Telephone Co.	VIRGILINA	VRGLVAXA
Central Telephone Co.	WOOLWINE	WLWNVAXA
Verizon South Inc. – VA	BLUEFIELD	BLFDVAXA
Verizon South Inc. – VA	ROCKY GAP	RCGPVAXA
United Inter-Mountain Telephone	AUSTINVL	ATVLVAXA
United Inter-Mountain Telephone	BLAND	BLNDVAXA
United Inter-Mountain Telephone	CANA	CANAVAXA
United Inter-Mountain Telephone	CERES	CERSVAXA
United Inter-Mountain Telephone	CHILHOWIE	CHLHVAXA
United Inter-Mountain Telephone	CMSRKELCRK	CMRKVAXA
United Inter-Mountain Telephone	CRIPPLECRK	CRCKVAXA
United Inter-Mountain Telephone	FRIES	FRISVAXA
United Inter-Mountain Telephone	GALAX	GALXVAXA
United Inter-Mountain Telephone	GLADE SPG	GDSPVAXA
United Inter-Mountain Telephone	HILLSVILLE	HLVLVAXA
United Inter-Mountain Telephone	INDEPNDNCE	INDPVAXA
United Inter-Mountain Telephone	KONNAROCK	KNRKVAXA
United Inter-Mountain Telephone	LAURELFORK	LRFKVAXA
United Inter-Mountain Telephone	MARION	MARNVAXA
United Inter-Mountain Telephone	MOUTHWILSN	MTWLVAXA
United Inter-Mountain Telephone	MAXMEADOWS	MXMDVAXA
United Inter-Mountain Telephone	RICHVALLEY	RCVYVAXA
United Inter-Mountain Telephone	RURALRTRET	RRRTVAXA
United Inter-Mountain Telephone	SUGARGROVE	SGGVVAXA
United Inter-Mountain Telephone	SALTVILLE	SLVLVAXA
United Inter-Mountain Telephone	SYLVATUS	SYLVVAXA
United Inter-Mountain Telephone	WYTHEVILLE	WYVLVAXA

APPENDIX C

RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment

1. On October 7, 2005, the Wireline Competition Bureau (Bureau) released an order granting a petition of RCC Minnesota, Inc. and RCC Atlantic, Inc. (RCC) to be designated as an ETC in portions of its licensed service areas in the state of New Hampshire.¹ In its petition, RCC requested ETC designation in the entirety of the Kearsarge Telephone Company study area. However, RCC failed to include one wire center in the Kearsarge Telephone Company study area, the Meridian wire center, in the list of wire centers attached to its petition. Because RCC did not identify the Meridian wire center in the list of Kearsarge Telephone Company wire centers in its Petition, Appendix B of the *RCC Order* similarly did not include this wire center.² RCC has notified the Commission of this omission.³ Inclusion of this wire center would not have changed the Bureau's analysis because RCC requested, and the Bureau granted, designation in the entire Kearsarge Telephone Company study area. Therefore, we amend Appendix B of the *RCC Order* by inserting "Meridian MRDNNHXA" in the list of Kearsarge Telephone Company service areas, following "Chichester CHCHNHXA."

¹ *Federal-State Joint Board on Universal Service, RCC Minnesota, Inc. and RCC Atlantic, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of New Hampshire*, CC Docket No. 96-45, Order, 20 FCC Rcd 15833 (Wireline Comp. Bur. 2005) (*RCC Order*).

² See *RCC Minnesota, Inc. and RCC Atlantic, Inc., Petition for Designation as an Eligible Telecommunications Carrier in the State of New Hampshire*, CC Docket No. 96-45, Supplemental Filing, at Exhibit C (filed Aug. 26, 2005).

³ See Letter from David A. LaFuria and B. Lynn F. Ratnavale, Lukas, Nace, Gutierrez, and Sachs, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 96-45 (filed Dec. 13, 2005).

APPENDIX D

Final Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),¹ an Initial Regulatory Flexibility Analysis (IRFA) was incorporated in the *Notice*.² The Commission sought written public comment on the proposals in the *Notice*, including comment on the IRFA.³ This Final Regulatory Flexibility Analysis (FRFA) conforms to the RFA.⁴

A. Need for, and Objectives of, the Proposed Rules

2. On May 1, 2007, the Joint Board recommended that the Commission adopt an interim cap on high-cost universal service support for competitive ETCs to rein in the explosive growth in universal service.⁵ We agree with the Joint Board's assessment that the rapid growth in high-cost support places the federal universal service fund in dire jeopardy. In 2006, the universal service fund provided approximately \$4.1 billion per year in high-cost support.⁶ In contrast, in 2001, high-cost universal service support totaled approximately \$2.6 billion.⁷ In recent years, this growth has been due to increased support provided to competitive ETCs, which receive high-cost support based on the per-line support that the incumbent LECs receive, rather than on the competitive ETCs' own costs. While support to incumbent LECs has been flat, or has even declined since 2003,⁸ competitive ETC support, in the six years from 2001 through 2006, has grown from under \$17 million to \$980 million – an average annual

¹ See 5 U.S.C. § 603. The RFA, see 5 U.S.C. § 601-12., has been amended by the Small Business Regulatory Enforcement Fairness Act of 1996, Pub. L. No. 104-121, Title II, 110 Stat. 847 (1996).

² *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 22 FCC Rcd 9705, 9737-42 (2007) (*Notice*).

³ *Id.* at 9737.

⁴ See 5 U.S.C. § 604.

⁵ *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Recommended Decision, FCC 07J-1 (Fed.-State Jt. Bd., rel. May 1, 2007) (*Recommended Decision*) (Appendix A).

⁶ Universal Service Administrative Company 2006 Annual Report, 39 (2006), available at http://www.usac.org/_res/documents/about/pdf/usac-annual-report-2006.pdf (*USAC 2006 Annual Report*).

⁷ See *Universal Service Monitoring Report*, CC Docket No. 98-202, Prepared by the Federal and State Staff for the Federal-State Joint Board on Universal Service in CC Docket No. 96-45, Table 3.2 (2006) (*Universal Service Monitoring Report*).

⁸ Incumbent LECs received \$3.129 billion in high-cost support in 2003; \$3.153 billion in 2004; \$3.186 billion in 2005; and \$3.116 billion in 2006. *Universal Service Monitoring Report*, at Table 3.2 (for 2003, 2004, and 2005 data); *USAC 2006 Annual Report* at 41 (for 2006 data). In 2001, much of the growth in high-cost support was attributable to removing implicit subsidies from access charges and the inclusion of these amounts in explicit universal service mechanisms adopted in the *CALLS Order* and the *MAG Plan Order*. See *Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers; Low-Volume Long-Distance Users; Federal-State Joint Board on Universal Service*, Sixth Report and Order in CC Docket Nos. 96-262 and 94-1, Report and Order in CC Docket No. 99-249, Eleventh Report and Order in CC Docket No. 96-45, 15 FCC Rcd 12962 (2000) (*CALLS Order*); *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Federal-State Joint Board on Universal Service; Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation; Prescribing the Authorized Rate of Return From Interstate Services of Local Exchange Carriers*, Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, 16 FCC Rcd 19613 (2001) (*MAG Plan Order*), *recon. pending*.

growth rate of over 100 percent.⁹ Competitive ETCs received \$557 million in high-cost support in the first six months of 2007.¹⁰ Annualizing this amount projects that they will receive approximately \$1.11 billion in 2007. We find that the continued growth of the fund at this rate is not sustainable and would require excessive (and ever growing) contributions from consumers to pay for this fund growth.¹¹

3. We conclude that immediate action must be taken to stem the dramatic growth in high-cost support. Therefore, we immediately impose an interim cap on high-cost support provided to competitive ETCs until fundamental comprehensive reforms are adopted to address issues related to the distribution of support and to ensure that the universal service fund will be sustainable for future years. The interim cap that we adopt herein limits the amount of high-cost support that competitive ETCs can receive in the interim period to the amount they were eligible to receive in March 2008 on an annualized basis.

B. Summary of Significant Issues Raised by Public Comments in Response to the IRFA

4. None

C. Description and Estimate of the Number of Small Entities to Which Rules Will Apply

5. The RFA directs agencies to provide a description of, and, where feasible, an estimate of the number of small entities that may be affected by the rules, if adopted.¹² The RFA generally defines the term “small entity”¹³ as having the same meaning as the terms “small business,”¹⁴ “small organization,”¹⁵ and “small governmental jurisdiction.”¹⁶ In addition, the term “small business” has the same meaning as the term “small business concern” under the Small Business Act, unless the Commission has developed one or more definitions that are appropriate to its activities.¹⁷ Under the

⁹ *Universal Service Monitoring Report*, at Table 3.2; USAC 2006 Annual Report at 41.

¹⁰ See Universal Service Administrative Company, *Universal Service Fund Facts – High Cost Quarterly Program Statistics; High Cost Program Support Distribution By CETCs & ILECs 1998 Through 2Q2007*, <http://www.universalservice.org/res/documents/about/pdf/fund-facts/HC%20CETC-ILEC%20Distribution.pdf> (July 23, 2007).

¹¹ Support for the fund derives from assessments paid by providers of interstate telecommunications services and certain other providers of interstate telecommunications. See 47 C.F.R. § 54.706. Fund contributors are permitted to, and almost always do, pass those contribution assessments through to their end-user customers. See 47 C.F.R. § 54.712. Fund assessments paid by contributors are determined by applying the quarterly contribution factor to the contributors’ contribution base revenues. In the second quarter of 2007, the contribution factor reached 11.7 percent, which is the highest level since its inception. See *Proposed Second Quarter 2007 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice, 22 FCC Rcd 5074 (Off. of Man. Dir. 2007). The contribution factor has since declined slightly to 11.0 percent in the fourth quarter of 2007. *Proposed Fourth Quarter 2007 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice, DA 07-3928 (Off. of Man. Dir. 2007).

¹² 5 U.S.C. § 604(a)(3).

¹³ 5 U.S.C. § 601(6).

¹⁴ 5 U.S.C. § 601(3).

¹⁵ 5 U.S.C. § 601(4).

¹⁶ 5 U.S.C. § 601(5).

¹⁷ 5 U.S.C. § 601(3) (incorporating by reference the definition of “small business concern” in 5 U.S.C. § 632).

Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies “unless an agency after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public

(continued....)

Small Business Act, a “small business concern” is one that: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) meets any additional criteria established by the Small Business Administration (SBA).¹⁸ Nationwide, there are a total of approximately 22.4 million small businesses, according to SBA data.¹⁹ A small organization is generally “any not-for-profit enterprise which is independently owned and operated and is not dominant in its field.”²⁰ Nationwide, as of 2002, there were approximately 1.6 million small organizations.²¹

6. The most reliable source of information regarding the total numbers of certain common carrier and related providers nationwide, as well as the number of commercial wireless entities, is the data that the Commission publishes in its *Trends in Telephone Service* report.²² The SBA has developed small business size standards for wireline and wireless small businesses within the three commercial census categories of Wired Telecommunications Carriers,²³ Paging,²⁴ and Cellular and Other Wireless Telecommunications.²⁵ Under these categories, a business is small if it has 1,500 or fewer employees. Below, using the above size standards and others, we discuss the total estimated numbers of small businesses that might be affected by our actions.

1. Wireline Carriers and Service Providers

7. We have included small incumbent local exchange carriers (LECs) in this present RFA analysis. As noted above, a “small business” under the RFA is one that, *inter alia*, meets the pertinent small business size standard (e.g., a telephone communications business having 1,500 or fewer employees), and “is not dominant in its field of operation.”²⁶ The SBA’s Office of Advocacy contends that, for RFA purposes, small incumbent LECs are not dominant in their field of operation because any such dominance is not “national” in scope.²⁷ We have therefore included small incumbent LECs in this RFA analysis, although we emphasize that this RFA action has no effect on Commission analyses and determinations in other, non-RFA contexts.

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comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition in the Federal Register.” 5 U.S.C. § 601(3).

¹⁸ 15 U.S.C. § 632.

¹⁹ See SBA, Programs and Services, SBA Pamphlet No. CO-0028, at 40 (July 2002).

²⁰ 5 U.S.C. § 601(4).

²¹ Independent Sector, *The New Nonprofit Almanac & Desk Reference* (2002).

²² FCC, Wireline Competition Bureau, Industry Analysis and Technology Division, *Trends in Telephone Service*, Table 5.3, page 5-5 (February 2007) (*Trends in Telephone Service*). This source uses data collected as of October 20, 2005.

²³ 13 C.F.R. § 121.201, North American Industry Classification System (NAICS) code 517110.

²⁴ *Id.* § 121.201, NAICS code 517211 (This category will be changed for purposes of the 2007 Census to “Wireless Telecommunications Carriers (except Satellite),” NAICS code 517210.).

²⁵ *Id.* § 121.201, NAICS code 517212 (This category will be changed for purposes of the 2007 Census to “Wireless Telecommunications Carriers (except Satellite),” NAICS code 517210.).

²⁶ 15 U.S.C. § 632.

²⁷ See Letter from Jere W. Glover, Chief Counsel for Advocacy, SBA, to Chairman William E. Kennard, Federal Communications Commission (May 27, 1999). The Small Business Act contains a definition of “small business concern,” which the RFA incorporates into its own definition of “small business.” See 15 U.S.C. § 632(a) (Small Business Act); 5 U.S.C. § 601(3) (RFA). SBA regulations interpret “small business concern” to include the concept of dominance on a national basis. 13 C.F.R. § 121.102(b).

8. *Incumbent LECs.* Neither the Commission nor the SBA has developed a size standard for small businesses specifically applicable to incumbent LECs. The closest applicable size standard under SBA rules is for “Wired Telecommunications Carriers.” Under that size standard, such a business is small if it has 1,500 or fewer employees.²⁸ According to Commission data,²⁹ 1,307 carriers reported that they were engaged in the provision of local exchange services. Of these 1,307 carriers, an estimated 1,019 have 1,500 or fewer employees, and 288 have more than 1,500 employees. Consequently, the Commission estimates that most providers of incumbent local exchange service are small businesses that may be affected by our action.

9. *Competitive LECs, Competitive Access Providers (CAPs), “Shared-Tenant Service Providers,” and “Other Local Service Providers.”* Neither the Commission nor the SBA has developed a small business size standard specifically for these service providers. The appropriate size standard under SBA rules is for the category “Wired Telecommunications Carriers.” Under that size standard, such a business is small if it has 1,500 or fewer employees.³⁰ According to Commission data,³¹ 859 carriers reported that they were engaged in the provision of either competitive LEC or CAP services. Of these 859 carriers, an estimated 741 have 1,500 or fewer employees, and 118 have more than 1,500 employees.³² In addition, 16 carriers have reported that they are “Shared-Tenant Service Providers,” and all 16 are estimated to have 1,500 or fewer employees. In addition, 44 carriers have reported that they are “Other Local Service Providers.” Of the 44, an estimated 43 have 1,500 or fewer employees, and one has more than 1,500 employees. Consequently, the Commission estimates that most competitive LECs, CAPs, “Shared-Tenant Service Providers,” and “Other Local Service Providers” are small entities that may be affected by our action.

2. Wireless Carriers and Service Providers

10. *Wireless Service Providers.* The appropriate size standard for wireless service providers is the category of “Wireless Telecommunications Carriers (except Satellite).” Under that standard, the SBA deems a wireless business to be small if it has 1,500 or fewer employees.³³ The data necessary to estimate the number of entities in this category has not been gathered since it was adopted in November 2007. Therefore, we will use the earlier, now-superseded categories – “Paging” and “Cellular and Other Wireless Telecommunications” – to estimate the number of entities. For the census category of “Paging,” Census Bureau data for 2002 show that there were 807 firms in this category that operated for the entire year.³⁴ Of this total, 804 firms had employment of 999 or fewer employees, and three firms had employment of 1,000 employees or more.³⁵ Thus, under this category and associated small business size standard, the majority of firms can be considered small. For the census category of “Cellular and Other Wireless Telecommunications,” Census Bureau data for 2002 show that there were 1,397 firms in this

²⁸ 13 C.F.R. § 121.201, NAICS code 517110.

²⁹ *Trends in Telephone Service* at Table 5.3.

³⁰ 13 C.F.R. § 121.201, NAICS code 517210.

³¹ *Trends in Telephone Service* at Table 5.3.

³² *Id.*

³³ 13 C.F.R. § 121.201, NAICS Code 517210.

³⁴ U.S. Census Bureau, 2002 Economic Census, Subject Series: “Information,” Table 5, Employment Size of Firms for the United States: 2002, NAICS code 517211 (issued Nov. 2005).

³⁵ *Id.* The census data do not provide a more precise estimate of the number of firms that have employment of 1,500 or fewer employees; the largest category provided is for firms with “1000 employees or more.”

category that operated for the entire year.³⁶ Of this total, 1,378 firms had employment of 999 or fewer employees, and 19 firms had employment of 1,000 employees or more.³⁷ Thus, under this second category and size standard, the majority of firms can, again, be considered small.

11. *Wireless Telephony.* Wireless telephony includes cellular, personal communications services (PCS), and specialized mobile radio (SMR) telephony carriers. As noted earlier, the SBA has developed a small business size standard for “Wireless Telecommunications Carriers (except Satellite).” Under that SBA small business size standard, a business is small if it has 1,500 or fewer employees.³⁸ The data necessary to estimate the number of entities in this category has not been gathered since it was adopted in November 2007. Therefore, we will use the earlier, now-superseded categories of “Cellular and Other Wireless Telecommunications” to estimate the number of entities. According to Commission data, 432 carriers reported that they were engaged in the provision of wireless telephony.³⁹ We have estimated that 221 of these are small under the SBA small business size standard.

3. Satellite Service Providers

12. *Satellite Telecommunications and Other Telecommunications.* There is no small business size standard developed specifically for providers of international service. The appropriate size standards under SBA rules are for the two broad census categories of “Satellite Telecommunications” and “All Other Telecommunications.”

13. The first category of “Satellite Telecommunications” “comprises establishments primarily engaged in providing point-to-point telecommunications services to other establishments in the telecommunications and broadcasting industries by forwarding and receiving communications signals via a system of satellites or reselling satellite telecommunications.”⁴⁰ Under this category, the SBA size standard is \$13.5 million or less in average annual receipts.⁴¹ For this category, Census Bureau data for 2002 show that there were a total of 371 firms that operated for the entire year.⁴² Of this total, 307 firms had annual receipts of under \$10 million, and 26 firms had receipts of \$10 million to \$24,999,999.⁴³ Consequently, we estimate that the majority of Satellite Telecommunications firms are small entities that might be affected by our action.

14. The second category of “All Other Telecommunications” “comprises establishments primarily engaged in (1) providing specialized telecommunications applications, such as satellite tracking, communications telemetry, and radar station operations; or (2) providing satellite terminal stations and associated facilities operationally connected with one or more terrestrial communications systems and

³⁶ U.S. Census Bureau, 2002 Economic Census, Subject Series: “Information,” Table 5, Employment Size of Firms for the United States: 2002, NAICS code 517212 (issued Nov. 2005).

³⁷ *Id.* The census data do not provide a more precise estimate of the number of firms that have employment of 1,500 or fewer employees; the largest category provided is for firms with “1000 employees or more.”

³⁸ 13 C.F.R. § 121.201, NAICS Code 517110.

³⁹ *Trends in Telephone Service* at Table 5.3.

⁴⁰ U.S. Census Bureau, 2002 NAICS Definitions, “517410 Satellite Telecommunications”; <http://www.census.gov/epcd/naics02/def/NDEF517.HTM>.

⁴¹ 13 C.F.R. § 121.201, NAICS codes 517410.

⁴² U.S. Census Bureau, 2002 Economic Census, Subject Series: Information, “Establishment and Firm Size (Including Legal Form of Organization),” Table 4, NAICS code 517410 (issued Nov. 2005).

⁴³ *Id.* An additional 38 firms had annual receipts of \$25 million or more.

capable of transmitting telecommunications to or receiving telecommunications from satellite systems.”⁴⁴ The SBA size standard for “All Other Telecommunications” is \$23.0 million or less in average annual revenues.⁴⁵ For this category, Census Bureau data for 2002 show that there were a total of 332 firms that operated for the entire year.⁴⁶ Of this total, 259 firms had annual receipts of under \$10 million and 15 firms had annual receipts of \$10 million to \$24,999,999.⁴⁷ Consequently, we estimate that the majority of Other Telecommunications firms are small entities that might be affected by our action.

D. Description of Projected Reporting, Recordkeeping, and Other Compliance Requirements

15. In order to qualify for the exception to the interim cap, some small carriers serving tribal lands or Native Alaskan regions will be required to file certifications that they qualify for the exception. Other small carriers may qualify for an exception if they file data reporting their costs of serving high-cost areas for which they seek the exception to be applied.

E. Steps Taken to Minimize Significant Economic Impact on Small Entities, and Significant Alternatives Considered

16. The RFA requires an agency to describe any significant alternatives that it has considered in reaching its proposed approach, which may include the following four alternatives (among others): (1) the establishment of differing compliance and reporting requirements or timetables that take into account the resources available to small entities; (2) the clarification, consolidation, or simplification of compliance or reporting requirements under the rule for small entities; (3) the use of performance, rather than design, standards; and (4) an exemption from coverage of the rule, or part thereof, for small entities.⁴⁸

17. In adopting the interim cap, the Commission considered several alternatives to minimize the cap’s effect on small entities. We adopt an exception to the rule for carriers providing services to tribal lands. We also note that the Commission is examining ways to comprehensively reform federal high-cost universal service. The interim cap that the Commission adopts today is an interim measure that will be replaced by comprehensive reforms which will be developed in the future and which will minimize any economically adverse effect of the cap on small businesses.

F. Report to Congress

18. The Commission will send a copy of the Order, including this FRFA, in a report to be sent to Congress pursuant to the SBREFA.⁴⁹ In addition, the Commission will send a copy of the Order,

⁴⁴ U.S. Census Bureau, 2002 NAICS Definitions, “517910 Other Telecommunications”; <http://www.census.gov/epcd/naics02/def/NDEF517.HTM>.

⁴⁵ The SBA size standard for “All Other Telecommunications” is \$23.0 million or less in average annual revenues. See 13 C.F.R. § 121.201, NAICS Code 517919.

⁴⁶ U.S. Census Bureau, 2002 Economic Census, Subject Series: Information, “Establishment and Firm Size (Including Legal Form of Organization),” Table 4, NAICS code 517910 (issued Nov. 2005).

⁴⁷ *Id.* An additional 14 firms had annual receipts of \$25 million or more.

⁴⁸ See 5 U.S.C. § 603(c).

⁴⁹ See 5 U.S.C. § 801(a)(1)(A).

including the FRFA, to the Chief Counsel for Advocacy of the SBA. A copy of the Order and the FRFA (or summaries thereof) will also be published in the Federal Register.⁵⁰

⁵⁰ See 5 U.S.C. § 604(b).

**STATEMENT OF
CHAIRMAN KEVIN J. MARTIN**

Re: High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment, WC Docket No. 05-337, CC Docket No. 96-45.

Today, we act to stem the explosive growth of the Universal Service Fund (Fund) by capping total annual high-cost universal service support for competitive eligible telecommunications carriers (ETCs) at the level of support that they were eligible to receive in each state during March 2008. This action is essential to preserve and advance the benefits of the universal service program while we consider comprehensive reform.

The United States and the Commission have a long history and tradition of ensuring that rural areas of the country are connected and have similar opportunities for communications as other areas. Our universal service program must continue to promote investment in rural America's infrastructure and ensure access to telecommunications services that are comparable to those available in urban areas today, as well as provide a platform for delivery of advanced services.

Changes in technology and increases in the number of carriers that receive universal service support, however, have placed significant pressure on the stability of the Fund. A large and rapidly growing portion of the high-cost support program is now devoted to supporting multiple competitors to serve areas in which costs are prohibitively expensive for even one carrier. These competitive ETCs don't receive support based on their own costs, but rather on the costs of the incumbent provider, even if their costs of providing service are lower.

Indeed, growth in required contributions to the Fund is largely attributable to these competitive ETCs. High-cost support to competitive ETCs has grown from approximately \$1.5 million in 2000 to well over \$1 billion in 2007. Left unchecked, this staggering growth threatens the sustainability of the Fund.

A year ago, the Federal-State Joint Board on Universal Service recommended capping competitive ETC funding to address the escalating impact of this problem. I supported that recommendation, and six months ago, I proposed the cap we adopt today.

Today's decision is not an end in itself, but a step on the path towards comprehensive reform. I continue to believe the long-term answer for comprehensive reform of high-cost universal service support is to move to a reverse auction methodology and to require that high-cost support be based on a carrier's own costs. I'm supportive of these measures to contain the growth of universal service in order to preserve and advance the benefits of the Fund and protect the ability of people in rural areas to continue to be connected. I look forward to working with my colleagues as we consider comprehensive reform.

**DISSENTING STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

Re: High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment, WC Docket No. 05-337, CC Docket No. 96-45.

I dissent from today's decision to cap high-cost support for competitive eligible telecommunications carriers (CETC) because it falls woefully short of the fundamental, comprehensive reforms needed to meet the overarching telecommunications challenge of the Twenty-first century. That challenge, both by statute and by necessity, is to encourage the deployment of basic and advanced telecommunications to all of our citizens and to ensure that the Universal Service system, which accomplished so much in the 20th Century, can do so again now. Today's decision does nothing meaningful to meet that challenge; indeed, it only deflects us from the goal. The outcome is an illusory band-aid that is supposed to contain costs but, in reality, imposes the much heavier cost of lost opportunity to reform Universal Service and put America back in the vanguard of advanced telecommunications. As a result of today's vote, real reform is on the back-burner. What a pity!

The need for reform is patently obvious. As this country continues to lag in so many international broadband rankings and as consumers and competitors around the world are receiving high-speed and high-value services, Americans in urban and rural areas and on tribal lands are falling further behind. One critical element of turning this ship around is re-tooling the Universal Service system with broadband deployment as its mission. And while my colleagues on the Federal-State Universal Service Joint Board unanimously agreed to make broadband part of the system, today's Order has the effect of putting this off to another day. So too does it put off the many other difficult questions regarding sustainability of the Fund that the Joint Board wrestled with and put in its recommendations six months ago.

Comprehensive reform is not painless and may require shared sacrifice from all stakeholders. Yet, today's piecemeal approach has the unfortunate consequence of pushing interested parties apart rather than bringing them all to the table to develop workable solutions. Just consider that 365 days ago the Joint Board recommended an interim, emergency high-cost cap. Since then Commission and stakeholder attention has been largely focused on the merits and demerits of such a cap. Today's Order ends up picking winners and losers when it comes to future Universal Service support and increases the risk that no one will return to the table to discuss real reform any time soon. Had all interested parties spent the same time and energy over the last year focused on comprehensive reform, we might "be there" already.

The Commission seems to forget that we do not have the luxury of time here. Why is it slamming on the brakes when it comes to reform? The Joint Board gave us more, and it is those proposals we should be considering in a more comprehensive fashion. While I disagreed with some of the Joint Board's recommendations, at a minimum they put us on the road to real reform. The majority's response today, while they will attempt to bill it as an "interim, emergency cap", has no sunset period and commits only to completing comprehensive reform "as soon as feasible." Remember that old song "The Twelfth of Never"?

While I strongly disagree with the overall decision taken today, I am encouraged the majority added to their CETC cap two caveats that I have long deemed important. The Order excludes from the cap high cost support for CETCs serving tribal lands or Native Alaskan Regions. These areas are among the most underserved when it comes to telecommunications—both basic phone service and broadband. The Commission must continue to focus on ways to bring affordable services to these areas as their residents are equally deserving of the benefits that technology affords. Second, a CETC will not be

subject to the cap to the extent it provides cost data documenting its actual costs for providing competitive service. I continue to believe that the elimination of the Identical Support rule should be part of any comprehensive solution and this step is consistent with that approach.

I, for one, will continue to beat the drums for comprehensive Universal Service reform. It's what Congress wants, what the statute commands, and what consumers deserve. So I pledge today to do everything I can to encourage all stakeholders to come to the table and take on the unfinished business of empowering all our citizens through the awesome new tools of communications technology.

**DISSENTING STATEMENT OF
COMMISSIONER JONATHAN S. ADELSTEIN**

Re: High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment, WC Docket No. 05-337, CC Docket No. 96-45.

Universal service has long been at the heart of telecommunications policy. The resulting benefits – economic and social, in health care and education – accrue to us all, no matter where we live. So I take seriously our directive under the Act to ensure the continued vitality of universal service and am extremely grateful to the members of the Federal-State Joint Board on Universal Service for their multiple recommendations. Despite the importance and magnitude of the challenge of developing meaningful long-term improvements to our universal service policies, the Commission focuses today solely on the narrow question of whether to cap support for competitive eligible telecommunications carriers (CETCs). After careful deliberation, I dissent from this Order, which, I conclude, amounts to a step backwards in universal service policy rather than a step toward the future.

While I am deeply skeptical about the imposition of artificial caps on universal service, I have long been concerned about fund growth and the need to manage scarce resources responsibly. One apparent obstacle to that goal is the current designation process, which gives State commissions strong incentives to designate additional universal service recipients but places no corresponding financial responsibility for those designations. Going back to my days on the Joint Board, I have urged both our Commission and our State commission colleagues to exercise caution in granting CETC designations. Yet, the cap mechanism adopted by the Commission today suffers from a major flaw because it penalizes most harshly the very States that heeded calls for discretion in the designation process.

I would have preferred that the Commission take more meaningful measures to address growth of the fund, such as eliminating the Commission's so-called identical support rule, tightening the designation process and improving the Commission's audit processes. In this respect, I appreciate the majority's efforts to address a number of my concerns with this revised cap mechanism, such as creating an exception for CETCs that document their own costs. I am also pleased that the Commission recognizes the unique nature of Tribal lands and Alaskan Native Regions, many of which face devastatingly low telephone penetration rates and high barriers to deploying advanced communications. A limited exemption should help maintain incentives for carriers to bring services to these hard-to-serve areas.

As technology and the marketplace rapidly reshape the communications landscape, we face difficult questions about how our universal service policies should keep pace. Our larger challenge is preserving and advancing universal service amidst these changes. At the same time, we remain ever mindful that it is consumers who ultimately fund universal service contributions. This means that universal service must evolve, as Congress intended. In particular, universal service can and must be an integral part of meeting our nation's broadband challenge. We also must craft our universal service policies with an eye towards their impact on providers of last resort, the deployment of spectrum-based services, the competitive marketplace, and the role of the states. The time is now to tackle these issues in earnest, lest time and technology render our policies obsolete.

I share the concern expressed by so many commenters and Members of Congress that this decision to impose a cap, while labeled "interim," may be used as an excuse for foot dragging. Our choices regarding long-term universal service reform will require hard work and the input of a wide range of providers, state commissions, and consumer interests. Rightly so, for our decisions will have a dramatic effect on the ability of communities and consumers in Rural America to thrive and grow with

the rest of the country. Yet, today, we do not meaningfully advance those discussions. Rather, the entire debate over the cap has, in fact, been a distraction from tackling the underlying issues.

With the question of a cap now decided, the Commission must now turn its attention back to developing long-term solutions for universal service. I would like to again thank the Members of the Joint Board for their considerable efforts to deliver recommendations for comprehensive reform. The Commission has now sought comment on no less than three reform proposals. While I am not without reservations about some of them, it is time for the Commission to rededicate itself to ensuring that universal service continues to meet our communications challenges and stays vibrant in a broadband age. I look forward to the coming dialogue with Members of Congress, our state commission colleagues, consumers, providers, and the many others with a stake in the future of universal service.

**STATEMENT OF
COMMISSIONER DEBORAH TAYLOR TATE**

Re: High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment, WC Docket No. 05-337, CC Docket No. 96-45.

Today we take an important and historic step down the necessary road to real reform of universal service. Specifically, the Commission takes appropriate action to rein in the explosive growth in high-cost universal service support disbursements to competitive eligible telecommunications carriers.

In both my role at the Commission and as Federal Chair of the Federal-State Joint Board on Universal Service (Joint Board), I have been clear about my commitment to the key tenets of universal service: to promote the availability of quality services at just, reasonable and affordable rates, to increase access to advanced telecommunications services throughout the Nation, and to advance the availability of such services to all consumers in the U.S., no matter where they live. At the same time, we all recognize that the system is outdated as competition and ever-changing technologies have caused inefficiencies in the current system. I look forward to examining market-oriented solutions such as reverse auctions that can provide appropriate incentives for investment and efficiencies, and closely scrutinizing whether it make economic sense to provide ongoing support for multiple providers who ultimately compete for the same customers. As we examine comprehensive reform our focus should be on encouraging efficiencies, as well as reviewing affordability and creating a level playing field. Most importantly, we must ensure that support from the fund is being utilized as it was intended: to provide services to those in truly high cost areas. And we must do so in a way that is efficient, targeted and fiscally responsible. As stewards of public funds, we must remain mindful that it is consumers who ultimately pay universal service contributions.

It has been almost one year since the Joint Board made its recommendation and I would like to reiterate my appreciation for my Co-Chair, Commissioner Ray Baum of the Oregon Public Utility Commission and all of the Joint Board members. Each made valuable contributions to the process and set aside their individual state interests to work toward a unified, national recommendation. In addition, I would like to recognize the dedication and years of committed work of Billy Jack Gregg, former Consumer Advocate of West Virginia, and other public interest stakeholders. Their important input was crucial to bringing us to this point in the process. They should all take pride in the fact that their interim recommendation was adopted today by the Commission and will immediately begin to curb the unsustainable growth-at least regarding the high cost fund.

I want to commend members of Congress who have drafted universal service reform proposals- the most recent from Congressman Barton whose draft is renewing discussion on fresh and innovative ideas. I look forward to working with members of Congress as we progress toward comprehensive reform and hope we may all come together to address the issues for the good of the program.

Now, the difficult work must begin again toward lasting and full reform to insure the viability of our universal service fund in this new digital age. I humbly ask all of the providers/companies, scholars, economists, professors, and consumer advocates and others with unique knowledge to help us balance the varied and various interests and to work toward a consensus which will continue to insure the fund will remain for future generations.

**STATEMENT OF
COMMISSIONER ROBERT M. McDOWELL**

Re: High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment, WC Docket No. 05-337, CC Docket No. 96-45.

I support this Order imposing an interim cap on the Universal Service High Cost Fund. Since becoming a commissioner, I have maintained that controlling the growth of the fund should be the Commission's first priority. Like an unabated fever, expenditures from this fund continue to spike out of control. Ultimately, it is consumers who pay for these unbridled escalations. While the Commission works toward broader and permanent reform, it is our duty to enact a temporary measure to instill fiscal discipline.

For a time, it appeared as though the runaway growth of the fund was slowing. After a spike in the contribution factor to 11.7 percent for the second quarter of 2007, the factor declined steadily to 10.2 percent for the first quarter of 2008. However, the contribution factor is on the increase again, to 11.3 percent for the second quarter of 2008, as announced by the Commission's Office of Managing Director on March 14. Funding for competitive eligible telecommunications carriers (CETCs) is increasing at a rate of roughly \$150 million per year, and some estimate that the CETC funding level could reach as high as \$1.4 billion by 2009, if left unchecked. Moreover, this estimate does not even take into account the additional potential increase in demand for CETC funding to build out AWS and 700 MHz spectrum when services on those frequencies come on line.

As a result of our order, the fund is frozen at March 2008 levels. Additionally, I support an exception for all of the providers serving tribal lands across the country, and Alaska Native lands – some of the most under-served parts of America. This limited exception will ensure that companies operating in these remote areas will continue to receive high-cost support to provide their services while we move toward a permanent solution. Furthermore, these terms do not favor any specific provider.

I look forward to pursuing comprehensive reform of the Universal Service system as quickly as possible. The Commission has a rare opportunity to enact permanent reform this year, and I am encouraged by the Chairman's pledge to forge ahead. As always, I will work closely with my colleagues, Congress, industry, and consumers toward this end.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Alltel Communications, Inc., <i>et al.</i>	)	
Petitions for Designation as Eligible	)	
Telecommunications Carriers	)	
	)	
RCC Minnesota, Inc. and RCC Atlantic, Inc. New	)	
Hampshire ETC Designation Amendment	)	

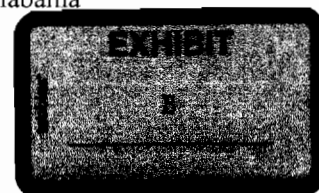
ERRATUM

Released: June 10, 2008

By the Acting Chief, Telecommunications Access Policy Division, Wireline Competition Bureau:

On May 1, 2008, the Commission released an order, FCC 08-122, in the above captioned proceeding. This Erratum corrects that document as indicated below.

1. In footnote 33 of the order, replace "23 FCC Rcd 2241, at para. 246" with "23 FCC Rcd 2241, 2340-41, para. 246".
2. In footnote 62 of the order, replace "23 FCC Rcd 2241, at para. 246" with "23 FCC Rcd at 2340-41, para. 246".
3. In footnote 65 of the order, replace "*Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, WT Docket No. 06-17, Eleventh Report, 21 FCC Rcd 10947, 11027, para. 205 (2006) (citing survey reporting that approximately 8 percent of U.S. households relied exclusively on wireless phones in 2005)" with "*2007 Commercial Mobile Services Report*, 23 FCC Rcd at 2340-41, para. 246 (citing survey reporting that approximately 11.8 percent of U.S. households relied exclusively on wireless phones in 2006)."
4. In footnote 96 of the order, replace "15 FCC Rcd 11794, 11795" with "15 FCC Rcd 12208, 12211-12".
5. In Appendix B, paragraph 21, delete "CenturyTel of Claiborne, Inc." from the first sentence. Insert "Tennessee Telephone Co." into the first sentence after "Tennessee, LLC," and before "and Twin Lakes". Insert the following sentence at the end of Appendix B, paragraph 21: "We note that U.S. Cellular did not provide sufficient data for us to perform a creamskimming analysis with respect to Tennessee Telephone Co."
6. In Appendix B, Exhibit 22, Rural Study Areas for Inclusion in SouthernLINC's Alabama



ETC Service Area, insert the following wire center:

Brindlee Mountain Telephone Company	ARAB	ARABALXA
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7. In Appendix B, Exhibit 22, Rural Study Areas for Inclusion in SouthernLINC's Alabama ETC Service Area, replace "KNSTNALXA" (CLLI code for Kinston wire center) with "KSTNALXA". Replace "DLCYALXA" (CLLI code for Midland CY) with "MLCYALXA".

8. In Appendix B, Exhibit 27, Non-Rural Wire Centers for Inclusion in U.S. Cellular's ETC Service Area, Tennessee, delete the following wire centers:

BellSouth Telecomm Inc d/b/a South Central Bell Tel	CARTHAGE	CRTHTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	FORK RIDGE	MDBOKYMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	GALLATIN	GALLTNMA
BellSouth Telecomm Inc d/b/a South Central Bell Tel	LEBANON	LBNNTNMA

9. In Appendix B, Exhibit 28, Rural Wire Centers for Inclusion in U.S. Cellular's ETC Service Area, Tennessee, insert the following wire centers:

CenturyTel of Clairborne, Inc.	NEWTAZWELL	NWTZTNXA
CenturyTel of Clairborne, Inc.	SHARPSCHPL	SHCPTNXA
Citizens Telecom – Vol St DBA Frontier Vol. State	CLAXTON	CXTNTNXA
Citizens Telecom – Vol St DBA Frontier Vol. State	POWELL	POWLTNXA
Citizens Telecom – Vol St DBA Frontier Vol. State	RUTLEDGE	RTLGTNXA
Citizens Telecom – Vol St DBA Frontier Vol. State	TATE SPG	TTSPTNXA
Citizens Telecom – Vol St DBA Frontier Vol. State	WASHBURN	WSBNTNXA
Concord Telephone Exchange, Inc.	CONCORD	CNCRTNXA
Tellico Telephone Co., Inc.	BALL PLAY	BLPLTNXA
Tellico Telephone Co., Inc.	COKERCREEK	CKCKTNXA
Tellico Telephone Co., Inc.	ENGLEWOOD	ENWDTNXA
Tellico Telephone Co., Inc.	NIOTA	NIOTTNXA
Tellico Telephone Co., Inc.	RICEVILLE	RCVLTNXA
Tellico Telephone Co., Inc.	TELLICO PL	TLPLTNXA
Tellico Telephone Co., Inc.	VONORE	VONRTNXA

FEDERAL COMMUNICATIONS COMMISSION

Jennifer McKee
Acting Chief
Telecommunications Access Policy Division
Wireline Competition Bureau