

DOCKET FILE COPY ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

PR 94-110
~~GN DOCKET NO. 93-252~~

PR File No. 94-SP8

IN THE MATTER OF)
OMNIBUS BUDGET RECONCILIATION ACT OF 1993)
IMPLEMENTATION OF SECTION 3(N) AND SECTION 332(C) (3) OF THE)
COMMUNICATIONS ACT)
REGULATORY TREATMENT OF MOBILE SERVICES)

STATE PETITION FOR AUTHORITY TO MAINTAIN CURRENT REGULATION OF RATES AND
MARKET ENTRY (SECT 20.12)

RECEIVED

AUG 10 1994

FCC MAIL ROOM

PUBLIC SERVICE COMMISSION OF WYOMING

BIL TUCKER, Chairman

JOHN R. SMYTH, Deputy Chairman

STEVE ELLENBECKER, Commissioner

DOUGLAS J. MOENCH, Assistant Secretary
and Commission Counsel

700 W. 21st Street
Cheyenne, Wyoming 82002

OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
WASHINGTON, D.C. 20554

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

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IN THE MATTER OF)
OMNIBUS BUDGET RECONCILIATION ACT OF 1993)
IMPLEMENTATION OF SECTION 3(N) AND SECTION 332(C) (3) OF THE)
COMMUNICATIONS ACT)
REGULATORY TREATMENT OF MOBILE SERVICES)

STATE PETITION FOR AUTHORITY TO MAINTAIN CURRENT REGULATION OF RATES AND
MARKET ENTRY (SECT 20.12)

As of June 1, 1993, the Public Service Commission of Wyoming did exercise some rate and market entry regulation of commercial mobile radio service (CMRS) providers. Specifically, the Public Service Commission of Wyoming reviews and approves the market entry of the wholesale cellular providers as licensed and authorized by the FCC. The Public Service Commission of Wyoming does not require cost justification for the rates proposed by the wholesale cellular providers or other CMRS providers and existing rates of the wholesale cellular providers or other CMRS providers can be easily changed to meet market demand or competitive forces. The Public Service Commission of Wyoming does require that the rates be nondiscriminatory and that necessary customer service guidelines and procedures are in place. The Public Service Commission of Wyoming respectfully requests authority from the FCC to maintain this important and proper oversight of these intrastate services.

1. Evidence that market conditions in the state do not adequately protect subscribers:

Union Telephone is the certificated Cellular provider in Wyoming RSA Number 3. As such it provides service to a large portion of the state of roughly south of a line drawn from the North West corner of the state through Laramie, Wyoming. Union Telephone has applied for and been granted a certificate to provide fixed cellular telephone service (called tellular service) throughout its certificated area and other uncertificated land line territory in the state of Wyoming. The rates associated with this service are provided as Exhibit #1. The rates, set after public hearing on the matter, reflect a non-usage sensitive based flat rate, so as to provide traditional, landline, like service. The Order authorizing the Service is shown as Exhibit 2. Because provision of this service is from the cellular operation as an integral part of the land line company (non-structural separation), it is imperative that regulation by the Wyoming Public Service Commission be continued because the rates for the tellular service will forestall land line expansion if not properly reviewed and established by the Public Service Commission of Wyoming; the tellular service can infringe in other companies land line certificated areas, and could affect extension of facilities, service quality and rates; other land line companies have expressed concern over provision of tellular service as opposed to Basic Exchange Telephone Radio Service (BETRS) provided services.

Maps of coverage areas are provided as Exhibit #3. The exhibits show somewhat substantial coverage areas, but not throughout Wyoming. As the maps included in Exhibit #3 illustrate, a substantial portion of the subscribers in Wyoming RSA #3 have no alternative means of obtaining basic telephone service other than fixed cellular service from Union Telephone Company. The other cellular licensee for Wyoming RSA #3 has expressed no interest in offering fixed cellular service similar to Union Telephone. The Commission in General Order Number 67 , Exhibit #4, found that telephone service in much of Wyoming's rural areas was not available or, where available, often not adequate. Provision of cellular service through fixed locations may be a strong solution along primary Wyoming Highways, particularly Interstate Highways, however, the impact on land line expansion and rates must be carefully weighed on a case by case basis, through public hearings, a process the Wyoming Commission can handle more effectively than the FCC.

U S WEST Communications, Wyoming's largest local exchange company with 92% of the access lines in the state, has requested authority to discontinue its provision of Improved Mobile Telephone Service (IMTS) throughout Wyoming, Exhibit #5. In their application they list options for subscribers. In some areas, there is no alternative. If the U S WEST application is approved, one less competitor will exist. The provision of Rural Radio, shown on tariffs marked Exhibit #6, from this service will be unavailable.

2. (i),(ii),(iii) The numbers or estimated numbers of radio service providers is shown in Exhibit #7. The rate experience for the providers, exclusive of Cellular is essentially flat; that is, no increases or decreases. The estimated number of subscribers is shown in Exhibit #7.

2(iv) . Please refer to #1 above for detail, however, the sparse population of Wyoming does not fully support all applicants in each area. Therefore, actual operational radio carriers do not permeate Wyoming areas to provide full benefits of competition. If fact, often subscribers have to find a service providing coverage needed.

2(v). The Wyoming Commission does not impede or inhibit entry into an area, unless clearly not in the public interest, or unfit (operationally or financially) as jurisdiction may allow. The Commission has certificated multiple carriers in past proceedings. See Exhibit #8 (RCC Dockets.)

- 2(vi). Attached are complaints received by the Wyoming Public Service Commission. (Exhibit #9)
- 2(vii). Please see No. 1 and 2(vi) above.
- 2(viii) Subscriber complaints (Exhibit #10)

3. Certification that Wyoming Public Service Commission is responsible for regulation of telecommunications services:

The Wyoming Public Service Commission is a commission created by legislative action, as codified in Title 37, Public Utilities, §37-1-101 et. seq. Specifically, the Public Service Commission of Wyoming was created and established at §37-2-101. § 37-2-112 provides that "The Commission shall have general and exclusive power to regulate and supervise every public utility within the state in accordance with the provisions of this act. (Laws 1915, ch. 146, §11; C.S. 1920, § 5463; R.S. 1931, § 94-111; C.S. 1945, § 64-111; W.S. 1957, § 37-11.)" Revised Statutes, 1977 Republished Edition. (See Exhibit #11). The Commission hereby certifies that it is solely responsible for entry and rate regulation of telecommunications providers in the State of Wyoming.

4. The Commission operates under the Rules of The Public Service Commission of Wyoming, copy enclosed as Exhibit #12. The Commission has not required extensive cost support or onerous applications or studies for radio based carriers. A minor exception can be where provision of the radio service is a part of a fully regulated utility (Union), wherein, the studies for the landline operation identify the cellular operations. The Commission has authorized regulated competition, thereby minimizing intrusion into the operations. The Commission has regulated Cellular providers on the wholesale contract basis wherein the same terms and conditions are offered to all retail providers. This regulation has shown need for the retail establishments to provide a copy of the rates offered for file.

5. The Wyoming Public Service Commission requests authority to regulate rates until such time as ubiquitous competition provides two or more alternatives for telecommunications within (70%) of the area of Wyoming. The Wyoming Commission would be pleased to offer expert staff testimony in the matter to the FCC from a technical/facilities view, a rate and service view and an accounting view, if required.

ADDITIONAL MATERIAL

Wyoming's telecommunications industry and structure is unlike any other state in the country. The large amount of uncertificated areas, the sparse population, and the high costs to provide even basic telecommunications services to many of the state's residents present unique regulatory challenges best handled by the PUBLIC SERVICE COMMISSION OF WYOMING. No Competitive Access Providers (CAPs) have shown any interest in entering any portion of the Wyoming local exchange market. Local Competition is nonexistent in Wyoming. Over the years, the Public Service Commission of Wyoming has developed an efficient and effective method of regulatory oversight for market entry, rates, and services. It is in the best interest of Wyoming citizens that state oversight of these items should be maintained in order to ensure the just and reasonable provision of these services. The Public Service Commission of Wyoming will not be able to perform its statutory duties unless this petition is granted by the FCC.

Dated August 9, 1994.

PUBLIC SERVICE COMMISSION OF WYOMING

Bil Tucker

BIL TUCKER, Chairman

John R. Smyth

JOHN R. SMYTH, Deputy Chairman

Steve Ellenbecker

STEVE ELLENBECKER, Commissioner



J. Moench

J. Moench, Assistant Secretary
and Commission Counsel

WYOMING PUBLIC SERVICE COMMISSION

FCC GENERAL DOCKET 93-252

**OMNIBUS BUDGET RECONCILIATION ACT OF 1993
AMENDMENTS TO THE COMMUNICATIONS ACT OF
1934**

**PETITION TO MAINTAIN EXISTING
REGULATORY OVERSIGHT**

EXHIBIT #1

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EXHIBIT B

3.10 Fixed Cellular Service

Rates and Charges

A. Fixed cellular service provided by the company shall be provided consistent with FCC and Wyoming PSC regulations and directives. Fixed cellular service shall be provided coextensive with the company's cellular service area except as limited by the Wyoming Public Service Commission. Service shall be provided to prospective subscribers pursuant to the following rates and charges dependent upon the subscriber's location:

B. Fixed cellular service is identified as that service encompassed under Federal Communication Commission regulation as an "incidental service" which is authorized to the extent it is compatible with a company's licensed mobile operations.

Subscribers within Wire-Line Area

Subscribers located within Union Telephone Company's wire-line service area shall be provided fixed cellular service at the following rates:

a. A monthly charge of \$9.49 per month consistent with Part III of the Company's Local Exchange Service Tariff. This charge is to be computed consistent with the company's wire-line service rates and tariffs, which local service includes a mileage charge additional to the base rate dependent on the customer's location in relation to the nearest base rate area. The basic rate will be adjusted by \$.35 per 1/4 mile for these subscribers residing outside of the base rate area or defined in the Company's Local Exchange Service Tariff. Mileage is calculated from the subscriber's location to the nearest base rate area or point.

b. Service provided under this section will be accomplished without payment of any "air time" or measured usage charge.

c. Union will not charge for installation of the customer's previous equipment.

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Customers located outside of the Company's Wire-Line Service Area

Fixed cellular service to subscribers outside of Union's wire-line service area but within Union's cellular service area will be at the following rates:

a. The subscriber will be charged a \$48.00 per month basic service charge.

b. The subscriber will not be charged for "air time" or measured usage while utilizing the fixed cellular system.

c. Union shall install any customer premise equipment necessary for the provision of fixed cellular service for a charge of \$500.00 per installation.

WYOMING PUBLIC SERVICE COMMISSION

FCC GENERAL DOCKET 93-252

**OMNIBUS BUDGET RECONCILIATION ACT OF 1993
AMENDMENTS TO THE COMMUNICATIONS ACT OF
1934**

**PETITION TO MAINTAIN EXISTING
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EXHIBIT #2

FCC MAIL ROOM

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION)
OF UNION TELEPHONE COMPANY, INC.)
FOR AUTHORITY TO PROVIDE FIXED)
CELLULAR TELEPHONE SERVICE TO)
POTENTIAL CUSTOMERS LOCATED IN)
ISOLATED POCKETS THROUGHOUT)
ITS CELLULAR SERVICE AREA IN)
SOUTHWESTERN WYOMING BY)
MEANS OF ITS EXISTING CELLULAR)
TELEPHONE SYSTEM)

DOCKET NO. 62006-RA-92-8

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ORDER GRANTING EMERGENCY AUTHORITY

(Issued October 20, 1993)

This matter is before the Commission upon the October 8, 1993, application of Union Telephone Company, Inc., hereinafter referred to as Union, Applicant or the Company, for emergency authority to provide fixed cellular telephone service to certain customers in Union's "wireline" certificated territory.

The Commission, having reviewed the application and proposed tariff, as well as the applicable law, and being otherwise advised in the premises, FINDS and CONCLUDES:

1. Union is a public utility as defined in W.S. § 37-1-101(a)(vi) and, as such, the Commission has jurisdiction pursuant to W.S. § 37-2-112.

2. Union originally filed its application for authority on October 27, 1992, requesting general authority to provide fixed cellular service to potential customers throughout its cellular system. The emergency request of Union seeks to provide fixed cellular telephone service to certain customers in Union's "wireline" certificated territory who have immediate need for

telecommunications services. Union will provide fixed cellular service to those potential customers listed on its application Exhibit A, under the emergency tariff provisions contained in, Exhibit B, applicable to "Subscribers within Wire-Line Area" and shall provide documented verification of the location of the listed customers as those located within its "wireline" certificated area. The tariff provisions applicable to "Customers located outside of the Company's Wire-Line Service Area" will be considered within the context of the public hearing to be held for the purpose of final determination in this docket and are not, therefore, approved at this time. The Commission, having considered the position of the Consumer Representative Staff as well as the position of the Applicant, in open meeting of October 14, 1993, finds that there is good cause for granting this emergency authority, under the specific circumstances of the emergency request, and that no further hearing, therefore, is required.

IT IS THEREFORE ORDERED THAT:

1. Pursuant to open meeting action taken on October 14, 1993, the application of Union Telephone Company, Inc. for authority to provide fixed cellular telephone service only to certain customers in Union's "wireline" certificated territory as listed on Exhibit A, for an effective date of October 14, 1993, should be, and the same hereby is, approved, subject to the conditions that Union provide fixed cellular service to only those listed on its application Exhibit A, under an emergency tariff, Exhibit B, consistent with the findings set forth above, and contingent upon Union providing documented verification of the location of the listed customers as those located within its "wireline" certificated area. All rates approved herein remain subject to review in the current rate case concerning Union and such rates are applicable for these

subscribers only. This is interim emergency authority and remains subject to such other and further order as the Commission may deem necessary.

2. The tariffs filed with this application are hereby accepted for filing.
3. This Order is effective immediately.

MADE and ENTERED at Cheyenne, Wyoming this 20th day of October, 1993.

PUBLIC SERVICE COMMISSION OF WYOMING



JOHN R. SMYTH, Deputy Chairman



STEVE ELLENBECKER, Commissioner





DOUGLAS J. MOENCH, Assistant Secretary
and Commission Counsel

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION OF)
UNION TELEPHONE COMPANY, INC. FOR)
AUTHORITY TO PROVIDE FIXED)
CELLULAR TELEPHONE SERVICE TO)
POTENTIAL CUSTOMERS LOCATED IN)
ISOLATED POCKETS THROUGHOUT ITS)
CELLULAR SERVICE AREA IN)
SOUTHWESTERN WYOMING BY MEANS)
OF ITS EXISTING CELLULAR TELEPHONE)
SYSTEM)

DOCKET NO. 62006-RA-92-8

RECEIVED

AUG 10 1994

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APPEARANCES

MR. BRUCE S. ASAY, Attorney at Law, Cheyenne, Wyoming for Applicant,
Union Telephone Company, Inc.

MR. WILLIAM HEASTON, Attorney at Law, Denver, Colorado for Intervenor,
U S WEST

MR. RON B. McCUE, Assistant Vice President, Freedom, Wyoming for
Intervenor, Silver Star Telephone Company, Inc.

MR. DAN CHRISTOPHERSON, President, Riverton, Wyoming for Intervenor,
Commercial Communications, Inc.

MR. DAVID J. LUCERO, Attorney at Law, Cheyenne, Wyoming for Intervenor,
Consumer Representative Staff of the Wyoming Public Service Commission

HEARD BEFORE

CHAIRMAN BIL TUCKER
DEPUTY CHAIRMAN JOHN R. SMYTH
COMMISSIONER STEVE ELLENBECKER
Chairman Bil Tucker presiding

FINDINGS, CONCLUSIONS AND ORDER

(Issued December 17, 1993)

This matter is before the Public Service Commission of Wyoming upon
the Application of Union Telephone Company, Inc. for authority to provide fixed

cellular telecommunications service to prospective customers in Union's wire line certificated area and outside of its wire line certificated areas in locations, within Union's Rural Service Area No. 3, where no other local exchange telecommunications utility is providing service. The Commission has previously addressed the provision of fixed cellular service within *the certificated wire line* territory of other certificated utilities in Docket No. 70008-TA-89-2, wherein the Commission approved such provisioning of fixed cellular only by written agreement between Union and the wire-line, certificated carrier. This matter was heard, pursuant to a Notice Setting Hearing, on December 3, 1993 in Cheyenne, Wyoming. The Commission having reviewed the application, its files concerning the Applicant, including the Order entered in Docket No. 70008-TA-89-2, applicable Wyoming utility law and being otherwise fully advised in the premises FINDS and CONCLUDES:

PROCEDURAL FINDINGS

1. Union Telephone Company, Inc. (hereinafter Union) is a public utility as defined in W.S. § 37-1-101(a)(vi) and, as such, the Commission has jurisdiction pursuant to W.S. § 37-2-112. Union serves communities in southwest Wyoming with its principal offices in Mountain View, Wyoming.

2. Parties to this matter, in addition to the Applicant, are the Consumer Representative Staff which provided analysis of the filing and presented an independent public interest position pursuant to W.S. § 16-3-111 of the Wyoming Administrative Procedure Act and the Commission's Rules, §§ 101, 103, 111 and 113; U S WEST Communications; Silver Star Telephone Company; and Commercial Communications, Inc. The Wyoming Independent Telephone Association withdrew its petition to intervene on March 17, 1993.

3. The application of Union was filed on October 22, 1992 and amended on January 21, 1993. On August 2, 1993, Union filed a Motion for Interim Authority and on October 8, 1993 Union filed a Request for Emergency Authority to provide fixed cellular service to five customers, four of whom were located within the wire line certificated area of Union. This emergency authority was granted as to those four prospective customers by Order Granting Emergency Authority issued on October 20, 1993. With regard to the fifth prospective customer, whose proposed fixed cellular site lay outside of Union's wire line certificated area, the Commission reserved approval until the hearing, held December 3, 1993. At the close of the hearing the Commission issued its bench decision granting and extending the emergency authority to the fifth prospective customer, Alex Radosevich of Minnies Gap, Wyoming.

4. Public notice was given pursuant to the Rules of the Wyoming Public Service Commission and a hearing was held in Cheyenne, Wyoming on December 3, 1993, pursuant to such notice.

FINDINGS

1. The citizens of the State of Wyoming, living in more remote areas should be afforded the opportunity to obtain telecommunications services. In many such areas of the State there are simply no certificated wire line telecommunications providers or the wire line certificated carrier has not extended its backbone plant due to lack of population density, remoteness and other reasons leaving these citizens without the opportunity to obtain telecommunications services and the advantages offered by such service.

2. With the advent of such systems as Basic Exchange Telecommunications Radio Service (BETRS) and fixed cellular, many of the benefits of wire line based communications can be achieved, albeit without the same quality that wire line based systems offer. Radio Common Carriers

(RCCs) certificated in the State of Wyoming also have dispatched technologically sound systems that permit two way communications and, in some instances, may even provide "dial tone" (Christopherson testimony). It is, however, the finding of the Commission that wire line telecommunications systems are, in general, the superior technology for the provision of "dial tone" and the related features which the general public has become accustomed to, in terms of telephone service. Wire line service is, however, expensive to provide to remote areas. As a result, telecommunications providers have looked to BETRS systems, and more recently, to fixed cellular systems, sometimes referred to as "Telular®". Union shall allow the fixed cellular subscriber to convert to wire line service when it is available, however, and shall continue to extend land line service within Union's wire line certificated area in a timely manner.

3. Union has been granted the authority by the Federal Communications Commission, to provide cellular service within Rural Service Area No. 3. This authority has led Union to deploy equipment in this area for the supplying of roaming cellular services. As a result, Union is able to provide fixed cellular service and utilize parts of its cellular system to give remote subscribers some of the benefits traditionally reserved for wire line service. Union's fixed cellular system will give the subscriber voice, data and fax transmission capability. It would be able to provide this service in a timely fashion without the need for construction of land line, backbone facilities.

4. The Commission finds that this authorization, as it relates to the supplying of fixed cellular services, is appropriate and in the public interest to the extent that such authority is non-exclusive to Union. As such, the authority granted herein does not preclude another wire line, certificated carrier from properly applied for extension of its wire line area into the area served by fixed

cellular, with wire line or other services, as appropriate. Such application would be addressed by this Commission on a case by case basis.

5. In granting this authorization the Commission finds that the public interest would be served best by requiring Union to provide, on an annual basis, a reporting of the total number of customers served by fixed cellular within Union's wire line certificated area, including names and locations of such customers added during the year. Such report shall also include the costs associated with the fixed cellular service and the extent to which the federal High Cost Fund is utilized to support the provision of the service. The use of a sub account for reporting costs is the appropriate method for such reporting and, with regard to the High Cost Fund, Union shall report upon its application for such funds and the determination at the time it is received from the National Exchange Carrier Association. The Commission has previously established and required sub accounts for similar services in Dockets 70006-TR-89-1 and 70006-TT-89-2.

6. For customers served by fixed cellular outside of Union's certificated area Union shall provide, on an annual basis, a reporting of the total number of customers served by fixed cellular including names and locations of such customers added during the year.

7. Union has filed tariffs for these fixed cellular services which are hereby approved. It is the finding of the Commission that all revenues for fixed cellular services provided to customers within Union's wire line certificated local exchange area are to be attributed to the exchange revenues. All such revenues attributable to the provision of fixed cellular outside of Union's wire line certificated local exchange area shall be cellular revenues. Issues of allocations between revenues for wire line certificated local exchange area and

between cellular services will be addressed in Union's docketed general rate case.

8. Union shall provide fixed cellular services utilizing a channel lock to prevent the use of the equipment for roaming cellular service.

CONCLUSIONS OF LAW

1. The Public Service Commission has jurisdiction over this matter, pursuant to Wyoming law.

2. Public notice was given in accordance with the Wyoming Administrative Procedure Act, W.S. § 37-2-201, W.S. § 37-2-202, and the Commission's Rules.

3. A public hearing was held and conducted pursuant to W.S. § 16-3-107, W.S. § 16-3-108, W.S. § 37-2-120, W.S. § 37-2-201, W.S. § 37-2-203 and the Commission's Rules.

IT IS THEREFORE ORDERED THAT:

1. Union Telephone Company, Inc. is hereby authorized to provide fixed cellular telecommunications services, utilizing channel locking to the location as installed, to subscribers within its wire line certificated exchange area and in areas outside its certificated wire line exchange area not certificated to other local exchange companies but within the Rural Service Area No. 3 under tariffs as filed in its application and consistent with the findings set forth hereinabove.

2. Union shall provide, on an annual basis, a reporting of the total number of customers served by fixed cellular within Union's wire line certificated area, including names and locations of such customers added during the year. Such report shall also include the costs associated with the fixed cellular service and the extent to which the federal High Cost Fund is utilized to support the provision of the service. The use of a sub account for

reporting costs is the appropriate method for such reporting and, with regard to the High Cost Fund, Union shall report upon its application for such funds and the determination at the time it is received from the National Exchange Carrier Association.

3. For customers served by fixed cellular outside of Union's certificated area Union shall provide, on an annual basis, a reporting of the total number of customers served by fixed cellular including names and locations of such customers added during the year.

4. All revenues for fixed cellular services provided to customers within Union's wire line certificated local exchange area are to be attributed to the exchange revenues. All such revenues attributable to the provision of fixed cellular outside of Union's wire line certificated local exchange area shall be cellular revenues.

5. This Order is effective immediately.

MADE and ENTERED at Cheyenne, Wyoming, this 17th day of December, 1993.

PUBLIC SERVICE COMMISSION OF WYOMING



(SEAL)

Bil Tucker

BIL TUCKER, Chairman

John R. Smyth

JOHN R. SMYTH, Deputy Chairman

Steve Ellenbecker

STEVE ELLENBECKER, Commissioner

ATTEST:

Douglas J. Moench

DOUGLAS J. MOENCH, Assistant Secretary

WYOMING PUBLIC SERVICE COMMISSION

FCC GENERAL DOCKET 93-252

**OMNIBUS BUDGET RECONCILIATION ACT OF 1993
AMENDMENTS TO THE COMMUNICATIONS ACT OF
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EXHIBIT #3

CELLULARONE®

Wyoming Cellular Network

BRONZE PLAN

Monthly Access \$39.99

- Includes the first **FIRST HOUR** (60 min.) of LOCAL use per month
- All System Features are included
- Additional airtime, per minute 61+ minutes 37¢

SILVER PLAN

Monthly Access \$79.99

- Includes the first **3.5 HOURS** (210 min.) of LOCAL use per month
- All System Features are included
- Additional airtime, per minute 211+ minutes 32¢

GOLD PLAN

Monthly Access \$119.99

- Includes the first **6 HOURS** (360 min.) of LOCAL use per month
- All System Features are included
- Additional airtime, per minute 361+ minutes 29¢

TOLL-FREE FEATURES

America Toll-Free: \$9.95 /mo.

Call anywhere in America (48 contiguous states) from your home area and pay no long distance charges.

Wyoming Toll-Free: \$5.99 /mo.

Call anywhere in Wyoming from your home area and pay no long distance charges.

★ New Features!

- Automatic Connection to the *North American Cellular Network™*. This provides automatic call delivery in hundreds of cities across the United States and Canada.
- Wyoming State Wide *Automatic Call Delivery*. All of your calls are automatically routed to you regardless of your location in Wyoming. There is now no need to give out confusing roaming access numbers to your callers.

SERVICE INFORMATION

- Service Activation.
One time per phone \$35.00
- Agreement is month-to-month after a 12 month access commitment. 30 days written notice required for cancellation.
- First billing will be pro-rated (access and minutes) based on service activation date.
- All airtime is billed in 60-second increments.
- Customer requests for transfer to a different rate plan will be accommodated with prior written notice and will be effective at the next regular billing cycle.
- Charges subject to applicable federal, state and local taxes.

VOICEMAIL MESSAGE SERVICE

★ Voicemail \$4.95 per month

★ Voicemail **PLUS**
Includes outcall notification and group list capability..... \$6.95 per month

★ Choose one of these services to try **FREE** for the first two months.
To discontinue, contact Cellular One® Customer Care at 611, a free call from your cellular phone.



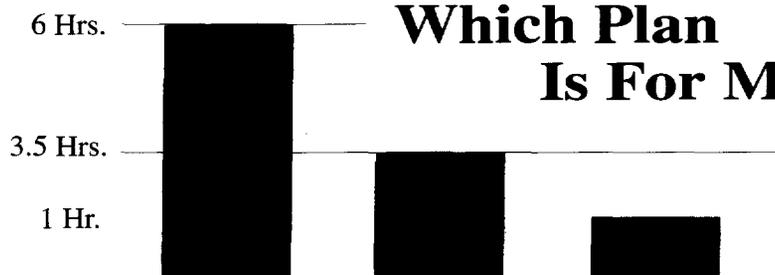
SYSTEM FEATURES

- Incoming Calls
- Outgoing Calls Only
- Toll Restriction

ADDED VALUE SERVICE

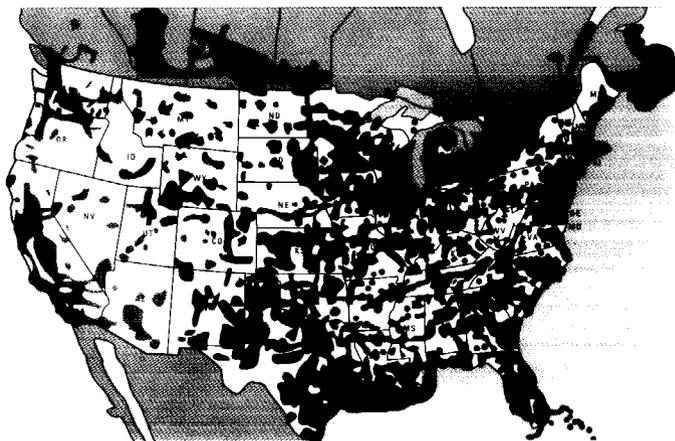
- Detailed Billing.....\$2.00/mo.
Shows name of use as well as call detail. No charge for the first two months. To discontinue, contact Cellular One® Customer Care at 611, a free call from your cellular phone.
- The following provided on request at \$2.00 each or 3 features for \$5.00 per month:
 - Call Forwarding - Immediate and No Answer
 - Call Waiting
 - 3 - Way Conference Calling

Which Plan Is For Me?



Your authorized Cellular One® Representative will be happy to assist you in selecting the best rate plan based on YOUR anticipated usage.

Introducing MobiLinkSM service, making it easy to stay in touch from coast to coast



Map denotes combined coverage area of MobiLink and existing cellular service across the U.S.

Now you can enjoy even better cellular service. As part of the MobiLinkSM cellular network, we're making it easier and more convenient to use your cellular phone both at home and when you travel. MobiLink enhances cellular service in a number of ways:

- **Easier calling.** Make calls instantly in more cities while roaming without using credit card billing. And receive calls simply by pressing *18 SND when roaming in MobiLink (or EasyRoaming) cities. Callers just dial your normal cellular number to reach you.

- **Call quality standards.** With MobiLink's high service standards, more calls go through the first time, and they're maintained without dropping, more consistently across the MobiLink network.

- **Flexible dialing.** When you're in an area with MobiLink service, you don't have to dial a "1" or "*" before numbers that usually require it. Either way, your call goes through.

- **Standardized dialing codes.** Calling features such as call forwarding have simplified dialing codes that are shared by all MobiLink cities.

- **Fast troubleshooting.** If you have trouble making a call, standardized recorded announcements allow the problem to be pinpointed quickly.

- **Customer service.** 24-hour toll-free telephone customer service at home or when traveling in MobiLink cities.

- **Satisfaction guarantee.** If you're not pleased with every aspect of MobiLink service and we can't fix the problem to your satisfaction, you'll get a free call on us.*

- **MobiLink service centers.** You are guaranteed a broad range of services. For example, you'll get a loaner phone when your cellular phone is in for repair at any MobiLink service center in the U.S. or Canada.**

- **A single service number.** You can call 1-800-995-4000 for answers to sales and service questions anywhere in the U.S. and Canada.

That's just part of what MobiLink offers you. And the network will continue to grow to meet your changing needs. So whether you're home or traveling across the U.S. and Canada, U S WEST Cellular and MobiLink have you covered.

For details about MobiLink and EasyRoaming—or for answers to other questions about your cellular service call U S WEST Cellular Customer Service at *611 SND from your cellular phone or 1-800-626-6611

* Excludes service pricing and equipment pricing. Call calculated at average length for your home city.
** Subject to availability.

U S WEST Cellular Coverage Map

Wyoming

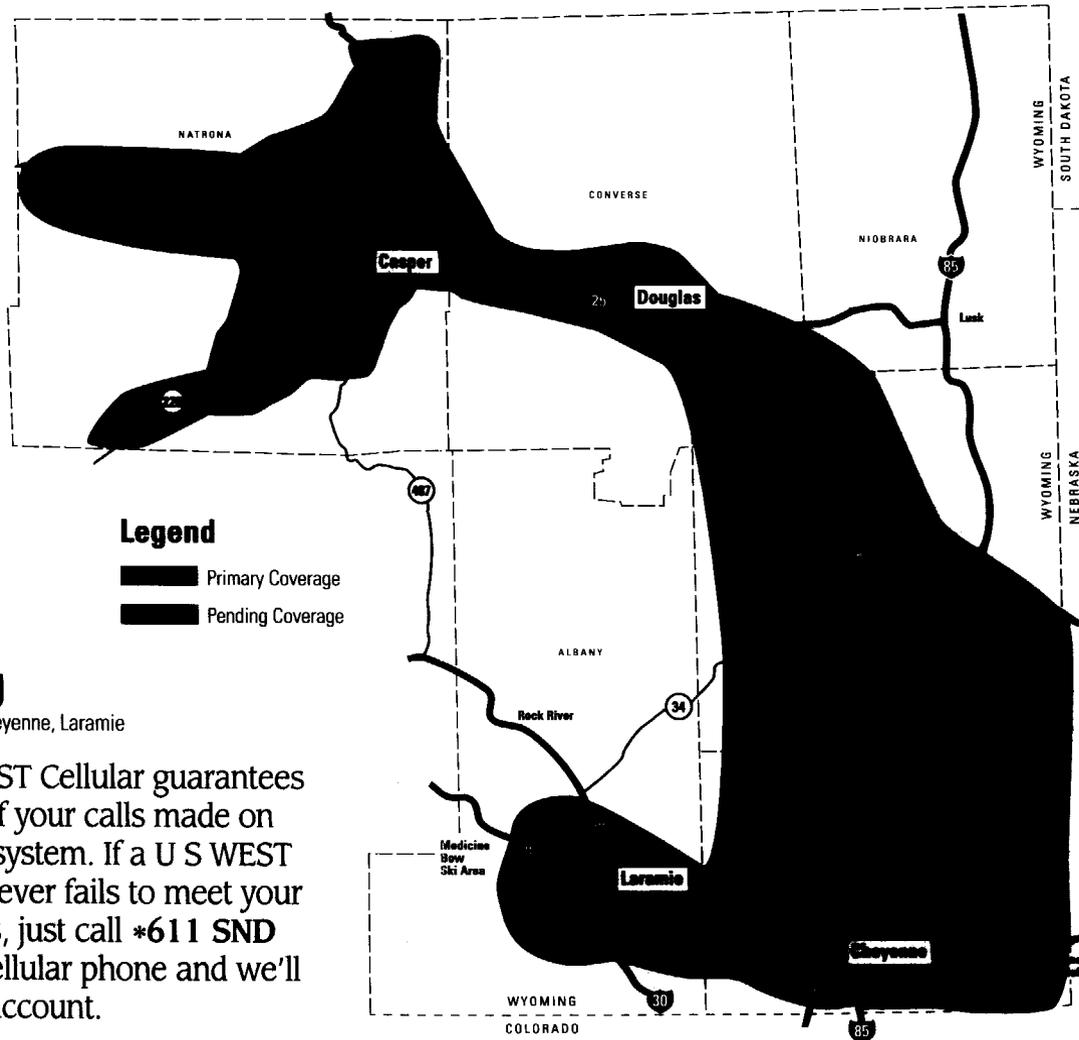
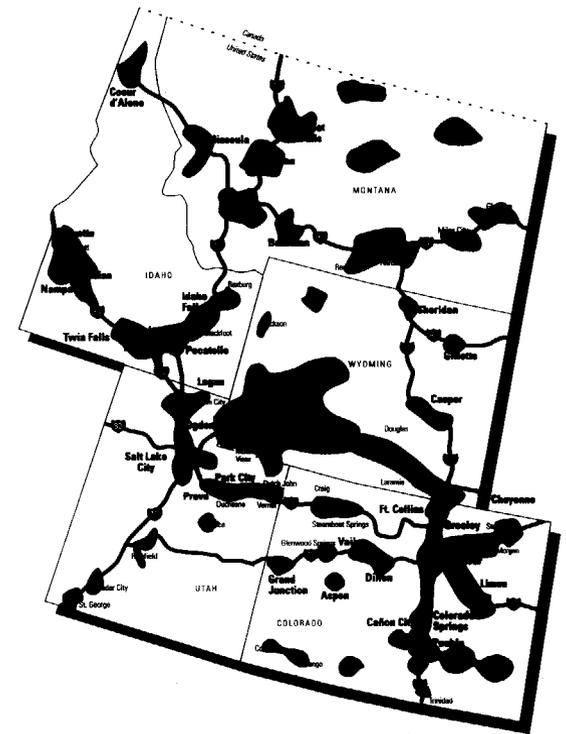
Casper, Douglas, Cheyenne, Laramie



USWEST[®]
CELLULAR

MobiLink

At U S WEST Cellular, we have Wyoming covered.



Legend

-  Primary Coverage
-  Pending Coverage

Wyoming

Casper, Douglas, Cheyenne, Laramie

U S WEST Cellular guarantees the quality of your calls made on our cellular system. If a U S WEST Cellular call ever fails to meet your expectations, just call *611 SND from your cellular phone and we'll credit your account.

Since cellular phone calls are based on wireless radio communication, transmission and reception can be affected by terrain, atmospheric conditions, and local interference. But our Call Guarantee lets you get credit for U S WEST Cellular calls that don't meet your standards no matter what the reason within U S WEST Cellular territory.

U S WEST Cellular service is provided by U S WEST NewVector Group and the Wyoming Regional Limited Partnership.

The Intermountain Advantage: Preferred roaming rates and network enhancements.

U S WEST Cellular has teamed up with other cellular providers to offer you lower roaming rates in Colorado, Utah, Idaho, Wyoming, and Montana.

The Intermountain Advantage Cellular Service Network lets you take advantage of preferred roaming rates of just 85¢ per minute and no daily access fee in the Intermountain Advantage cities highlighted on the map.* That's a savings of up to 20% on roaming charges.

As a U S WEST Cellular customer, you also have access to EasyRoaming and new MobiLink services at no extra charge. MobiLink, the largest cellular network in North America, and EasyRoaming let people in your home area reach you when you travel to hundreds of cities in the U.S. and Canada simply by dialing your normal cellular number—no extra codes are needed.

MobiLink and EasyRoaming services are free, but calls forwarded from your home city to the city in which you are roaming via EasyRoaming are long distance. You are billed both roaming and long distance charges for these calls. Roaming airtime is usually more than your home cellular service rate, and you may be charged a daily access fee.

* Subject to change