

DECLARATION OF GENE DEJORDY

1. My name is Gene DeJordy. My title is Vice President, Regulatory Affairs, Western Wireless Corporation. My business address is 3650 – 131st Ave., S.E., Suite 400, Bellevue, Washington 98006, and my business telephone number is (425) 586-8055.

2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of Nebraska, for purposes of receiving federal and state universal service support (Application No. C-1889 dated November 21, 2000).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. In the near future, Western Wireless will launch a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Nebraska only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Nebraska, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because

of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.


Gene DeJordy

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2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of Nevada, for purposes of receiving federal and state universal service support (Docket No. 00-6003 dated August 22, 2000).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has launched a universal service offering in the manner contemplated by the FCC as evidenced in the Nevada ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Nevada only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Nevada, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because

of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.


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2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of North Dakota, for purposes of receiving federal universal service support (Case No. PU-1564-98-428).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in North Dakota only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in North Dakota, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important

exception: WRS is more costly to provide than conventional cellular service because of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.



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2. WWC Texas RSA Limited Partnership, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of Texas, for purposes of receiving federal and state universal service support (Docket Nos. 22289 and 22295, dated October 19, 2000).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section

254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Texas only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Texas, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important

exception: WRS is more costly to provide than conventional cellular service because of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

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3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Utah only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Utah, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because

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8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

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