

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

In the Matter of)	
)	
Application of Sprint Corporation)	
)	
For Designation as an Eligible)	
Telecommunications Carrier)	
in the Commonwealth of Pennsylvania)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	

**APPLICATION OF SPRINT CORPORATION
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE COMMONWEALTH OF PENNSYLVANIA**

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September 4, 2003

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INTRODUCTION AND SUMMARY

Sprint Corporation, on behalf of its Wireless Division ^{1/} (“Sprint”) and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier (“ETC”) in the portions of its licensed service area in the Commonwealth of Pennsylvania that are served by non-rural incumbent local exchange carriers (“ILECs”), specifically Verizon Pennsylvania, Inc. and Verizon North, Inc. (collectively, “Verizon”), for purposes of receiving federal universal service support. As

^{1/} Sprint’s Wireless Division consists of Sprint Spectrum, L.P., WirelessCo, L.P., SprintCom, Inc., Sprint PCS License, L.L.C., APC PCS, LLC, PhillieCo, L.P., and other wholly-owned and controlled affiliates.

demonstrated below, Sprint satisfies the prerequisites for ETC designation set forth in the Act and the Commission's rules, and Sprint's designation will serve the public interest.

I. SPRINT'S UNIVERSAL SERVICE OFFERING.

Sprint is authorized to provide broadband personal communications service ("PCS") in Pennsylvania pursuant to Part 24 of the Commission's rules. Sprint is a common carrier, consistent with the definition in 47 U.S.C. § 153(10) and the requirements of 47 U.S.C. § 214(e)(1), and is a commercial mobile radio service ("CMRS") provider as set forth in 47 U.S.C. § 332(c)(1).

Sprint intends to obtain universal service support funding in certain of the high-cost areas served by Verizon, a non-rural ILEC, in Pennsylvania. As required, this funding will be used only to support the provision, upgrading, and maintenance of Sprint's all-digital wireless network in Pennsylvania. As a result, Sprint will be able to increase the service quality and geographic coverage of its network. In addition, designation of Sprint as an ETC will speed the deployment of advanced wireless network facilities that support provision of both basic wireless services and higher-bandwidth and enhanced services to consumers in Pennsylvania.^{2/} As an ETC, Sprint will also offer a reduced-rate universal service package to subscribers who are eligible for Lifeline support. Sprint's service offerings are competitive with those of Verizon.

^{2/} See *Federal-State Joint Board on Universal Service, Order and Order on Reconsideration*, CC Docket No. 96-45, FCC 03-170, ¶ 13 (released July 14, 2003) ("*Definition of Universal Service Order*") ("[W]e continue to support the Commission's prior conclusion that 'our universal service policies should not inadvertently create barriers to the provision or access to advanced services, and. . . that our current universal service system does not create such barriers.' Thus, even though advanced services are not directly supported by federal universal service, '[Commission] policies do not impede the deployment of modern plant capable of providing access to advanced services.' We recognize that the network is an integrated facility that may be used to provide both supported and non-supported services.").

The Applicant, Sprint, has its principal place of business at 6200 Sprint Parkway, Overland Park, Kansas. All correspondence regarding this Application should be directed to the undersigned counsel for Sprint:

Roger C. Sherman
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(202) 585-1924

II. SPRINT SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC.

Sprint satisfies each of the elements required for ETC designation, as shown below.

A. The State Commission in Pennsylvania Has Provided an Affirmative Statement That It Lacks Authority to Designate CMRS Carriers As ETCs.

In the *Section 214(e)(6) Public Notice*, the Commission established that a carrier must demonstrate it is “not subject to the jurisdiction of a state commission” in order to petition the Commission for designation as an ETC.^{3/} Specifically, in its *Twelfth Report and Order* in the Universal Service docket, the Commission stated that where a carrier provides the Commission with an “affirmative statement” from the state commission or a court of competent jurisdiction that the state commission lacks jurisdiction to perform the designation, the Commission will consider requests filed pursuant to 214(e)(6), and has “commit[ted] to resolve, within six months of the date

^{3/} *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, Public Notice, 12 FCC Rcd 22947, 22948 (1997) (“*Section 214(e)(6) Public Notice*”), citing 47 U.S.C. § 214(e)(6).

filed at the Commission, all designation requests for non-tribal lands that are properly before us pursuant to section 214(e)(6).”^{4/}

The Pennsylvania Public Utility Commission (“Pennsylvania PUC”) has affirmatively stated that it lacks jurisdiction over ETC applications by CMRS carriers. Specifically, the Pennsylvania PUC has determined that “the Commonwealth of Pennsylvania does not exercise jurisdiction over commercial mobile radio service providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designations.”^{5/}

It is thus well settled that the Pennsylvania PUC is without authority to take action on Sprint’s ETC Application, and that the letter cited above provides the requisite “affirmative statement” in full satisfaction of Section 214(e)(6). Consequently, the FCC is the appropriate regulatory authority to consider Sprint’s Application for ETC status in Pennsylvania.

B. Sprint Provides Each of the Services Supported By the Federal High-Cost Universal Service Program.

Sprint provides all the services and functionalities supported by the federal universal service program, as set forth in Section 214(e) of the Act and Section 54.101(a) of the Commission’s rules, throughout the service area for which it seeks ETC designation in Pennsylvania.

^{4/} *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, 15 FCC Rcd 12208, 12265, ¶ 114 (2000).

^{5/} NPCR, Inc. d/b/a Nextel Partners, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania, CC Docket No. 96-45, Attachment 2 (filed Apr. 3, 2003). A copy of the Pennsylvania PUC’s letter is attached as Exhibit D.

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area. 47 U.S.C. § 214(e)(1). The Commission has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:

1. Voice-grade access to the public switched telephone network;
2. Local usage;
3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.

For purposes of ETC applications, carriers must certify that they provide each of the supported services, or where appropriate, its functional equivalent.^{6/} As shown below and in the Declaration attached as Exhibit A hereto, Sprint provides the required services throughout the area for which it seeks designation.

1. Voice-grade access to the public switched network. The Commission has concluded that voice-grade access means the ability to make and receive phone calls,

^{6/} Section 214(e)(6) Public Notice, 12 FCC Rcd at 22948 & n.5.

within a specified bandwidth and frequency range.^{7/} Sprint meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with Verizon and other local exchange carriers, all customers of Sprint are able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local usage. ETCs must include local usage beyond providing simple access to the public switched network as part of a universal service offering.^{8/} Sprint includes specified quantities of usage in each of its rate plans, at the option of the customer, and thereby complies with the requirement that all ETCs offer local usage.

3. Dual-tone multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the Commission permits carriers to provide signaling that is functionally equivalent to DTMF, such as out-of-band digital signaling, in satisfaction of this requirement.^{9/} The DTMF-emulating service offered by Sprint, like that offered by other CMRS providers, satisfies this requirement.

^{7/} *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8810-12, ¶¶ 63-64 (1997) (“*First Report and Order*”), *subsequent history omitted*.

^{8/} The Commission has rejected proposals to require unlimited local usage, and has not quantified any minimum amount of local usage required to be included in a universal service offering. In the *First Report and Order*, the Commission deferred a determination on the amount of local usage that a carrier would be required to provide. *Id.* at 8812-14, ¶¶ 65-69. The Commission later issued a Notice of Proposed Rulemaking seeking comment on how much, if any, local usage an ETC should be required to offer, *Federal-State Joint Board on Universal Service*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 13 FCC Rcd 21252, 21279-81, ¶¶ 50-53 (1998), but more recently, the Commission decided to “adopt[] the Joint Board recommendation that unlimited local usage should not be added to the list of supported services.” *Definition of Universal Service Order*, ¶ 14.

^{9/} 47 C.F.R. § 54.101(a)(3); *First Report and Order*, 12 FCC Rcd at 8814-15, ¶ 71.

4. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line (in contrast to a multi-party line).^{10/} The Commission has concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission.”^{11/} Sprint meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

5. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Sprint currently provides its subscribers with access to 911 emergency services in accord with this requirement, and consistent with Commission regulations throughout the service area for which designation is sought. Sprint also provides Enhanced 911 services, including Phase I and Phase II E-911 services, where requested by local public safety authorities ready to receive the information and where such services are supported by the local exchange carrier.

6. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.^{12/} Sprint meets this requirement by providing all of its customers with access to operator services, including customer service and call completion.

^{10/} *First Report and Order*, 12 FCC Rcd at 8810, ¶ 62.

^{11/} *Id.*

^{12/} *Id.* at 8817-18, ¶ 75.

7. Access to interexchange service. An ETC must offer consumers access to interexchange service to make and receive toll or interexchange calls.^{13/} Sprint meets this requirement by providing all of its customers with the ability to make and receive interexchange calls. Most Sprint rate plans include nationwide interexchange calling at the same rate as local calls. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

8. Access to directory assistance. The ability to place a call to directory assistance is a required service offering.^{14/} Sprint meets this requirement by providing all of its customers with access to directory assistance by dialing “411.”

9. Toll limitation for qualifying low-income consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no additional charge. 47 C.F.R. § 54.101(a)(9). Once designated as an ETC, Sprint will participate in Lifeline as required, and will provide toll control and/or toll blocking capability in satisfaction of the Commission’s requirement. Sprint currently has the technology to provide toll limitation and will utilize this technology to provide such functionality at no additional charge to Lifeline customers.

C. Sprint Offers Supported Services Over Its Own Facilities.

A carrier requesting designation must certify that it offers the supported services “either using its own facilities or a combination of its own facilities and resale of

^{13/} Equal access, however, is not required at this time. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Id.* at 8819, ¶ 78; *Definition of Universal Service Order* at ¶ 33 (“[W]e make no decision regarding equal access at this time. . . . [W]e defer consideration of this issue pending resolution of the *Portability Proceeding*.”).

^{14/} *First Report and Order*, 12 FCC Rcd at 8821, ¶ 80.

another carrier's services."^{15/} Sprint provides the supported services using its existing network infrastructure, which includes the antennas, cell-sites, towers, trunking, mobile switching, and interconnection facilities owned or leased by Sprint, used to serve PCS customers.

D. Sprint Advertises Its Universal Service Offering.

Sprint advertises the availability of the supported services and the corresponding charges in a manner that informs the general public within the designated service area of both the services available and the corresponding charges. Sprint advertises its wireless services through several different media of general distribution throughout the service areas for which designation is requested.

III. SPRINT PROVIDES SERVICE THROUGHOUT THE SERVICE AREA IN PENNSYLVANIA FOR WHICH IT REQUESTS DESIGNATION.

Sprint requests ETC designation for the service area in Pennsylvania depicted on the map attached as Exhibit B. Specifically, Sprint proposes a service area consisting of each of the Verizon wire centers in Pennsylvania in which PCS service is available over the Sprint PCS network. To the extent Sprint serves only a portion of the wire center, Sprint requests ETC designation only in that portion of the wire center where it provides service. A map of the proposed service area is attached in Exhibit B, and a list of the full and partial wire centers included in the proposed service area is provided in Exhibit C.

Pursuant to the Act, a "service area" is a "geographic area established by a state commission . . . for the purpose of determining universal service obligations and

^{15/} 47 U.S.C. § 214(e)(1)(A).

support mechanisms.” 47 U.S.C. § 214(e)(5). For service areas served by non-rural ILECs such as Verizon, there are no restrictions on how a commission defines the “service area” for purposes of designating a competitive ETC. *Id.* Therefore, the Commission may designate Sprint as an ETC for a service area consisting of the Verizon wire centers set forth herein.

IV. GRANTING THIS APPLICATION WILL SERVE THE PUBLIC INTEREST.

Sprint need not make a separate public interest showing in connection with this Application, since it is seeking designation only in areas served by Verizon, a non-rural ILEC. The Commission has specifically rejected proposals to require such a showing from carriers seeking ETC designation for areas served by non-rural ILECs, holding:

[D]esignation of an additional ETC based upon a demonstration that the requesting carrier complies with the statutory eligibility obligations of section 214(e)(1) is consistent *per se* with the public interest. The carrier need make no further showing to satisfy this requirement.^{16/}

Nonetheless, Sprint confirms that a grant of its Application *will* serve the public interest by promoting additional deployment of wireless facilities and services to the high-cost areas served by Verizon in Pennsylvania, and bringing consumers in those areas the benefits of additional competitive universal service offerings.^{17/}

^{16/} *Federal-State Joint Board on Universal Service; Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, 16 FCC Rcd 39, 45, ¶ 14 (Com. Car. Bur. 2000).

^{17/} *See, e.g., Pine Belt Cellular, Inc. and Pine Belt PCS, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 17 FCC Rcd 9589, 9595, ¶ 13 (Wireline Comp. Bur. 2002) (“*Pine Belt*”) (“[F]or those areas served by non-rural telephone companies, the designation of an additional ETC based upon a demonstration that the requesting carrier complies with the statutory eligibility obligations of section 214(e)(1) is consistent *per se*

The public interest is further served by the expeditious grant of this Application. The Commission has recognized that “excessive delay in the designation of competing providers may hinder the development of competition and the availability of service in many high-cost areas,” and therefore the Commission made a public commitment to resolve ETC petitions within six months or less after they are filed.^{18/} The Commission should abide by that commitment, and should expeditiously proceed to grant this petition. In recent ETC applications, a number of ILECs have argued, in effect, that because they dislike various aspects of the current universal service rules and have argued in the pending Joint Board proceeding that the rules be changed, therefore the Commission should ignore the existing rules and should reject or defer the applications.^{19/} The Commission must reject these arguments.^{20/} The only rules under which the Commission may lawfully operate today are those on the books today. Potential rule changes will be addressed in the Joint Board proceeding, and cannot

with the public interest.”); *Cellco Partnership d/b/a ell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 16 FCC Rcd 39, 43, ¶ 8 (Com. Car. Bur. 2000) (“[A] policy of technological neutrality will foster competition by including providers, such as wireless providers, that may otherwise have been excluded from participation in the federal universal service mechanisms.”).

^{18/} *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, 15 FCC Rcd 12208, ¶ 94 (2000).

^{19/} Notably, much of the controversy over ETC applications has concerned the “public interest” standard to be applied to applications for ETC status in *rural* ILEC study areas pursuant to 47 U.S.C. § 214(e)(2) and (6). But that controversy has no relevance to the instant petition, since Sprint is applying for designation only in *non-rural* ILEC service areas.

^{20/} In particular, the Commission must reject the unfounded contention raised in certain past ETC applications that designating competitive entrants as ETCs would undermine access charge reform. See Sprint Reply Comments, ALLTEL Communications, Inc. Petitions for Designation as an Eligible Telecommunications Carrier in Alabama and Virginia, CC Docket No. 96-45 (filed July 14, 2003).

lawfully be considered in an individual ETC designation proceeding. On this basis, the Wireline Competition Bureau has correctly granted other ETC applications notwithstanding ILEC objections. “We recognize that these parties raise important issues regarding high-cost support. We find, however, that these concerns are beyond the scope of this Order, which designates a particular carrier as an ETC.”^{21/} Thus, the Commission should proceed expeditiously to grant this Application.

V. HIGH COST CERTIFICATION.

Sprint certifies that all high-cost universal service support received in Pennsylvania will be used only for the provision, maintenance, and upgrading of services and facilities for which the support is intended. See Exhibit A, ¶ 18.

VI. ANTI-DRUG ABUSE CERTIFICATION.

Sprint certifies that no party to this petition is subject of a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, and Sections 1.2001-1.2003 of the Commission’s rules, 47 C.F.R. §§ 1.2001-1.2003. See Exhibit A, ¶ 19.

^{21/} *Cellular South License, Inc. Petition for Designation as an Eligible Telecommunications Carrier in Alabama*, 17 FCC Rcd 24393, ¶ 32 (Wireline Comp. Bur. 2002); see also *RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier in Alabama*, 17 FCC Rcd 23532, ¶ 32 (Wireline Comp. Bur. 2002).

CONCLUSION

Sprint respectfully requests that the Commission designate it as an ETC in Pennsylvania on an expedited basis.

Respectfully submitted,

SPRINT CORPORATION

By  _____

Roger C. Sherman
Senior Attorney, PCS Regulatory Affairs
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401 Ninth St., N.W., Suite 400
Washington, D.C. 20004
(202) 585-1924

September 4, 2003

Exhibit A

Declaration of Luisa L. Lancetti

Pursuant to 47 C.F.R. § 1.16, Luisa L. Lancetti declares under penalty of perjury the following:

1. My name is Luisa L. Lancetti and I serve as Vice-President, PCS Regulatory Affairs for Sprint Corporation. My business address is 401 – 9th St., N.W., Washington, D.C. 20004. I am an authorized representative of Sprint Corporation's Wireless Division, which consists of Sprint Spectrum, L.P., WirelessCo, L.P., SprintCom, Inc., Sprint PCS License, L.L.C., APC PCS, LLC, PhillieCo, L.P., and other wholly-owned and controlled affiliates (collectively, "Sprint"), with regard to Sprint's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in the Commonwealth of Pennsylvania ("Application"). I have read the foregoing Application and all information therein is true and correct to the best of my knowledge, information and belief.

2. Sprint is authorized to provide broadband personal communications service ("PCS") in Pennsylvania pursuant to Part 24 of the Commission's rules. Sprint is a common carrier, consistent with the definition in 47 U.S.C. § 153(10) and the requirements of 47 U.S.C. § 214(e)(1), and is a commercial mobile radio service provider as set forth in 47 U.S.C. § 332(c)(1).

3. Sprint intends to obtain universal service support funding in certain of the high-cost areas served by non-rural incumbent local exchange carriers ("ILECs"), specifically Verizon Pennsylvania, Inc. and Verizon North, Inc. (collectively, "Verizon"), in Pennsylvania. As required, this funding will be used only to support the provision, upgrading, and maintenance of Sprint's all-digital wireless network in Pennsylvania. As a result, Sprint will be able to increase the service quality and geographic coverage of its network. In addition, designation of Sprint as an ETC will speed the deployment of advanced wireless network facilities that support provision of both basic wireless services and higher-bandwidth and enhanced services to consumers in Pennsylvania. As an ETC, Sprint will also offer a reduced-rate universal service package to subscribers who are eligible for Lifeline support. Sprint's service offerings are competitive with those of Verizon.

4. Sprint provides all the services and functionalities supported by the federal universal service program, as set forth in Section 214(e) of the Act and Section 54.101(a) of the Commission's rules, throughout the service area for which it seeks ETC designation in Pennsylvania.

5. Voice-grade access to the public switched network. The Commission has concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth and frequency range. Sprint meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with Verizon and other local exchange carriers, all customers of Sprint are able to make and receive calls on the public switched telephone network within the specified bandwidth.

6. Local usage. ETCs must include local usage beyond providing simple access to the public switched network as part of a universal service offering. Sprint includes specified quantities of usage in each of its rate plans, at the option of the customer, and thereby complies with the requirement that all ETCs offer local usage.

7. Dual-tone multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Sprint provides signaling that is functionally equivalent to DTMF, such as out-of-band digital signaling, which satisfies this requirement.

8. Single-party service or its functional equivalent. Sprint meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

9. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Sprint currently provides its subscribers with access to 911 emergency services in accord with this requirement, and consistent with Commission regulations throughout the service area for which designation is sought. Sprint also provides Enhanced 911 services, including Phase I and Phase II E-911 services, where requested by local public safety authorities ready to receive the information and where such services are supported by the local exchange carrier.

10. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. Sprint meets this requirement by providing all of its customers with access to operator services, including customer service and call completion.

11. Access to interexchange service. Sprint meets the requirement of access to interexchange service by providing all of its customers with the ability to make and receive interexchange calls. Most Sprint rate plans include nationwide interexchange calling at the same rate as local calls. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

12. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. Sprint meets this requirement by providing all of its customers with access to directory assistance by dialing “411.”

13. Toll limitation for qualifying low-income consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no additional charge. 47 C.F.R. § 54.101(a)(9). Once designated as an ETC, Sprint will participate in Lifeline as required, and will provide toll control and/or toll blocking capability in satisfaction of the Commission’s requirement. Sprint currently has the technology to provide toll limitation and will utilize this technology to provide such functionality at no additional charge to Lifeline customers.

14. A carrier requesting designation must certify that it offers the supported services “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.” Sprint provides the supported services using its existing network

infrastructure, which includes the antennas, cell-sites, towers, trunking, mobile switching, and interconnection facilities owned or leased by Sprint, used to serve PCS customers.

15. Sprint advertises the availability of the supported services and the corresponding charges in a manner that informs the general public within the designated service area of both the services available and the corresponding charges. Sprint advertises its wireless services through several different media of general distribution throughout the service areas for which designation is requested.

16. Sprint requests ETC designation for the service area in Pennsylvania depicted on the map attached as Exhibit B. Specifically, Sprint proposes a service area consisting of each of the Verizon wire centers in Pennsylvania in which PCS service is available over the Sprint PCS network. To the extent Sprint serves only a portion of the wire center, Sprint requests ETC designation only in that portion of the wire center where it provides service. A map of the proposed service area is attached in Exhibit B, and a list of the full and partial wire centers included in the proposed service area is provided in Exhibit C.

17. A grant of Sprint's Application will serve the public interest by promoting additional deployment of wireless facilities and services to the high-cost areas served by Verizon in Pennsylvania, and bringing consumers in those areas the benefits of additional competitive universal service offerings.

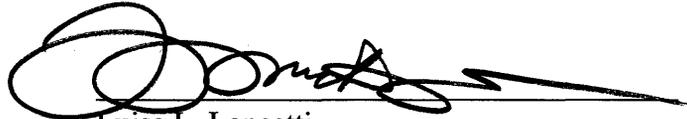
18. High-Cost Certification. Sprint certifies that all high-cost universal service support received in Pennsylvania will be used only for the provision, maintenance, and upgrading of services and facilities for which the support is intended.

19. Anti-Drug Abuse Certification. To the best of my knowledge, the applicant referred to in the foregoing Application, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) of the applicant as specified by Section 1.2002(b) of the Commission's rules, are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on September 4, 2003.

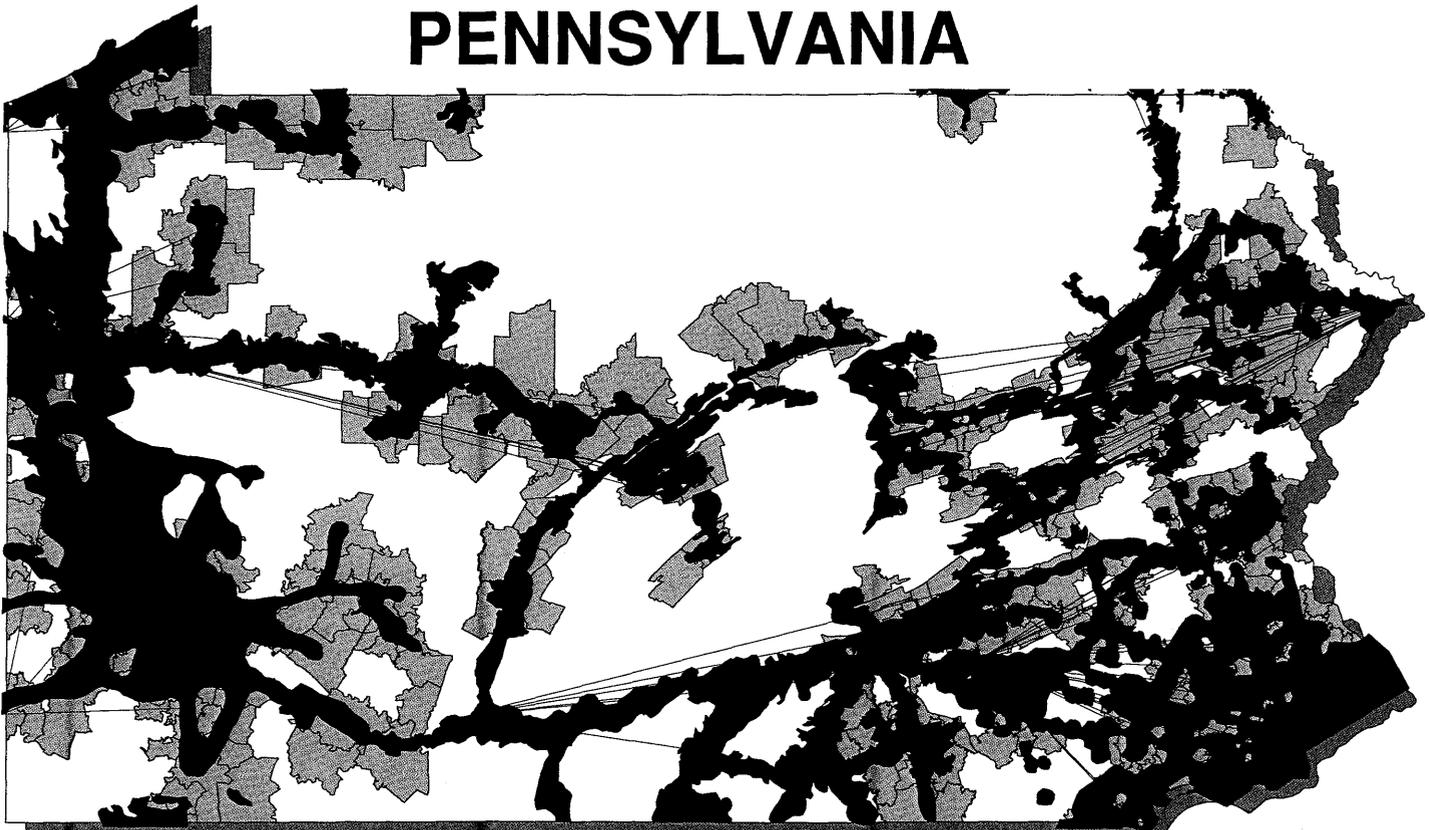
A handwritten signature in black ink, appearing to read 'Luisa L. Lancetti', written over a horizontal line.

Luisa L. Lancetti
Vice-President, PCS Regulatory Affairs
Sprint Corporation

Exhibit B

MAP OF SPRINT SERVICE AREA DEPICTING NON-RURAL
WIRE CENTERS WHERE ETC STATUS IS REQUESTED

PENNSYLVANIA



 VERIZON AND VERIZON NORTH WIRE CENTERS INTERSECTING
SPRINT PCS SERVING AREA FOR WHICH ETC STATUS IS REQUESTED

 SPRINT PCS SERVING AREA

NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested

ILEC	GLL	WIRE CENTER NAME
VERIZON NORTH INC.-PA (ID 170169)		
	BERVPAXB	BERNVILLE
	BRLNPAXB	BERLIN
	CIVLPAXC	CLINTONVILLE
	CMSPPAXC	CAMBRIDGE SPRINGS
	CNCYPAXC	CENTRAL CITY
	CRRYPAXC	CORRY
	DLBGPAXD	DILLSBURG
	DOVRPAXD	DOVER
	EBRLPAXE	EAST BERLIN
	EDNBPAXE	EDINBORO
	ERIEPAXE	ERIE EAST
	ERIEPAXM	ERIE MAIN
	ERIEPAXS	ERIE SOUTH
	ERIEPAXT	ERIE SOUTHEAST
	ERIEPAXW	ERIE WEST
	FKLNPAFX	FRANKLIN
	FRERPAXF	FAIRVIEW
	FYTWPAXF	FRYSTOWN
	GLRKPAXG	GLEN ROCK
	GRRDPAXG	GIRARD
	JHTWPAXB	BENSCREEK
	JHTWPAXG	GEISTOWN
	JHTWPAXJ	JOHNSTOWN MAIN
	JHTWPAXN	JOHNSTOWN NORTH
	JHTWPAXW	WESTMONT
	JNTWPAXJ	JONESTOWN
	MCKNPAXM	MCKEAN
	METWPAXM	MYERSTOWN
	MNCHPAXM	MANCHESTER
	NBFRPAXN	NEW BEDFORD
	NNGOPAXN	NANTY GLO
	NRTEPAXN	NORTH EAST
	NWWLPAXN	NEW WILMINGTON
	OLCYPAXO	OIL CITY
	PLSVPAXP	PLEASANTVILLE
	PRTNPAXP	PRINCETON
	RDLNPAXR	RED LION
	RKWDPAXR	ROCKWOOD
	ROBSPAXR	ROBESONIA
	SAYRPAXS	SAYRE
	SCTWPAXS	SCHAEFFERSTOWN
	SESPPAXS	SEVEN SPRINGS
	SHLVPAXS	SHELLSVILLE
	SMRTPAXS	SOMERSET
	SPGVPAXS	SPRING GROVE
	SWRDPAXS	SEWARD

NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested

ILEC	CLL	WIRE CENTER NAME
VERIZON NORTH INC.-PA (ID 170169)		
	BERVPAXB	BERNVILLE
	SWTWPAXS	STEWARTSTOWN
	TTVLPAXT	TITUSVILLE
	UNCYPAXU	UNION CITY
	VNDGPAXM	VANDERGRIFT MAIN
	VNDGPAXS	VANDERGRIFT SOUTH
	WGVLPAXW	WRIGHTSVILLE
	WMLSPAXW	WOMELSDORF
	WNDBPAXW	WINDBER
	WSLYPAXW	WESLEY
	WTBGPAXW	WATTSBURG
	WTFRPAXW	WATERFORD
	YORKPAXE	YORK EAST
	YORKPAXM	YORK MAIN
	YORKPAXN	YORK NORTH
	YORKPAXS	YORK SOUTH/LOGANVILLE
	YORKPAXW	YORK WEST
VERIZON NORTH INC.-PA (CONTEL - ID 170170)		
	EMMSPAXE	EMMAUS
	HRSHPAXH	HERSHEY
	MCNGPAXM	MACUNGIE
	MNZVPAXM	MANTZVILLE
	MSBGPAXM	MCKEANSBURG
	SHDMPAXS	SHAMOKIN DAM
	SLGVPAXS	SELINGSGROVE

Exhibit D



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

February 28, 2003

Ronald J. Jarvis
Catalano & Plache, PLLC
3221 M. Street, NW
Washington, DC 20007

Dear Mr. Jarvis;

In response to your letter request filed on February 7, 2003 as legal counsel for NPCR, Inc. d/b/a Nextel Partners ("Nextel Partners"), the Pennsylvania Public Utility Commission hereby affirmatively states that the Commonwealth of Pennsylvania does not exercise jurisdiction over commercial mobile radio service providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designations under 47 U.S.C. Section 2214(e) and 47 C.F.R. Section 54.201, *et. seq.* See 66 Pa. C.S. §102.

In particular, the Pennsylvania Public Utility Commission affirms that Nextel Partners is not subject to regulation in the Commonwealth of Pennsylvania for purposes of the foregoing determination.

Sincerely,

James J. McNulty
Secretary