

**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 State of Georgia)	
)	
)	
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 STATE OF GEORGIA**

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

September 8, 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 State of Georgia that are served by BellSouth Telecommunications Inc. (“BellSouth”), a non-rural incumbent local exchange carrier (“ILEC”), for purposes of receiving federal universal service support. As demonstrated below, Sprint satisfies the prerequisites for

^{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.

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 Georgia 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 BellSouth, a non-rural ILEC, in Georgia. As required, this funding will be used only to support the provision, upgrading, and maintenance of Sprint's all-digital wireless network in Georgia. 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 Georgia.^{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 BellSouth.

^{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
Senior Attorney, PCS Regulatory Affairs
Sprint Corporation
401 Ninth St., N.W., Suite 400
Washington, D.C. 20004
(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 Georgia 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 Georgia Public Service Commission (“Georgia PSC”) has affirmatively stated that it lacks jurisdiction over ETC applications by CMRS carriers. Specifically, the Georgia PSC has determined that it “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 214(e) and 47 C.F.R. Section 54.201 *et seq.*”^{5/}

It is thus well settled that the Georgia PSC 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 Georgia.

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 Georgia.

^{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/} Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Georgia, CC Docket No. 96-45, Exhibit B (filed Aug. 26, 2003). A copy of the Georgia PSC’s letter is attached to this Application 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 BellSouth 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 GEORGIA FOR WHICH IT REQUESTS DESIGNATION.

Sprint requests ETC designation for the service area in Georgia depicted on the map attached as Exhibit B. Specifically, Sprint proposes a service area consisting of each of the BellSouth wire centers in Georgia 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 support mechanisms.” 47 U.S.C. § 214(e)(5). For service areas served by non-rural

^{15/} 47 U.S.C. § 214(e)(1)(A).

ILECs such as BellSouth, 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 BellSouth 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 BellSouth, 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 BellSouth in Georgia, and bringing consumers in those areas the benefits of additional competitive universal service offerings.^{17/}

^{16/} *Federal-State Joint Board on Universal Service; Celco 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* with the public interest.”); *Celco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 16 FCC Rcd 39,

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 lawfully be considered in an individual ETC designation proceeding. On this basis, the

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).

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 Georgia 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 Georgia on an expedited basis.

Respectfully submitted,

SPRINT CORPORATION

By: 

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

September 8, 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 State of Georgia ("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 Georgia 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 BellSouth Telecommunications, Inc. ("BellSouth"), a non-rural incumbent local exchange carrier ("ILEC"), in Georgia. As required, this funding will be used only to support the provision, upgrading, and maintenance of Sprint's all-digital wireless network in Georgia. 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 Georgia. 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 BellSouth.

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 Georgia.

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 BellSouth 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 Georgia depicted on the map attached as Exhibit B. Specifically, Sprint proposes a service area consisting of each of the BellSouth wire centers in Georgia 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 BellSouth in Georgia, 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 Georgia 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.

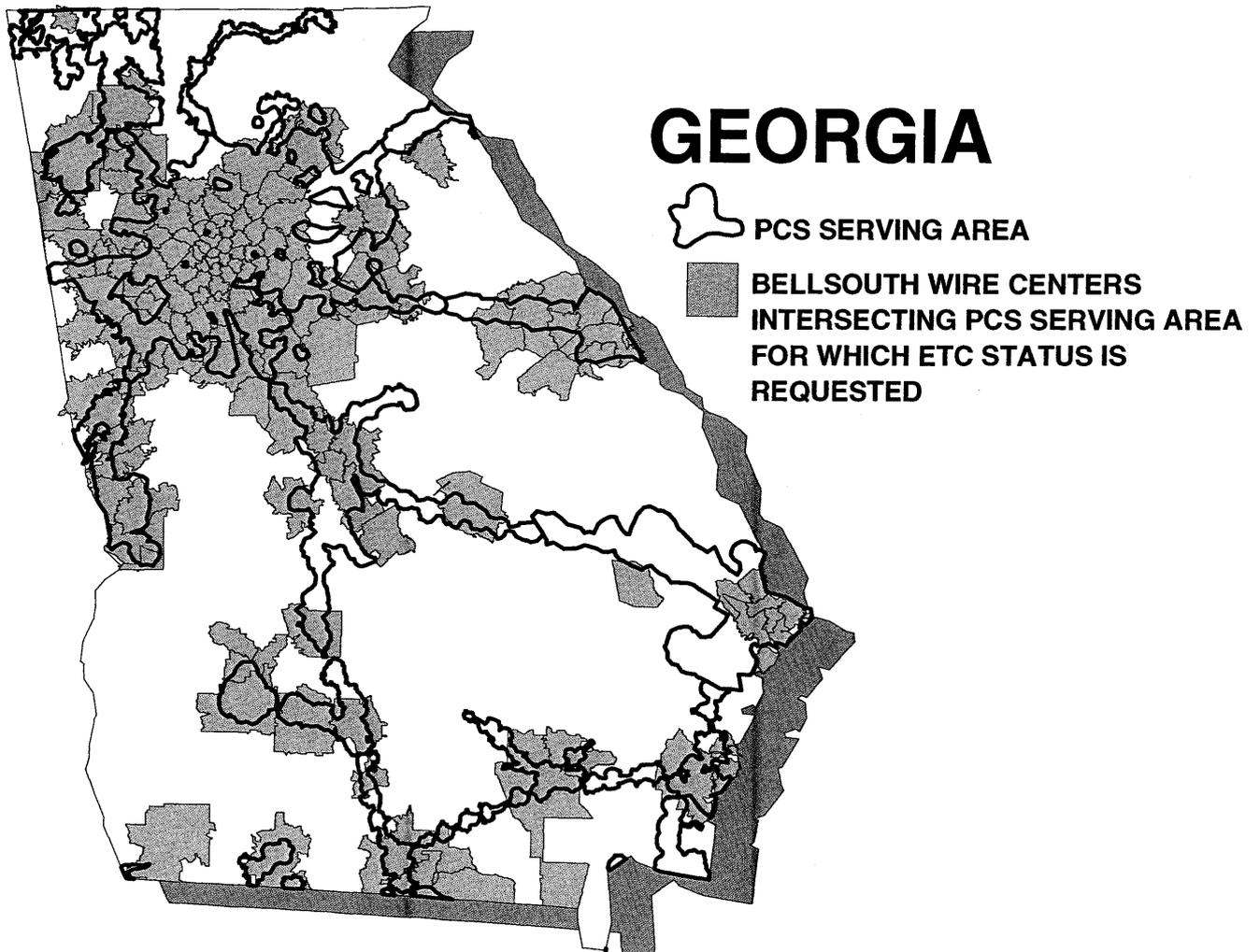
Executed on September 8, 2003.

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



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

ILEC	CLLI	WIRE CENTER NAME
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		
ACWOGAMA		ACWORTH MAIN
AGSTGAU		AUGUSTA MARTINEZ
AGSTGAF		AUGUSTA FLEMING
AGSTGAMT		AUGUSTA MAIN
AGSTGATH		AUGUSTA THE HILL
AIVLGAMA		ADAIRSVILLE MAIN
ALBYGAMA		ALBANY MAIN
ALPRGAMA		ALPHARETTA MAIN
APNGGAES		APPLING MAIN
ASTLGAMA		AUSTELL
ATHNGAMA		ATHENS MAIN
ATLNGAAD		ADAMSVILLE
ATLNGABH		BEN HILL
ATLNGABU		BUCKHEAD
ATLNGACD		COLUMBIA DRIVE
ATLNGACS		COURTLAND STREET
ATLNGAEL		EAST LAKE
ATLNGAEP		EAST POINT
ATLNGAFP		FOREST PARK
ATLNGAGR		GRESHAM
ATLNGAHR		HOLLYWOOD RD
ATLNGAIC		INDIAN CREEK
ATLNGALA		LAKESWOOD
ATLNGAPP		PEACHTREE PLACE
ATLNGASS		SANDY SPRINGS
ATLNGATH		TOCO HILL
ATLNGAWD		WOODLAND
ATLNGAWE		WEST END
BCHNGAES		BUCHANAN MAIN
BGRTGAMA		BOGART MAIN
BLCSGAES		BLACKSHEAR MAIN
BNBRGAMA		BAINBRIDGE
BRMNGAES		BREMEN MAIN
BRVIGAMA		BARNESVILLE MAIN
BRWKGAMA		BRUNSWICK MAIN
BUFRGABH		BUFORD ESS
BWDNGAMA		BOWDON MAIN
CCHRGAMA		COCHRAN MAIN
CDTWGAMA		CEDARTOWN MAIN
CHMBGAMA		CHAMBLEE MAIN
CLHNGAES		CALHOUN MAIN
CLMBGABV		COLUMBUS BARKER VILLA
CLMBGAMT		COLUMBUS MAIN
CLMBGAMW		COLUMBUS MEADOWOOD
CLMTGAMA		CLERMONT
CMNGGAMA		CUMMING MAIN
CNYRGAMA		CONYERS MAIN
CORDGAMA		CORDELE MAIN

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

ILEC	CLLI	WIRE CENTER NAME
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		
	ACWOGAMA	ACWORTH MAIN
	CRTNGAMA	CARROLLTON MAIN
	CRVLGAMA	CARTERSVILLE MAIN
	CSSTGAMA	CUSSETA MAIN
	CVSPGAMA	CAVE SPRING MAIN
	CVTNGAMT	COVINGTON MAIN
	CXTNGAMA	CLAXTON MAIN
	DBLNGAMA	DUBLIN MAIN
	DGVLGAMA	DOUGLASVILLE MAIN
	DLLSGAES	DALLAS ESS
	DLTHGAHS	DULUTH ESS
	DNWDGAMA	DUNWOODY
	FLBRGAMA	FLOWERY BRANCH MAIN
	FRBNGAEB	FAIRBURN ESS
	FRSYGAMA	FORSYTH
	FTVYGAMA	FORT VALLEY MAIN
	FYVLGASG	FAYETTEVILLE ESS
	GNBOGAES	GREENSBORO MAIN
	GRFNGAMA	GRIFFIN MAIN
	GSVLGAMA	GAINESVILLE MAIN
	GTVLGAMA	GRANTVILLE MAIN
	HGVLGAMA	HOGANSVILLE MAIN
	HMPNGAJW	HAMPTON ESS
	HMTNGAMA	HAMILTON MAIN
	HPHZGAES	HEPHZIBAH MAIN
	HRLMGAMA	HARLEM MAIN
	JCSNGAMA	JACKSON MAIN
	JKISGAMA	JEKYLL ISLAND MAIN
	JNBOGAMA	JONESBORO
	KGTNGAMA	KINGSTON MAIN
	LGRNGAMA	LAGRANGE MAIN
	LGVLGACS	LOGANVILLE ESS
	LKPKGAMA	LAKE PARK MAIN
	LLBNGAMA	LILBURN
	LRVLGAOS	LAWRENCEVILLE
	LSBGGAMA	LEESBURG MAIN
	LTHNGAJS	LITHONIA ESS
	LTVLGACS	LUTHERSVILLE MAIN
	LULAGAMA	LULA MAIN
	MACNGAGP	MACON GUY PAINE
	MACNGAMT	MACON MAIN
	MACNGAVN	MACON VINEVILLE
	MCDNGAGS	MCDONOUGH DMS
	MDSNGAMA	MADISON MAIN
	MNTIGAMA	MONTICELLO MAIN
	MRRWGAMA	MORROW
	MRTTGAEA	MARIETTA EAST
	MRTTGAMA	MARIETTA MAIN

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

ILEC	CLLI	WIRE CENTER NAME
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		
	ACWOGAMA	ACWORTH MAIN
	NRCRGAMA	NORCROSS
	NWNGGAMA	NEWNAN MAIN
	PANLGAMA	PANOLA ROAD
	PLMTGAMA	PALMETTO ESS
	PNMTGAMA	PINE MOUNTAIN MAIN
	POLRGAMA	POOLER MAIN
	PTCYGAMA	PEACHTREE CITY
	PWSPGAAS	POWDER SPRINGS ESS
	ROMEGATL	ROME EAST
	RPVLGAMA	ROOPVILLE MAIN
	RSWLGAMA	ROSWELL MAIN
	RTLGGAMA	RUTLEDGE MAIN
	RVDLGAMA	RIVERDALE
	RYTNGAMA	ROYSTONE MAIN
	SCCRGAMA	SOCIAL CIRCLE MAIN
	SENOGAMA	SENOIA MAIN
	SMVLGAMA	SMITHVILLE MAIN
	SMYRGAMA	SMYRNA
	SMYRGAPF	POWERS FERRY
	SNLVGAMA	SNELLVILLE
	SNMTGALR	STONE MOUNTAIN
	SPRKGAMA	SPARKS MAIN
	SSISGAES	ST. SIMONS MAIN
	STBRGANH	STOCKBRIDGE ESS
	SVNHGABS	SAV. BULL STREET
	SVNHGADE	SAV. DERENNE
	SVNHGAGC	SAV. GARDEN CITY
	SVNHGASI	SKIDWAY ISLAND MAIN
	SVNHGAWB	SAV. WHITE BLUFF
	SVNHGAWI	SAV. WILMINGTON ISLAN
	SYLVGAES	SYLVESTER MAIN
	TBISGAMA	TYBEE ISLAND MAIN
	TFTNGAMA	TIFTON
	THSNGAMA	THOMSON MAIN
	THVLGAMA	THOMASVILLE MAIN
	TLLPGAES	TALLAPOOSA MAIN
	TMPLGAMA	TEMPLE MAIN
	TUKRGAMA	TUCKER
	VLDGAMA	VALDOSTA MAIN
	VLRCGAES	VILLA RICA MAIN
	WDSTGACR	WOODSTOCK ESS
	WRNSGAMA	WRENS MAIN
	WRRBGAMA	WARNER ROBINS MAIN
	WRTNGAMA	WARRENTON MAIN
	WTVLGAES	WATKINSVILLE MAIN
	WYCRGAMA	WAYCROSS MAIN

Exhibit D

COMMISSIONERS:

ROBERT B. BAKER, JR., CHAIRMAN
DAVID L. BURGESS
H. DOUG EVERETT
ANGELA E. SPEIR
STAN WISE

DERORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

REECE McALMISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 658-4501
(800) 252-5813

244 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334-5701

FAX: (404) 854-2249
www.psc.state.ga.us

July 2, 2003

To Whom It May Concern:

In response to a letter filed on April 30, 2003, by ALLTEL Communications, Inc., Georgia RSA #12 Partnership and Georgia RSA #8 Partnership, the Georgia Public Service Commission hereby affirmatively states that the State of Georgia 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 214(e) and 47 C.F.R. Section 54.201 *et seq.*

In particular, the Georgia Public Service Commission affirms that ALLTEL Communications, Inc., Georgia RSA #12 Partnership and Georgia RSA #8 Partnership is not subject to jurisdiction of the State of Georgia for purposes of the foregoing determination.

Sincerely,



Robert B. Baker, Jr., Chairman
Georgia Public Service Commission

cc: **David L. Burgess, Commissioner, GPSC**
H. Doug Everett, Commissioner, GPSC
Angela B. Speir, Commissioner, GPSC
Stan Wise, Commissioner, GPSC
Tom Bond, Director Utilities Division, GPSC
Leon Bowles, Director Telecommunications, GPSC

Kristy Holley, CUC

Richard B. Moreland
Government Affairs
ALLTEL Communications
13560 Morris Road
One ALLTEL Center
Alpharetta, GA 30004