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January 23, 2004

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-B204  
Washington, DC 20554

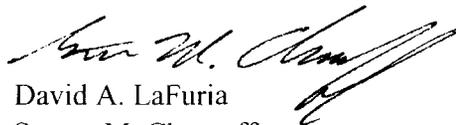
**Re: CC Docket No. 96-45  
Highland Cellular, Inc.  
Petition for Designation as an ETC in the Commonwealth of Virginia**

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 CFR Section 1.1206, we hereby provide you with notice of a written *ex parte* presentation in connection with the above-captioned proceeding. On Friday, January 23, 2004, on behalf of Highland Cellular, Inc. we sent a letter with attachments to Thomas Buckley, Wireline Competition Bureau. The letter was sent in response to Mr. Buckley's request for information.

If you have any questions or require any additional information, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria  
Steven M. Chernoff  
Counsel for Highland Cellular, Inc.

Enclosures  
cc: Thomas Buckley, Esq.

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WRITER'S DIRECT DIAL

January 23, 2004

Via Electronic Mail

Thomas Buckley, Esq.  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 6-C316  
Washington, DC 20554

Re: CC Docket No. 96-45  
Highland Cellular, Inc.  
Petition for Designation as an ETC in the Commonwealth of Virginia

Dear Mr. Buckley:

We write to follow up on your request for additional information regarding Highland's January 14, 2003, submission into the record which detailed the population density of wire centers served by Sprint/United Telephone Company Southeast ("UTC") and Verizon South, Inc. In response to your inquiry, we have reexamined our data sources and herein submit a revised population density chart for the record.<sup>1</sup>

Highland's initial submission purported to show the square miles, population, and population density for each of the wire centers served by UTC and Verizon South in Virginia. To prepare this submission, an engineer employed by Highland's Washington counsel utilized the Exchange Plus program developed by MapInfo Corporation. This program allows the user to simultaneously query an ILEC's exchange and the U.S. Census Bureau's 2000 population database to generate information such as population density or the area of a particular exchange or wire center.

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<sup>1</sup> At the time of the original submission, UTC was listed in USAC's high-cost filings as United Inter-Mountain Telephone. Accordingly, the revised chart also lists the company under its former name.

Thomas Buckley, Esq.  
January 23, 2004  
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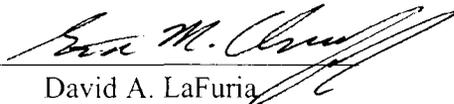
In response to your telephone inquiry noting a large discrepancy between Highland's reported UTC population figures and the number of lines reported by UTC to USAC, we worked with engineering staff to check the figures and confirmed that an error had been committed during the process of calculating UTC population figures and translating them into chart form. In the revised chart, the total population for UTC's Virginia study area based on Census 2000 data is 200,229. No revision is necessary for the Verizon South figures, which we believe to be accurate.

In the revised chart, Highland has taken the additional step of shading in gray each of the wire centers that are at least partially covered by Highland's proposed ETC service area. As reflected in the revised figures, Highland's proposed ETC service area fully or partially covers UTC wire centers that are significantly lower in population density than UTC's statewide average. While some of the Verizon South wire centers covered are higher-density areas, others are below average and, therefore, Highland is not proposing to serve only the lower-cost, higher-density wire centers.<sup>2</sup> Since Highland has proposed to serve throughout its entire licensed service area, it is clear that the company is not attempting to cream skim. This analysis demonstrates that Highland will not receive uneconomic support if it is designated throughout its licensed service area. In fact, it is likely that Highland will receive less than it would if UTC disaggregated support below the wire-center level to more accurately target support to the highest-cost and lowest-density areas.

We trust that you will find this information to be useful and appreciate your efforts in analyzing this submission. Should you have any questions or require any additional information, please contact undersigned counsel directly.

Respectfully submitted,

Highland Cellular, Inc.

By: 

David A. LaFuria  
Steven M. Chernoff  
Its Attorneys

Enclosure

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<sup>2</sup> See *Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket 96-45, FCC 03-338 at ¶ 34 (rel. Jan. 22, 2004).

<u>Company Name</u>	<u>Wirecenter Code</u>	<u>Locality</u>	<u>Area (Sq. Mi.)</u>	<u>Population</u>	<u>Population Density</u>
UNITED INTER-MOUNTAIN TELEPHONE	ABNGVAXA	ABINGDON	225.35	24,755	109.85
UNITED INTER-MOUNTAIN TELEPHONE	ATVLVAXA	AUSTINVL	24.23	2,243	92.57
UNITED INTER-MOUNTAIN TELEPHONE	BLNDVAXA	BLAND	114.66	2,795	24.38
UNITED INTER-MOUNTAIN TELEPHONE	BRSTVAXA	BRISTOL	221.15	30,023	135.76
UNITED INTER-MOUNTAIN TELEPHONE	CANAVAXA	CANA	57.19	4,657	81.43
UNITED INTER-MOUNTAIN TELEPHONE	CERSVAXA	CERES	79.24	994	12.54
UNITED INTER-MOUNTAIN TELEPHONE	CHLHVAXA	CHILHOWIE	29.16	4,729	162.19
UNITED INTER-MOUNTAIN TELEPHONE	CMRKVAXA	CMSRKELCRK	79.39	2,154	27.13
UNITED INTER-MOUNTAIN TELEPHONE	CRCKVAXA	CRIPPLECRK	60.81	1,585	26.06
UNITED INTER-MOUNTAIN TELEPHONE	DMSCVAXA	DAMASCUS	59.95	3,782	63.09
UNITED INTER-MOUNTAIN TELEPHONE	FRISVAXA	FRIES	32.34	2,946	91.11
UNITED INTER-MOUNTAIN TELEPHONE	GALXVAXA	GALAX	185.16	20,802	112.34
UNITED INTER-MOUNTAIN TELEPHONE	GDSPVAXA	GLADE SPG	64.26	4,727	73.56
UNITED INTER-MOUNTAIN TELEPHONE	GTCYVAXA	GATE CITY	113.96	10,298	90.37
UNITED INTER-MOUNTAIN TELEPHONE	HLVLVAXA	HILLSVILLE	175.13	10,219	58.35
UNITED INTER-MOUNTAIN TELEPHONE	INDPVAXA	INDEPNDCNCE	240.27	8,047	33.49
UNITED INTER-MOUNTAIN TELEPHONE	KNRKVAXA	KONNAROCK	170.36	7,406	43.47
UNITED INTER-MOUNTAIN TELEPHONE	LRFKVAXA	LAURELFORK	56.76	1,778	31.32
UNITED INTER-MOUNTAIN TELEPHONE	MARNVAXA	MARION	159.02	15,998	100.61
UNITED INTER-MOUNTAIN TELEPHONE	MDVWVAXA	MEADOWVIEW	61.43	6,207	101.05
UNITED INTER-MOUNTAIN TELEPHONE	MTWLVAXA	MOUTHWILSN	41.39	1,119	27.04
UNITED INTER-MOUNTAIN TELEPHONE	MXMDVAXA	MAXMEADOWS	103.37	3,640	35.21
UNITED INTER-MOUNTAIN TELEPHONE	RCVYVAXA	RICHVALLEY	83.60	1,563	18.70
UNITED INTER-MOUNTAIN TELEPHONE	RRRTVAXA	RURALRTRET	23.36	2,744	117.47
UNITED INTER-MOUNTAIN TELEPHONE	SGGVVAXA	SUGARGROVE	46.53	1,334	28.67
UNITED INTER-MOUNTAIN TELEPHONE	SLVLVAXA	SALTVILLE	127.54	6,259	49.07
UNITED INTER-MOUNTAIN TELEPHONE	SYLVVAXA	SYLVATUS	54.08	2,873	53.12
UNITED INTER-MOUNTAIN TELEPHONE	WYVLVAXA	WYTHEVILLE	187.90	14,552	77.44

Total population: **200,229** Avg. density: **67.05**

VERIZON SOUTH INC.-VA	RCGPVAXA	ROCKY GAP	67.94	1,227	18.06
VERIZON SOUTH INC.-VA	BLFDVAXA	BLUEFIELD	93.45	9,421	100.82
VERIZON SOUTH INC.-VA	HRLYVAXA	HURLEY	62.29	2,605	41.82
VERIZON SOUTH INC.-VA	DWGHVAXA	DWIGHT	80.15	3,672	45.81
VERIZON SOUTH INC.-VA	GRNDVAXB	GRUNDY	55.46	4,061	73.22
VERIZON SOUTH INC.-VA	BGRKVAXA	BIG ROCK	35.42	1,986	56.06
VERIZON SOUTH INC.-VA	MAXIVAXA	MAXIE	43.25	2,790	64.51
VERIZON SOUTH INC.-VA	BGPRVAXA	BIG PRATER	55.89	3,953	70.73
VERIZON SOUTH INC.-VA	JWRGVAXA	JEWELL RDG	73.49	1,593	21.68
VERIZON SOUTH INC.-VA	OKWDVAXA	OAKWOOD	58.58	3,692	63.03
VERIZON SOUTH INC.-VA	RCLDVAXA	RICHLANDS	117.20	16,761	143.01
VERIZON SOUTH INC.-VA	PCHNVAXA	POCAHONTAS	30.48	3,045	99.90
VERIZON SOUTH INC.-VA	TZWLVAXA	TAZEWELL	131.39	12,901	98.19

Total population: **67,707** Avg. density: **68.99**

(Wire centers fully or partially covered  
by requested ETC service area  
are shaded in gray)