

TO: Jeff Steinberg

FR: Mark Rubin, Western Wireless Corp.

RE: Response to Questions Posed on January 16, 2004, by WTB in Docket 00-239

DT: February 20, 2004

1. Describe the terms and features of Western Wireless' BUS offering at this time. In particular, indicate whether there have been any changes to the following in the record: \$14.99 per month for unlimited local calling, with an expanded home calling area to provide customer savings on toll charges for calls to neighboring communities. Using the wireless access unit, a BUS subscriber can make calls in portions of eastern Kansas without incurring roaming charges, and in other areas of the country while incurring roaming charges. Roaming charges apply to BUS calls made outside the home calling area.

RESPONSE: The company's BUS service offering has not changed since its initial offering, as reflected in the filing made on July 24, 2000 with the Kansas Corporation Commission in Western Wireless ETC proceeding. A copy of the original filing is attached as Exhibit A.

2. Does the BUS terminal currently being used to provide the BUS offering have the same characteristics as the Telular terminal described in Western Wireless' filings in WT Docket No. 00-239?

RESPONSE: The Telular unit described in the company's filings in this docket is an analog AMPS device. The company also now uses digital TDMA and CDMA BUS terminals, also manufactured by Telular, to provide the BUS service offering in Kansas. In addition to the differences between analog and digital characteristics, the digital TDMA terminal does not include data jacks for peripheral devices such as computers and faxes. Both the AMPS and CDMA devices include data jacks. Specification sheets for the three Telular devices are attached as Exhibits B, C, and D.

3. How many subscribers for which Western Wireless is receiving universal service funds are currently served using the BUS terminal in Kansas? Are there other universal service fund BUS subscribers in Kansas who use other types of equipment? If so, how many? Are there Western Wireless cellular subscribers in Kansas for which Western Wireless is receiving universal service funds that are not BUS subscribers? If so, how many? For each category, indicate how many subscribers are located in rural service

areas and how many in non rural service areas of Kansas, as designated by universal service rules.

RESPONSE: Western Wireless has 1,709 BUS customers and 43,090 “non-BUS” customers. These customers are located in both rural and non-rural telephone company areas where Western Wireless is designated as an ETC in Kansas. Western Wireless receives universal service funding for its BUS and non-BUS subscribers. At the present time, all BUS subscribers use one of the Telular devices identified in response to question #2, but the Company is continuously evaluating new types of customer equipment for use by its subscribers, including differing types of BUS customer equipment, such as handheld phones. In the end, customers decide what type of equipment best serves their needs, whether that is the Telular units, handheld phones, AMPs “bag” phones, CDMA power boosters, laptop computers with voice/ data cards, or PDAs.

4. With regard to each category of universal service fund lines discussed above, detail the kind and amount of universal service funds being received by Western Wireless in Kansas. For each category, indicate separately the amount and kind of universal service funds being received by Western Wireless for subscribers located in rural service areas and in non rural service areas of Kansas, as designated by universal service rules.

RESPONSE: USAC does not provide detailed information that enables the Company to identify the amount of universal service funds received based upon the type of equipment used by its customers. Western Wireless does not separately report to USAC its BUS and non-BUS customers. Because all customers are considered cellular customers, the Company does not distinguish these customers in any way in terms of customer service, technical support, or USAC reporting. For all of its customers, both BUS and non-BUS, Western Wireless receives the following in federal universal service support:

Federal USF Type	Amount*
High-Cost Loop	\$96,955.00
Local Switching	\$46,006.00
Long Term Support	\$23,682.00
ICLS	\$77,839.00
IAS	\$5,677.00
Safety Net Additive	\$609.00
LifeLine	\$3,136.00

* Amount is based upon most recent USAC payment invoice for November 2003.

5. Are there any general guidelines Western Wireless uses to determine when to provide universal service offerings using the BUS terminal and when to use traditional cellular telephones?

RESPONSE: The customer in ETC designated areas is free to choose between the BUS service offering and other mobile cellular service offerings. It is important to note that Western Wireless provides its customers with a choice of service offerings with a choice of equipment types. It is up to the customer to choose the best offering and equipment type to meet its needs. Some customers choose the BUS service offering with unlimited local usage, a \$14.99 rate plan, and a smaller local calling area, whereas other customers choose a different cellular service offering with a preset number of minutes, varying rates, and local, regional, or national calling areas.

It should also be noted that Western Wireless also offers its customers high-speed data service offerings where customers can use their laptop computers or other data devices to access our network. A customer chooses the type of customer equipment, e.g., data device, BUS terminal, or handheld phone, that best meets their communications needs.

Conclusion.

Western Wireless' responses to these questions continue to support the FCC's original decision "that BUS is properly classified as CMRS for two independently sufficient reasons: (1) it meets the definition of 'mobile' service under the statute and the Commission's rules, and (2) it is ancillary, auxiliary, or incidental to Western Wireless' provision of traditional cellular service." See MO&O (17 FCC Rcd 14802 (2002)) at para. 15; See generally MO&O at para. 24.