

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
PETITION OF AT&T WIRELESS SERVICES, INC. For Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act, FCC 97-419)	File No. DA-999

SUPPLEMENT TO PETITION OF AT&T WIRELESS SERVICES, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF ALABAMA

To: Chief, Wireline Competition Bureau

I. INTRODUCTION AND SUMMARY

AT&T Wireless Services, Inc., for itself and on behalf of its subsidiary licensees, AirCom PCS, Inc., Tritel C/F Holding Corp., Tritel A/B Holding Corp., AT&T Wireless PCS, LLC, and QuinCom, Inc. (collectively, "AWS"), respectfully supplements its previously filed Petition for designation as an additional federal eligible telecommunications carrier ("ETC") in requested service areas in the State of Alabama. This submission supplements AWS's petition with additional information and commitments in light of the Commission's recent memorandum opinion and order in *Virginia Cellular*,¹ and is filed in accordance with the Commission's Public

¹ *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion and Order, FCC 03-338 (rel. Jan. 22, 2004) ("*Virginia Cellular*").

Notice inviting ETC applicants to update their petitions in response to the *Virginia Cellular* Order.² Because the Petition as supplemented fully complies with the requirements of 47 U.S.C. § 214, and is consistent with the Commission's decision in *Virginia Cellular*, AWS' Petition should be granted.³

II. BACKGROUND/THE *VIRGINIA CELLULAR* DECISION

On December 29, 2003, AWS filed with the Commission its Petition for ETC designation in requested service areas in the State of Alabama. Subsequently, the Commission released its memorandum opinion and order in *Virginia Cellular*. Therein, the Commission "conclude[d] the value of increased competition, by itself, is not sufficient to satisfy the public interest test in rural areas."⁴ Instead, the Commission set forth a five-part balancing test to determine whether designation of a competitive ETC in rural telephone companies' service areas is in the public interest.⁵ These five factors include: "the benefits of increased competitive choice, the impact of multiple designation on the universal service fund, the unique advantages and disadvantages of the competitor's service offering, any commitments made regarding quality of telephone service provided by competing providers, and the competitive ETC's ability to provide the supported services throughout the designated service area within a reasonable time frame."⁶

² See **PUBLIC NOTICE**, *Parties are Invited to Update the Record Pertaining to Pending Petitions for Eligible Telecommunications Carrier Designations*, CC Docket No. 96-45, DA 04-999 (rel. April 12, 2004).

³ On March 18, 2004, AWS and Cingular Corporation filed a series of applications with the FCC seeking approval for the proposed transfer of control of AWS, along with interests in affiliates and other entities in which AWS holds substantial interests, to Cingular. The FCC is considering these applications in WT Docket No. 04-70 and placed the applications on public notice on April 2, 2004.

⁴ *Virginia Cellular*, ¶ 4.

⁵ *Id.*

⁶ *Id.* ¶ 28.

III. AMENDMENT TO REMOVE CERTAIN AREAS FROM PETITION

AWS understands the Commission's concern that an ETC be able to provide service throughout the area in which it is designated. In light of *Virginia Cellular*, AWS has carefully reviewed its requested service areas, and has removed a significant number of rural company study areas and non-rural wire centers from its request. Attachment 1 hereto is a revised list of areas that continue to be included in the Petition. Attachment 1 replaces Exhibit C to AWS' original Petition.

AWS' action to limit its designation addresses the Commission's concerns expressed in *Virginia Cellular*, as AWS believes it will immediately be able to provide service to the vast majority of potential customers included in the revised list of service areas without relying on significant future build out such as that promised by Virginia Cellular. This should obviate any concern regarding whether AWS can meet its service obligations as an ETC and eliminate any concerns regarding "cream-skimming." As discussed below, AWS will continue to upgrade and expand its network within its designated areas. As its network extends into areas not covered by this Petition AWS reserves the right to file a new petition to include those areas within its designation.

IV. AWS' DESIGNATION AS AN ETC IN THE REQUESTED SERVICE AREAS WOULD SERVE THE PUBLIC INTEREST

AWS' Petition asserted that designating AWS as an ETC serves the public interest pursuant to Section 214(e)(6). In *Virginia Cellular* the Commission modified its public interest analysis in areas served by rural telephone companies and also discussed public interest considerations in non-rural telephone company areas. In light of *Virginia Cellular*, AWS: 1) reiterates its statement of public interest in its Petition; 2) asserts that the public interest benefits described in the Petition would apply equally to both rural and non-rural telephone company

areas; and 3) undertakes additional commitments that the Commission found serve the public interest. Based on this record and these commitments, the Commission should grant AWS' Petition as requested.

A. The Benefits of Increased Competitive Choice and the Unique Advantages of AWS' Service Offering

Two factors considered by the Commission in *Virginia Cellular* are the benefits of increased competitive choice and the unique advantages of the carrier's service offerings.⁷ Benefits and advantages of wireless ETCs acknowledged by the Commission include service to customers who do not have access to a wire-line telephone, mobility, and an increase in the size of local calling area.⁸ AWS' proposed service offering provides these and other benefits and advantages. As detailed in its Petition, AWS' proposed service offering will benefit rural customers in Alabama who may not have access to wire-line telephones, will provide the multiple benefits of mobility, and will include a local calling area larger than those of the incumbent local exchange carriers.⁹ Other benefits and advantages of AWS' proposed service include state of the art network facilities, reduced long distance rates, competitive pricing, and advanced features, such as voice-mail, caller-ID, call-waiting, and call-forwarding.¹⁰ Extending these benefits and advantages of AWS' service within the designated Alabama service areas is in the public interest.

AWS is an industry leader in deploying state-of-the-art network facilities that provide both basic and advanced services to customers in Alabama and elsewhere. In the past two years

⁷ *Virginia Cellular*, ¶ 28.

⁸ *Id.*, ¶ 29.

⁹ Petition, pp. 14-16.

¹⁰ *Id.*

alone, AWS has invested more than \$10 billion to optimize its wireless network, including the development of network infrastructure for the provision of next generation voice and data services. With the implementation its new EDGE technology, AWS has more than tripled the speed of its GPRS wireless data network, making it nearly twice the speed of any other national wireless network. These unique benefits of AWS' service will be advanced by granting AWS Petition.¹¹

B. The Impact of AWS' Designation on the Universal Service Fund

Another *Virginia Cellular* factor is the impact of a carrier's ETC designation on the Universal Service Fund ("USF").¹² If the Commission grants AWS' petition, AWS estimates that it would be eligible to receive approximately \$240,000 per quarter in USF high-cost support per year in the requested service areas in Alabama. This estimate represents approximately .02% of the total USF high-cost support available to all ETCs.¹³ Like *Virginia Cellular*, the grant of AWS' ETC petition would have minimal impact on the USF.

Further, AWS will utilize revenues it receives from the USF to improve its network facilities and infrastructure. In 2004, for example, AWS estimates it will make capital expenditures in Alabama, including the requested services areas, that will amount to many times what it could receive in universal service support. This ensures that AWS' proposed use of

¹¹ See *In The Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Order and Order on Reconsideration*, FCC 03-170, ¶ 13 (rel. July 14, 2003) ("[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.").

¹² *Virginia Cellular*, ¶ 31.

¹³ See *Virginia Cellular*, ¶ 31, n.96.

federal USF support is consistent with the purpose of the USF and serves the public interest. As such, any impact that AWS' designation has on the USF is more than offset by AWS' commitment to use the support to improve and expand service and coverage in Alabama. AWS will also commit to submitting records and documentation on an annual basis detailing its progress towards meeting its build-out plans in the service areas it is designated as an ETC.¹⁴

C. AWS' Commitment to Service Quality

The next factor in *Virginia Cellular* is the carrier's commitments regarding quality of telephone service.¹⁵ The Commission has acknowledged that a carrier's adoption of the CTIA Code of Conduct for Wireless Service evidences a commitment to quality service which advances the public interest.¹⁶ AWS already has adopted the CTIA Code and is committed to compliance with CTIA Code in areas where it is seeking designation as an ETC. Furthermore, AWS exceeds the 14-day "no-risk" trial period set forth in the CTIA Code by providing the only 30-day trial period in the wireless industry. AWS's adoption of the Code demonstrates its commitment to service quality.

The Commission also observed that *Virginia Cellular's* commitment to provide the Commission with the number of consumer complaints per 1,000 handsets on an annual basis also promoted the quality of service.¹⁷ AWS will provide the Commission with aggregated FCC complaint data on a company-wide basis (per 1000 handsets), and Alabama-specific information to the extent it is available.

¹⁴ *Virginia Cellular*, ¶ 46.

¹⁵ *Virginia Cellular*, ¶ 28.

¹⁶ *Id.* ¶ 30.

¹⁷ *Id.*

Consistent with its commitment to providing high quality services, AWS has pursued an ongoing company initiative to increase GSM coverage and allow customers to eliminate roaming charges. In the past twelve months, AWS has added or improved 15,000 cell sites nationwide, including those added through roaming agreements with other carriers. With these new hardware and software upgrades, customers with compatible devices can use the 850-megahertz band, which generates a stronger signal, increasing reception and coverage.

D. AWS' Commitment to Quality Emergency Services

AWS has also made a substantial commitment to providing and maintaining essential telecommunications services in times of emergency. The Company's goal is to build a reliable, sustainable and robust wireless network. AWS designs extensive redundancy into its mobile switching centers (MSCs), including duplication of vital hardware. MSCs are equipped with automatic alarm notification systems for fire protection, extreme temperatures and intrusions. If damage does occur, the network is flexible enough to be quickly reconfigured to bypass damaged equipment.

From a readiness standpoint, there are several key contingency plans in place to respond to outages. For example, to protect against power failure, AWS has backup battery power plants located at Data Centers, MSCs and cell sites. Back-up generators are also located at all Data Centers, MSCs and critical cell sites to provide back-up power and/or recharge onsite batteries. A mobile fleet of more than 600 trailer-mounted generators can be also deployed as needed. All Data Centers, MSCs, and cell sites are alarmed with power-fail alarms and are monitored 24 hours per day by the Company's Data Center Operations group and Wireless Network Control Center (WNCC). To ensure adequate transmission facilities, AWS uses a combination of T-spans, coaxial cable, fiber optics and microwave links for transmission between cell sites and

MSCs. The Company's use of dedicated lines for landline links means they will not be affected by heavy non-wireless traffic during emergencies. In addition, AWS can deploy mobile cell sites (*i.e.*, cell-on-wheels, or COWs) consisting of base station radios, on-board power generation, a tower structure and antennas to replace or augment wireless services to a location where service has been lost or requires enhancement.

Further augmenting AWS' network capabilities is the fact that within wireless networks the coverage areas of two cell sites may overlap. Thus, when one cell site experiences an outage a customer can still be served by another operating cell site in that area. While not available in all areas, this feature of wireless networks adds internal redundancy at the cell level in many cases. AWS also has extensive "in-market" roaming agreements with other compatible wireless carriers, meaning that if a customer's AWS service is interrupted, the customer is allowed to roam onto another carrier's wireless network and receive seamless service even if a portion of AWS' network is affected by an outage. Even more important and beneficial to the customer, however, the Commission's rules require that a 911 call be accepted by any compatible wireless carrier without regard to customer validation. Thus, an AWS customer placing a 911 call may receive service even when there is an AWS network outage, and other wireless carriers' customers may make 911 calls over the AWS network when the situation is reversed.

E. AWS' Commitment to Service Extension

In *Virginia Cellular*, the Commission accepted the carrier's specific commitments concerning service extension requests.¹⁸ Likewise, AWS commits to implement the following procedures to provide reasonable service to requesting customers in the service areas where it is designated as an ETC in Alabama.

¹⁸ *Virginia Cellular*, ¶ 15.

If a request is made by a potential customer within its existing network, AWS will provide service immediately using its standard customer equipment or equipment selected by the customer.

If a potential customer is within AWS' designated service area but outside its existing network coverage, AWS will take the following steps to attempt to provide service:

1. Determine whether the requesting customer's equipment can be modified or replaced to provide the service;
2. Determine whether a roof-mounted antenna or other equipment can be deployed to provide service;
3. Determine whether adjustments can be made to the nearest cell tower to provide service;
4. Determine whether there are any other adjustments that can be made to network or customer facilities to provide service;
5. Determine whether AWS can offer resold services from another carrier's facilities to provide service; and
6. Determine whether an additional cell site, cell extender, or repeater can be employed or can be constructed to provide service.

After taking the above six steps, if AWS still cannot provide the requested service, it will notify the requesting party. AWS will also file an annual report with the Commission and USAC by October 1 of each year quantifying unfulfilled service requests. The Commission will retain jurisdiction to resolve any customer complaints that AWS has refused to provide service upon reasonable request.

AWS' commitments to reasonable service extension requests will promote the public interest and supports the grant of its Petition

V. CONCLUSION

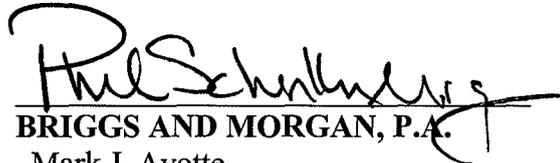
AWS respectfully requests that the Commission grant its Petition and designate it as a federal ETC in each of the requested service areas in the State of Alabama.

Dated: May 11, 2004

Respectfully submitted,

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*ATTORNEYS FOR AT&T WIRELESS
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ATTACHMENT 1

AWS' REQUESTED ETC SERVICE AREAS

SAC	Company Name	WC_Code	Exchange	Study Area?
250298	Gulf Tel Co	BNSCALXA	Bon Secour	Y
250298	Gulf Tel Co	FOLYALXB	Foley	Y
250298	Gulf Tel Co	FTMRALXA	Fort Morgan	Y
250298	Gulf Tel Co	GLSHALXA	Gulf Shores	Y
250298	Gulf Tel Co	GLSHALXB	Gulf Shores	Y
250298	Gulf Tel Co	MRLWALXA	Marlow	Y
250298	Gulf Tel Co	ORBHALXA	Orange Beach	Y
250298	Gulf Tel Co	ORBHALXC	Orange Beach	Y
250298	Gulf Tel Co	ORBHALXD	Orange Beach	Y
250298	Gulf Tel Co	RBDLALXB	Robertsdale	Y
250298	Gulf Tel Co	FTMRALXB	Fort Morgan	Y
250298	Gulf Tel Co	FOLYALXA	Foley	Y
250298	Gulf Tel Co	LXLYALXA	Loxley	Y
250298	Gulf Tel Co	RBDLALXA	Robertsdale	Y
250298	Gulf Tel Co	SRDLALXA	Summerdale	Y
250298	Gulf Tel Co	MGSPALXA	Magnolia Springs	Y
250298	Gulf Tel Co	LLLNALXA	Lillian	Y
250298	Gulf Tel Co	SMNLALXA	Seminole	Y
250298	Gulf Tel Co	ELBTALXA	Elberta	Y
250298	Gulf Tel Co	LXLYALXB	Loxley	Y
250298	Gulf Tel Co	SMNLALXB	Seminole	Y
250298	Gulf Tel Co	ELBTALXB	Elberta	Y
250298	Gulf Tel Co	LLLNALXB	Lillian	Y
255181	BELLSOUTH - AL	BRHMALEL	BIRMINGHAM-EAST LAKE	N
255181	BELLSOUTH - AL	BRHMALFS	BIRMINGHAM-FIVE POINTS SOUTH	N
255181	BELLSOUTH - AL	BRHMALHW	BIRMINGHAM-HOMEWOOD	N
255181	BELLSOUTH - AL	BRHMALMT	BIRMINGHAM-MAIN & TOLL	N
255181	BELLSOUTH - AL	BRHMALOX	BIRMINGHAM-OXMOOR	N
255181	BELLSOUTH - AL	BRHMALRC	BIRMINGHAM-RIVERCHASE	N
255181	BELLSOUTH - AL	BRHMALVA	BIRMINGHAM-VALLEY	N
255181	BELLSOUTH - AL	BRHMALWE	BIRMINGHAM-WEST END	N
255181	BELLSOUTH - AL	BRHMALWL	BIRMINGHAM-WOODLAWN	N
255181	BELLSOUTH - AL	FRHPALMA	FAIRHOPE	N
255181	BELLSOUTH - AL	HNVIALRW	HUNTSVILLE RESEARCH WEST	N
255181	BELLSOUTH - AL	MOBLALAZ	MOBILE-AZALEA	N
255181	BELLSOUTH - AL	MOBLALOS	MOBILE-OLD SHELL	N
255181	BELLSOUTH - AL	MOBLALPR	MOBILE-PRICHARD	N
255181	BELLSOUTH - AL	MOBLALSH	MOBILE-SPRING HILL	N
255181	BELLSOUTH - AL	BRHMALOM	BIRMINGHAM-OAK MOUNTAIN	N
255181	BELLSOUTH - AL	BRHMALCP	BIRMINGHAM-CENTERPOINT	N
255181	BELLSOUTH - AL	MOBLALSK	MOBILE-SKYLINE	N
255181	BELLSOUTH - AL	ANTNALLE	ANNISTON-LENLOCK	N
255181	BELLSOUTH - AL	BRHMALCH	BIRMINGHAM-CAHABA HEIGHTS	N
255181	BELLSOUTH - AL	HNVIALUN	HUNTSVILLE-UNIVERSITY	N
255181	BELLSOUTH - AL	HNVIALMT	HUNTSVILLE-MAIN&TOLL	N
255181	BELLSOUTH - AL	HNVIALRA	HUNTSVILLE-REDSTONE ARSENAL	N
255181	BELLSOUTH - AL	MOBLALTH	MOBILE-THEODORE	N
255181	BELLSOUTH - AL	BRHMALTA	BIRMINGHAM-TARRANT	N
255181	BELLSOUTH - AL	BRHMALFO	BIRMINGHAM-FORESTDALE	N
255181	BELLSOUTH - AL	ANTNALOX	ANNISTON-OXFORD	N
255181	BELLSOUTH - AL	BRHMALEW	BIRMINGHAM-EASTWOOD	N

SAC	Company Name	WC_Code	Exchange	Study Area?
255181	BELLSOUTH - AL	DCTRALMT	DECATUR-MAIN&TOLL	N
255181	BELLSOUTH - AL	MDSNALNM	MADISON-MAIN	N
255181	BELLSOUTH - AL	MOBLALSF	MOBILE-SPANISH FORT	N
255181	BELLSOUTH - AL	GDSDALRD	GADSDEN-RAINBOW DRIVE	N
255181	BELLSOUTH - AL	HNVIALLW	HUNTSVILLE-LAKEWOOD	N
255181	BELLSOUTH - AL	MOBLALAP	MOBILE-AIRPORT	N
255181	BELLSOUTH - AL	ALBSALMA	ALABASTER	N
255181	BELLSOUTH - AL	MOBLALSE	MOBILE-SEMMES	N
255181	BELLSOUTH - AL	BRHMALEN	BIRMINGHAM-ENSLEY	N
255181	BELLSOUTH - AL	MTGMALMT	MONTGOMERY-MAIN&TOLL	N
255181	BELLSOUTH - AL	MOBLALBF	MOBILE BAYFRONT	N
255181	BELLSOUTH - AL	AUBNALMA	AUBURN-MAIN&TOLL	N
255181	BELLSOUTH - AL	BLFNALMA	BELLE FONTAINE	N
255181	BELLSOUTH - AL	HNVIALPW	HUNTSVILLE-PARKWAY	N
255181	BELLSOUTH - AL	ATTLALNM	ATTALLA-MAIN	N
255181	BELLSOUTH - AL	CHLSALMA	CHELSEA	N
255181	BELLSOUTH - AL	MOBLALSA	MOBILE-SARALAND	N
255181	BELLSOUTH - AL	EUTWALBO	EUTAW-BOLIGEE	N
255181	BELLSOUTH - AL	GDSDALMT	GADSDEN-MAIN&TOLL	N
255181	BELLSOUTH - AL	BSMRALMA	BESSEMER-MAIN	N
255181	BELLSOUTH - AL	MTGMALMB	MONTGOMERY-MILLBROOK	N
255181	BELLSOUTH - AL	MTGMALDA	MONTGOMERY-DALRAIDA	N
255181	BELLSOUTH - AL	CALRALMA	CALERA	N
255181	BELLSOUTH - AL	GTVLALNM	GUNTERSVILLE-MAIN	N
255181	BELLSOUTH - AL	ALVLALMA	ALBERTVILLE-MAIN	N
255181	BELLSOUTH - AL	BRPTALMA	BRIDGEPORT-MAIN	N
255181	BELLSOUTH - AL	TSCALMT	TUSCALOOSA-MAIN&TOLL	N
255181	BELLSOUTH - AL	ANTNALMT	ANNISTON-MAIN&TOLL	N
255181	BELLSOUTH - AL	BSMRALBU	BESSEMER-BUCKSVILLE	N
255181	BELLSOUTH - AL	ATHNALMA	ATHENS-MAIN	N
255181	BELLSOUTH - AL	CRLDALMA	COURTLAND	N
255181	BELLSOUTH - AL	SHFDALMT	SHEFFIELD-MAIN&TOLL	N
255181	BELLSOUTH - AL	GRDLALNM	GARDENDALE	N
255181	BELLSOUTH - AL	HRTSALNM	HARTSELLE-MAIN	N
255181	BELLSOUTH - AL	MTGMALNO	MONTGOMERY-NORMANDALE	N
255181	BELLSOUTH - AL	ATHNALER	ATHENS-ELK RIVER	N
255181	BELLSOUTH - AL	PNSNALMA	PINSON	N
255181	BELLSOUTH - AL	FTPYALMA	FORT PAYNE-MAIN	N
255181	BELLSOUTH - AL	UNTWALNM	UNIONTOWN	N
255181	BELLSOUTH - AL	RRVLALMA	ROGERSVILLE	N
255181	BELLSOUTH - AL	BOAZALMA	BOAZ-MAIN	N
255181	BELLSOUTH - AL	GDSDALHS	GADSDEN-HILLSIDE	N
255181	BELLSOUTH - AL	HZGRALMA	HAZEL GREEN-MAIN	N
255181	BELLSOUTH - AL	MNFDALMA	MUNFORD-MAIN	N
255181	BELLSOUTH - AL	TSCALDH	TUSCALOOSA-DRUID HILLS	N
255181	BELLSOUTH - AL	WRRRALNM	WARRIOR	N
255181	BELLSOUTH - AL	JCVLALMA	JACKSONVILLE-MAIN	N
255181	BELLSOUTH - AL	WTMPALMA	WETUMPKA	N
255181	BELLSOUTH - AL	LGTNALMA	LEIGHTON	N
255181	BELLSOUTH - AL	MCINALMA	MCINTOSH	N
255181	BELLSOUTH - AL	GYVLALNM	GRAYSVILLE	N

SAC	Company Name	WC_Code	Exchange	Study Area?
255181	BELLSOUTH - AL	CLMNALMA	CULLMAN-MAIN	N
255181	BELLSOUTH - AL	VNCNALMA	VINCENT	N
255181	BELLSOUTH - AL	CHBGALMA	CHILDERSBURG	N
255181	BELLSOUTH - AL	KLLNALMA	KILLEN	N
255181	BELLSOUTH - AL	CTRNALNM	CITRONELLE	N
255181	BELLSOUTH - AL	BYMNALMA	BAY MINETTE	N
255181	BELLSOUTH - AL	MTVRALMA	MT VERNON	N
255181	BELLSOUTH - AL	DMPLALMA	DEMOPOLIS	N
255181	BELLSOUTH - AL	GRLYALMA	GURLEY-MAIN	N
255181	BELLSOUTH - AL	FTDPALMA	FORT DEPOSIT	N
255181	BELLSOUTH - AL	TSKGALMA	TUSKEGEE	N
255181	BELLSOUTH - AL	OPLKALMT	OPELIKA	N
255181	BELLSOUTH - AL	LVTNALMA	LIVINGSTON	N
259788	CENTURYTEL - AL	SCBOALXA	SCOTTSBORO	N
259788	CENTURYTEL - AL	GRGNALXA	GEORGIANA	N
259788	CENTURYTEL - AL	BRNDALXA	BRUNDIDGE	N
259789	CENTURYTEL - AL	IRSEALXA	IRVINGTON	N
259789	CENTURYTEL - AL	TSVLALXA	TRUSSVILLE	N
259789	CENTURYTEL - AL	BLBTALXA	BAYOU LA BATRE	N
259789	CENTURYTEL - AL	LNCLALXA	LINCOLN	N
259789	CENTURYTEL - AL	FWRVALXA	FOWL RIVER	N
259789	CENTURYTEL - AL	VYHDALXA	VALLEY HEAD	N
259789	CENTURYTEL - AL	DPISALXA	DAUPHIN ISLAND	N
259789	CENTURYTEL - AL	GDBAALXA	GRAND BAY	N
259789	CENTURYTEL - AL	FLVLALXA	FALKVILLE	N
259789	CENTURYTEL - AL	PLCYALXA	PELL CITY	N
259789	CENTURYTEL - AL	THRSALXA	THORSBY	N
259789	CENTURYTEL - AL	LECTALXA	LECTA	N

CERTIFICATE OF SERVICE

I, Philip R. Schenkenberg, do hereby certify that I have on this 11th day of May, 2004 served a true and correct copy of the foregoing SUPPLEMENT TO PETITION OF AT&T WIRELESS SERVICES, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF ALABAMA on the following:

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