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June 14, 2004

VIA ELECTRONIC FILING

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

Attn: Wireline Competition Bureau

**Re: Guam Cellular and Paging, Inc. d/b/a Saipancell
Petition for Designation as an Eligible Telecommunications
Carrier on the Islands of Saipan, Tinian and Rota in the
Commonwealth of the Northern Mariana Islands
CC Docket No. 96-45**

Dear Madam Secretary:

Guam Cellular and Paging, Inc. d/b/a Saipancell ("Saipancell") hereby amends its above-referenced petition for ETC status in the Commonwealth of the Northern Mariana Islands ("CNMI")¹ to provide information requested by the Commission, through its Wireline Competition Bureau ("WCB"), in addition to the information provided in Saipancell's amendment dated March 9, 2004 ("March 9 Amendment").

In its March 9 Amendment, Saipancell set forth a number of commitments it would make as an ETC, in response to a request from Bureau staff for a supplemental filing consistent with the Commission's *Virginia Cellular* decision.² These commitments included, *inter alia*, a

¹ Guam Cellular and Paging, Inc. d/b/a Saipancell, Petition for Designation as an Eligible Telecommunications Carrier on the Islands of Saipan, Tinian, and Rota in the Commonwealth of Northern Mariana Islands, CC Docket No. 96-45 (filed Feb. 19, 2002)("Petition"). Amendments to the Petition were filed on April 15, 2002, May 8, 2002, October 15, 2002, January 22, 2003, February 10, 2003, and March 9, 2004.

² *Virginia Cellular, LLC*, 19 FCC Rcd 1563 (2004), *recon. pending* ("*Virginia Cellular*").

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statement that, in the event Saipancell's petition is granted, "Saipancell plans to construct three to five new cell sites on the island of Rota, and one to two sites on the island of Tinian." March 9 Amendment at p. 5. In addition, Saipancell stated that it would "examine on an ongoing basis whether additional 'fill-in' facilities need to be constructed to reach unserved subscribers." *Id.* Saipancell noted that, in the absence of a specific request for service, general consumer demand often shifts which can cause a planned cell site to be relocated. *Id.* at pp. 4-5. Finally, Saipancell committed to "provide the Commission with information on how high-cost support funds are used so that any changes in construction plans can be properly explained." *Id.* at p. 5.

Saipancell recently received a follow-up request from Bureau staff for detailed information regarding the nature and location of the proposed facilities that were referred to in the March 9 Amendment. Saipancell therefore provides a chart attached as Exhibit A hereto for the Bureau's consideration in this matter.

We trust that you will find this information to be useful. Should you have any questions or require any additional information, please contact undersigned counsel directly.

Respectfully submitted,

GUAM CELLULAR AND PAGING, INC.
D/B/A SAIPANCELL

By: _____/s/_____
David A. LaFuria
Steven M. Chernoff
Its Counsel

cc: Thomas Buckley, Esq.
Lawrence W. Katz, Esq.

Guam Cellular and Paging, Inc. d/b/a Saipancell
Construction Plans Related To Petition for ETC Status in CNMI
June 14, 2004

Location	Type of Facility	Estimated Cost
Tinian	Rooftop antenna on Tinian Dynasty hotel	\$75,000 initial outlay plus \$20,000 per month in backhaul costs*
Tinian	Full tower	\$500,000 initial outlay plus \$20,000 per month in backhaul costs
Rota	Building-mounted antenna	\$70,000 initial outlay** plus \$20,000 per month in backhaul costs
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Estimated total population that would be served by proposed sites:

Tinian: 2,000
Rota: 5,000

* The only backhaul facility available in the area is among the most expensive in the world, providing connectivity at a rate of approximately \$100 per mile. Accordingly, backhaul is the most expensive component of cellular coverage in Tinian and Rota.

** This estimated construction cost assumes the availability of collocation.