

**COMMISSIONERS**  
MARC SPITZER - Chairman  
WILLIAM A. MUNDELL  
JEFF HATCH-MILLER  
MIKE GLEASON  
KRISTIN K. MAYES



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JUL 6 2004  
BRIAN C. McNEIL  
FCC - MAILROOM  
Executive Secretary

**ARIZONA CORPORATION COMMISSION**

June 30, 2004

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Ms. Lisa Zaina, President  
Universal Service Administration company  
2000 L Street, N.W.  
Washington, D.C. 20037

Re: CC Docket 96-45, USF Certification as Required by 47 C.F.R. § 54.313

Ms. Dortch and Ms. Zaina:

On February 13, 2004, the Arizona Corporation Commission ("ACC") granted the petition of Sprint Spectrum L.P. ("Sprint") for ETC designation in Decision No. 66787, a copy of which is attached for your information.

Pursuant to 47 C.F.R § 54.313 a duly authorized representative of Sprint filed an Affidavit (copy attached) with the ACC certifying that the federal high-cost support funds it received will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Based upon this Affidavit, and the representations contained therein, the ACC certifies Sprint's compliance with 47 C.F.R. § 54.313(a). This certification applies only for support provided in calendar year 2004.

If you have any questions regarding this letter, please contact Richard Boyles at [rboyles@cc.state.az.us](mailto:rboyles@cc.state.az.us) or at (602) 364-0336.

Sincerely,

Ernest G. Johnson  
Director  
Utilities Division

EGJ:RLB:MAS

Enclosures

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

Page 2

cc: Eric S. Heath, Attorney  
Sprint Law & External Affairs Dept.  
100 Spear Street, Suite 930  
San Francisco, CA 94105

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BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER  
Chairman  
WILLIAM A. MUNDELL  
Commissioner  
JEFF HATCH-MILLER  
Commissioner  
MIKE GLEASON  
Commissioner  
KRISTIN K. MAYES  
Commissioner

Arizona Corporation Commission  
**DOCKETED**  
FEB 13 2004

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**RECEIVED**  
FEB 13 2004

ARIZONA CORPORATION COMMISSION  
DIRECTOR OF UTILITIES

IN THE MATTER OF THE APPLICATION ) DOCKET NO. T-04206A-03-0675  
OF SPRINT SPECTRUM L.P. DBA SPRINT )  
FOR DESIGNATION AS AN ELIGIBLE ) DECISION NO. 66787  
TELECOMMUNICATIONS CARRIER ) ORDER  
UNDER 47 U.S.C. 214(e)(2) )

Open Meeting  
February 10 and 11, 2004  
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

**I. Procedural History**

1. On September 15, 2003, Sprint Spectrum L.P. d/b/a Sprint ("Sprint" or "the Company") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to 47 U.S.C. § 214(e)(2).
2. In its Application, Sprint indicated that it is licensed to provide wireless service throughout Arizona, including the following areas: the Phoenix and Tucson metropolitan areas, Flagstaff, Prescott, and Yuma. Sprint requests that the Arizona Corporation Commission ("Commission") designate it as an ETC for that portion of its licensed service area which overlaps Qwest's service territory, so that it will be eligible to receive federal universal service funds.
3. No parties intervened in this docket.

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...

1 **II. Background**

2 4. Sprint is a telecommunications corporation as defined in A.R.S. § 40-201. Sprint is  
3 a Commercial Mobile Radio Service ("CMRS") provider as defined in 47 C.F.R. 20.3<sup>1</sup> and the  
4 Company provides telecommunications services as defined in 47 U.S.C. § 157(45). The  
5 Company's Federal Communications Commission ("FCC") licensed wireless service area includes  
6 the following areas: the Phoenix and Tucson metropolitan areas, Flagstaff, Prescott, and Yuma.

7 5. Sprint is seeking ETC designation in the portions of its licensed service area which  
8 overlap Qwest's service territory. Sprint is not seeking ETC designation in any areas served by  
9 rural ILECs within the State of Arizona, but only within areas served by Arizona's non-rural  
10 ILEC, Qwest. Exhibit A is a map showing Sprint's ETC requested area. Designation as an ETC  
11 will enable Sprint to apply for and receive monies from the Federal Universal Service Fund  
12 ("FUSF").

13 **III. Requirements for Designation as an ETC**

14 6. The requirements for designation of ETCs are specified by 47 U.S.C. § 214(e)(1).  
15 It states that:

16 "A common carrier designated as an eligible telecommunications carrier  
17 under paragraph (2) or (3) shall be eligible to receive universal service  
18 support in accordance with section 254 and shall throughout the service area  
19 for which the designation is received - (A) offer the services that are  
20 supported by Federal universal service support mechanisms under section  
21 254(c), either using its own facilities or a combination of its own facilities  
22 and resale of another carrier's services (including the services offered by  
23 another eligible telecommunications carrier); and (B) advertise the  
24 availability of such services and the corresponding charges using media of  
25 general distribution."

26  
27 7. The Telecommunications Act of 1996 ("1996 Act") defines "service area" as a  
28 geographic area established by a State commission for the purpose of determining universal  
service obligations and support mechanisms. See Section IV C below.

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<sup>1</sup> Commercial Mobile Radio Service is defined as a "mobile service that is: (a)(1) provided for profit, i.e. with the intent of receiving compensation or monetary gain; (2) An interconnected service; and (3) Available to the public, or to such class of eligible users as to be effectively available to a substantial portion of the public."

1           8.     47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to  
2 receive Federal universal service fund support. The services include:

- 3           a.     Voice Grade Access to the Public Switched Network. "Voice grade access" is  
4 defined as a functionality that enables a user of telecommunications services to  
5 transmit voice communications, including signaling the network that the caller  
6 wishes to place a call, and to receive voice communications, including receiving a  
7 signal indicating there is an incoming call. For purposes of this Part, bandwidth for  
8 voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- 9           b.     Local usage. "Local usage" means an amount of minutes of use of exchange  
10 service, prescribed by the Commission<sup>2</sup>, provided free of charge to end users;
- 11           c.     Dual Tone Multi-Frequency Signaling of its Functional Equivalent. "Dual tone  
12 multi-frequency" ("DTMF") is a method of signaling that facilitates the  
13 transportation of signaling through the network, shortening call set-up time;
- 14           d.     Single-party service or its functional equivalent. "Single-party service" is a  
15 telecommunications service that permits users to have exclusive use of a wireline  
16 subscriber loop or access line for each call placed, or, in the case of wireless  
17 telecommunications carriers, which use spectrum shared among users to provide  
18 service, a dedicated message path for the length of a user's particular transmission;
- 19           e.     Access to Emergency Services. "Access to emergency services" includes access to  
20 services, such as 911 and enhanced 911, provided by local governments or other  
21 public safety organizations. 911 is defined as a service that permits a  
22 telecommunications user, by dialing the three-digit code "911", to call emergency  
23 services through a Public Service Access Point ("PSAP") operated by the local  
24 government. "Enhanced 911" is defined as 911 service that includes the ability to  
25 provide automatic numbering information ("ANI"), which enables the PSAP to call  
26 back if the call is disconnected, and automatic location information ("ALI"), which  
27 permits emergency service providers to identify the geographic location of the  
28 calling party. "Access to emergency services" includes access to 911 and enhanced  
29 911 services to the extent the local government in an eligible carrier's service area  
30 has implemented 911 or enhanced 911 systems;
- 31           f.     Access to Operator Services. "Access to operator services" is defined as access to  
32 any automatic or live assistance to a consumer to arrange for billing or completion,  
33 or both, of a telephone call;
- 34           g.     Access to Interexchange Service. "Access to interexchange service" is defined as  
35 the use of the loop, as well as that portion of the switch that is paid for by the end  
36 user, or the functional equivalent of these network elements in the case of a wireless  
37 carrier, necessary to access an interexchange carrier's network;
- 38           h.     Access to Directory Assistance. "Access to directory assistance" is defined as

---

<sup>2</sup> FCC.

1 access to a service that includes, but is not limited to, making available to  
2 customers, upon request, information contained in directory listings; and

3 i. Toll Limitation for Qualifying Low-Income Consumers. Toll limitation for  
4 qualifying low-income consumers is described in Subpart E<sup>3</sup> of this part.

5 9. In order to be designated as an ETC, a carrier must also offer Lifeline and Link Up  
6 service to all qualifying low-income consumers within its service area.<sup>4</sup> Lifeline service provides  
7 basic telephone service with discounts on monthly telecommunications charges. Link Up service  
8 provides financial assistance to help cover the installation charges for telecommunications service.

8 **IV. Sprint's Compliance with the Requirements for ETC Designation**

9 **A. Offering the Services Designated for Support**

10 10. Sprint states that it currently offers the services designated for support by the  
11 Federal universal support mechanisms under 47 U.S.C. § 51.101(a) which include the following:

- 12 a. Voice grade access to the public switched network.  
13 b. Local usage.  
14 c. Dual tone, multi-frequency signaling or its functional equivalent.  
15 d. Single party service or its functional equivalent.  
16 e. Access to emergency services.  
17 f. Access to operator services.  
18 g. Access to interexchange service.  
19 h. Access to directory service.  
20 i. Toll limitation for qualifying low-income consumers.

21 11. Sprint intends to provide digital wireless service in the proposed ETC coverage area  
22 to subscribers taking service under its plans.

23 12. In its First Report and Order in CC Docket 96-45, the FCC found that any  
24 telecommunications carrier using any technology, including wireless technology, is eligible to  
25 receive universal service support if it meets the criteria under 47 U.S.C. § 214(e)(1). The FCC  
26 found that "wholesale exclusion of a class of carriers by the Commission would be inconsistent  
27 with the language of the statute and the pro-competitive goals of the 1996 Act."<sup>5</sup> The FCC has

28 <sup>3</sup> "Toll limitation" denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications that are capable of providing both services, "toll limitation" denotes both toll blocking and toll control. 47 C.F.R. §54.400 (d).

<sup>4</sup> 47 C.F.R. §§ 54.405 and 54.411(a).

<sup>5</sup> *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket 96-45, Report and Order, (Released May 8, 1997), para. 145.

1 reaffirmed these findings in both its Seventh Report and Order and in its Ninth Report and Order  
2 and Eighteenth Order on Reconsideration on Universal Service, CC Docket No. 96-45, finding that  
3 "federal universal service high-cost support should be made available to all eligible  
4 telecommunications carriers that provide the supported services, including wireless carriers,  
5 regardless of the technology used."

6 13. Sprint states that it will offer the supported services (including the nine services  
7 listed above and Lifeline and Link Up services) using its own facilities. Therefore, Staff  
8 recommends that the Commission find that Sprint meets this requirement for ETC designation in  
9 the portions of its ETC requested area that are served by Qwest, a non-rural ILEC.

10 **B. Advertising of Supported Services**

11 14. Sprint states that it advertises the availability of its supported services (which  
12 include all nine services listed above) and the corresponding charges using media of general  
13 distribution as required by 47 U.S.C. § 214(e)(1)(B).

14 15. Therefore, Staff recommends that the Commission find that Sprint also meets this  
15 ETC designation criteria in its ETC requested area.

16 **C. Universal Service Support Area**

17 17. The Commission must establish a geographic area for the purpose of determining  
18 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §  
19 214(e)(2); 47 C.F.R. § 54.201(b).

20 18. For wire centers served by non-rural ILECs, no analysis with respect to redefinition  
21 of a LEC service area is required. Therefore, since Sprint is only requesting ETC designation for  
22 wire centers served by Qwest, a non-rural ILEC, no redefinition analysis is required.

23 19. Exhibit B contains a listing of the non-rural wire centers served by Qwest which  
24 Sprint serves and for which Sprint is seeking ETC designation. For certain wire centers within  
25 Qwest's service area, Sprint is requesting that it receive ETC designation for partial wire centers  
26 since Sprint is only licensed to provide wireless service to portions of these wire centers. Exhibit  
27 B contains a listing of whole and partial wire centers for which it requests ETC designation.

28 ...

1 **V. Staff Recommendation**

2 20. Consistent with prior ETC Orders of the Commission, Staff recommends Sprint's  
3 Application for designation as an ETC be granted subject to the following conditions:

- 4 a. Sprint shall make available Lifeline and Link Up services to qualifying low-income  
5 applicants in its ETC service area no later than 90 days after a Commission  
6 Decision. Sprint shall send a letter to the Utilities Division Director to provide  
7 notification of the commencement date for the services.
- 8 b. Sprint shall file an informational tariff with the Commission, setting forth the rates,  
9 terms and conditions for its general services (including, but not limited to, its Life  
10 Line and Link Up service) and other services for which it receives FUSF support in  
11 the areas approved herein within thirty (30) days of an Order in this matter. On an  
12 ongoing basis Sprint shall comply with ARS 40-367 in amending its tariffs.
- 13 c. Sprint shall be required to file with its informational tariff service area maps of the  
14 areas for which it is granted ETC status by the Commission within thirty (30) days  
15 of an Order in this matter.
- 16 d. Sprint shall be required to provide service quality data, and other information as  
17 may be required by the Commission. Sprint shall provide such data within the  
18 timeframe given in Staff's request to Sprint.
- 19 e. Sprint shall submit any consumer complaints that may arise from its ETC service  
20 offerings to the Commission's Consumer Service Division, provide a regulatory  
21 contact, and comply with the provisions of the Commission's customer service and  
22 termination of service rules.
- 23 f. Sprint shall submit its advertising plan for Lifeline and Link Up services to Staff for  
24 review prior to commencing service.
- 25 g. Sprint shall be required to submit to an audit of its expenditures of its universal  
26 service funds upon a request by Commission Staff.
- 27 h. Sprint shall submit to the Commission an affidavit<sup>6</sup> that all federal high-cost  
28 support for its ETC service area will only be used for the provision, maintenance,  
and upgrading of facilities and services for which the support is intended, consistent  
with Section 254(e) of the 1996 Act, by September 15 of each year following ETC  
approval, beginning with September 15, 2004.
- i. Sprint shall be required to utilize all federal high-cost support which it receives for  
its ETC service area within the State of Arizona, within those Arizona service areas.

6 The affidavit should be provided to Staff in the format and detail designated by Staff each year.

CONCLUSIONS OF LAW

1  
2           1.       Sprint is a telecommunications corporation as defined in A.R.S. § 40-201(26), and  
3 is a "telecommunications carrier" as defined in 47 U.S.C. § 153(44). Sprint is also a Commercial  
4 Mobile Radio Service provider as defined in 47 U.S.C. § 153(27) and A.A.C. R14-2-1201.

5           2.       The Commission has jurisdiction over the subject matter of this Application.

6           3.       Under 47 U.S.C. § 214(e)(1), a common carrier that is designated as an Eligible  
7 Telecommunications Carrier must, throughout its service area, offer the services that are supported  
8 by federal universal service support mechanisms either using its own facilities or a combination of  
9 its own facilities and resale of another carrier's services. The carrier must also advertise the  
10 availability of such services and the rates for the services using media of general distribution.

11          4.       Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area  
12 for the purpose of determining universal service obligations and support mechanisms.  
13 Sprint's application, as amended, applies to the service area of Qwest, a non-rural carrier, and  
14 accordingly, no further redefinition under § 54.207(b) of the FCC's rules is necessary.

15          5.       Under 47 C.F.R. § 54.405 and 47 C.F.R. § 54.411, as part of its obligations as an  
16 Eligible Telecommunications Carrier, the carrier is required to make available Lifeline and Link  
17 Up services to qualifying low-income customers.

18          6.       Sprint meets the requirements contained in 47 U.S.C. § 214 and 47 C.F.R. § 54.201  
19 et seq. to be designated as an Eligible Telecommunications Carrier.

20          7.       It is reasonable to grant ETC status to Sprint for those areas within its existing  
21 licensed service area that overlap Qwest's service area.

22          8.       Staff's findings and recommendations, which are set forth herein, are reasonable  
23 and should be adopted.

ORDER

24  
25           IT IS THEREFORE ORDERED that the Sprint Spectrum L.P. d/b/a Sprint Application for  
26 Designation as an Eligible Telecommunications Carrier under 47 U.S.C. § 214(e)(2) be and hereby  
27 is granted.

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IT IS FURTHER ORDERED that Sprint shall make available Lifeline and Link Up services to qualifying low-income applicants in its new ETC area no later than 90 days after this Decision.

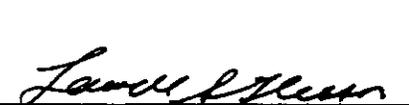
IT IS FURTHER ORDERED that Staff's findings and recommendations incorporated herein are adopted.

IT IS FURTHER ORDERED that Sprint shall comply with the conditions of Findings of Fact No. 20.

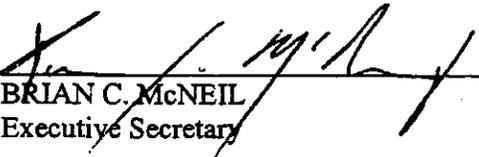
IT IS FURTHER ORDERED that this Decision shall become effective immediately.

**BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

		
CHAIRMAN	COMMISSIONER	COMMISSIONER

	
COMMISSIONER	COMMISSIONER

IN WITNESS WHEREOF, I BRIAN C. McNEIL, Executive Secretary of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this 13<sup>th</sup> day of February, 2004.

  
 BRIAN C. McNEIL  
 Executive Secretary

DISSENT: \_\_\_\_\_

DISSENT: \_\_\_\_\_

EGJ:RLB:red/

1 SERVICE LIST FOR: SPRINT SPECTRUM L.P. DBA SPRINT  
2 DOCKET NO. T-04206A-03-0675

3 Mr. Steven J. Duffy  
4 Isaacson & Duffy P.C.  
5 3101 North Central Avenue, Suite 740  
6 Phoenix, AZ 85012-2638

7 Mr. Eric S. Heath  
8 Sprint Law and External Affairs Department  
9 100 Spear Street, Suite 930  
10 San Francisco, CA 94105-3114

11 Mr. Ernest G. Johnson  
12 Director, Utilities Division  
13 Arizona Corporation Commission  
14 1200 West Washington  
15 Phoenix, Arizona 85007

16 Mr. Christopher C. Kempley  
17 Chief Counsel  
18 Arizona Corporation Commission  
19 1200 West Washington  
20 Phoenix, Arizona 85007

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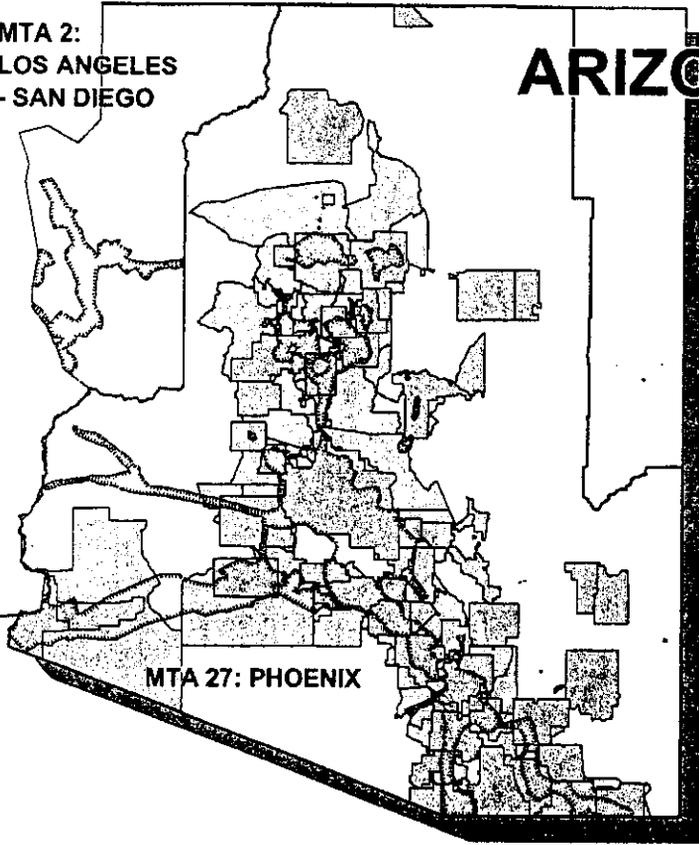
Exhibit A

Map of Sprint Service Area Depicting Non-Rural Wire Centers Where ETC Status is Requested

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MTA 2:  
LOS ANGELES  
- SAN DIEGO

ARIZONA



-  SPRINT PCS SERVING AREA
-  QWEST WIRE CENTERS INTERSECTING SPRINT PCS SERVING AREA FOR WHICH ETC STATUS IS REQUESTED (NATIONALLY USED STANDARD DATA BASE)
-  QWEST ARIZONA SERVING AREA
-  PCS LICENSE AREAS

MTA 27: PHOENIX

## Exhibit B

Non-Rural ILEC Wire Centers Served Entirely by Sprint for which ETC Status is Requested

ILEC	CELL	WIRE CENTER NAME
------	------	------------------

**QWEST CORPORATION (SAC 455101)****Wire Centers 100% Served by Sprint PCS (by Land Area)**

AGFIAZSR	SUNRISE
CHNDAZMA	CHANDLER MAIN
CHNDAZSO	CHANDLER SOUTH
CHNDAZWE	CHANDLER WEST
CTWDAZSO	COTTONWOOD-SOUTH
GDYRAZCW	COLDWATER
GLDLAZMA	GLENDALE MAIN
HGLYAZMA	HIGLEY
LTPKAZMA	LITCHFIELD PARK
MESAAZGI	GILBERT
MESAAZMA	MESA
PHNXAZ81	PHOENIX-FOOTHILLS
PHNXAZBW	PHOENIX-BETHANY WEST
PHNXAZCA	PHOENIX-CACTUS
PHNXAZEA	PHOENIX-EAST
PHNXAZGR	PHOENIX-GREENWAY
PHNXAZLV	PHOENIX-LAVEEN
PHNXAZMA	PHOENIX-MAIN
PHNXAZMR	PHOENIX-MID RIVERS
PHNXAZMY	MARYVALE
PHNXAZNE	PHOENIX-NORTHEAST
PHNXAZNO	PHOENIX-NORTH
PHNXAZNW	PHOENIX-NORTHWEST
PHNXAZPP	PHOENIX-PECOS
PHNXAZPR	PHOENIX-PEORIA
PHNXAZSE	PHOENIX-SOUTHEAST
PHNXAZSO	PHOENIX-SOUTH
PHNXAZSY	PHOENIX-SUNNYSLOPE
PHNXAZWE	PHOENIX-WEST
SCDLAZMA	SCOTTSDALE MAIN
SCDLAZSH	SHEA
SCDLAZTH	THUNDERBIRD
SPRSZAZWE	SUPERSTITION WEST
TCSNAZCR	TUCSON CRAYCROFT
TCSNAZEA	TUCSON EAST
TCSNAZFW	FLOWING WELLS
TCSNAZSE	TUCSON SOUTHEAST
TCSNAZSO	TUCSON SOUTH CAP
TEMPAZMA	TEMPE MAIN
TEMPAZMC	MCCLINTOCK
TLSNAZMA	TOLLESON
YUMAAZFT	YUMA FORTUNA
YUMAAZMA	YUMA

## Non-Rural ILEC Wire Centers Served Partially by Sprint for which ETC Status is Requested

ILEC	CLI	WIRE CENTER NAME
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**QWEST CORPORATION (SAC 455101)**

**Wire Centers Less Than 100% Served by Sprint PCS (by Land Area)**

ASFKAZMA	ASHFORK
BISBAZMA	BISBEE
BLCNAZMA	BLACK CANYON
BNSNAZMA	BENSON
BNSNAZSD	SAINT DAVID
BRDSAZMA	BEARDSLEY
CHVYAZMA	CHINO VALLEY
CLDGAZMA	COOLIDGE
CMVRAZRR	RIMROCK
CRCYAZNM	CIRCLE CITY
CRNDAZMA	CORONADO
CSGRAZMA	CASA GRANDE
CTWDAZMA	COTTONWOOD-MAIN
CVCKAZMA	CAVE CREEK
DGLSAZMA	DOUGLAS
DRVYAZNO	DEER VALLEY NORTH
ELOYAZ01	ELOY
FLGSAZEA	FLAGSTAFF EAST
FLGSAZMA	FLAGSTAFF MAIN
FLGSAZSO	FLAGSTAFF SOUTH
FLRNAZMA	FLORENCE
FTMDAZMA	FORT MCDOWELL
GLBNAZMA	GILA BEND
GNVYAZMA	GREEN VALLEY
HGLYAZQC	QUEEN CREEK
HMBLAZMA	HUMBOLDT
MARNAZ02	MARANA WEST
MARNAZ03	MARANA SOUTH
MARNAZMA	MARANA MAIN
MRCPAZMA	MARICOPA
MSPKAZMA	MUNDS PARK
NGLSAZMA	NOGALES
NGLSAZMW	NOGALES MIDWAY
NWRVAZMA	NEW RIVER
PLMNAZMA	PALOMINAS
PRSCAZEA	PRESCOTT EAST
PRSCAZMA	PRESCOTT MAIN
PRVYAZPP	PINNACLE PEAK
PTGNAZMA	PATAGONIA
PYSNAZMA	PAYSON
SEDNAZMA	SEDONA
SEDNAZSO	SEDONA SOUTH
SMTNAZMA	SOMERTON

1 Non-Rural ILEC Wire Centers Served Partially by Sprint for which ETC Status is Requested  
 2 (continued)

3 **ILEC                      CARRIER                      WIRE CENTER NAME**

4 **QWEST CORPORATION (SAC 455101)**

5 **Wire Centers Less than 100% Served by Sprint PCS (by Land Area)**

6	SPRSAZEA	SUPERSTITION EAST
7	SPRSAZMA	SUPERSTITION MAIN
8	SRVSAZMA	SIERRA VISTA MAIN
9	SRVSAZNO	SIERRA VISTA NORTH
10	SRVSAZSO	SIERRA VISTA SOUTH
11	STFDAZMA	STANFIELD
12	TCSNAZCA	CATALINA
13	TCSNAZCO	CORTARO
14	TCSNAZMA	TUCSON MAIN
15	TCSNAZML	MOUNT LEMMON
16	TCSNAZNO	TUCSON NORTH
17	TCSNAZRN	RINCON
18	TCSNAZSW	TUCSON SOUTHWEST
19	TCSNAZTV	TANQUE VERDE
20	TCSNAZWE	TUCSON WEST
21	TMBSAZMA	TOMBSTONE
22	TUBCAZMA	TUBAC
23	VAILAZNO	VAIL NORTH
24	VAILAZSO	VAIL SOUTH
25	WCBGAZMA	WICKENBURG
26	WHTKAZMA	WHITE TANKS
27	WHTLAZMA	WHITLOW
28	WLMSAZMA	WILLIAMS
	WLTNAZMA	WELLTON
	WNBGAZ01	BUCKEYE
	YUMAAZSE	YUMA SOUTHEAST

## Exhibit A

### Affidavit of Dr. Brian K. Staihr

Brian K. Staihr, being first duly sworn upon oath, deposes and states as follows:

1. My name is Brian K. Staihr, and I serve as Regulatory Economist for Sprint Corporation. My business address is 6450 Sprint Parkway, Overland Park, KS 66251. I am an authorized representative of Sprint Corporation's Wireless Division, which operates in Arizona as Sprint Spectrum L.P., dba Sprint ("Sprint"), with regard to its Application for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Arizona ("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") pursuant to Part 24 of the FCC's rules in Arizona. 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 Qwest Corporation ("Qwest"), a non-rural incumbent local exchange carrier ("ILEC"), in Arizona. As required, this funding will be used only to support the provision, upgrading, and maintenance of Sprint's all-digital wireless network in Arizona. 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 Arizona. 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 Qwest.
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 FCC's rules, throughout the service area for which it seeks ETC designation in Arizona.
5. Voice-grade access to the public switched network. The FCC 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 Qwest 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 FCC 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 FCC'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 the Company, 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.

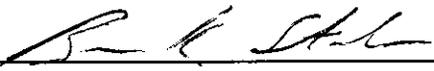
16. Sprint requests ETC designation for the service area in Arizona depicted on the map attached as Exhibit B. Specifically, Sprint proposes a service area consisting of each of the Qwest wire centers in Arizona in which PCS service is available over the Sprint PCS network. To the extent Sprint serves 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 Qwest in Arizona, 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 Arizona 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 FCC'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.

20. This concludes my affidavit.

  
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Brian K. Stair

Washington, District of Columbia  
Subscribed and sworn to before me, in my presence,  
this 11<sup>th</sup> day of September, 2013  
by Brian K. Stair  
Jo-Ann A. Monroe Notary Public  
My commission expires 11-19-05

**JO-ANN G. MONROE**  
Notary Public District of Columbia  
My Commission Expires November 14, 2005