

# STAMP AND RETURN

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October 13, 2005

**RECEIVED**

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

Federal Communications Commission  
Office of Secretary

**Re: APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR  
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS  
CARRIER IN THE COMMONWEALTH OF VIRGINIA —  
CONFIDENTIAL TREATMENT REQUESTED**

Dear Ms. Dortch:

Alltel Communications, Inc. ("Alltel"), by its attorneys, hereby submits an original and four redacted copies of Alltel's Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia ("Application"). Alltel is simultaneously submitting a confidential copy of this filing. As such, Alltel requests confidential treatment under Section 0.459 of the Commission's rules<sup>1</sup> regarding Exhibit D (Alltel's Five-Year Service Improvement Plan) provided as an attachment to Alltel's Application. This attachment is labeled "Confidential — Not for Public Inspection."

Exhibit D contains proprietary company information not available to the public, including information that is competitively sensitive about Alltel's future plans for building out its network.

As required by Section 0.459(b) of the Commission's rules, Alltel provides the following information regarding its request for confidential treatment:

1. Confidential treatment is requested for all information contained in Exhibit D.
2. This information is submitted as an attachment to Alltel's Application being filed in the Commission's universal service docket, CC Docket No. 96-45.
3. The information being submitted is commercially and financially sensitive and is privileged. Exhibit D provides detailed financial information regarding how Alltel intends to spend its universal service funds in certain wire centers over the next five

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<sup>1</sup> 47 C.F.R. § 0.459.

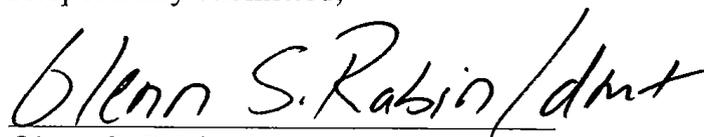
years. Also, Alltel is providing in Exhibit D general information as how it intends to spend this funding, (*i.e.*, for capacity or coverage enhancements).

4. The wireless industry is highly competitive.<sup>2</sup>
5. The release of such information will cause substantial competitive harm to Alltel. Disclosure of Alltel's five-year plans for its expenditures of universal service funds would give Alltel's competitors access to privileged information that would affect the actions of those competitors. Competitors seeking to compete with Alltel could upgrade their networks in an attempt to, for example, preempt Alltel's planned upgrades. Also, by providing information about where Alltel intends to expand coverage, Alltel could expose itself to predatory practices by tower owners and potential tower site owners in areas where it committed to add cell sites.
6. Alltel considers the information in Exhibit D to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
7. The information in Exhibit D is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel.
8. The information provided in Exhibit D should never be released for public inspection, as this document contains proprietary company information that is competitively and financially sensitive. Even after the five-year term of the plan expires, Alltel would not reveal to its competitors the amount of money it has spent in the past in certain wire centers.

For the foregoing reasons, Alltel respectfully requests that the Commission allow for confidential treatment of Exhibit D.

If you have any questions regarding this supplemental information or the confidentiality request, please contact the undersigned.

Respectfully submitted,



Glenn S. Rabin

Vice President

Federal Communications Council

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<sup>2</sup> See *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Eighth Report*, 18 F.C.C.R. 14783, 14812 (2003) ("Continued downward price trends, the continued expansion of mobile networks into new and existing markets, high rates of investment, and churn rates of about 30%, when considered together with the other metrics, demonstrate a high level of competition for mobile telephone consumers."); *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Ninth Report*, 19 F.C.C.R. 20597, 20600-01 (2004) ("[C]ompetition is robust in terms of the current number of competitors per market ..." and "[i]ndicators of market performances show that competition continues to afford many significant benefits to consumers.").

**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C.**

In the Matter of	)	
	)	
Application of Alltel Communications, Inc.	)	
	)	Docket No. 96-45
	)	
For Designation as an Eligible	)	
Telecommunications Carrier Pursuant To	)	
Section 214(e)(6) of the Communications	)	
Act of 1934	)	

**APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION  
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF VIRGINIA**

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Date: October 13, 2005

**TABLE OF CONTENTS**

I. Alltel’s Universal Service Offering ..... 2

II. Alltel Satisfies All the Statutory and Regulatory Prerequisites for Designation  
as an ETC..... 2

    A. The Virginia Corporation Commission Has Provided an Affirmative Statement  
    That It Does Not Regulate CMRS Carriers ..... 2

    B. Alltel Offers All of the Services Supported By the Federal High-Cost Universal  
    Service Program..... 4

    C. Alltel Meets the Additional Eligibility Criteria Adopted by the FCC in the *ETC*  
    *Criteria Order* ..... 8

    D. Alltel Will Offer Supported Services Using a Combination of its Own Facilities and  
    Resale of Another Carrier’s Services..... 13

    E. Alltel Will Advertise its Universal Service Offering..... 14

III. Alltel Requests ETC Designation in the “Rural” Study Areas Within its Licensed  
Service Area in the Commonwealth of Virginia..... 14

IV. Alltel Requests that Affected Rural LEC Service Areas be Redefined ..... 16

V. Granting This Application Will Serve the Public Interest ..... 20

    A. Benefits of Increased Consumer Choice..... 21

    B. Unique Advantages and Disadvantages of Alltel’s Service Offering..... 21

    C. Creamskimming..... 23

VI. High-Cost Certification..... 23

VII. Anti-Drug Abuse Certification ..... 24

VIII. Conclusion ..... 25

**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C.**

In the Matter of	)	
	)	
Application of Alltel Communications, Inc.	)	Docket No. 96-45
	)	
For Designation as an Eligible Telecommunications Carrier Pursuant To Section 214(e)(6) of the Communications Act of 1934	)	

**APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION  
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF VIRGINIA**

Alltel Communications, Inc., on behalf of itself and its wholly-owned and controlled licensee affiliates (“Alltel” or “Company”), and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier (“ETC”) in the rural telephone company areas within its licensed service area in the Commonwealth of Virginia (“Application”). By Order issued September 24, 2004 the Commission designated Alltel ETC status in the non-rural telephone company wire centers within its licensed service area.<sup>1</sup> As demonstrated below, Alltel meets all the statutory and regulatory prerequisites for ETC designation in the rural telephone company areas, and Alltel’s designation will serve the public interest.

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<sup>1</sup> *Federal-State Joint Board on Universal Service; ALLTEL Communications Inc., Petitions for Designation as an Eligible Telecommunications Carriers in the States of Alabama, Florida, Georgia, North Carolina, and Virginia*, Order, 19 FCC Rcd 20496 (WCB 2004) (“*Alltel Non-Rural Designation Order*”).

## **I. Alltel's Universal Service Offering.**

Alltel is the licensee authorized to provide cellular mobile radio telephone service in the following Cellular Market Areas ("CMAs") in Virginia: CMA 43, CMA 59, CMA 85, CMA 104, CMA 203, CMA 235, CMA 256, CMA 262, CMA 681, CMA 682, CMA 684, CMA 686, CMA 687, CMA 688, CMA 689 and CMA 691.<sup>2</sup> Alltel intends to obtain high-cost support in the rural telephone company areas to expand its coverage to include unserved or underserved areas, to increase the service quality and reliability of its network, and to speed the delivery of advanced wireless services to the citizens of Virginia. As an ETC, Alltel will also offer a basic universal service package to subscribers who are eligible for Lifeline support and will offer Link-Up to eligible subscribers. Alltel's service offering will be competitive with those of the incumbent local exchange carriers ("LECs").

## **II. Alltel Satisfies All the Statutory and Regulatory Prerequisites for Designation as an ETC.**

Alltel satisfies each of the elements enumerated by the Commission for ETC designation pursuant to Section 214(e)(6) of the Act as set forth in the FCC's *Section 214(e)(6) Public Notice*.<sup>3</sup>

### **A. The Virginia Corporation Commission Has Provided an Affirmative Statement That It Does Not Regulate CMRS Carriers.**

As a CMRS carrier, Alltel is entitled to seek designation as an ETC.<sup>4</sup> Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section

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<sup>2</sup> The areas that Alltel seeks designation for within its licensed area will be referred to in this document as the "ETC Service Area."

<sup>3</sup> FCC Public Notice, *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, 12 FCC Rcd 22947 (1997) ("*Section 214(e)(6) Public Notice*").

<sup>4</sup> See *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8858-59 (1997) ("*First Report and Order*").

214(e) shall be eligible to receive specific federal universal service support.”<sup>5</sup> Pursuant to Section 214(e)(6) of the Act, the Commission may, upon request, designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission.”<sup>6</sup>

In the *Section 214(e)(6) Public Notice*, the Commission established that a carrier must demonstrate it “is not subject to the jurisdiction of a state commission.”<sup>7</sup> In its *Twelfth Report and Order*, the Commission stated that where a carrier provides the Commission with an “affirmative statement” from the state commission or a court of competent jurisdiction that the state lacks jurisdiction to perform the designation, the Commission would consider requests filed pursuant to 214(e)(6).<sup>8</sup>

In 1985, the General Assembly of Virginia repealed Chapters 16.1 and 16.2 of Title 56 of the Code of Virginia relating to radio common carriers and cellular mobile radio communications carriers, thus divesting the Virginia Corporation Commission (“VCC”) of jurisdiction over the rates and services of cellular telephone service providers. Further, on October 23, 1995, in Case Number PUC950062, the VCC issued a Final Order which states in part that the General Assembly of Virginia clearly established a public policy of deregulating radio common carriers and cellular carriers by repealing various provisions of the law that authorized the VCC to regulate these services. This Final Order went on to cancel all certificates of convenience and necessity granted to radio common carriers and cellular carriers, as well as

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<sup>5</sup> 47 U.S.C. § 254(e).

<sup>6</sup> 47 U.S.C. § 214(e)(6).

<sup>7</sup> *Section 214(e)(6) Public Notice*, 12 FCC Rcd at 22948.

<sup>8</sup> *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12264 (2000).

all tariffs filed by those carriers. Finally, on April 9, 2002, in the Application of Virginia Cellular, LLC (Case No. PUC10263), the VCC stated:

The Commission finds that Section 214(e)(6) of the Act is applicable to Virginia Cellular's Application as this Commission has not asserted jurisdiction over CMRS carriers and that the Applicant should apply to the FCC for ETC designation.

A copy of the Virginia Cellular Order is attached hereto as Exhibit B. The Acts of the General Assembly and the Orders of the VCC constitute an "affirmative statement" from Virginia, as required under Section 214(e)(6), that the FCC is the appropriate authority to consider Alltel's application as an ETC in the commonwealth.<sup>9</sup>

**B. Alltel Offers All of the Services Supported By the Federal High-Cost Universal Service Program.**

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area.<sup>10</sup> The FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:<sup>11</sup>

1. Voice-grade access to the public switched telephone network;
2. Local usage;
3. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;

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<sup>9</sup> Moreover, the FCC previously has processed ETC petitions in Virginia. *See, e.g., Alltel Non-Rural Designation Order, supra* n.1.

<sup>10</sup> 47 U.S.C. § 214(e)(1).

<sup>11</sup> *See* 47 C.F.R. § 54.101(a).

8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.

The *Section 214(e)(6) Public Notice* requires a carrier to certify that it provides each of the supported services, or where appropriate, functionally equivalent services.<sup>12</sup> As shown below and in the Declaration attached as Exhibit A hereto, Alltel currently provides, or will provide upon designation, each of the required services.

1. Voice-grade access to the public switched telephone network:

The FCC concluded that voice-grade access means the ability to make and receive phone calls within a specified bandwidth.<sup>13</sup> Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with LECs, each of Alltel's customers is able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local usage:

Section 54.202(a)(4) of the FCC's rules require an ETC applicant to "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation."<sup>14</sup> The FCC has explained that an ETC applicant's local usage plans should be reviewed on a case-by-case basis to ensure that each ETC provides a local usage component in its universal service offering that is comparable to the plan offered by the incumbent LEC in the area.<sup>15</sup> The FCC has declined to adopt a specific local usage threshold.<sup>16</sup> Alltel commits to provide rate plans that have a substantial local calling area with a

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<sup>12</sup> *Section 214(e)(6) Public Notice*, 12 FCC Rcd at 22948.

<sup>13</sup> *First Report and Order*, 12 FCC Rcd at 8810-11.

<sup>14</sup> 47 C.F.R. § 54.202(a)(4).

<sup>15</sup> *Federal-State Joint Board on Universal Service, Report and Order*, 20 FCC Rcd 6371 (2005) ("*ETC Criteria Order*").

corresponding level of included local usage that provides an outstanding consumer value. A description of Alltel's current rate plans that are available in the areas for which Alltel seeks ETC designation is attached as Exhibit C hereto. Exhibit C confirms that Alltel includes local usage in each rate plan and that Alltel offers local calling areas that are substantially larger than those offered by the incumbent LECs. Further, since Alltel offers several rate plans as its universal service offering, customers have the opportunity to select a rate plan that best meets their needs based on the local calling areas and the amount of local calling included in each plan.

3. 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. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement.<sup>17</sup> Alltel currently uses out-of-band digital signaling, and Alltel therefore meets this requirement.

4. Single-party service or its functional equivalent:

"Single-party service" means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.<sup>18</sup> The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user's particular transmission.<sup>19</sup> Alltel meets the requirement of single-party service in this manner.

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<sup>16</sup> *Id.* at 6385.

<sup>17</sup> 47 C.F.R. § 54.101(a)(3).

<sup>18</sup> *First Report and Order*, 12 FCC Rcd at 8810.

<sup>19</sup> *Id.*

5. 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. Alltel currently provides its customers with access to emergency services by dialing 911 in accord with this requirement throughout the geographic area where it is seeking ETC designation. Further, Alltel provides both automatic numbering information (“ANI”) and automatic location information (“ALI”) to public emergency service providers capable of both receiving and utilizing the data and has made arrangements for the delivery of the data.

6. 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.<sup>20</sup> Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (*e.g.* LECs, IXC, etc.)

7. Access to interexchange service:

A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXCs. On most of the Company’s rate plans, interexchange calls can be made for no additional charge (*i.e.*, all outgoing minutes are treated the same). Additionally, customers are able to reach other IXCs by dialing the appropriate access code or dial-around number.

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<sup>20</sup> *Id.* at 8817-18.

8. Access to directory assistance:

The ability to place a call to directory assistance is a required service offering.<sup>21</sup> Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing either “411” or “Area Code + 555-1212.”

9. Toll limitation for qualifying low-income consumers:

An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service.<sup>22</sup> In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls.<sup>23</sup> Once designated as an ETC, Alltel will participate in Lifeline as required and will provide toll blocking capability in satisfaction of the FCC’s requirement. Alltel currently has the capability to provide toll blocking and will provide this service at no charge to its Lifeline customers.

**C. Alltel Meets the Additional Eligibility Criteria Adopted by the FCC in the ETC Criteria Order.**

The FCC’s March 17, 2005 *ETC Criteria Order* established additional criteria that all ETC applicants must satisfy in order to be granted ETC status. The FCC found that an ETC applicant must demonstrate: (1) a commitment and ability to provide the supported services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) that it will satisfy consumer protection and service quality standards; (4) that it offers local usage comparable to that offered by the incumbent LEC; and (5) an understanding that it may be

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<sup>21</sup> *Id.* at 8821.

<sup>22</sup> 47 C.F.R. § 54.101 (a)(9); see *Federal-State Joint Board Universal Service*, Fourth Order on Reconsideration, 13 FCC Rcd 5318, 5388 (1997).

<sup>23</sup> *First Report and Order*, 12 FCC Rcd at 8821-22.

required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.<sup>24</sup>

1. Commitment and Ability to Provide the Supported Services:

Section 54.202(a)(1) of the FCC's rules require an ETC applicant to demonstrate its commitment and ability to provide the supported services throughout the designated service area by: (a) committing to provide service throughout its proposed ETC designated service area to all potential customers making a reasonable request for service; and (b) submitting a five-year plan demonstrating how high-cost universal service support will be used to improve the Company's coverage, service quality and capacity throughout the service area for which it seeks ETC designation.

a. Commitment to Serve All Customers Making a Reasonable Request for Service:

Alltel certifies that: (1) it will provide service throughout the proposed ETC area using its standard customer equipment and service offerings where available; or (2) if a request within Alltel's licensed service area but outside its existing network coverage is received from a potential customer, Alltel will follow the steps described in Section 54.202(a)(1)(a) of the FCC's rules. If, after following the steps specified therein, Alltel still cannot provide service, it will notify the requesting party and report the unfulfilled request to the Commission within 30-days after making such a determination. Furthermore, consistent with the requirement in Section 54.209(a)(3) of the FCC's rules, Alltel will annually report the number of requests from potential customers that were unfulfilled during the pervious year. Alltel submits that the above described service provisioning commitments satisfy the FCC's requirements in Section 54.202(a)(1)(a) and ensures that Alltel is responsive to consumers' needs in the ETC Service Area, while acting as a proper steward of available high-cost support funds.

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<sup>24</sup> See *ETC Criteria Order*, 20 FCC Rcd at 6386-87.

b. Five-Year Service Improvement Plan:

Alltel submits its proposed five-year service improvement plan (“Plan”), attached hereto as Exhibit D, is in accordance with Section 54.202(a)(1)(b) of the FCC’s rules. Alltel’s Plan contains highly confidential information, and therefore, will be submitted separately in accordance with Section 0.459 of the Commission’s rules. The Plan describes projected improvements in both the previously approved non-rural areas and the rural areas in which Alltel seeks ETC designation in this Application. The capital expenditures in the Plan represent substantially greater levels of financial commitment than Alltel would commit in the absence of high-cost support. As represented in the Plan, Alltel also will incur expenses associated with upgrading, maintaining and operating its existing network in the ETC Service Area, which is an equally appropriate use of high-cost funds. Alltel submits that these plans must be flexible and are subject to change in response to general consumer demand, changes in technology and other appropriate factors. The priority under which each cell site is to be constructed is subject to change depending upon requests for service and other market factors. Alltel also commits to annually provide the Commission a progress report consistent with Section 54.209(a)(1) of the FCC’s rules. Alltel believes the five-year plan attached hereto as Exhibit D satisfies the requirements of the FCC’s rules and constitutes a good faith estimate of the universal service benefits – due to expanded coverage and improved signal and service quality – that rural and non-rural customers in the Commonwealth of Virginia will enjoy if the Commission designates Alltel as an ETC in the requested areas.

2. Ability to Remain Functional in Emergency Situations:

Alltel is able to remain functional in emergency situations. Alltel’s network is designed to remain functional in emergency situations. Alltel has adequate amounts of back-up power to ensure functionality without an external power source, is able to reroute traffic around

damaged facilities and is capable of managing traffic spikes resulting from emergency situations.<sup>25</sup>

Alltel has deployed fixed and portable back-up power generators at various locations throughout its network that can be deployed in emergency situations. These back-up power generators are capable of keeping a cell site up and running until power is restored to the cell site, until system changes are made to reroute traffic or until a cell site on wheels (“COWs”) is deployed. Alltel tests its back-up power generators regularly to ensure functionality. Alltel is capable of and will reroute traffic around damaged or out-of-service facilities by changing call routing translations as needed. Alltel also is able to deploy COWs as temporary cell sites when existing facilities are damaged or out of service for longer periods of time. Further, by changing call routing translations or deploying COWs, Alltel is able to manage traffic spikes throughout its network. As a long-term solution for managing increased traffic levels and traffic spikes, Alltel will increase capacity at its cell sites, switches and transport facilities.

Finally, in accordance with Section 54.209(a)(6) of the FCC’s rules, Alltel will annually certify that it is able to function in emergency situations. Alltel also will fulfill the annual outage reporting requirement described in Section 54.209(a)(2) of the FCC’s rules. Section 54.209(a)(2) of the FCC’s rules requires an ETC applicant to submit detailed information on any outage of at least 30 minutes in duration that potentially affects (a) at least ten percent of the end users served in a designated service area; or (b) a 911 special facility. Specifically, such a report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular services affected; (d) the geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the

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<sup>25</sup> See 47 C.F.R. § 54.202(a)(2).

future; and (f) the number of customers affected.<sup>26</sup>

3. Consumer Protection:

Section 54.202(a)(3) of the FCC's rules states that an ETC applicant must "demonstrate that it will satisfy applicable consumer protection and service quality standards."<sup>27</sup> A commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this requirement. Other commitments will be considered on a case-by-case basis. Alltel has already committed to abide by the CTIA Consumer Code for its entire wireless operations across the country, not simply those states in which it seeks ETC status. Although its commitment to this Code goes well beyond a simple inducement to the Commission for the grant of ETC status, Alltel specifically commits that, as an ETC, Alltel will abide by the CTIA Consumer Code with respect to its ETC Service Area.<sup>28</sup>

In addition to its commitment to the CTIA Consumer Code, Alltel has taken several steps, on its own initiative, to further protect its customers and enhance service quality. For example, Alltel offers its customers an automatic one-minute credit for all dropped calls on its network. Alltel does not require a customer to call and report such instances. Instead, Alltel monitors its network for dropped calls and automatically credits customers' accounts for dropped calls. In another initiative, in recognition of the fact that changing circumstances and needs may require customers to opt for a different rate plan, Alltel offers its customers the ability to change rate plans at anytime without extending their current service contracts. These are two initiatives taken by Alltel to further protect its customers. As noted, if designated as an ETC, Alltel will satisfy the requirements in Sections 54.209(a)(5) and 54.209(a)(4) by annually certifying its

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<sup>26</sup> See 47 C.F.R. § 54.209(a)(2).

<sup>27</sup> 47 C.F.R. § 54.202(a)(3).

compliance with the CTIA Consumer Code and annually reporting the number of customer complaints per thousand handsets.

4. Local Usage:

As described Section II.B.2 of this Application and as demonstrated in Exhibit C hereto, Alltel is committed to offering local usage plans comparable to those offered by the incumbent LEC in the service areas for which it seeks designation. Each of Alltel's service plans described in Exhibit C are within the scope of "comparability" as defined by the FCC in the *ETC Criteria Order*.<sup>29</sup> Further, Alltel will annually certify that it offers local usage plans that are comparable to those offered by the incumbent LEC in the relevant areas in accordance with Section 54.209(a)(7) of the FCC's rules.

5. Equal Access:

In accordance with Section 54.202(a)(5) of the FCC's rules, Alltel acknowledges that the Commission may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within the designated ETC Service Area.<sup>30</sup> Further, pursuant to Section 54.209(a)(8), Alltel will file an annual certification acknowledging the fact that it may be required to provide equal access to long-distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

**D. Alltel Will Offer Supported Services Using a Combination of its Own Facilities and Resale of Another Carrier's Services.**

The Commission's *Section 214(e)(6) Public Notice* established that a carrier requesting designation must certify that it offers the supported services "either using its own facilities or a

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<sup>28</sup> Alltel recently re-certified its compliance with the CTIA Consumer Code.

<sup>29</sup> *ETC Criteria Order*, 20 FCC Rcd at 6385.

<sup>30</sup> 47 C.F.R. § 54.202(a)(5).

combination of its own facilities and resale of another carrier's services."<sup>31</sup> Alltel will provide the supported services using its own network infrastructure, consisting of antennas, cell sites, towers, trunkings, mobile switching and interconnection facilities. Alltel may, on a limited basis, provide service through resale of another carrier's service in areas lacking adequate coverage. *See also* Exhibit A.

**E. Alltel Will Advertise its Universal Service Offering.**

Alltel will advertise the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the ETC Service Area of both the available services and the associated rates.<sup>32</sup> Alltel currently advertises its services through a variety of advertising media, including newspapers, television, radio, public exhibits and displays, and the Company website. Alltel will utilize the same media to advertise the universal service offerings throughout the ETC Service Area. Further, Alltel commits to advertise the availability of Lifeline and Link-Up discounts throughout the ETC Service Area.

**III. Alltel Requests ETC Designation in the "Rural" Study Areas Within its Licensed Service Area in the Commonwealth of Virginia .**

Alltel, in its capacity as a provider of cellular services, is not a "rural telephone company" as that term is defined by 47 U.S.C. Section 153(37). Accordingly, Alltel is required to describe the geographic area in which it requests designation.<sup>33</sup> In this Application, Alltel requests ETC designation in the "rural" study areas depicted on the maps attached hereto as Exhibits E, F-2, G-2 and listed in Exhibits F and G, within its licensed service area in the Commonwealth of Virginia.<sup>34</sup>

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<sup>31</sup> *Section 214 Public(e)(6) Public Notice*, 12 FCC Rcd at 22949.

<sup>32</sup> *See id.*

<sup>33</sup> *Id.*

<sup>34</sup> As noted above, Alltel previously was designated as an ETC in the non-rural portions of its licensed territory in Virginia. *See supra* n.1.

Pursuant to Section 54.207 of the Commission’s rules, a “service area” is a “geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms.”<sup>35</sup> In an area served by a rural telephone company, the Commission’s rules define “service area” to mean the LEC study area unless a different definition of service area is established for such company.<sup>36</sup> The rural LEC study areas that Alltel serves in their entirety are set forth in Exhibit F attached hereto. The maps attached hereto as Exhibits F-1 and F-2 confirm that the rural study areas identified in Exhibit F are entirely within Alltel’s licensed area. The Commission may designate Alltel as an ETC in those areas upon a finding that such designation is in the public interest (see Section V below).<sup>37</sup>

In situations where Alltel is not licensed to serve a rural ILEC study area in its entirety, Alltel may be designated as an ETC once the Commission redefines the ILEC’s service area in accordance with Section 54.207(c)(1) of the FCC’s rules. As set forth in Section IV below, Alltel requests a redefinition of those rural ILEC study areas that it partially serves on a wire center by wire center basis. Where Alltel is not licensed to serve a rural ILEC study area in its entirety, Alltel requests that it be designated as an ETC only in those wire centers in which it provides service in its entirety. The wire centers that are not served or are only partially served within the rural LECs’ study areas are identified in Exhibits G and G-2 and should be excluded from Alltel’s ETC Service Area.<sup>38</sup> Accordingly, where Alltel serves only a portion of a wire

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<sup>35</sup> 47 C.F.R. § 54.207(a).

<sup>36</sup> See 47 C.F.R. § 54.207(b); see also *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking, 16 FCC Rcd 11244 (2001) (“*MAG Fourteenth Report and Order*”).

<sup>37</sup> 47 U.S.C. § 214(e)(2).

<sup>38</sup> In column five of Exhibit G, “Yes” indicates that Alltel serves the applicable wire center in its entirety, and “No” indicates that Alltel either does not serve or only partially serves the applicable wire center.

center, it does not request ETC status for that wire center. Since the VCC does not assert jurisdiction over CMRS carriers, including the designation of a cellular carrier as an ETC,<sup>39</sup> the Commission has jurisdiction to consider redefinition of the ILEC service areas in Virginia for ETC purposes, as set forth in Section IV below.

#### **IV. Alltel Requests that Affected Rural LEC Service Areas be Redefined.**

Alltel requests that the Commission redefine the service areas of Central Telephone Company of Virginia, NTELOS Telephone, Inc., United Inter-Mountain Telephone and Verizon South, Inc of Virginia (“Rural LECs”) on a wire center by wire center basis. However, to the extent that redefinition already has been granted in the above service areas to other carriers, the redefinition request should be treated as moot under the terms of the *Epic Touch Public Notice*.<sup>40</sup>

Absent redefinition of these service areas, Alltel would be prohibited from being designated as a competitive ETC in any of the wire centers within these rural telephone company study areas where it can serve today. Redefinition of the service areas identified in Exhibits G, G-1 and G-2 on a wire center by wire center basis will foster competition and offer customers in the exchanges that are served by Alltel a competitive universal service offering. Further, redefinition of these areas will serve the public interest by bringing the benefits described in Section V to the areas that Alltel is licensed to serve.

Pursuant to Section 54.207(b)-(c) of the Commission’s rules,<sup>41</sup> a petition to redefine a rural LEC service area must include an analysis that takes into account the recommendations of

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<sup>39</sup> See Exhibit B.

<sup>40</sup> FCC Public Notice, *Dismissal of Epic Touch Co.’s Petition for Redefinition of Service Area of Pioneer Telephone Association, Inc.* DA 05-2431, CC Docket No. 96-45 (rel. Sept. 8, 2005). In this *Public Notice*, the Commission dismissed as moot Epic Touch Co.’s petition with the Commission for redefinition of Pioneer Telephone Association, Inc.’s service area since redefinition of this service area already had been granted as a result of another carrier’s petition. As such, the *Public Notice* indicates that once redefinition is granted of a service area to one carrier, no further redefinition approval is required from a different carrier for that service area.

the Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company. The *ETC Criteria Order* did not amend Section 54.207; this decision, however, added new Section 54.202(c) to the rules, which specifies that “in instances where an [ETC] applicant seeks designation below the study area level of a rural telephone company, the Commission shall also conduct a creamskimming analysis that compares the population density of each wire center in which the [ETC] applicant seeks designation against that of the wire centers in the study area in which the [ETC] applicant does not seek designation.”<sup>42</sup> This requirement is consistent with the first prong of the analysis laid out by the Joint Board, as required by Section 54.207(b). As discussed below, Alltel’s request meets the requirements of Sections 54.202(c) and 54.207.

In the *Recommended Decision* that laid the foundation for the Commission’s *First Report and Order*,<sup>43</sup> the Federal-State Joint Board enumerated three factors to be considered when redefining a rural service area. The first factor, as noted above, is whether the competitive carrier is attempting to “creamskim” by only proposing to serve the lowest cost exchanges.<sup>44</sup> As a wireless carrier, Alltel is restricted to providing service in those areas where it is licensed by the Commission. Alltel intends to exclude certain wire centers only because they fall outside of Alltel’s licensed area. Exhibits G-1 and G-2 clearly illustrate the fact that Alltel is seeking to exclude only wire centers that fall outside of its licensed area. It is clear there is no deliberate

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<sup>41</sup> 47 C.F.R. § 54.207(b)-(c).

<sup>42</sup> 47 C.F.R. § 54.202(c). The rule prescribes the creamskimming analysis as part of the public interest analysis. To avoid repetition, the discussion of creamskimming is contained solely in this redefinition section. *See also infra* section V.C. (cross-referencing the instant discussion).

<sup>43</sup> *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87 (1996) (“*Joint Board Recommended Decision*”).

<sup>44</sup> *Id.* at 179-80.

effort by Alltel to creamskim by picking and choosing the lowest cost exchanges. Alltel's requested ETC area is based solely upon its licensed service area.

In *Virginia Cellular*, the FCC elaborated on its creamskimming analysis by relying on population density data that was submitted to demonstrate a lack of creamskimming effects.<sup>45</sup> This population density analysis has since been codified in Section 54.202(c). The population density data set forth in Exhibit H demonstrates that redefinition of the Virginia ILEC service areas will not result in creamskimming effects. As demonstrated in Exhibit H, the population density data establishes that the average population density of the Central Telephone Company, United Inter-Mountain Telephone Company and Verizon South wire centers "served" by Alltel statewide is 88.04, 77.98 and 74.65 persons per square mile respectively, and therefore is only slightly higher than the average population density of the Central Telephone Company, United Inter-Mountain Telephone Company and Verizon South wire centers that are "not served," which is 65.52, 45.11 and 53.89 persons per square mile respectively. This difference is not significant when compared with the magnitude of the differences found to raise creamskimming concerns in *Virginia Cellular* and *Highland Cellular*.<sup>46</sup> Further, in the Central Telephone study area, the second and third least-dense wire centers are in the *served* area (Brookneal, 26.15; Schuyler, 24.29). In the United Inter-Mountain study area, the two least-dense wire centers are all in the *served* area (Ceres, 8.48; Damascus 21.66), and the least dense wire center in the *unserved* area (Mouth of Wilson, 22.02) is fully 260% denser than the least-dense wire center in the *served* area (Ceres, 8.48). In the Verizon South study area, the least-dense wire center

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<sup>45</sup> *Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, 19 FCC Rcd 1563, 1578-80 (2004) ("*Virginia Cellular*").

<sup>46</sup> *See id.* at 1579-80 (finding that it would not be in the public interest to designate Virginia Cellular in NTELOS' study area because the population density in the served wire center would be approximately 273 persons per square mile, while the average population density of the remaining wire centers would be 33 persons per square).

(Narrows, 20.29) is in the *served* area, and is less than half as dense as the least-dense wire center in the unserved area (Whitewood, 42.33).

In the NTELOS study area, the relative density is greater (298.53 persons per square mile in the served wire center versus 47.42 in the unserved wire centers), but still significantly less than the 800% difference found to create a “great disparity” in *Virginia Cellular*.<sup>47</sup> Moreover, the average population density of the “served” areas in all the study areas (87.67 persons per square mile) is also not significantly higher than the population density in the “unserved” areas (59.28 persons per square mile). Thus, redefinition of those study areas listed in Exhibit G on a wire center by wire center basis will not harm the Rural LECs’ ability to serve their entire study area or otherwise raise concerns of creamskimming effects.<sup>48</sup>

Second, the Joint Board urged the Commission to consider the rural carrier’s special status under the Telecommunications Act of 1996.<sup>49</sup> Alltel submits that a Commission decision to designate Alltel as an ETC in the rural LEC areas in this proceeding will not affect or prejudice any future action the Commission may take with respect to the rural LECs’ special status as a rural telephone company, which is afforded pursuant to Section 251 of the Act. Further, because the Commission must weigh the relevant factors and consider the manner in which the public interest is affected prior to designating Alltel as an ETC pursuant to Section 214(e)(2), the Commission’s public interest evaluation would duly recognize the special status of the rural LECs.

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<sup>47</sup> *Id.*

<sup>48</sup> In the event the Commission concludes that the population density disparity between the served and the unserved portions of any of these study areas is sufficiently great to present creamskimming concerns, Alltel proposes to withdraw certain dense wire centers from the proposed ETC Service Area in order to equalize the density between the served and the unserved areas.

<sup>49</sup> *Joint Board Recommended Decision*, 12 FCC Rcd at 180.

Finally, the Federal-State Joint Board recommended that the FCC consider the administrative burden a rural LEC would face by calculating its costs on a basis other than its entire study area.<sup>50</sup> In the instant case, Alltel is proposing to redefine rural LEC service areas solely for ETC designation purposes. Redefining service areas for ETC purposes will in no way impact the way the affected rural LECs calculate their costs, but it is solely to determine the LEC area in which Alltel is to be designated as an ETC. Further, LECs may disaggregate their study areas to reallocate high-cost loop support payments pursuant to the FCC's *MAG Order*.<sup>51</sup> Accordingly, redefining rural LEC service areas as proposed herein will not impose any additional burdens on the rural LECs.

#### **V. Granting This Application Will Serve the Public Interest.**

Prior to designating an eligible telecommunications carrier, the Commission must determine that such a designation is in the public interest.<sup>52</sup> The Commission, in the *ETC Criteria Order*, codified a fact-specific public interest analysis it had developed in prior orders as the appropriate process for determining that an ETC designation is in the public interest. The Commission determined that, in the case of an applicant seeking designation in an area served by a rural telephone company, it will consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering, as well as creamskimming issues when redefinition is requested. As demonstrated below, the Commission should find that designating Alltel as an ETC will serve the public interest.

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<sup>50</sup> *Id.*

<sup>51</sup> *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Federal-State Joint Board on Universal Service*, Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, 16 FCC Rcd 19613 (2001).

<sup>52</sup> 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(c).

**A. Benefits of Increased Consumer Choice.**

The FCC has recognized that designation of wireless ETCs promotes competition and benefits consumers in rural, high-cost areas by increasing consumer choice, availability of innovative services and deployment of new technologies. Designating Alltel as an ETC in these rural areas will bring to rural customers the benefits described above that are otherwise available mostly to urban customers. Availability of universal service funds will enable Alltel to improve service quality and coverage in areas that it currently serves, and expand its services into areas that would not be economically feasible to serve absent universal service funding.

Universal service funding will enable Alltel to continue to operate and maintain a higher number of cell sites in high-cost, low-density areas. Upon ETC designation, Alltel will offer qualifying customers a choice in their Lifeline/Link-Up provider. The mobility of wireless service will offer qualifying Lifeline/Link-Up customers an alternative means of communications that they do not currently enjoy. Further, improving and expanding the choices available to consumers will not only strengthen inter-modal wireless/wireline competition but also increase intra-modal wireless competition to the benefit of telecommunications customers throughout Virginia. Finally, increased competition in the rural areas provides incentives to incumbent service providers to achieve new operating efficiencies and introduce additional choices, higher quality and better value to their customers.

**B. Unique Advantages and Disadvantages of Alltel's Service Offering.**

Designating Alltel as an ETC will also bring customers the unique advantages of mobility. The FCC recognized the unique advantages of mobility when it stated that:

[T]he mobility of telecommunications assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other critical community locations. In addition, the availability of a wireless universal service offering provides access to emergency services that can mitigate

the unique risks of geographic isolation associated with living in rural communities.<sup>53</sup>

Further, because Alltel's local calling areas are significantly larger than those of the incumbent LEC, Alltel's customers will be subject to fewer toll charges and be able to communicate across greater distances more frequently. Alltel will make available several offerings to its customers with varying amounts of local calling and different local calling areas, allowing customers to choose a universal service offering that best suits their particular calling needs.

The Commission has acknowledged that the disadvantages of wireless service may include dropped calls and poor coverage.<sup>54</sup> However, the FCC found that Virginia Cellular's assurances to build new towers to improve coverage, its commitments to comply with the CTIA Code for Wireless Service and annually report the number of complaints per thousand handsets, adequately addressed any concerns about the quality of Virginia Cellular's service.<sup>55</sup> Alltel understands that its business is built on customer satisfaction as evidenced by its recent initiative to voluntarily credit customers' accounts for dropped calls. Further, Alltel is a signatory to the CTIA Consumer Code for its entire operations, not only its ETC designated areas.

In addition, Alltel commits to maintain and construct cell sites in order to improve coverage, service quality and capacity. Attached as Exhibit D is Alltel's five-year plan demonstrating how high-cost universal service support will be used to improve its network. Finally, as described in Section II.C.1 of this Application, Alltel has committed to respond to reasonable requests for service from potential customers that are within its ETC Service Area, as required by Section 54.202(a)(1)(A) of the Commission's rules. In instances where a request for

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<sup>53</sup> *Virginia Cellular*, 19 FCC Rcd at 1576.

<sup>54</sup> *Id.* at 1576-77

<sup>55</sup> *Id.*

service is received from a potential customer within the ETC area but outside Alltel's existing network coverage, Alltel has committed to take the steps required by the rules to respond to such a request. Alltel's commitments to a network improvement plan and to respond to reasonable requests for service within the designated area mitigate any concerns that may exist regarding Alltel's network quality. Thus, grant of this petition will serve the public interest.

**C. Creamskimming.**

As demonstrated in detail in Section IV of this Application and Exhibit H attached hereto, there is no evidence of intentional creamskimming by Alltel, or creamskimming effects, in the two study areas that Alltel serves partially. Therefore, designating Alltel as an ETC is in the public interest and the Commission should expeditiously proceed to grant this Petition.

**VI. High-Cost Certification.**

Under Sections 54.313 and 54.314 of the Commission's rules, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administration Corporation ("USAC") their compliance with Section 254(e) of the Act. As explained above, the VCC does not exercise jurisdiction over CMRS carriers such as Alltel. Therefore, in accordance with Sections 54.313(b) and 54.314(b) of the FCC's rules, Alltel commits to use available federal high-cost support for its intended purposes – the provision, maintenance and upgrading of facilities serving the areas for which support is intended.<sup>56</sup> See Exhibit A.

Additionally, Alltel has submitted its high-cost certification with the FCC and USAC. A copy of this certification is attached hereto as Exhibit I. Alltel respectfully requests that the Commission issue a finding that Alltel has met the high-cost certification requirement and that

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<sup>56</sup> 47 U.S.C. § 254(e); 47 C.F.R. §§ 54.313, 54.314.

Alltel is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.<sup>57</sup>

**VII. Anti-Drug Abuse Certification.**

Alltel certifies that no party to this petition is 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. Section 862. *See also* Exhibit A.

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<sup>57</sup> *See* 47 C.F.R. § 54.307(d); *see also* *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314 of the Commission's Rules and Regulations*, Order, 18 FCC Rcd 7138 (2003).

**VIII. Conclusion.**

Alltel respectfully request the Commission to designate it as an ETC on an expedited basis.

Respectfully submitted,

Alltel Communications, Inc.

By: 

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Vice President  
Federal Communications Counsel  
Alltel Corporation  
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Suite 720  
Washington, D.C. 20004  
(202) 783-3970

Date: October 13, 2005

**EXHIBIT A**  
**DECLARATION**

## AFFIDAVIT

I, Glenn S. Rabin, do hereby declare under penalty of perjury as follows:

1. I am the authorized representative of Alltel Communications, Inc. (“Alltel” or the “Company”) in charge of Alltel’s Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Virginia. This affidavit is submitted in support of that Petition.
2. Alltel is authorized to provide cellular radiotelephone service in the Commonwealth of Virginia and is authorized to provide service in the requested ETC area described in its Application.
3. Alltel meets the criteria for ETC designation as explained herein.
4. Alltel is a “common carrier” for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). A “common carrier” is generally defined in 47 U.S.C. § 153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission’s Rules provides that cellular service is a common carrier service. *See* 47 C.F.R. § 20.9(a)(7).
5. Alltel currently offers and is able to provide the services and functionalities identified in 47 C.F.R. § 54.101(a). Each of these services and functionalities is discussed more fully below.
  - a. Voice-grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hertz frequency range. *See Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) (“Universal Service Order”).* Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, all customers of Alltel are able to make and receive calls on the public switched telephone network within the specified bandwidth.
  - b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. Although the FCC had previously deferred a determination on the amount of local usage carriers would be required to provide as part of its universal service offering, it recently declined to adopt a specific local usage threshold. *See Federal-State Joint Board on Universal Service, Report and Order, 20 FCC Rcd 6371, 6385 (2005).* The FCC concluded that a competitive ETC should offer a local usage plan comparable to the one offered by the incumbent Local Exchange Carrier (LEC) in the service areas for which it seeks ETC designation. Alltel will meet such a requirement by offering rate plans that include a predetermined level of local usage within a substantially larger local calling area than the incumbent LEC. Alltel meets the FCC’s local usage requirement by offering customers (a) local

usage plans which include a predetermined level of local usage; and (b) a universal service offering that provides a comparable value to the one offered by the incumbent LEC.

- c. 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. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. § 54.101(a)(3). Alltel currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Alltel therefore meets the requirement to provide DTMF signaling or its functional equivalent.
- d. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. *Universal Service Order* at 8810. Alltel meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.
- e. 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. Phase I E-911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. Alltel currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of the basic 911 requirement, and either provides, or will provide subscribers with Phase I and Phase II E-911 services in accordance with the deployment schedules agreed to by Alltel and the local emergency service provider.
- f. 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. *Universal Service Order* at 8817-18. Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXC, etc.).
- g. Access to interexchange services. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Universal Service Order* at 8819. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with IXCs.

- h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service Order* at 8821. Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing “411” or “XXX-555-1212”.
  
  - i. Toll limitation for qualifying low-income consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9). *See Universal Service Fourth Order on Reconsideration*, 13 FCC Rcd 5318 (1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. *Universal Service Order* at 8821-22. Alltel currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. §§ 54.400-415. Once designated as an ETC, Alltel will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC’s requirement. Alltel currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.
6. ANTI-DRUG ABUSE CERTIFICATION. To the best of my knowledge, no party to the Application, nor any of their officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 1.2002(b) of the Commission’s rules, are subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 V.S.C. § 862.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 13, 2005.

Alltel Communications, Inc.

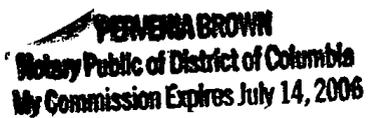


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Vice President  
Federal Communications Counsel  
Authorized Representative

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Subscribed and sworn to before me  
This 13<sup>th</sup> day of October, 2005.

  
Notary Public

  
PENNEIA BROWN  
Notary Public of District of Columbia  
My Commission Expires July 14, 2006

**EXHIBIT B**

**STATEMENT FROM  
VIRGINIA CORPORATION COMMISSION  
THAT IT LACKS JURISDICTION OVER  
CMRS APPLICATIONS**

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

AT RICHMOND, APRIL 9, 2002

COMMONWEALTH OF VIRGINIA, ex rel.<sup>1</sup>

At the relation of the

STATE CORPORATION COMMISSION

CASE NO. PUC970135

Ex Parte, in re: Implementation  
of Requirements of § 214(e) of the  
Telecommunications Act of 1996

IN RE:

APPLICATION OF VIRGINIA CELLULAR LLC

CASE NO. PUC010263

For designation as an eligible  
telecommunications provider under  
47 U.S.C. § 214(e) (2)

ORDER

On September 15, 1997, the State Corporation Commission ("Commission") established the docket in Case No. PUC970135 to consider the requests of local exchange carriers ("LECs") to be designated as eligible telecommunications carriers ("ETC designation") to receive universal service support pursuant to § 214(e) of the Telecommunications Act of 1996, 47 U.S.C. § 251 et seq., ("Act") and associated Federal Regulations.<sup>1</sup> The Commission's exercise of its jurisdiction under § 214(e) (2) of the Act has been to establish a simple and streamlined process for telecommunications carriers to certify their eligibility with a minimum of regulatory burden placed upon each applicant

<sup>1</sup> 47 C.F.R. § 54.201-207

All Virginia carriers receiving an ETC designation have merely been required to file an affidavit which, among other matters, certifies that all requirements of the Act for designation are

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Until the above-captioned Application was filed in Case PUC010263 by Virginia Cellular LLC ("Virginia Cellular" or "Applicant") for ETC designation, these proceedings have been uncontested. This is the first application by a Commercial Mobile Radio Service ("CMRS") carrier for ETC designation.<sup>3</sup> Pursuant to the Order Requesting Comments, Objections, or Requests for Hearing, issued by the Commission on January 24 2002, the Virginia Telecommunications Industry Association ("VTIA") and NTELOS Telephone Inc. ("NTELOS") filed their respective comments and requests for hearing on February 20, 2002. Virginia Cellular filed Reply Comments on March 6, 2002.<sup>4</sup>

The comments of NTELOS and VTIA both contest the sufficiency of the Application and claim Virginia Cellular has

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<sup>2</sup> See Order issued November 21, 1997, in Case No. PUC970135, pp. 2-4 ("November 21, 1997, Order"). Also, the annual certification procedure to comply with 47 C.F.R. §§ 54.313 and 314 has been reduced to filing a form affidavit approved by the Commission in a Preliminary Order, issued August 29, 2001, in Case No. PUC010172.

<sup>3</sup> Virginia Cellular is a CMRS carrier as defined in 47 U.S.C. § 153(27) and is authorized as the "A-band" cellular carrier for the Virginia 6 Rural Service Area, serving the counties of Rockingham, Augusta, Nelson, and Highland and the cities of Harrisonburg, Staunton, and Waynesboro.

<sup>4</sup> On March 4, 2002, Virginia Cellular filed a Consent Motion requesting until March 6, 2002, to file Reply Comments. There being no objection, we now grant the Consent Motion.

failed to demonstrate how the public interest will be served.<sup>5</sup> NTELOS and VTIA each allude in their comments to other expected applications for ETC designation<sup>1</sup> by wireless and CLEC carriers to follow this case of first impression. For that reason, we are asked by VTIA and NTELOS to convene a hearing and establish certain standards for the provisioning of the nine services specified in 47 C.F.R. § 54.101.<sup>6</sup> Each applicant is required to provide these nine services to be eligible for ETC designation.

VTIA further comments that "[i]t is not clear how the designation of Virginia Cellular as an ETC will affect the distribution of Universal Funds to the existing carriers in any given rural exchange area." Virginia Cellular replies that this "macroeconomic concern" need not be addressed with this Application. Rather, the Federal Communications Commission ("FCC") and the Federal State Joint Board on Universal Service

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<sup>5</sup> § 214(e)(2) of the Act requires that an ETC designation in areas served by a rural telephone company be based upon a finding that the designation is in the public interest. The Commission did recognize in its November 21, 1997, Order that any carrier seeking ETC designation in a rural area would have the burden of proving that such designation is in the public interest if challenged. Virginia Cellular is seeking ETC designation in the service territories of the following rural telephone companies: Shenandoah Telephone Company ("Shenandoah"), Clifton Forge Waynesboro Telephone Company ("NTELOS"), New Hope Telephone Company, North River Cooperative, Highland Telephone Cooperative, and Mountain Grove-Williamsville Telephone Company ("MGW").

<sup>6</sup> The nine services required to be offered include: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation for qualifying low-income consumers. Also, the services must be advertised in appropriate media sources. See In Re: Federal-State Joint Board of Universal Service, Report and Order, CC Docket No. 96-45, ¶ 145 (May 8, 1997) ("Universal Service Report & Order").

are reported by Virginia Cellular to be conducting ongoing proceedings to ensure the solvency of the high-cost support fund.<sup>7</sup> Presumably, VTIA views any public interest served by Virginia Cellular's ETC designation to depend upon whether there would be a consequent diminution of universal service funds.

Virginia Cellular cites the authority of § 214(e)(6) of the Act for this Commission to send Applicant to the FCC for ETC designation if this Commission declines to act on its Application.<sup>8</sup> In its Reply Comments, Virginia Cellular reports that the "FCC has been actively processing ETC applications on behalf of states which have declined to exercise jurisdiction [over CMRS carriers]. Its internal processing time has been six months, and it has met that timeline in almost all of its proceedings [and] . . . most, if not all of the issues raised by the commenters have been previously addressed by the FCC in its prior orders involving applications for ETC status."<sup>9</sup>

The Commission finds that § 214(e)(6) of the Act is applicable to Virginia Cellular's Application as this Commission has not asserted jurisdiction over CMRS carriers and that the

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Reply Comments at p.

<sup>8</sup> Pursuant to § 332(c)(3), 47 U.S.C. § 332(c)(3), state regulation of the entry of or the rates charged by any commercial mobile service or any private mobile service is preempted. The Commission has deregulated all Virginia radio common carriers and cellular mobile radio communications carriers. See Final Order issued October 23, 1995, Case No. PUC950062.

<sup>9</sup> Reply Comments at p. 3

Applicant should apply to the FCC for ETC designation.<sup>10</sup> The Applicant points out that if Virginia Cellular is designated as an ETC carrier, then the Commission must redefine the service areas of NTELOS and Shenandoah, pursuant to 47 C.F.R. § 54.207(c).<sup>11</sup> The Applicant has indicated a willingness to propose a plan to redefine these companies' service areas and may submit such a plan with its application to the FCC for ETC designation.

If necessary, this Commission will participate with the FCC and Federal-State Joint Board in redefining the service areas of NTELOS and Shenandoah for "the purpose of determining universal service obligations and support mechanisms." 47 C.F.R.

§ 54.207(a)<sup>12</sup> Although the FCC will make the final determination on Virginia Cellular's requests, we need to leave this docket open in case there is additional action we must take with respect to defining the service areas of NTELOS and Shenandoah.

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<sup>10</sup> The action is similar to that taken by the Commission in Case No. PUC010172 in its August 29, 2001, Order that required cooperatives to certify directly with the FCC.

<sup>11</sup> The Commission believes that the service area of MGW does not necessarily need to be redefined if Virginia Cellular is designated as an ETC in that territory. However, if the FCC determines otherwise, the Commission will consider additional action if necessary.

<sup>12</sup> Pursuant to 47 C.F.R. § 54.207(c), if the Applicant proposes to redefine these two companies' service areas, the FCC's procedures require the Commission's agreement on the definitions.

<sup>13</sup> At this juncture, it is unclear whether the Commission will need to address the redefinitions once disaggregation plans are filed at the FCC pursuant to 47 C.F.R. § 54.315(a).

NOW UPON CONSIDERATION of all the pleadings of record and the applicable law, the Commission is of the opinion that Virginia Cellular should request the FCC to grant the requested ETC designation, pursuant to 47 U.S.C. § 214(e)(6).

Accordingly, IT IS ORDERED THAT Case No. PUC010263 will remain open for further order of the Commission.

**EXHIBIT C**

**DESCRIPTION OF ALLTEL'S  
CURRENT RATE PLANS  
IN THE COMMONWEALTH OF VIRGINIA**

## Total Freedom®

Select a Plan 

 COMPARE PLANS

 PRINT

The Total Freedom wireless plan from Alltel features our largest coverage area and eliminates long-distance and roaming fees in all 50 states. When you connect with Total Freedom, you're free to call from anywhere to anywhere across the entire U.S.



**Start Today**  
Call 1-866-Alltel7  
Find a store near you



VIEW LARGER

### Sign up today and receive

- Our largest coverage area
- Free nationwide long distance
- Free nationwide roaming

### Plan features include

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

Total Freedom Plans	\$39.99	\$49.99	\$59.99	\$79.99	\$99.99	\$149.99	\$199.99	\$299.99
Included Anytime Minutes	200	350	500	650	900	1500	2000	3000
Night and Weekend Home Minutes*	1000	1000	1000	1000	1000	1000	1000	1000
Mobile-to-Mobile Home Minutes**	1000	1000	1000	1000	1000	1000	1000	1000
Add'l Minute Rate	40¢	40¢	40¢	35¢	25¢	25¢	25¢	20¢

A \$20 non-refundable activation fee will apply.

\*Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon 5:59 a.m. Night and Weekend minutes available in the Total Freedom coverage area. Minutes must be used each month and do not carry over.

\*\*Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the Total Freedom coverage area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Please note: Some included features and add-ons may not be available in certain areas.

[Explanation of Fees & Services](#) | [Service Agreement](#)

### Available Add-ons

Touch2Talk<sup>SM</sup>  
**\$5-15 per month**

Call Home Free

Share Your Minutes  
**\$9.99 per month on sele**

Enhanced Voice Mail  
**\$5 per month**

ProductGuard<sup>SM</sup>  
**\$4 per month**

Mr. Rescue<sup>®</sup>  
**\$3 per month**

Directory Plus  
**\$1.25 per call plus airtim**

Extended Night Minutes  
**\$7 per month**

[> MORE](#)

### Add Lines for \$9.99

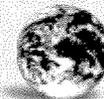
Share your minutes on up to 4 lines! **\$9.99**

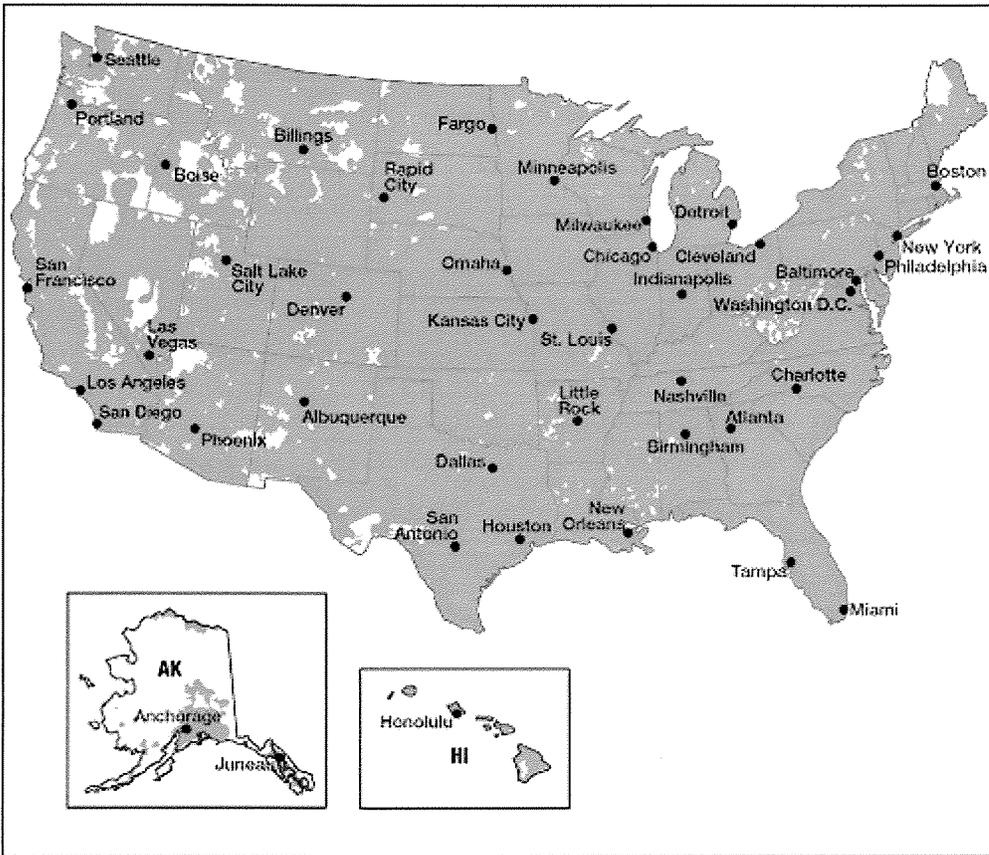
[> MORE](#)

### Stay in touch worldwide

Call Internationally

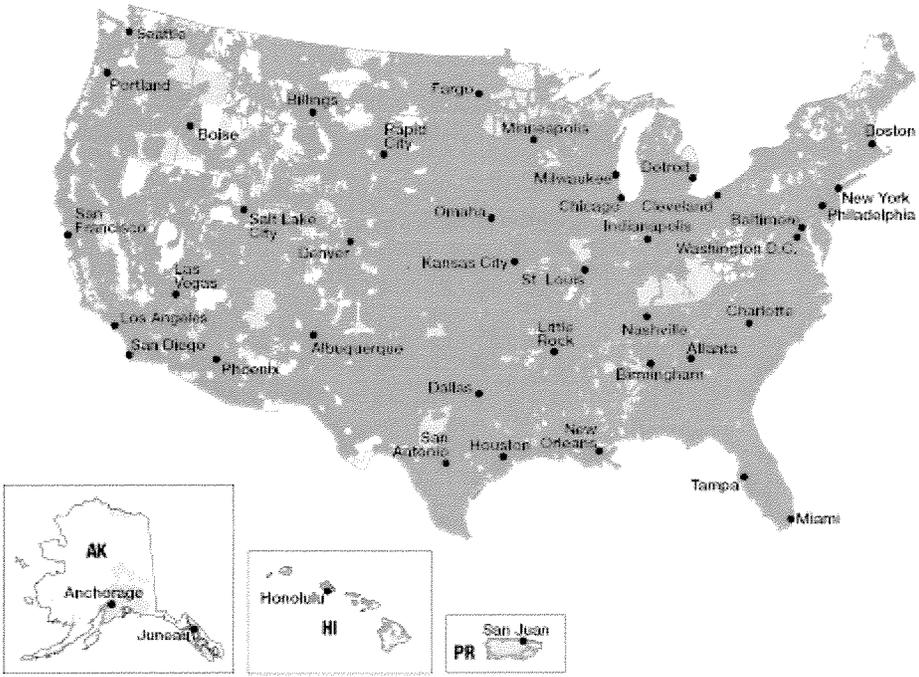
[> MORE](#)





h e c e e e g e f e e g f





h e c e e e ge fee gf

**Greater Freedom**<sup>SM</sup>

Select a Plan

COMPARE PLANS

PRINT

The Greater Freedom wireless plan from Alltel is the best value for those who keep calls local. You'll receive great coverage in your large local area and when you need to call outside your network, extended coverage is at your fingertips.



**Start Today**  
Call 1-866-Alltel7  
Find a store near you

VIEW YOUR COVERAGE  
Enter Zip Code > GO

**Sign up today and receive**

- Large local coverage area
- Best value for local callers
- Free nationwide long distance\*

**Plan\* features include**

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

\*Included on plans \$39.99 and higher.

Greater Freedom Plans	\$29.99	\$39.99	\$49.99	\$59.99	\$79.99	\$99.99	\$149.99	\$199.99
Included Anytime Minutes	300	1000	1000	1200	1600	2200	3200	4200
Night and Weekend Minutes**	—	—	unlimited	unlimited	unlimited	unlimited	unlimited	unlimited
Mobile-to-Mobile Minutes***	—	—	unlimited	unlimited	unlimited	unlimited	unlimited	unlimited
Add'l Minute Rate	45¢	40¢	40¢	40¢	35¢	25¢	25¢	25¢

Calls originating and terminating within the local coverage area use plan minutes and are toll free. On the \$29.99 plan, calls placed while in the local coverage area and terminating to anywhere outside the local coverage area will be charged 15¢ per minute long distance. Some areas may offer options for toll-free calling to the U.S. Customers utilizing one of these options may not pay long-distance charges, but will still continue to use rate plan minutes. Airtime charges may apply if rate plan minutes are unavailable. A \$20 non-refundable activation fee will apply.

Maps are general representation of coverage. Coverage varies based on system buildout, system availability and capacity, customer's equipment, terrain, signal strength, weather and other conditions.

\*\*Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon. 5:59 a.m. Minutes must be used each month and do not carry over.

\*\*\*Mobile-to-Mobile Minutes apply to calls between Alltel wireless customers that begin and end in your plan's calling area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Some included features and add-ons may not be available in certain areas.

[Explanation of Fees & Services](#) | [Service Agreement](#)

**Available Add-ons\***

Touch2Talk<sup>SM</sup>  
\$5-15 per month

FreeToRoam<sup>®</sup> Minutes  
\$10 per month

Call Home Free

Share Your Minutes  
\$9.99 per month on sele

Extended Night Minutes  
\$7 per month

*Special terms and condit apply.*

Learn more about availa ons, including add-ons fo under \$39.99. >MORE

**Nationwide Long Distance**

**FREE** – When you sign up today for \$49.99.

**FreeToRoam<sup>®</sup> Minutes**

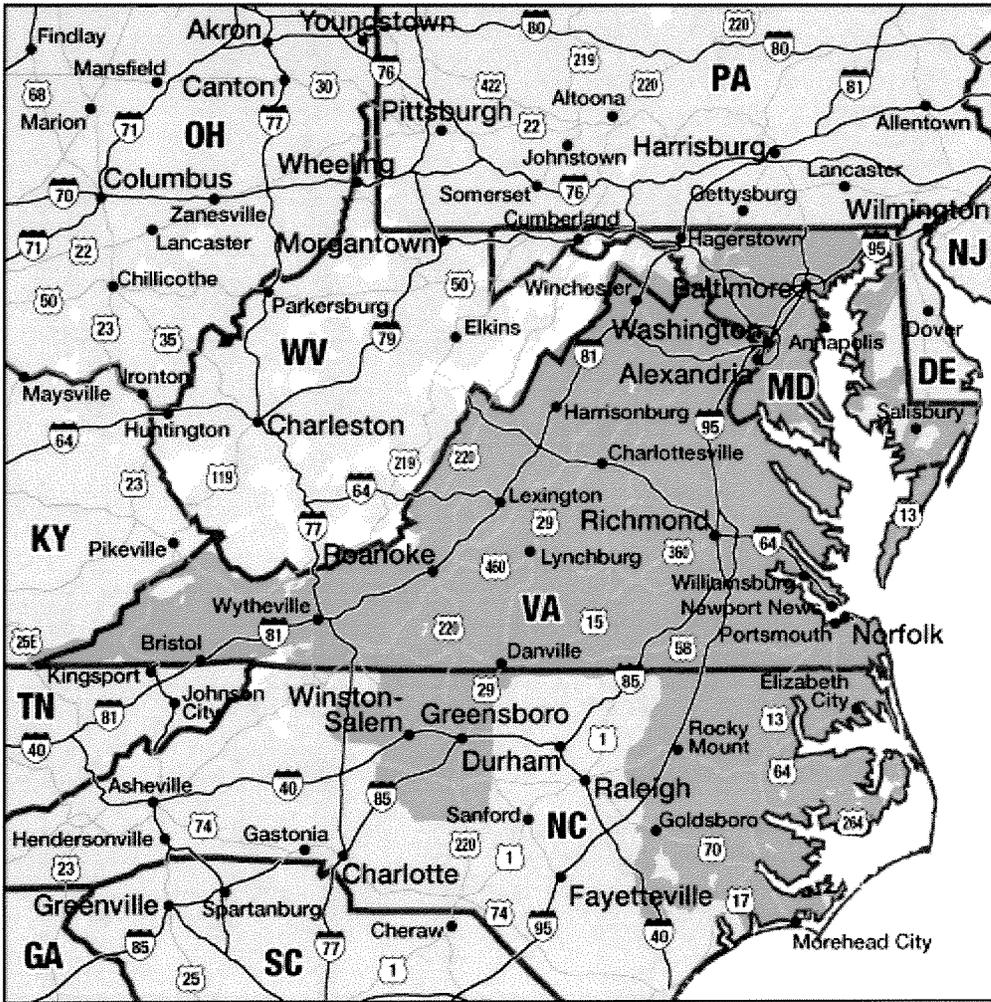
Get 100 nationwide minutes each month.  
> MORE



**Stay in touch worldwide**

Call Internationally  
> MORE





**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**

**EXHIBIT D**

**ALLTEL'S  
FIVE-YEAR SERVICE  
IMPROVEMENT PLAN**

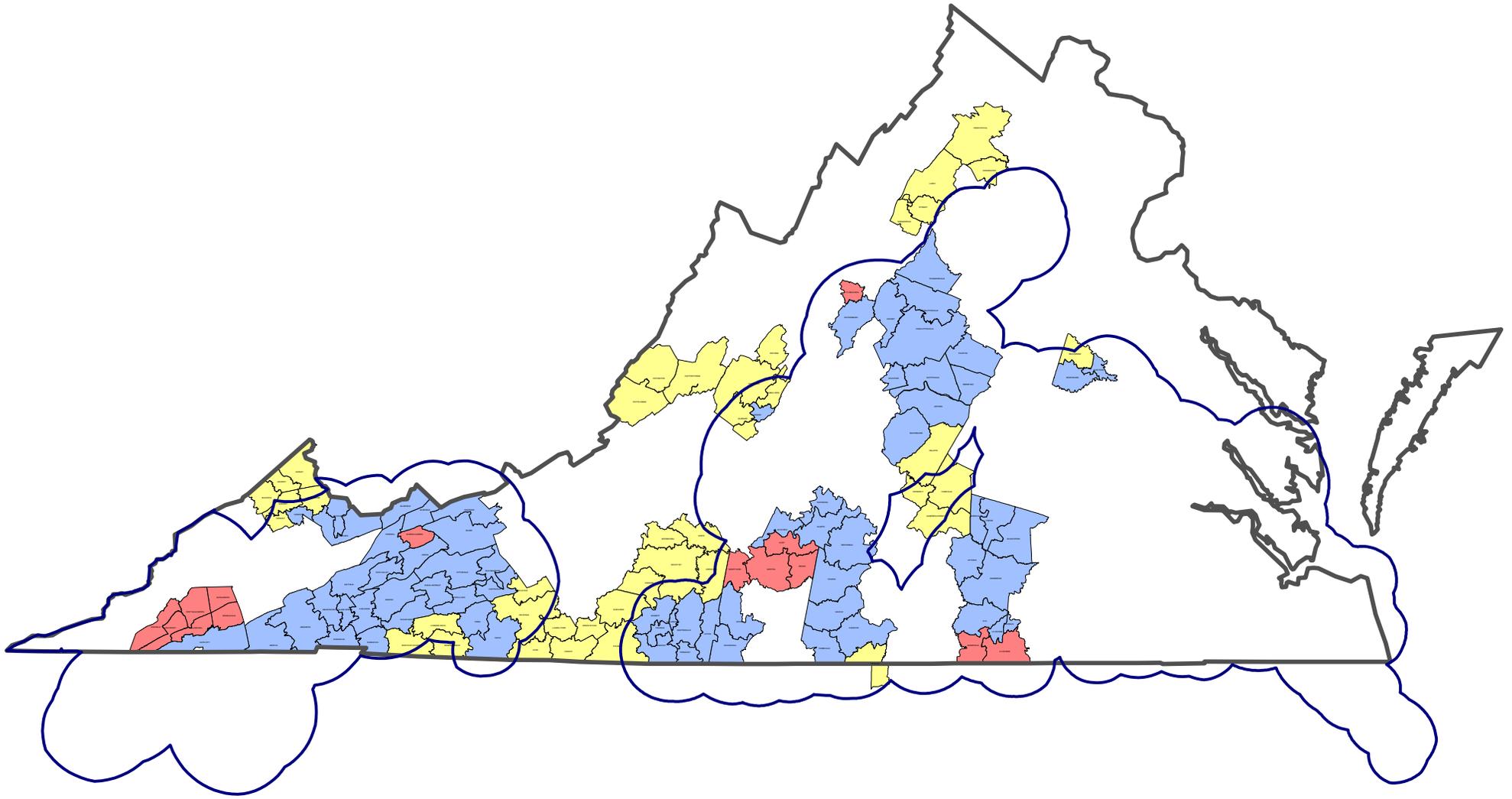
**REDACTED**

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**EXHIBIT E**

**MAP ILLUSTRATING  
ALLTEL'S LICENSED (RURAL) AREA**

# Alltel Communications, Inc. Commonwealth of Virginia



- Wire centers served by Alltel in partially served rural study areas
- Wire centers not served by Alltel in partially served rural study areas
- Wire centers in rural study areas served in their entirety

**EXHIBIT F**

**LIST OF WIRE CENTERS  
WITHIN RURAL STUDY AREAS  
THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY**

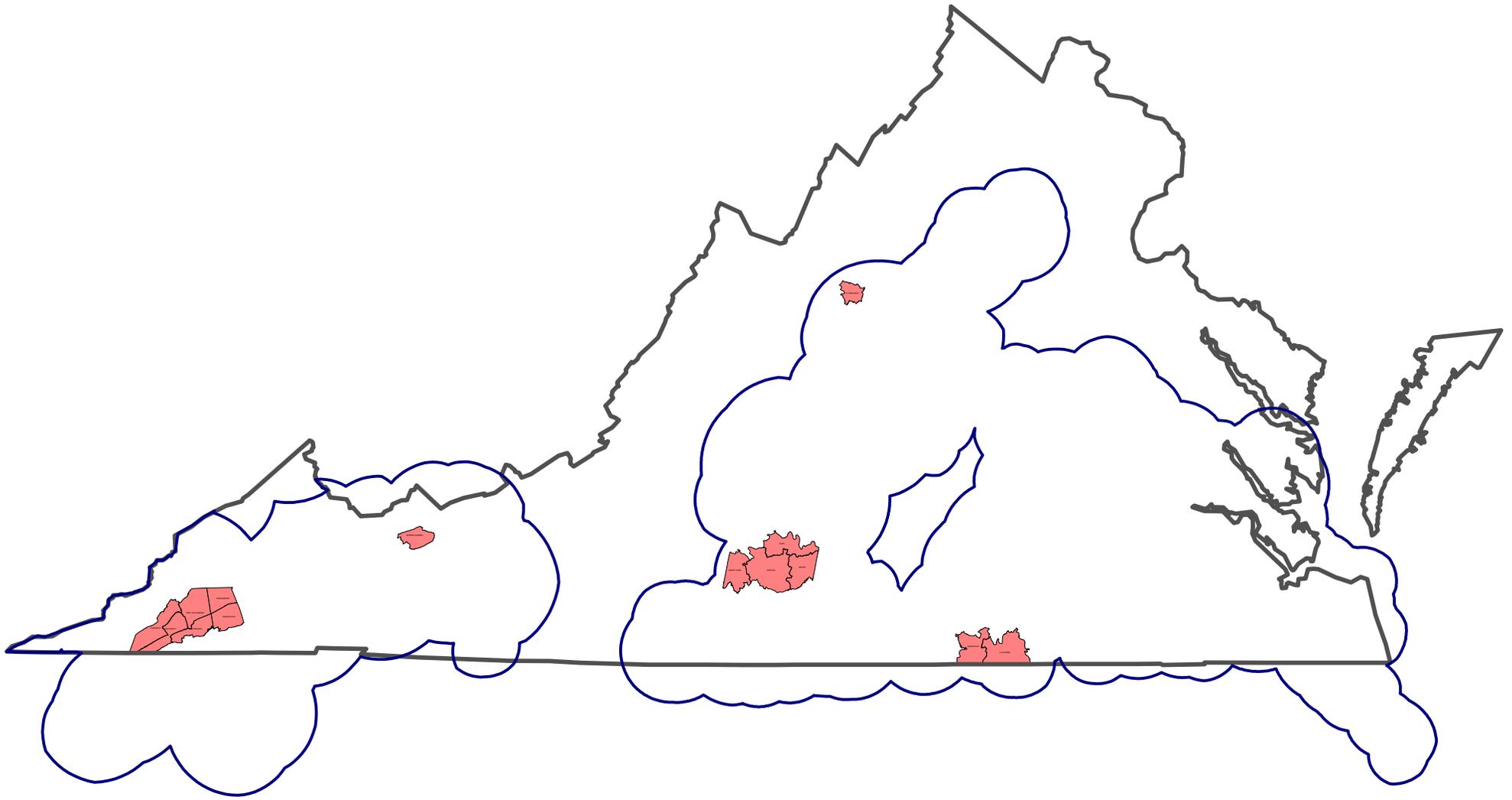
**Alltel Communications, Inc.**  
**Commonwealth of Virginia**  
**Rural Study Areas Served in Their Entirety**

STUDY AREA CODE	STUDY AREA NAME	WIRE CENTER NAME	CLLI CODE
190219	BUGGS ISLAND TELEPHONE COOP	LA CROSSE	BCRGVAXA
190219	BUGGS ISLAND TELEPHONE COOP	BAKERVILLE	BCWDVAXA
190220	BURKE S GARDEN TELEPHONE CO. INC	BURKES GARDEN	BRGRVAXA
190239	NEW HOPE TELEPHONE CO.	FT DEFIANCE	NWHPVAXA
190240	PEOPLES MUTUAL TELEPHONE CO.	GRETNA	GRETVAXA
190240	PEOPLES MUTUAL TELEPHONE CO.	HURT	HURTVAXA
190240	PEOPLES MUTUAL TELEPHONE CO.	RENAN	RENNVAXA
190240	PEOPLES MUTUAL TELEPHONE CO.	SANDY LEVEL	SNLVVAXA
190248	SCOTT COUNTY TELEPHONE COOP	CLINCHPORT	CLPTVAXA
190248	SCOTT COUNTY TELEPHONE COOP	DUFFIELD	DFFDVAXA
190248	SCOTT COUNTY TELEPHONE COOP	DUNGANNON	DNGNVAXA
190248	SCOTT COUNTY TELEPHONE COOP	FORT BLACKMORE	FTBCVAXA
190248	SCOTT COUNTY TELEPHONE COOP	NICKELSVILLE	NCVLVAXA
190248	SCOTT COUNTY TELEPHONE COOP	WILLIAMS MILL	WLMLVAXA

**EXHIBIT F-1**

**MAP ILLUSTRATING WIRE CENTERS  
WITHIN RURAL STUDY AREAS  
THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY**

**Alltel Communications, Inc.  
Commonwealth of Virginia**

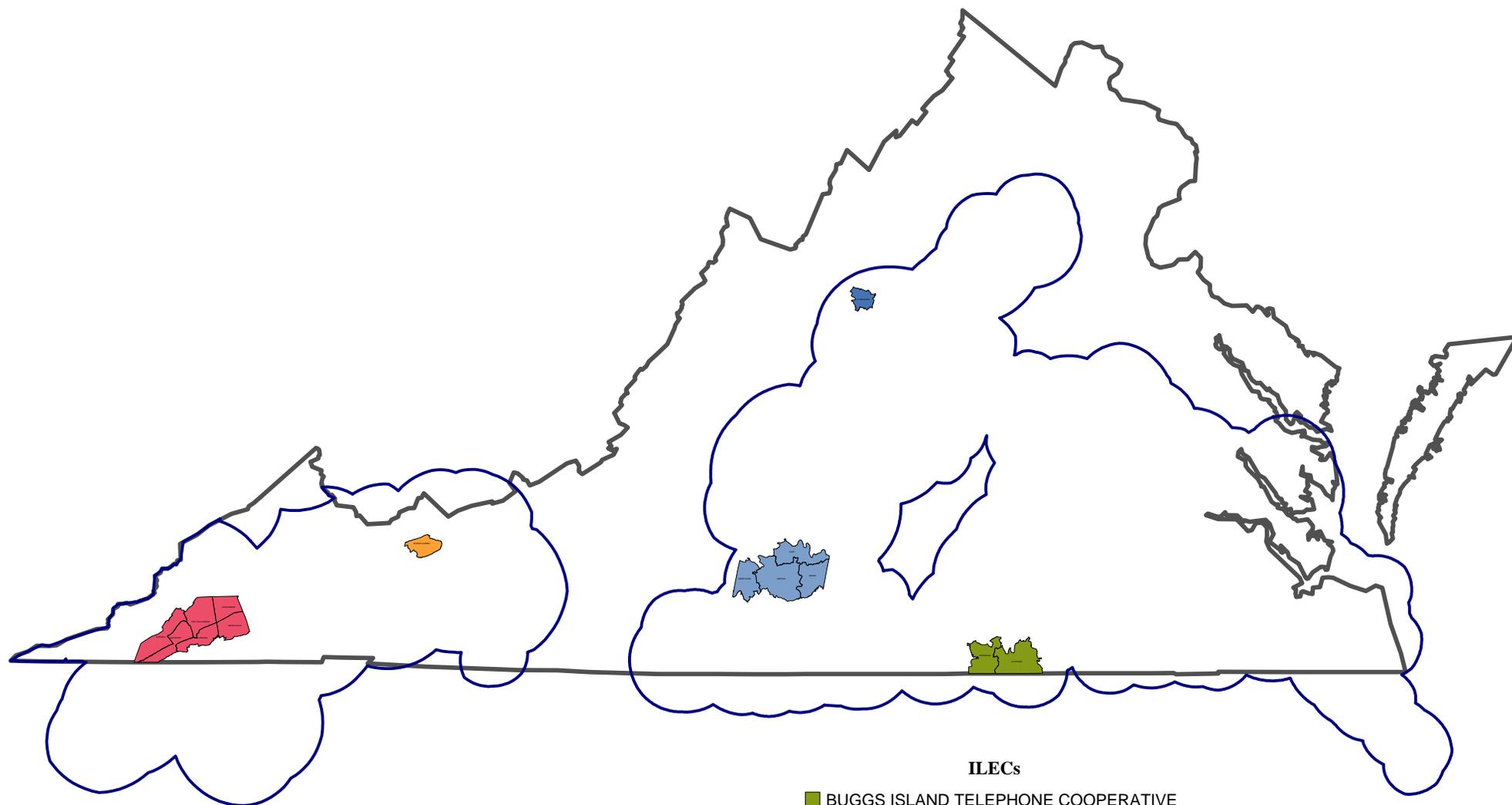


■ Wire centers in rural study areas served in their entirety

**EXHIBIT F-2**

**MAP ILLUSTRATING  
INCUMBENT LEC STUDY AREAS  
THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY**

# Alltel Communications, Inc. Commonwealth of Virginia



**ILECs**

- BUGGS ISLAND TELEPHONE COOPERATIVE
- BURKE S GARDEN TELEPHONE CO., INC.
- NEW HOPE TELEPHONE CO.
- PEOPLE'S MUTUAL TELEPHONE CO.
- SCOTT COUNTY TELEPHONE COOPERATIVE

**EXHIBIT G**

**LIST OF WIRE CENTERS  
WITHIN RURAL STUDY AREAS  
THAT ARE NOT SERVED IN THEIR ENTIRETY**

**Alltel Communications, Inc.**  
**Commonwealth of Virginia**  
**Partially Served Rural Study Areas**

STUDY AREA CODE	STUDY AREA NAME	WIRE CENTER NAME	CLLI CODE	SERVED BY ALLTEL
190254	CENTRAL TELEPHONE CO. - VIRGINIA	ALTAVISTA	ALTVVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	ARVONIA	ARVNVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	AXTON	AXTNVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BACHESHALL	BCHLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BUCKINGHAM	BCHMVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BLACKSTONE	BLCSVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BRODNAX	BRDNVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BROOKNEAL	BRKNVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BURKEVILLE	BRVLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BASSETT	BSSTVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	CHARLOTTESVILLE	CHVLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	CHARLOTTESVILLE	CHVLVAXB	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	COLLINSVILLE	COVLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	CREWE	CREWVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	CROZET	CRZTVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BREMO BLF	FKUNVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	FIELDALE	FLDLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	GLADYS	GLDYVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	GLASGOW	GLSGVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	GUM TREE	GMTRVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	HALIFAX	HLFXVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	KENBRIDGE	KNBRVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	LA CROSSE	LACRVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	MONTPELIER	MTPLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	MARTINSVILLE	MTVIVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	PALMYRA	PLMYVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	RIDGEWAY	RDWYVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	RUSTBURG	RSBGVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	S BOSTON	SBTNVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	SCHUYLER	SCHLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	SCOTTSVILLE	SCVLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	STANARDSVILLE	SDVLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	RIDGEWAY	SPNCVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	S HL	STHLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	TURBEVILLE	TBVLVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	VICTORIA	VCTAVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	VOLENS	VLNSVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	WHITMELL	WHTMVAXA	YES
190254	CENTRAL TELEPHONE CO. - VIRGINIA	ARARAT	ARRTVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BOONES MILL	BNMLVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BUENA VISTA	BNVSVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	RAPHINE	BRBGVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	WIRTZ	BTCHVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	BEAVERDAM	BVRDVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	DILLWYN	DLWYVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	FERRUM	FRRMVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	FRONT ROYAL	FRRYVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	FARMVILLE	FRVLVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	HAMPDEN-SYDNEY	HMSYVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	LURAY	LURYVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	LEXINGTON	LXTNVAXA	NO

**Alltel Communications, Inc.**  
**Commonwealth of Virginia**  
**Partially Served Rural Study Areas**

STUDY AREA CODE	STUDY AREA NAME	WIRE CENTER NAME	CLLI CODE	SERVED BY ALLTEL
190254	CENTRAL TELEPHONE CO. - VIRGINIA	MDWS OF DAN	MDDNVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	GLASGOW	NTBRVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	PROSPECT	PRSPVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	ROCKY MT	RCMTVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	SHENANDOAH	SHNDVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	STANLEY	STNLVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	STUART	STRTVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	UNION HALL	UNHLVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	VIRGINIA	VRGLVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	WASHINGTON	WASHVAXA	NO
190254	CENTRAL TELEPHONE CO. - VIRGINIA	WOOLWINE	WLWNVAXA	NO
190226	NTELOS TELEPHONE INC.	WAYNESBORO	WYBOVAXA	YES
190226	NTELOS TELEPHONE INC.	CLIFTON FORGE	CFFRVAXA	NO
190226	NTELOS TELEPHONE INC.	COVINGTON	CVTNVAXA	NO
190226	NTELOS TELEPHONE INC.	POTTS CREEK	PTCKVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	ABINGDON	ABNGVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	AUSTINVILLE	ATVLVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	BLAND	BLNDVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	BRISTOL	BRSTVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	CERES	CERSVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	CHILHOWIE	CHLHVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	CRIPPLE CRK	CRCKVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	DAMASCUS	DMSCVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	FRIES	FRISVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	GALAX	GALXVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	GLADE SPRING	GDSPVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	GATE CITY	GTCYVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	DAMASCUS	KNRKVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	MARION	MARNVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	MEADOWVIEW	MDVWVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	MAX MEADOWS	MXMDVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	RICH VALLEY	RCVYVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	RURAL RETREAT	RRRTVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	SUGAR GROVE	SGGVVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	SALTVILLE	SLVLVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	WYTHEVILLE	WYVLVAXA	YES
190567	UNITED INTER-MOUNTAIN TELEPHONE	CANA	CANAVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	COMERS ROCK	CMRKVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	HILLSVILLE	HLVLVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	INDEPENDENCE	INDPVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	LAUREL FORK	LRFKVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	MOUTH OF WILSON	MTWLVAXA	NO
190567	UNITED INTER-MOUNTAIN TELEPHONE	SYLVATUS	SYLVVAXA	NO
190479	VERIZON SOUTH INC.-VA	BLUEFIELD	BLFDVAXA	YES
190479	VERIZON SOUTH INC.-VA	RICHLANDS	JWRGVAXA	YES
190479	VERIZON SOUTH INC.-VA	OAKWOOD	OKWDVAXA	YES
190479	VERIZON SOUTH INC.-VA	BLUEFIELD	PCHNVAXA	YES
190479	VERIZON SOUTH INC.-VA	NARROWS	RCGPVAXA	YES
190479	VERIZON SOUTH INC.-VA	RICHLANDS	RCLDVAXA	YES
190479	VERIZON SOUTH INC.-VA	TAZEWELL	TZWLVAXA	YES
190479	VERIZON SOUTH INC.-VA	VANSANT	BGPRVAXA	NO

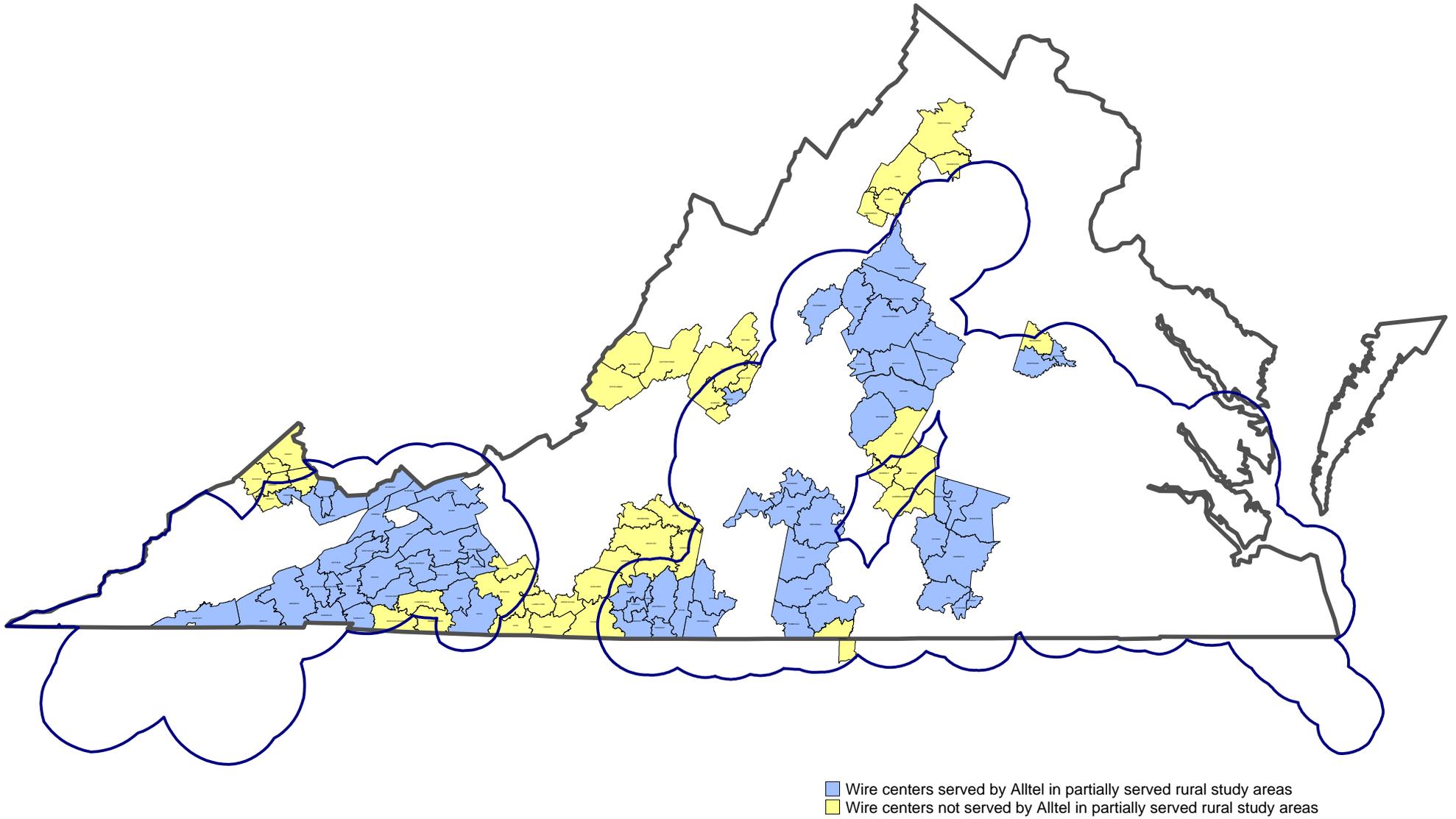
**Alltel Communications, Inc.**  
**Commonwealth of Virginia**  
**Partially Served Rural Study Areas**

<b>STUDY AREA CODE</b>	<b>STUDY AREA NAME</b>	<b>WIRE CENTER NAME</b>	<b>CLLI CODE</b>	<b>SERVED BY ALLTEL</b>
190479	VERIZON SOUTH INC.-VA	GRUNDY	BGRKVAXA	NO
190479	VERIZON SOUTH INC.-VA	WHITEWOOD	DWGHVAXA	NO
190479	VERIZON SOUTH INC.-VA	GRUNDY	GRNDVAXB	NO
190479	VERIZON SOUTH INC.-VA	HURLEY	HRLYVAXA	NO
190479	VERIZON SOUTH INC.-VA	BIG ROCK	MAXIVAXA	NO

**EXHIBIT G-1**

**MAP ILLUSTRATING WIRE CENTERS  
WITHIN RURAL STUDY AREAS  
THAT ARE NOT SERVED IN THEIR ENTIRETY**

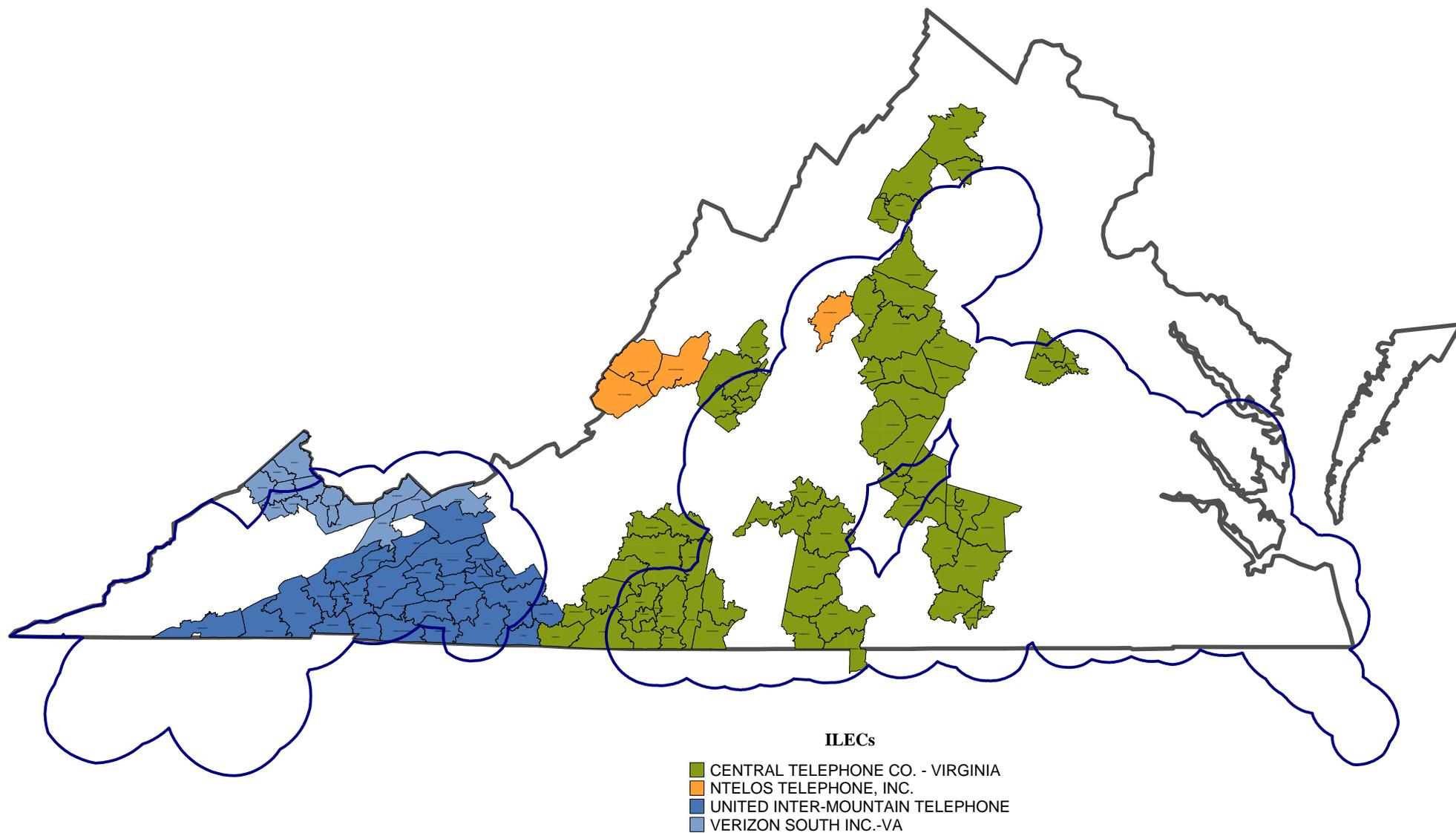
# Alltel Communications, Inc. Commonwealth of Virginia



**EXHIBIT G-2**

**MAP ILLUSTRATING  
INCUMBENT LEC STUDY AREAS  
THAT ARE NOT SERVED IN THEIR ENTIRETY**

# Alltel Communications, Inc. Commonwealth of Virginia



**EXHIBIT H**  
**DENSITY ANALYSIS**

**AltTel Communications, Inc.**  
**Eligible Telecommunications Carrier Designation in the Commonwealth of Virginia**  
**Density Analysis of Partially Served Rural Study Areas**

STUDY AREA NAME	WIRE CENTER NAME	CLL CODE	SERVED BY ALLTEL	WIRE CENTER POPULATION	AREA OF WIRE CENTER MI <sup>2</sup>	DENSITY
CENTRAL TELEPHONE CO. - VIRGINIA	ARARAT	ARRTVAXA	NO	4,196	86.70	48.40
CENTRAL TELEPHONE CO. - VIRGINIA	BOONES MILL	BNMLVAXA	NO	5,147	72.28	71.21
CENTRAL TELEPHONE CO. - VIRGINIA	BUNES VISTA	BNVSVAXA	NO	8,832	87.84	100.54
CENTRAL TELEPHONE CO. - VIRGINIA	RAPHINE	BRBGVAXA	NO	1,761	101.55	17.34
CENTRAL TELEPHONE CO. - VIRGINIA	WIRTZ	BTCHVAXA	NO	10,061	98.86	101.77
CENTRAL TELEPHONE CO. - VIRGINIA	BEAVERDAM	BVRDVAXA	NO	3,083	61.19	50.38
CENTRAL TELEPHONE CO. - VIRGINIA	DILLWYN	DLWVVAXA	NO	5,020	180.56	27.80
CENTRAL TELEPHONE CO. - VIRGINIA	FERRUM	FRRMVAXA	NO	4,259	99.16	42.95
CENTRAL TELEPHONE CO. - VIRGINIA	FRONT ROYAL	FRRYVAXA	NO	33,268	224.84	147.96
CENTRAL TELEPHONE CO. - VIRGINIA	FARMVILLE	FRVLVAXA	NO	13,943	167.01	83.49
CENTRAL TELEPHONE CO. - VIRGINIA	HAMPDEN-SYDNEY	HMSVAXA	NO	4,402	122.41	35.96
CENTRAL TELEPHONE CO. - VIRGINIA	LURAY	LURVVAXA	NO	10,647	165.42	64.36
CENTRAL TELEPHONE CO. - VIRGINIA	LEXINGTON	LXTNVAXA	NO	15,421	207.29	74.39
CENTRAL TELEPHONE CO. - VIRGINIA	MDWS OF DAN	MDDNVAXA	NO	1,430	50.42	28.36
CENTRAL TELEPHONE CO. - VIRGINIA	GLASSGOW	NTBRVAXA	NO	2,651	86.11	30.79
CENTRAL TELEPHONE CO. - VIRGINIA	PROSPECT	PRSPVAXA	NO	2,488	49.44	50.32
CENTRAL TELEPHONE CO. - VIRGINIA	ROCKY MT	RCMTVAXA	NO	22,195	250.02	88.77
CENTRAL TELEPHONE CO. - VIRGINIA	SHENANDOAH	SHNDVAXA	NO	4,698	66.69	70.44
CENTRAL TELEPHONE CO. - VIRGINIA	STANLEY	STNLVAXA	NO	6,085	67.44	90.23
CENTRAL TELEPHONE CO. - VIRGINIA	STUART	STRTVAXA	NO	10,438	164.33	63.52
CENTRAL TELEPHONE CO. - VIRGINIA	UNION HALL	UNHLVAXA	NO	4,655	111.14	41.88
CENTRAL TELEPHONE CO. - VIRGINIA	VIRGLINA	VRGLVAXA	NO	2,482	76.78	32.33
CENTRAL TELEPHONE CO. - VIRGINIA	WASHINGTON	WASHVAXA	NO	1,942	62.52	31.06
CENTRAL TELEPHONE CO. - VIRGINIA	WOOLWINE	WLWNVAXA	NO	3,338	124.46	26.82
<b>WIRE CENTERS NOT SERVED</b>				<b>182,442</b>	<b>2,784.44</b>	<b>65.52</b>
CENTRAL TELEPHONE CO. - VIRGINIA	ALTAVISTA	ALTVVAXA	YES	7,358	66.85	110.06
CENTRAL TELEPHONE CO. - VIRGINIA	ARVONIA	ARVNAXA	YES	4,818	169.74	28.39
CENTRAL TELEPHONE CO. - VIRGINIA	AXTON	AXTNVAXA	YES	3,727	89.34	41.72
CENTRAL TELEPHONE CO. - VIRGINIA	BACHESHALL	BCHLVAXA	YES	6,998	104.17	67.18
CENTRAL TELEPHONE CO. - VIRGINIA	BUCKINGHAM	BCHMVAXA	YES	5,755	195.50	29.44
CENTRAL TELEPHONE CO. - VIRGINIA	BLACKSTONE	BLCSVAXA	YES	7,330	162.78	45.03
CENTRAL TELEPHONE CO. - VIRGINIA	BRODNAX	BRDNVAXA	YES	1,172	27.27	42.97
CENTRAL TELEPHONE CO. - VIRGINIA	BROOKNEAL	BRKNVAXA	YES	5,205	199.02	26.15
CENTRAL TELEPHONE CO. - VIRGINIA	BURKEVILLE	BRVLVAXA	YES	1,627	44.69	36.41
CENTRAL TELEPHONE CO. - VIRGINIA	BASSETT	BSSVAXA	YES	13,610	94.46	144.08
CENTRAL TELEPHONE CO. - VIRGINIA	CHARLOTTESVILLE	CHLVVAXA	YES	83,572	315.21	265.13
CENTRAL TELEPHONE CO. - VIRGINIA	CHARLOTTESVILLE	CHLVVAXB	YES	33,045	156.69	210.89
CENTRAL TELEPHONE CO. - VIRGINIA	COLLINSVILLE	COLVAXA	YES	9,117	11.61	785.07
CENTRAL TELEPHONE CO. - VIRGINIA	CREWE	CREWVAXA	YES	6,845	107.19	63.86
CENTRAL TELEPHONE CO. - VIRGINIA	CROZET	CRZTVAXA	YES	7,633	115.53	66.07
CENTRAL TELEPHONE CO. - VIRGINIA	BREMO BLF	BRMLVAXA	YES	3,047	75.26	40.49
CENTRAL TELEPHONE CO. - VIRGINIA	FIELDALE	FLDVVAXA	YES	8,038	28.16	285.45
CENTRAL TELEPHONE CO. - VIRGINIA	GLADYS	GLDYVAXA	YES	3,442	111.94	30.75
CENTRAL TELEPHONE CO. - VIRGINIA	GLASGOW	GLSGVAXA	YES	2,505	19.52	128.32

**Alitel Communications, Inc.**  
**Eligible Telecommunications Carrier Designation in the Commonwealth of Virginia**  
**Density Analysis of Partially Served Rural Study Areas**

STUDY AREA NAME	WIRE CENTER NAME	CLL CODE	SERVED BY ALL TEL	WIRE CENTER POPULATION	AREA OF WIRE CENTER MI <sup>2</sup>	DENSITY
CENTRAL TELEPHONE CO. - VIRGINIA	GUM TREE	GMTRVAXA	YES	1,555	32.11	48.43
CENTRAL TELEPHONE CO. - VIRGINIA	HALFAX	HLFXVAXA	YES	6,474	152.14	42.55
CENTRAL TELEPHONE CO. - VIRGINIA	KENBRIDGE	KNBRVAXA	YES	6,263	227.09	27.58
CENTRAL TELEPHONE CO. - VIRGINIA	LA CROSSE	LACRVAXA	YES	1,834	24.08	76.16
CENTRAL TELEPHONE CO. - VIRGINIA	MONTPELIER	MTPLVAXA	YES	6,057	86.18	70.28
CENTRAL TELEPHONE CO. - VIRGINIA	MARTINSVILLE	MRTVVAXA	YES	28,718	126.83	226.43
CENTRAL TELEPHONE CO. - VIRGINIA	PALMYRA	PLMYVAXA	YES	16,604	147.09	112.88
CENTRAL TELEPHONE CO. - VIRGINIA	RIDGEWAY	RDWYVAXA	YES	8,810	41.16	214.06
CENTRAL TELEPHONE CO. - VIRGINIA	RUSTBURG	RSBGVAXA	YES	4,427	66.87	66.21
CENTRAL TELEPHONE CO. - VIRGINIA	S BOSTON	SBTNVAXA	YES	16,380	155.42	105.40
CENTRAL TELEPHONE CO. - VIRGINIA	SCHUYLER	SCHLVAXA	YES	1,341	55.20	24.29
CENTRAL TELEPHONE CO. - VIRGINIA	SCOTTSVILLE	SCVLVAXA	YES	7,004	159.13	44.02
CENTRAL TELEPHONE CO. - VIRGINIA	STANARDSVILLE	SDVLVAXA	YES	16,587	157.69	105.19
CENTRAL TELEPHONE CO. - VIRGINIA	RIDGEWAY	SPNCVAXA	YES	3,717	83.74	44.39
CENTRAL TELEPHONE CO. - VIRGINIA	S HL	STHLVAXA	YES	9,179	115.49	79.48
CENTRAL TELEPHONE CO. - VIRGINIA	TURBEVILLE	TBLVAXA	YES	2,409	97.70	24.66
CENTRAL TELEPHONE CO. - VIRGINIA	VICTORIA	VCTAVAXA	YES	5,339	123.42	43.26
CENTRAL TELEPHONE CO. - VIRGINIA	VOLENS	VLSVAXA	YES	4,728	152.97	30.91
CENTRAL TELEPHONE CO. - VIRGINIA	WHITMELL	WHTMVAXA	YES	9,563	124.06	77.08
WIRE CENTERS SERVED				371,833	4,223.26	88.04
NTELOS TELEPHONE INC.	CLIFTON FORGE	CFFRVAXA	NO	10,025	220.27	45.51
NTELOS TELEPHONE INC.	COVINGTON	CVTNVAXA	NO	12,919	159.71	80.89
NTELOS TELEPHONE INC.	POTTS CREEK	PTCKVAXA	NO	3,331	174.06	19.14
WIRE CENTERS NOT SERVED				26,275	554.05	47.42
NTELOS TELEPHONE INC.	WAYNESBORO	WYBOVAXA	YES	38,691	129.60	298.53
WIRE CENTERS SERVED				38,691	129.60	298.53
UNITED INTER-MOUNTAIN TELEPHONE	CANA	CANAVAXA	NO	6,617	74.72	88.56
UNITED INTER-MOUNTAIN TELEPHONE	COMERS ROCK	CMRKVAXA	NO	2,075	70.85	29.29
UNITED INTER-MOUNTAIN TELEPHONE	HILLSVILLE	HLVLVAXA	NO	9,478	189.16	50.11
UNITED INTER-MOUNTAIN TELEPHONE	INDEPENDENCE	INDPVAXA	NO	3,199	86.61	36.94
UNITED INTER-MOUNTAIN TELEPHONE	LAUREL FORK	LRFKVAXA	NO	2,963	63.80	46.44
UNITED INTER-MOUNTAIN TELEPHONE	MOUTH OF WILSON	MTWLVAXA	NO	1,994	90.56	22.02
UNITED INTER-MOUNTAIN TELEPHONE	SYLVATIUS	SYLVVAXA	NO	2,174	56.05	38.79
WIRE CENTERS NOT SERVED				28,500	631.74	45.11
UNITED INTER-MOUNTAIN TELEPHONE	ABINGDON	ABNGVAXA	YES	24,323	182.28	133.44
UNITED INTER-MOUNTAIN TELEPHONE	AUSTINVILLE	ATVLVAXA	YES	7,499	70.73	106.02
UNITED INTER-MOUNTAIN TELEPHONE	BLAND	BLNDVAXA	YES	3,952	171.21	23.08
UNITED INTER-MOUNTAIN TELEPHONE	BRISTOL	BRSTVAXA	YES	28,707	142.65	201.24
UNITED INTER-MOUNTAIN TELEPHONE	CERES	CERSVAXA	YES	650	76.64	8.48
UNITED INTER-MOUNTAIN TELEPHONE	CHILHOWIE	CHLHVAXA	YES	10,947	104.81	104.45
UNITED INTER-MOUNTAIN TELEPHONE	CRIPPLE CRK	CRCKVAXA	YES	3,393	63.09	53.78

**Alltel Communications, Inc.**  
**Eligible Telecommunications Carrier Designation in the Commonwealth of Virginia**  
**Density Analysis of Partially Served Rural Study Areas**

STUDY AREA NAME	WIRE CENTER NAME	CLI CODE	SERVED BY ALLTEL	WIRE CENTER POPULATION	AREA OF WIRE CENTER MI <sup>2</sup>	DENSITY
UNITED INTER-MOUNTAIN TELEPHONE	DAMASCUS	DMSCVAXA	YES	3,863	61.08	63.58
UNITED INTER-MOUNTAIN TELEPHONE	FRIES	FRISVAXA	YES	4,823	85.54	56.38
UNITED INTER-MOUNTAIN TELEPHONE	GALAX	GALXVAXA	YES	19,422	166.05	116.97
UNITED INTER-MOUNTAIN TELEPHONE	GLADE SPRING	GDSPVAXA	YES	3,781	37.96	99.60
UNITED INTER-MOUNTAIN TELEPHONE	GATE CITY	GTCVAXA	YES	11,587	155.32	74.60
UNITED INTER-MOUNTAIN TELEPHONE	DAMASCUS	KNRKVAXA	YES	1,435	66.25	21.66
UNITED INTER-MOUNTAIN TELEPHONE	MARION	MARNVAXA	YES	13,789	147.03	93.79
UNITED INTER-MOUNTAIN TELEPHONE	MEADOWVIEW	MDVWVAXA	YES	6,635	100.56	65.98
UNITED INTER-MOUNTAIN TELEPHONE	MAX MEADOWS	MXMDVAXA	YES	2,827	78.10	36.20
UNITED INTER-MOUNTAIN TELEPHONE	RICH VALLEY	RCVYVAXA	YES	2,394	64.38	37.18
UNITED INTER-MOUNTAIN TELEPHONE	RURAL RETREAT	RRRTVAXA	YES	4,219	101.64	41.51
UNITED INTER-MOUNTAIN TELEPHONE	SUGAR GROVE	SGGVAXA	YES	4,115	82.45	49.91
UNITED INTER-MOUNTAIN TELEPHONE	SALTVILLE	SLVTVAXA	YES	4,471	113.08	39.54
UNITED INTER-MOUNTAIN TELEPHONE	WYTHEVILLE	WYVTVAXA	YES	10,288	149.49	68.82
UNITED INTER-MOUNTAIN TELEPHONE	WYTHEVILLE	WYVTVAXA	YES	173,140	2,220.30	77.98
<b>WIRE CENTERS SERVED</b>						
VERIZON SOUTH INC.-VA	VANSANT	BGPRVAXA	NO	1,359	26.16	51.96
VERIZON SOUTH INC.-VA	GRUNDY	BGRKVAXA	NO	2,515	42.45	59.25
VERIZON SOUTH INC.-VA	WHITEWOOD	DWGHVAXA	NO	2,445	57.76	42.33
VERIZON SOUTH INC.-VA	GRUNDY	GRNDVAXB	NO	4,471	52.71	84.82
VERIZON SOUTH INC.-VA	HURLEY	HRLVYVAXA	NO	4,710	108.76	43.31
VERIZON SOUTH INC.-VA	BIG ROCK	MAXIVAXA	NO	3,101	57.33	54.09
VERIZON SOUTH INC.-VA	BIG ROCK	MAXIVAXA	NO	18,601	345.16	53.89
<b>WIRE CENTERS NOT SERVED</b>						
VERIZON SOUTH INC.-VA	BLUEFIELD	BLFVAXA	YES	9,357	62.63	149.41
VERIZON SOUTH INC.-VA	RICHLANDS	JWRGVAXA	YES	1,226	61.07	20.07
VERIZON SOUTH INC.-VA	OAKWOOD	OKWVAXA	YES	2,806	38.21	73.44
VERIZON SOUTH INC.-VA	BLUEFIELD	PCHNVAXA	YES	5,866	85.76	68.40
VERIZON SOUTH INC.-VA	NARROWS	RCGPVAXA	YES	2,420	119.27	20.29
VERIZON SOUTH INC.-VA	RICHLANDS	RCLDVAXA	YES	13,261	109.03	121.63
VERIZON SOUTH INC.-VA	RICHLANDS	RCLDVAXA	YES	7,361	90.63	81.22
VERIZON SOUTH INC.-VA	TAZEWELL	TZWLAXA	YES	42,297	566.58	74.65
<b>AVERAGE DENSITY OF ALL "SERVED" WIRE CENTERS</b>				625,961	7,139.75	87.67
<b>AVERAGE DENSITY OF ALL "UNSERVED" WIRE CENTERS</b>				255,818	4,315.38	59.28

**EXHIBIT I**

**HIGH-COST CERTIFICATION**

**EXHIBIT I**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-B204  
Washington, DC 20037

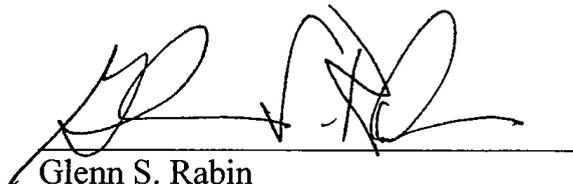
Ms. Irene Flannery  
2120 L Street, N.W.  
Suite 600  
Washington, DC 20037

Re: Alltel Communications, Inc.  
High Cost Certification  
Docket No. 96-45

Dear Ms. Dortch and Ms. Flannery:

On behalf of Alltel Communications, Inc. and in connection with its application before the FCC for status as an eligible telecommunications carrier in the Commonwealth of Virginia, we hereby forward the attached certification for high-cost support under the Universal Service program pursuant to Sections 54.313 and 54.314 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. S. Rabin', is written over a horizontal line.

Glenn S. Rabin  
Vice President  
Federal Communications Counsel  
Alltel Corporation  
601 Pennsylvania Avenue, N.W.  
Suite 720  
Washington, D.C. 20004  
(202) 783-3970

**EXHIBIT I**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-B204  
Washington, DC 20037

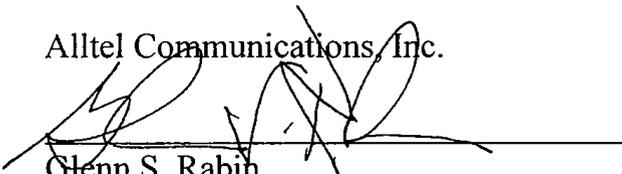
Ms. Irene Flannery  
2120 L Street, N.W.  
Suite 600  
Washington, DC 20037

Re: Alltel Communications, Inc. Certification or High Cost Loop Support

Dear Ms. Dortch and Ms. Flannery:

This certification is submitted on behalf of Alltel Communications, Inc. ("Alltel" or the "Company") in connection with its application before the FCC for status as an eligible telecommunications carrier in the Commonwealth of Virginia and in accordance with Sections 54.313 and 54.314 of the Commission's rules. On behalf of Alltel, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

Alltel Communications, Inc.



Glenn S. Rabin

Vice President

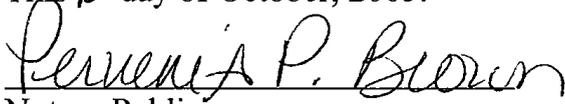
Federal Communications Counsel

Authorized Representative

Alltel Corporation  
601 Pennsylvania Avenue, N.W.  
Suite 720  
Washington, D.C. 20004  
(202) 783-3970

Date: October 13, 2005

Subscribed and sworn to before me  
This 13<sup>th</sup> day of October, 2005.

  
Notary Public

**PERUVIA BROWN**  
Notary Public of District of Columbia  
My Commission Expires July 14, 2006