

STAMP AND RETURN

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October 13, 2005

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

RECEIVED

OCT 13 2005

Federal Communications Commission
Office of Secretary

**Re: APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF NORTH CAROLINA — 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 State of North Carolina (“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 rules¹ 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

¹ 47 C.F.R. § 0.459.

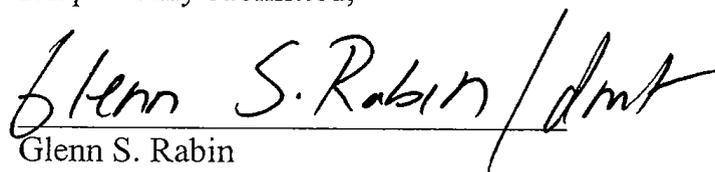
years. Also, Alltel is providing in Exhibit D general information as how it intends to spend this funding, (*i.e.*, for capacity or coverage enhancements).

4. The wireless industry is highly competitive.²
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 Counsel

² 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 STATE OF NORTH CAROLINA**

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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 North Carolina Utilities 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..... 14

 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 State of North Carolina 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..... 22

 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 STATE OF NORTH CAROLINA**

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 State of North Carolina (“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.¹ 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.

¹ *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 North Carolina: CMA 280, CMA 166, CMA 218, CMA 149, CMA 43, CMA 47, CMA 71, CMA 61, CMA 258, CMA 566, CMA 568, CMA 569, CMA 570, CMA 571, CMA 572, CMA 573, CMA 574, CMA 575, CMA 576, CMA 577, CMA 578 and CMA 579.² 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 North Carolina. 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*.³

A. The North Carolina Utilities 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.⁴ Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section

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

³ 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*").

214(e) shall be eligible to receive specific federal universal service support.”⁵ 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.”⁶

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.”⁷ 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).⁸

On July 29, 1995, the North Carolina General Assembly passed House Bill 941 that amended Chapter 62 of the North Carolina General Statutes. The relevant amendments were a new General Statute 62-3(23)j and a repeal of Article 6A consisting of General Statute 62-119 through General Statute 62-125 dealing with radio common carriers.

General Statute 62-3(23)j reads as follows:

The term “public utility” shall not include any person, not otherwise a public utility, conveying or transmitting messages or communications by mobile radio communications service. Mobile radio communications service includes one-way or two-way radio service provided to mobile or fixed stations or receivers using mobile radio frequencies.

⁴ See *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8858-59 (1997) (“*First Report and Order*”).

⁵ 47 U.S.C. § 254(e).

⁶ 47 U.S.C. § 214(e)(6).

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

⁸ *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).

In response to the actions of the General Assembly, the North Carolina Utilities Commission (“NCUC”) issued an Order in dockets P-100, Sub 114 and P-100, Sub 124. The NCUC Order found that General Statute 62-3(23)j removed from the NCUC’s jurisdiction cellular services, radio common carrier services, personal communications services, and such other services that now or in the future constitute a mobile radio communications service.

On May 1, 2003, Alltel Communications, Inc. filed a Petition with the NCUC seeking an affirmative declaratory ruling from the NCUC that it lacked jurisdiction to designate CMRS carriers as ETCs for purposes of receiving federal universal service support. By Order issued June 24, 2003, the NCUC found that it lacked jurisdiction over CMRS services and that the appropriate venue for designation of ETC status for such services is with the FCC. A copy of the NCUC Order is attached to this application as Exhibit B.⁹

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.¹⁰ 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:¹¹

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;

⁹ The FCC previously has processed ETC petitions in North Carolina. *See, e.g., Alltel Non-Rural Designation Order, supra* n.1.

¹⁰ 47 U.S.C. § 214(e)(1).

¹¹ *See* 47 C.F.R. § 54.101(a).

6. Access to operator services;
7. Access to interexchange service;
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.¹² 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.¹³ 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."¹⁴ 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

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

¹³ *First Report and Order*, 12 FCC Rcd at 8810-11.

¹⁴ 47 C.F.R. § 54.202(a)(4).

incumbent LEC in the area.¹⁵ The FCC has declined to adopt a specific local usage threshold.¹⁶ Alltel commits to provide rate plans that have a substantial local calling area with a 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.¹⁷ 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.¹⁸ 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

¹⁵ *Federal–State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) (“*ETC Criteria Order*”).

¹⁶ *Id.* at 6385.

¹⁷ 47 C.F.R. § 54.101(a)(3).

¹⁸ *First Report and Order*, 12 FCC Rcd at 8810.

user's particular transmission.¹⁹ Alltel meets the requirement of single-party service in this manner.

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.²⁰ 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

¹⁹ *Id.*

²⁰ *Id.* at 8817-18.

outgoing minutes are treated the same). Additionally, customers are able to reach other IXC's by dialing the appropriate access code or dial-around number.

8. Access to directory assistance:

The ability to place a call to directory assistance is a required service offering.²¹ 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.²² In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls.²³ 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

²¹ *Id.* at 8821.

²² 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).

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.²⁴

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

²³ *First Report and Order*, 12 FCC Rcd at 8821-22.

²⁴ *See ETC Criteria Order*, 20 FCC Rcd at 6386-87.

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.

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 state of North Carolina 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.²⁵

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

²⁵ See 47 C.F.R. § 54.202(a)(2).

geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the future; and (f) the number of customers affected.²⁶

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."²⁷

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.²⁸

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

²⁶ See 47 C.F.R. § 54.209(a)(2).

²⁷ 47 C.F.R. § 54.202(a)(3).

satisfy the requirements in Sections 54.209(a)(5) and 54.209(a)(4) by annually certifying its 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*.²⁹ 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.³⁰ 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.

²⁸ Alltel recently re-certified its compliance with the CTIA Consumer Code.

²⁹ *ETC Criteria Order*, 20 FCC Rcd at 6385.

³⁰ 47 C.F.R. § 54.202(a)(5).

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 combination of its own facilities and resale of another carrier’s services.”³¹ 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.³² 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 State of North Carolina.

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.³³ In this Application, Alltel requests ETC designation in the “rural” study areas depicted on the maps attached hereto as

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

³² *See id.*

Exhibits E, F-2, G-2 and listed in Exhibits F and G, within its licensed service area in the State of North Carolina.³⁴

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.”³⁵ 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.³⁶ 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).³⁷

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

³³ *Id.*

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

³⁵ 47 C.F.R. § 54.207(a).

³⁶ *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*”).

within the rural LECs' study areas are identified in Exhibits G and G-2 and should be excluded from Alltel's ETC Service Area.³⁸ Accordingly, where Alltel serves only a portion of a wire center, it does not request ETC status for that wire center. Since the NCUC does not assert jurisdiction over CMRS carriers, including the designation of a cellular carrier as an ETC,³⁹ the Commission has jurisdiction to consider a redefinition of the ILEC service areas in North Carolina 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 Alltel Carolina, Inc.,⁴⁰ Central Telephone Company, Sprint-Mid Atlantic and Surry Telephone Membership ("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*.⁴¹

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

³⁷ 47 U.S.C. § 214(e)(2).

³⁸ In column four 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.

³⁹ See Exhibit B.

⁴⁰ Alltel Carolina, Inc. and the Applicant are corporate affiliates by virtue of common ownership by Alltel Corporation.

⁴¹ 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.

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,⁴² a petition to redefine a rural LEC service area must include an analysis that takes into account the recommendations of 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."⁴³ 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*,⁴⁴ 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

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.

⁴² 47 C.F.R. § 54.207(b)-(c).

⁴³ 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).

⁴⁴ *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87 (1996) ("*Joint Board Recommended Decision*").

carrier is attempting to “creamskim” by only proposing to serve the lowest cost exchanges.⁴⁵ 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 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 creamskinning analysis by relying on population density data that was submitted to demonstrate a lack of creamskinning effects.⁴⁶ 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 North Carolina ILEC service areas will not result in creamskinning effects. As demonstrated in Exhibit H, the population density data establishes that the average population density of the Alltel Carolina and Sprint-Mid Atlantic wire centers “served” by Alltel statewide is 188.18 and 114.69 persons per square mile respectively, and therefore is only slightly higher than the average population density of the Alltel Carolina and Sprint-Mid Atlantic wire centers that are “not served,” which is 95.29 and 55.09 persons per square mile. This difference is not significant when compared with the magnitude of the differences found to raise creamskinning concerns in *Virginia Cellular* and *Highland Cellular*.⁴⁷ Moreover, in both of these study areas, the lowest-density wire centers are

⁴⁵ *Id.* at 179-80.

⁴⁶ *Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Memorandum Opinion and Order, 19 FCC Rcd 1563, 1578-80 (2004) (“*Virginia Cellular*”).

⁴⁷ *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).

included in the served area. In the Alltel Carolina, Inc. study area, the served wire centers Ansonville (27.67), Morven (42.28), Marshville (56.13), and Wagram (52.49) are all less dense than the least-dense wire center in the unserved area (Green Creek, 66.0). Similarly, in the Sprint Mid-Atlantic study area, there are 26 wire centers in the served area that are less dense or roughly as dense as the least-dense wire center in the unserved area (Eure, 34.49),⁴⁸ including the two lowest-density wire centers by far, Engelhard (7.82) and Swanquarter (10.15).

The population density of the “served” areas in the Central Telephone and Surry Telephone study areas (157.36 and 75.01 persons per square mile) is actually *lower* than the population density in the “unserved” areas (170.92 and 83.90 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.⁴⁹

Second, the Joint Board urged the Commission to consider the rural carrier’s special status under the Telecommunications Act of 1996.⁵⁰ 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

⁴⁸ Aulander (35.34); Atlantic (25.97); Aurora (19.52); Belhaven (26.60); Bayboro (33.85); Colerain (26.98); Conway (32.36); Creswell (17.27); Engelhard (7.82); Halifax (35.12); Jackson (37.52); Lake Waccamaw (37.96); Manteo (28.73); Stacy (26.89); Maysville (35.56); Pollocksville (25.66); Belvidere (24.09); Rich Square (31.15); Seaboard (27.89); Scotland Neck (35.56); Camden (35.37); Sunbury (27.7); South Mills (26.68); Swanquarter (10.15); Whitakers (31.89); and Windsor (31.81).

⁴⁹ 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.

⁵⁰ *Joint Board Recommended Decision*, 12 FCC Rcd at 180.

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.

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.⁵¹ 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*.⁵² 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.⁵³ 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

⁵¹ *Id.*

⁵² *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).

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.

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 North Carolina. 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.

⁵³ 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(c).

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.⁵⁴

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.⁵⁵ 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.⁵⁶ 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.

⁵⁴ *Virginia Cellular*, 19 FCC Rcd at 1576.

⁵⁵ *Id.* at 1576-77

⁵⁶ *Id.*

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 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 NCUC 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.⁵⁷ *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 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.⁵⁸

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.

⁵⁷ 47 U.S.C. § 254(e); 47 C.F.R. §§ 54.313, 54.314.

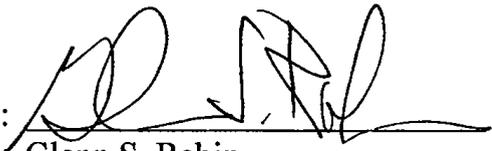
⁵⁸ *See* 47 C.F.R. § 54.307(d); *see also* *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314 of the Commission's Rules and Regulations*, Order, 18 FCC Rcd 7138 (2003).

VIII. Conclusion.

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

Respectfully submitted,

Alltel Communications, Inc.

By: 
Glenn S. Rabin
Vice President
Federal Communications Counsel
Alltel Corporation
601 Pennsylvania Avenue, N.W.
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 State of North Carolina. This affidavit is submitted in support of that Petition.
2. Alltel is authorized to provide cellular radiotelephone service in the State of North Carolina 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

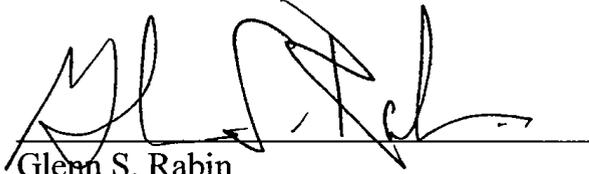
usage plans which include a predetermined level of local usage; and (b) a universal service offering that provides a comparable value to the one offered by the incumbent LEC.

- 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, IXCs, 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.

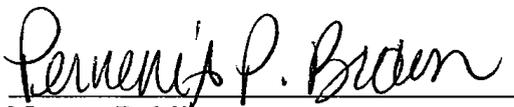
Alltel Communications, Inc.



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

Subscribed and sworn to before me
This 13th day of October, 2005.


Notary Public

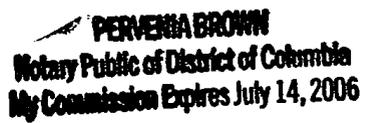

PERVENIA BROWN
Notary Public of District of Columbia
My Commission Expires July 14, 2006

EXHIBIT B

**STATEMENT FROM
NORTH CAROLINA UTILITIES COMMISSION
THAT IT LACKS JURISDICTION OVER
CMRS APPLICATIONS**

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. P-100, SUB 133c

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Designation of Carriers Eligible for Universal)
Carrier Support) **ORDER GRANTING PETITION**

BY THE COMMISSION: On May 1, 2003, ALLTEL Communications, Inc. (ALLTEL), a commercial mobile radio service (CMRS) provider, filed a Petition seeking an affirmative declaratory ruling that the Commission lacks jurisdiction to designate CMRS carrier eligible telecommunications carrier (ETC) status for the purposes of receiving federal universal service support.

In support of its Petition, ALLTEL stated that it was a CMRS provider authorized by the Federal Communications Commission (FCC) to provide cellular mobile radio telephone service in North Carolina, and that the FCC had clearly recognized that CMRS carriers such as ALLTEL may be designated as ETCs. ETC status is necessary for a provider to be eligible to receive universal service support. Section 214(e)(6) of the Telecommunications Act provides that if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC is charged with making the ETC determination. The FCC has stated that, in order for the FCC to consider requests pursuant to this provision, a carrier must provide an "affirmative statement" from the state commission or court of competent jurisdiction that the state lacks jurisdiction to perform the designation. To date, several state commissions have declined to exercise such jurisdiction.

North Carolina has excluded CMRS from the definition of "public utility." See, G.S. 62-3(23)j. Pursuant to this, the Commission issued its Order Concerning Deregulation of Wireless Providers in Docket Nos. P-100, Sub 114 and Sub 124 on August 28, 1995, concluding that the Commission no longer has jurisdiction over cellular services. Accordingly, ALLTEL has now requested the Commission to issue an Order stating that it does not have jurisdiction to designate CMRS carriers ETC status for the purposes of receiving federal universal service support.

The Commission requested comments from interested parties.

The Public Staff filed comments on June 3, 2003, in which it stated that it believes that ETC designation by the Commission of CMRS providers is not necessary and may not be appropriate under G.S. 62-3(23)j. Thus the Public Staff recommended that the Commission grant ALLTEL's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status for CMRS carriers. This is consistent with the Commission's December 15, 1997 Order in this docket regarding ETC designation for telephone membership corporations.

There were no reply comments filed.

WHEREUPON, the Commission reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that it should grant ALLTEL's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status for CMRS carriers. As noted above, in its August 28, 1995, Order in Docket Nos. P-100, Sub 114 and Sub 124, the Commission noted that G.S. 62-3(23)j, enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission's jurisdiction. 47 USC 3(41) defines a "state commission" as a body which "has regulatory jurisdiction with respect to the intrastate operation of carriers." Pursuant to 47 USC 214(e)(6), if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC must determine which carriers in that class may be designated as ETCs. Given these circumstances, it follows that the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 24th day of June, 2003.

NORTH CAROLINA UTILITIES COMMISSION

Gail L. Mount

Gail L. Mount, Deputy Clerk

pb082303.02

EXHIBIT C

**DESCRIPTION OF ALLTEL'S
CURRENT RATE PLANS
IN THE STATE OF NORTH CAROLINA**

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

- Touch2TalkSM
\$5-15 per month
- Call Home Free
- Share Your Minutes
\$9.99 per month on sele
- Enhanced Voice Mail
\$5 per month
- ProductGuardSM
\$4 per month
- Mr. Rescue[®]
\$3 per month
- Directory Plus
\$1.25 per call plus airtim
- Extended Night Minutes
\$7 per month

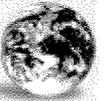
[> MORE](#)

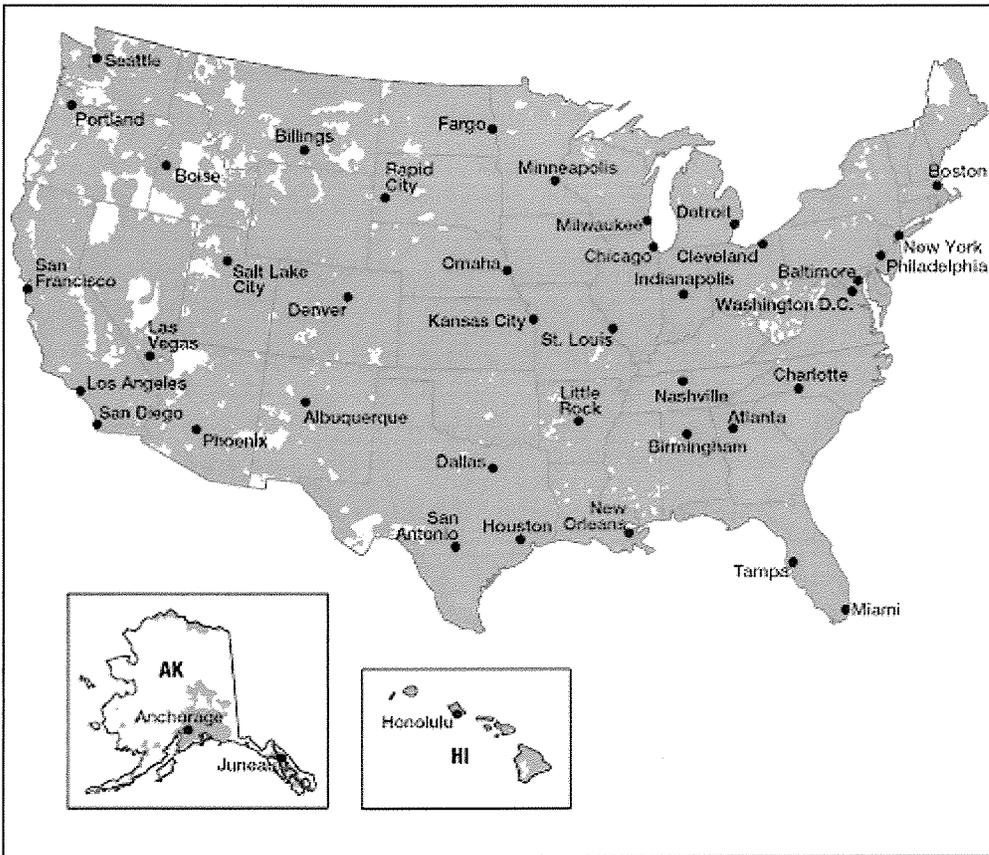
Add Lines for \$9.99

Share your minutes on up to 4 lines! **\$9.99**
[> MORE](#)

Stay in touch worldwide

Call Internationally
[> MORE](#)





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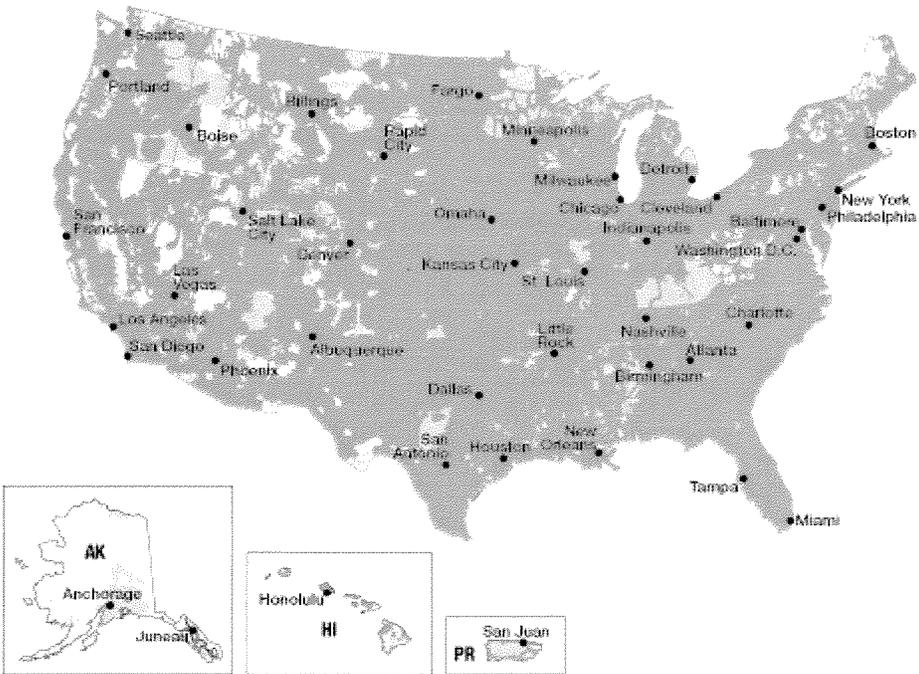
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Home | Personal | Wireless | Plans | Greater Freedom

Greater FreedomSM

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*

Touch2TalkSM
\$5-15 per month

FreeToRoam[®] 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.

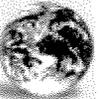
FreeToRoam[®] Minutes

Get 100 nationwide minutes each month.
> MORE



Stay in touch worldwide

Call Internationally
> MORE





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EXHIBIT D

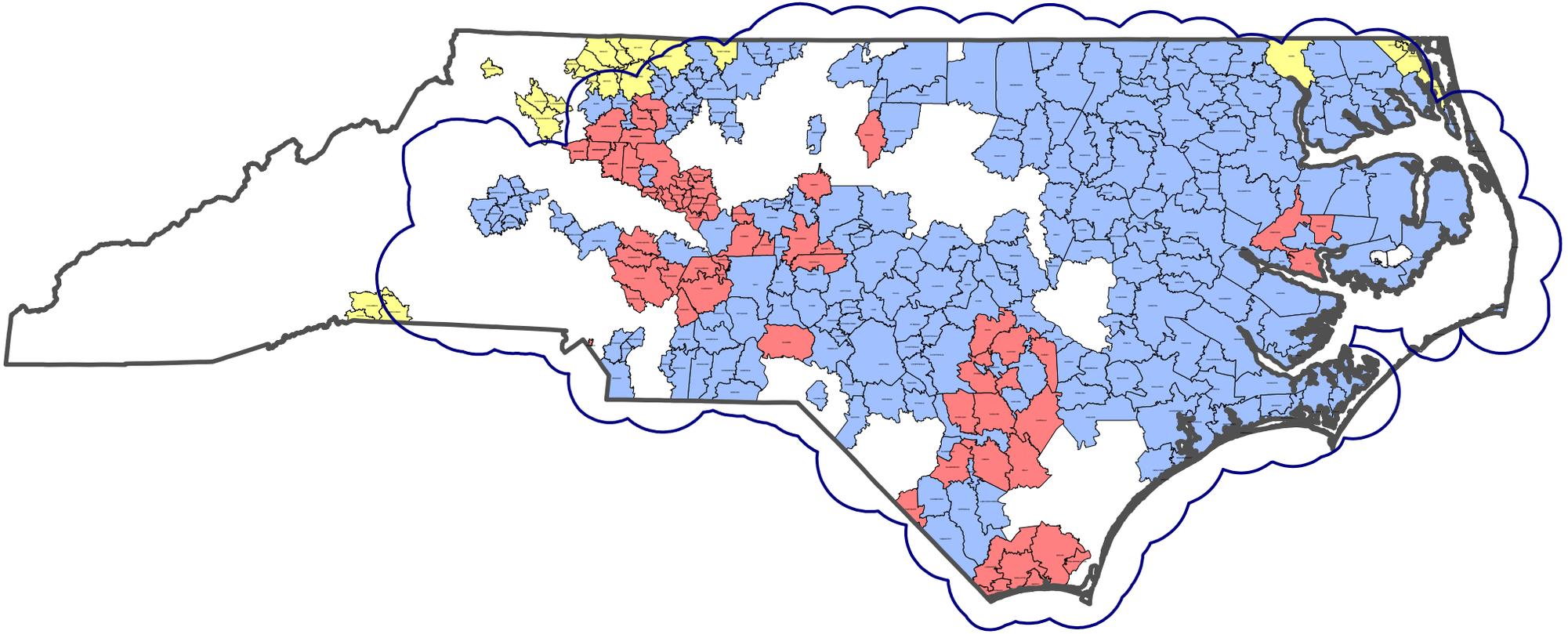
**ALLTEL'S
FIVE-YEAR SERVICE
IMPROVEMENT PLAN**

REDACTED

EXHIBIT E

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

Alltel Communications, Inc. State of North Carolina



- 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**

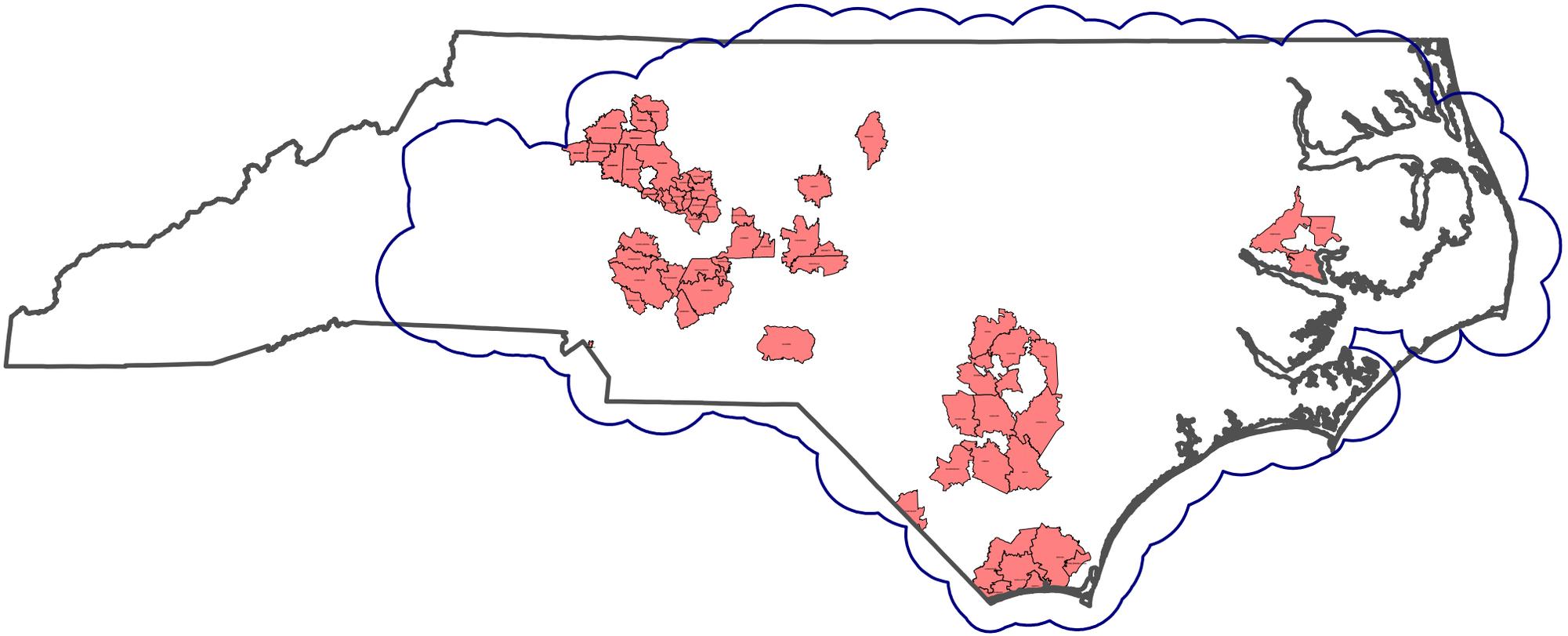
**ALLTEL COMMUNICATIONS, INC.
RURAL STUDY AREAS SERVED IN THEIR ENTIRETY**

LEC NAME	WIRE CENTER	CLLI CODE
ATLANTIC TELEPHONE MEMBERSHIP CO	BOLIVIA	BOLVNCXA
ATLANTIC TELEPHONE MEMBERSHIP CO	BOILING SPRING LAKES	BSLKNCXA
ATLANTIC TELEPHONE MEMBERSHIP CO	SUPPLY	HLBHNCXB
ATLANTIC TELEPHONE MEMBERSHIP CO	LONGWOOD	LGWDNCXA
ATLANTIC TELEPHONE MEMBERSHIP CO	OCEAN IS BEACH	SESDNCXB
ATLANTIC TELEPHONE MEMBERSHIP CO	SHALLOTTE	SHLTNCXA
CONCORD TELEPHONE CO.	ALBEMARLE	ALBMNCXA
CONCORD TELEPHONE CO.	BADIN	BADNNCXA
CONCORD TELEPHONE CO.	CHINA GROVE	CHGVNCXA
CONCORD TELEPHONE CO.	CONCORD	CNCRNCXA
CONCORD TELEPHONE CO.	HARRISBURG	HRBGNCXA
CONCORD TELEPHONE CO.	KANNAPOLIS	KNPLNCXA
CONCORD TELEPHONE CO.	MT PLEASANT	MNPLNCXA
CONCORD TELEPHONE CO.	NEW LONDON	NWLNNCXA
CONCORD TELEPHONE CO.	OAKBORO	OKBONCXA
ELLERBE TELEPHONE CO. INC.	ELLERBE	ELRBNCXA
LEXCOM TELEPHONE COMPANY	LEXINGTON	LXTNNCXA
LEXCOM TELEPHONE COMPANY	LEXINGTON	LXTNNCXB
LEXCOM TELEPHONE COMPANY	LEXINGTON	LXTNNCXC
LEXCOM TELEPHONE COMPANY	LEXINGTON	LXTNNCXD
LEXCOM TELEPHONE COMPANY	LEXINGTON	LXTNNCXE
LEXCOM TELEPHONE COMPANY	SOUTHMONT	SMNTNCXA
LEXCOM TELEPHONE COMPANY	WELCOME	WLCMNCXA
MEBTEL INC.	MEBANE	MEBNNCXA
PIEDMONT TELEPHONE MEMBERSHIP CO	CHURCHLAND	CHLDNCXA
PIEDMONT TELEPHONE MEMBERSHIP CO	LEXINGTON	REDSNCXA
PINEVILLE TELEPHONE CO.	PINEVILLE	PIVLNCXB
RANDOLPH TELEPHONE CO.	LIBERTY	LBRTNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	BADIN LAKE	BDLKNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	BENNETT	BNNTNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	COLERIDGE	CLRGNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	FARMER	FRMRNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	HIGHFALLS	HGHFNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	JACKSON CREEK	JKCKNCXA
RANDOLPH TELEPHONE MEMBERSHIP CO	ASHEBORO	PSGHNCXA
SERVICE TELEPHONE CO.	FAIR BLUFF	FRBLNCXA
STAR TELEPHONE MEMBERSHIP CORP.	BLADENBORO	ABBGNCXA
STAR TELEPHONE MEMBERSHIP CORP.	DUNN	COHRNCXA
STAR TELEPHONE MEMBERSHIP CORP.	GARLAND	CYCKNCXA
STAR TELEPHONE MEMBERSHIP CORP.	HARRELLS	HRLSNCXA
STAR TELEPHONE MEMBERSHIP CORP.	CLINTON	HRNGNCXA
STAR TELEPHONE MEMBERSHIP CORP.	KELLY	KLLYNCXA
STAR TELEPHONE MEMBERSHIP CORP.	LISBON	LSBNNCXA
STAR TELEPHONE MEMBERSHIP CORP.	ROSEBORO	SORVNCXA
STAR TELEPHONE MEMBERSHIP CORP.	TURKEY	SXRNNCXA
STAR TELEPHONE MEMBERSHIP CORP.	WHITE OAK	WHOKNCXA
TRI - COUNTY TELEPHONE MEMBERSHI	PANTEGO	PKRDNCXA
TRI - COUNTY TELEPHONE MEMBERSHI	PINETOWN	PNTWNCXA
TRI - COUNTY TELEPHONE MEMBERSHI	BATH	SDNYNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	ADVANCE	ADVNNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	HAMPTONVILLE	BRKSNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	COOLEEMEE	COLMNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	YADKINVILLE	CRTYNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	EAST BEND	EBNDNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	FORBUSH	FRBSNCXB
YADKIN VALLEY TELEPHONE MEMBERSH	HARMONY	HRMYNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	MOCKSVILLE	IJAMNCXA
YADKIN VALLEY TELEPHONE MEMBERSH	UNION GROVE	UNGVNCXB
YADKIN VALLEY TELEPHONE MEMBERSH	NEW HOPE	NWHPNCXA

EXHIBIT F-1

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

**Alltel Communications, Inc.
State of North Carolina**

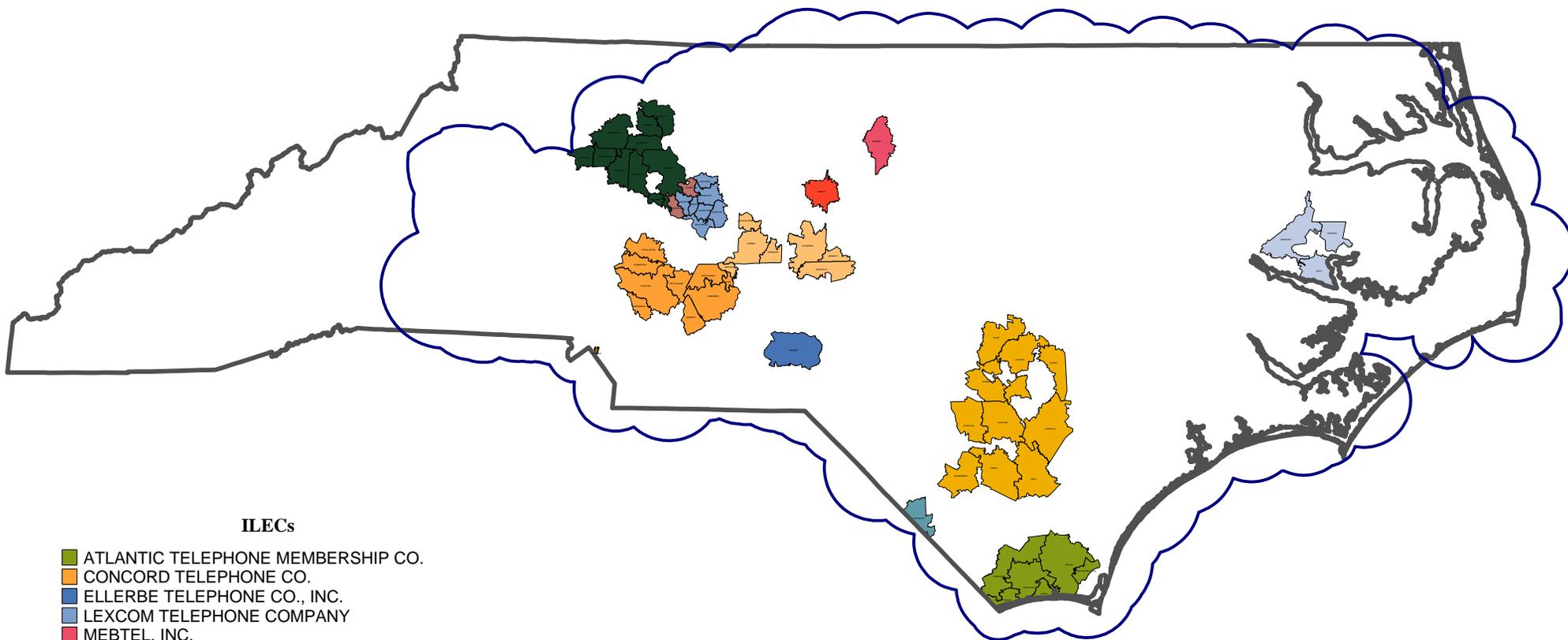


■ Wire centers in rural study areas served in their entirety

EXHIBIT F-2

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

Alltel Communications, Inc. State of North Carolina



ILECs

- ATLANTIC TELEPHONE MEMBERSHIP CO.
- CONCORD TELEPHONE CO.
- ELLERBE TELEPHONE CO., INC.
- LEXCOM TELEPHONE COMPANY
- MEBTEL, INC.
- PIEDMONT TELEPHONE MEMBERSHIP CO.
- PINEVILLE TELEPHONE CO.
- RANDOLPH TELEPHONE CO.
- RANDOLPH TELEPHONE MEMBERSHIP CO
- SERVICE TELEPHONE CO.
- STAR TELEPHONE MEMBERSHIP CORP.
- TRI - COUNTY TELEPHONE MEMBERSHIP CC
- YADKIN VALLEY TELEPHONE MEMBERSHIP I

EXHIBIT G

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

**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS IN THE STATE OF NORTH CAROLINA**

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
ALLTEL CAROLINA - NORTH INC.	COLUMBUS	CLMBNCXA	NO
ALLTEL CAROLINA - NORTH INC.	GREEN CREEK	GRCKNCXA	NO
ALLTEL CAROLINA - NORTH INC.	TRYON	TRYNNCXA	NO
ALLTEL CAROLINA - NORTH INC.	ABERDEEN	ABRDNCXA	YES
ALLTEL CAROLINA - NORTH INC.	ANSONVILLE	ASVLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	BROADWAY	BRWYNCXA	YES
ALLTEL CAROLINA - NORTH INC.	DENTON	DNTNNCXA	YES
ALLTEL CAROLINA - NORTH INC.	ROCKWELL	GRQYNCXA	YES
ALLTEL CAROLINA - NORTH INC.	HEMBY BRIDGE	HMBRNCXA	YES
ALLTEL CAROLINA - NORTH INC.	MATTHEWS	INTRNCXA	YES
ALLTEL CAROLINA - NORTH INC.	KING	KINGNCXA	YES
ALLTEL CAROLINA - NORTH INC.	LILESVILLE	LLVLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	LAUREL HILL	LRHLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	LEWISVILLE	LWVLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	MARSHVILLE	MHVLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	MOORESVILLE	MRVINCXA	YES
ALLTEL CAROLINA - NORTH INC.	MORVEN	MRVNNCXA	YES
ALLTEL CAROLINA - NORTH INC.	MATTHEWS	MTHWNCXB	YES
ALLTEL CAROLINA - NORTH INC.	NORWOOD	NRWDNCXA	YES
ALLTEL CAROLINA - NORTH INC.	MARSHVILLE	NWSLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	OLIVIA	OLIVNCXA	YES
ALLTEL CAROLINA - NORTH INC.	WINSTON SALEM	OLTWNCXA	YES
ALLTEL CAROLINA - NORTH INC.	PEACHLAND	PCLDNCXA	YES
ALLTEL CAROLINA - NORTH INC.	PINEBLUFF	PNBLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	RURAL HALL	RRHLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	STANLEYVILLE	SLVLNCXA	YES
ALLTEL CAROLINA - NORTH INC.	SANFORD	SNFRNCXA	YES
ALLTEL CAROLINA - NORTH INC.	WADESBORO	WDBONCXA	YES
ALLTEL CAROLINA - NORTH INC.	WAGRAM	WGRMNCXA	YES
ALLTEL CAROLINA - NORTH INC.	WINGATE	WNGTNCXA	YES
ALLTEL CAROLINA - NORTH INC.	WAXHAW	WXHWNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	DOBSON	DBSNNCXB	NO
CENTRAL TELEPHONE CO. - NORTH CA	N WILKESBORO	HAYSNCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	N WILKESBORO	MLBYNCXB	NO
CENTRAL TELEPHONE CO. - NORTH CA	MT AIRY	MTARNCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	N WILKESBORO	NWBONCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	ROARING GAP	RRGPNCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	SANDY RIDGE	SNRGNCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	STATE ROAD	STRDNCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	W JEFFERSON	WJSNNCXA	NO
CENTRAL TELEPHONE CO. - NORTH CA	ASHEBORO	ASBONCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	ASHEBORO	ASBONCXB	YES
CENTRAL TELEPHONE CO. - NORTH CA	HICKORY	BHLHNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	BISCOE	BISCNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	BOONVILLE	BNVLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	CANDOR	CNDRNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	CATAWBA	CTWBNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	EDEN	EDENNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	EDEN	EDENNCXB	YES
CENTRAL TELEPHONE CO. - NORTH CA	ELKIN	ELKNNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	GRANITE FALLS	GRFLNCXA	YES

ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS IN THE STATE OF NORTH CAROLINA

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
CENTRAL TELEPHONE CO. - NORTH CA	HICKORY	HCKRNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	HICKORY	HCKRNCXB	YES
CENTRAL TELEPHONE CO. - NORTH CA	HILLSBOROUGH	HLBONCXB	YES
CENTRAL TELEPHONE CO. - NORTH CA	HILDEBRAN	HLDBNCXB	YES
CENTRAL TELEPHONE CO. - NORTH CA	MADISON	MDSNNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	MOCKSVILLE	MKVLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	MT GILEAD	MTGLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	HICKORY	MTVWNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	PILOT MT	PLMTNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	PROSPECT HILL	PRHLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	WALNUT COVE	QKGPNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	RAMSEUR	RMSRNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	ROXBORO	RXBONCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	SEAGROVE	SEGVNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	SHERRILLS FORD	SHFRNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	STONEVILLE	STVLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	ROUGEMONT	TMLKNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	TROY	TROYNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	VALDESE	VLDSNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	W END	WENDNCXB	YES
CENTRAL TELEPHONE CO. - NORTH CA	WALKERTOWN	WKTWNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	WALNUT COVE	WLCVNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	YANCEYVILLE	YCVLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	YADKINVILLE	YDVLNCXA	YES
CENTRAL TELEPHONE CO. - NORTH CA	DANBURY	DNBRNCXA	YES
SPRINT MID ATLANTIC	COINJOCK	CNJCNCXA	NO
SPRINT MID ATLANTIC	EURE	GTVLNCXA	NO
SPRINT MID ATLANTIC	MOYOCK	MOYCNCXA	NO
SPRINT MID ATLANTIC	MOYOCK	MOYCNCXB	NO
SPRINT MID ATLANTIC	AHOSKIE	AHSKNCXA	YES
SPRINT MID ATLANTIC	AULANDER	ALNDNCXA	YES
SPRINT MID ATLANTIC	ANGIER	ANGRNCXA	YES
SPRINT MID ATLANTIC	AURORA	AURRNCXA	YES
SPRINT MID ATLANTIC	AYDEN	AYDNNCXA	YES
SPRINT MID ATLANTIC	BAILEY	BALYNCXA	YES
SPRINT MID ATLANTIC	BATH	BATHNCXA	YES
SPRINT MID ATLANTIC	BETHEL	BETHNCXA	YES
SPRINT MID ATLANTIC	BEULAVILLE	BEVLNCXA	YES
SPRINT MID ATLANTIC	BLADENBORO	BLBONCXA	YES
SPRINT MID ATLANTIC	BELHAVEN	BLHNNCXA	YES
SPRINT MID ATLANTIC	BENSON	BNSNNCXA	YES
SPRINT MID ATLANTIC	BONLEE	BONLNCXA	YES
SPRINT MID ATLANTIC	BEAUFORT	BUFTNCXA	YES
SPRINT MID ATLANTIC	BUXTON	BXTNNCXA	YES
SPRINT MID ATLANTIC	BUXTON	BXTNNCXB	YES
SPRINT MID ATLANTIC	BAYBORO	BYBONCXA	YES
SPRINT MID ATLANTIC	CHADBOURN	CHDBNCXA	YES
SPRINT MID ATLANTIC	CLARKTON	CKTNNCXA	YES
SPRINT MID ATLANTIC	COLUMBIA	CLMANCXA	YES
SPRINT MID ATLANTIC	COLERAIN	CLRNNCXA	YES
SPRINT MID ATLANTIC	CLINTON	CLTNNCXA	YES

ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS IN THE STATE OF NORTH CAROLINA

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
SPRINT MID ATLANTIC	CONWAY	CNWYNCXA	YES
SPRINT MID ATLANTIC	CARTHAGE	CRTHNCXA	YES
SPRINT MID ATLANTIC	CRESWELL	CRWLNCXA	YES
SPRINT MID ATLANTIC	CLAYTON	CYTNNCXA	YES
SPRINT MID ATLANTIC	DUNN	DUNNNCXA	YES
SPRINT MID ATLANTIC	ERWIN	DUNNNCXB	YES
SPRINT MID ATLANTIC	EDENTON	EDTNNCXA	YES
SPRINT MID ATLANTIC	ELIZABETH CITY	ELCYNCXA	YES
SPRINT MID ATLANTIC	ELM CITY	EMCYNCXA	YES
SPRINT MID ATLANTIC	ENFIELD	ENFDNCXA	YES
SPRINT MID ATLANTIC	ENGELHARD	ENGLNCXA	YES
SPRINT MID ATLANTIC	ELIZABETH TOWN	EZTWNCXA	YES
SPRINT MID ATLANTIC	FAISON	FASNNCXA	YES
SPRINT MID ATLANTIC	FRANKLINTON	FKTNNCXA	YES
SPRINT MID ATLANTIC	FOUNTAIN	FONTNCXA	YES
SPRINT MID ATLANTIC	FUQUAY VARINA	FQVRNCXA	YES
SPRINT MID ATLANTIC	FREMONT	FRMTNCXA	YES
SPRINT MID ATLANTIC	FOUR OAKS	FROKNCXA	YES
SPRINT MID ATLANTIC	FARMVILLE	FRVLNCXA	YES
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXA	YES
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXB	YES
SPRINT MID ATLANTIC	FT BRAGG	FYVLNCXD	YES
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXF	YES
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXG	YES
SPRINT MID ATLANTIC	GIBSONVILLE	GBVLNCXA	YES
SPRINT MID ATLANTIC	GRIFFON	GFTNNCXA	YES
SPRINT MID ATLANTIC	GOLDSTON	GLDSNCXA	YES
SPRINT MID ATLANTIC	GREENVILLE	GNVLNCXA	YES
SPRINT MID ATLANTIC	GREENVILLE	GNVLNCXB	YES
SPRINT MID ATLANTIC	GARLAND	GRLDNCXA	YES
SPRINT MID ATLANTIC	HALIFAX	HLFXNCXA	YES
SPRINT MID ATLANTIC	HOLLY RIDGE	HLRGNCXA	YES
SPRINT MID ATLANTIC	HAMILTON	HMTNNCXA	YES
SPRINT MID ATLANTIC	HENDERSON	HNSNNCXA	YES
SPRINT MID ATLANTIC	HERTFORD	HRFRNCXA	YES
SPRINT MID ATLANTIC	HAVELOCK	HVLCNCXA	YES
SPRINT MID ATLANTIC	JACKSON	JCSNNCXA	YES
SPRINT MID ATLANTIC	JACKSONVILLE	JCVLNCXA	YES
SPRINT MID ATLANTIC	JACKSONVILLE	JCVLNCXB	YES
SPRINT MID ATLANTIC	KILL DEVIL HLS	KDHLNCXA	YES
SPRINT MID ATLANTIC	KITTY HAWK	KDHLNCXB	YES
SPRINT MID ATLANTIC	KENLY	KNLYNCXA	YES
SPRINT MID ATLANTIC	KENANSVILLE	KNVLNCXA	YES
SPRINT MID ATLANTIC	KERNERSVILLE	KRVLNCXA	YES
SPRINT MID ATLANTIC	KINSTON	KSTNNCXA	YES
SPRINT MID ATLANTIC	LA GRANGE	LGRNNCXA	YES
SPRINT MID ATLANTIC	LAKE WACCAMAW	LKWCNCXA	YES
SPRINT MID ATLANTIC	LILLINGTON	LLTNNCXA	YES
SPRINT MID ATLANTIC	LOUISBURG	LSBGNCXA	YES
SPRINT MID ATLANTIC	LOUISBURG	LSBGNCXB	YES
SPRINT MID ATLANTIC	LEWISTON WOODVILLE	LSTNNCXA	YES
SPRINT MID ATLANTIC	LITTLETON	LTTNNCXA	YES

**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS IN THE STATE OF NORTH CAROLINA**

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
SPRINT MID ATLANTIC	LUCAMA	LUCMNCXA	YES
SPRINT MID ATLANTIC	HARBINGER	MAMINCXA	YES
SPRINT MID ATLANTIC	MANTEO	MANTNCXA	YES
SPRINT MID ATLANTIC	STACY	MRBGNCXA	YES
SPRINT MID ATLANTIC	MURFREESBORO	MRBONCXA	YES
SPRINT MID ATLANTIC	MOREHEAD CITY	MRCYNCXA	YES
SPRINT MID ATLANTIC	DEEP RUN	MSHLNCXA	YES
SPRINT MID ATLANTIC	MAXTON	MXTNNCXA	YES
SPRINT MID ATLANTIC	MAYSVILLE	MYVLNCXA	YES
SPRINT MID ATLANTIC	NORLINA	NRLNNCXA	YES
SPRINT MID ATLANTIC	NASHVILLE	NSVLNCXA	YES
SPRINT MID ATLANTIC	NEW BERN	NWBRNCXA	YES
SPRINT MID ATLANTIC	NEWTON GROVE	NWGVNCXA	YES
SPRINT MID ATLANTIC	NEWPORT	NWPTNCXA	YES
SPRINT MID ATLANTIC	OCRACOKE	OCRCNCXA	YES
SPRINT MID ATLANTIC	ORIENTAL	ORNTNCXA	YES
SPRINT MID ATLANTIC	OXFORD	OXFRNCXA	YES
SPRINT MID ATLANTIC	POLLOCKSVILLE	PCVLNCXA	YES
SPRINT MID ATLANTIC	PINK HL	PKHLNCXA	YES
SPRINT MID ATLANTIC	PARKTON	PKTNNCXA	YES
SPRINT MID ATLANTIC	PLYMOUTH	PLMONCXA	YES
SPRINT MID ATLANTIC	PINEHURST	PNHRNCXA	YES
SPRINT MID ATLANTIC	PINETOPS	PNTPNXA	YES
SPRINT MID ATLANTIC	PRINCETON	PRTNNCXA	YES
SPRINT MID ATLANTIC	PITTSBORO	PTBONCXA	YES
SPRINT MID ATLANTIC	BELVIDERE	PYWDNCXA	YES
SPRINT MID ATLANTIC	RAEFORD	RAFDNCXA	YES
SPRINT MID ATLANTIC	ROBBINS	RBNSNCXA	YES
SPRINT MID ATLANTIC	ROBERSONVILLE	RBVLNCXA	YES
SPRINT MID ATLANTIC	RICHLANDS	RCLDNCXA	YES
SPRINT MID ATLANTIC	ROCKY MT	RCMTNCXA	YES
SPRINT MID ATLANTIC	ROCKY MT	RCMTNCXB	YES
SPRINT MID ATLANTIC	RICH SQ	RCSQNCXA	YES
SPRINT MID ATLANTIC	RED SPGS	RDSPNCXA	YES
SPRINT MID ATLANTIC	ROANOKE RAPIDS	RNRPNXA	YES
SPRINT MID ATLANTIC	ROSEBORO	RSBONCXA	YES
SPRINT MID ATLANTIC	ROSE HILL	RSHLNCXA	YES
SPRINT MID ATLANTIC	ROXOBEL	RXBLNCXA	YES
SPRINT MID ATLANTIC	SEABOARD	SBRDNCXA	YES
SPRINT MID ATLANTIC	SCOTLAND NECK	SCNKNCXA	YES
SPRINT MID ATLANTIC	CAMDEN	SHLHNCXA	YES
SPRINT MID ATLANTIC	SILER CITY	SLCYNCXA	YES
SPRINT MID ATLANTIC	SMITHFIELD	SMFDNCXA	YES
SPRINT MID ATLANTIC	SUNBURY	SNBYNCXA	YES
SPRINT MID ATLANTIC	SNEADS FERRY	SNFYNCXA	YES
SPRINT MID ATLANTIC	SNOW HL	SNHLNCXA	YES
SPRINT MID ATLANTIC	SOUTHERN PINES	SPNSNCXA	YES
SPRINT MID ATLANTIC	SPG HOPE	SPRHNCXA	YES
SPRINT MID ATLANTIC	STANTONSBURG	STBGNCXA	YES
SPRINT MID ATLANTIC	SOUTH MILLS	STMLNCXA	YES
SPRINT MID ATLANTIC	ST PAULS	STPLNCXA	YES
SPRINT MID ATLANTIC	SWANQUARTER	SWNQNCXA	YES

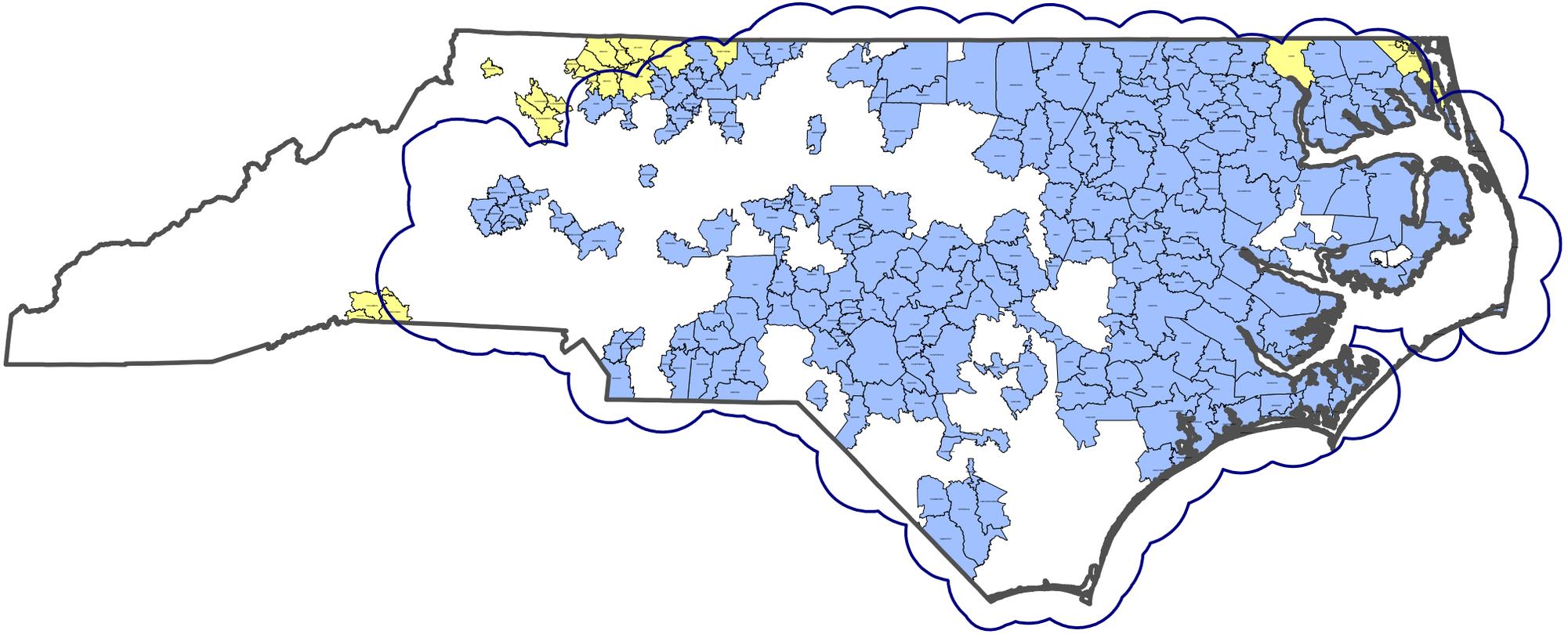
**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS IN THE STATE OF NORTH CAROLINA**

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
SPRINT MID ATLANTIC	SWANSBORO	SWNSNCXA	YES
SPRINT MID ATLANTIC	EMERALD IS	SWNSNCXB	YES
SPRINT MID ATLANTIC	TABOR CITY	TBCYNCXA	YES
SPRINT MID ATLANTIC	SNEADS	TPISNCXA	YES
SPRINT MID ATLANTIC	TARBORO	TRBONCXA	YES
SPRINT MID ATLANTIC	TRENTON	TRENNCXA	YES
SPRINT MID ATLANTIC	VASS	VASSNCXA	YES
SPRINT MID ATLANTIC	VANCEBORO	VNBONCXA	YES
SPRINT MID ATLANTIC	WASHINGTON	WASHNCXA	YES
SPRINT MID ATLANTIC	WAVES	WAVSNCXA	YES
SPRINT MID ATLANTIC	WOODLAND	WDLNXCXA	YES
SPRINT MID ATLANTIC	WOODVILLE	WDVLNCXA	YES
SPRINT MID ATLANTIC	CARTHAGE	WHPNNCXA	YES
SPRINT MID ATLANTIC	WHITAKERS	WHTKNCXA	YES
SPRINT MID ATLANTIC	WHITEVILLE	WHVLNCXA	YES
SPRINT MID ATLANTIC	WINTON	WITNNCXA	YES
SPRINT MID ATLANTIC	WAKE FRST	WKFSNCXA	YES
SPRINT MID ATLANTIC	WEEKSVILLE	WKVLNCXA	YES
SPRINT MID ATLANTIC	TYNER	WLCHNCXA	YES
SPRINT MID ATLANTIC	WELDON	WLDNNCXA	YES
SPRINT MID ATLANTIC	WALLACE	WLLCNCXA	YES
SPRINT MID ATLANTIC	WILSON	WLSNNCXA	YES
SPRINT MID ATLANTIC	WILLIAMSTON	WMTNNCXA	YES
SPRINT MID ATLANTIC	WINDSOR	WNDSNCXA	YES
SPRINT MID ATLANTIC	WARSAW	WRSWNCXA	YES
SPRINT MID ATLANTIC	WARRENTON	WRTNNCXA	YES
SPRINT MID ATLANTIC	ATLANTIC	ATLTNCXA	YES
SURRY TELEPHONE MEMBERSHIP CORP.	BEULAH	BELHNCXA	NO
SURRY TELEPHONE MEMBERSHIP CORP.	LEVEL CROSS	LVCRCNCXA	NO
SURRY TELEPHONE MEMBERSHIP CORP.	RED BRUSH	RDBSNCXA	NO
SURRY TELEPHONE MEMBERSHIP CORP.	WESTFIELD	WSFDNCXA	NO
SURRY TELEPHONE MEMBERSHIP CORP.	ZEPHYR	ZPHYNCXA	NO
SURRY TELEPHONE MEMBERSHIP CORP.	SHOALS	SHLSNCXA	YES

EXHIBIT G-1

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

Alltel Communications, Inc. State of North Carolina

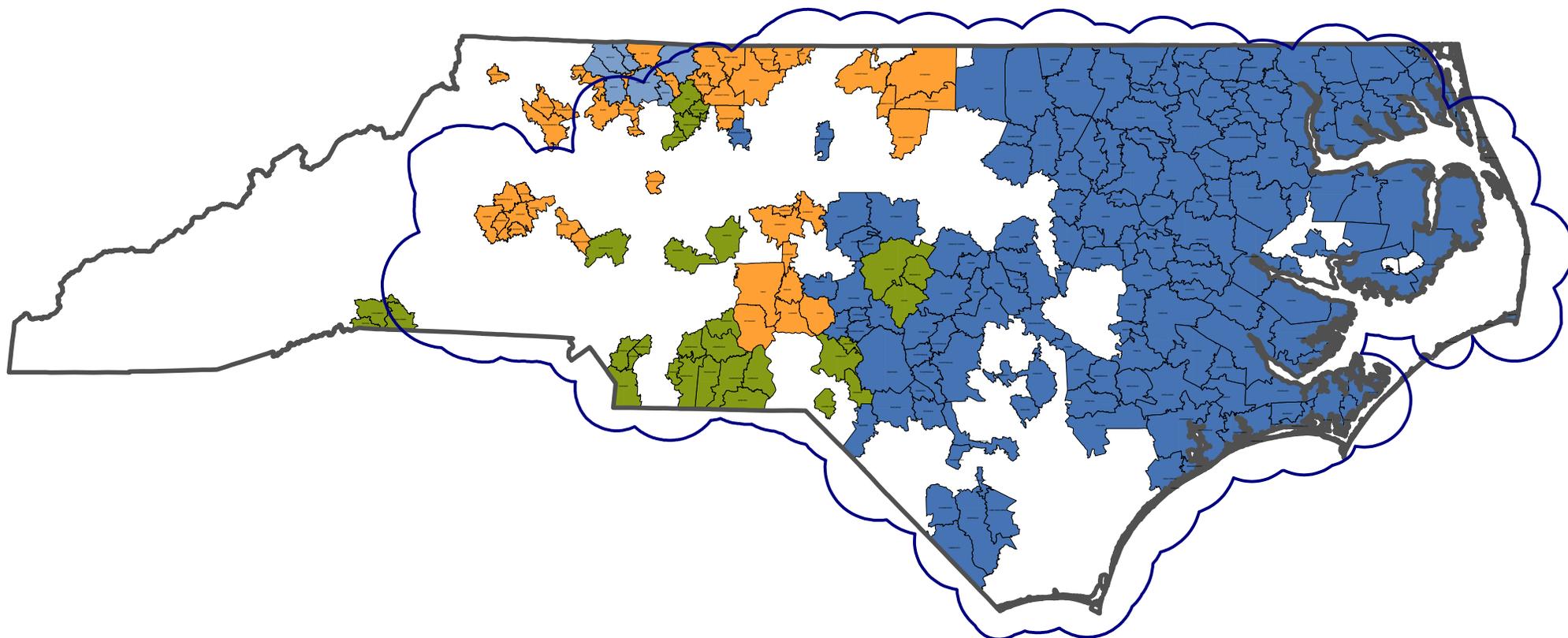


- Wire centers served by Alltel in partially served rural study areas
- Wire centers not served by Alltel in partially served rural study areas

EXHIBIT G-2

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

Alltel Communications, Inc. State of North Carolina



ILECs

- ALLTEL CAROLINA - NORTH, INC.
- CENTRAL TELEPHONE CO. - NORTH CAROLINA
- SPRINT MID ATLANTIC
- SURRY TELEPHONE MEMBERSHIP CORP.

EXHIBIT H
DENSITY ANALYSIS

Alltel Communications, Inc.
Density Analysis of Partially Served Rural Wire Centers

STUDY AREA NAME	WIRE CENTER	CLLI CODE	SERVED	POPULATION	AREA IN SQ MILE	DENSITY PERSONS PER SQ MILE
ALLTEL CAROLINA INC.	COLUMBUS	CLMBNCXA	NO	7,043	75.95	92.74
ALLTEL CAROLINA INC.	GREEN CREEK	GRCKNCXA	NO	4,466	67.67	66.00
ALLTEL CAROLINA INC.	TRYON	TRYNNCXA	NO	4,382	23.16	189.23
DENSITY OF "UNSERVED" WIRE CENTERS				15,891	166.77	95.29
ALLTEL CAROLINA INC.	ABERDEEN	ABRDNCXA	YES	7,001	37.15	188.47
ALLTEL CAROLINA INC.	ANSONVILLE	ASVLNCXA	YES	2,843	102.76	27.67
ALLTEL CAROLINA INC.	BROADWAY	BRWYNCXA	YES	6,672	77.34	86.27
ALLTEL CAROLINA INC.	DENTON	DNTNNCXA	YES	9,885	115.16	85.84
ALLTEL CAROLINA INC.	ROCKWELL	GRQYNCXA	YES	20,791	103.34	201.18
ALLTEL CAROLINA INC.	HEMBY BRIDGE	HMBRNCXA	YES	17,532	25.95	675.61
ALLTEL CAROLINA INC.	MATTHEWS	INTRNCXA	YES	12,440	18.76	663.15
ALLTEL CAROLINA INC.	KING	KINGNCXA	YES	17,450	70.19	248.63
ALLTEL CAROLINA INC.	LILESVILLE	LLVLNCXA	YES	4,063	114.60	35.45
ALLTEL CAROLINA INC.	LAUREL HILL	LRHLNCXA	YES	4,812	56.59	85.03
ALLTEL CAROLINA INC.	LEWISVILLE	LWVLNCXA	YES	12,693	36.08	351.84
ALLTEL CAROLINA INC.	MARSHVILLE	MHVLNCXA	YES	9,066	106.88	84.82
ALLTEL CAROLINA INC.	MOORESVILLE	MRVINCXA	YES	45,166	98.30	459.49
ALLTEL CAROLINA INC.	MORVEN	MRVNNCXA	YES	3,688	87.23	42.28
ALLTEL CAROLINA INC.	MATTHEWS	MTHWNCXB	YES	68,698	58.14	1,181.68
ALLTEL CAROLINA INC.	NORWOOD	NRWDNCXA	YES	7,119	60.81	117.07
ALLTEL CAROLINA INC.	MARSHVILLE	NWSLNCXA	YES	3,373	60.10	56.13
ALLTEL CAROLINA INC.	OLIVIA	OLIVNCXA	YES	23,463	146.06	160.64
ALLTEL CAROLINA INC.	WINSTON SALEM	OLTWNCXA	YES	28,569	43.47	657.17
ALLTEL CAROLINA INC.	PEACHLAND	PCLDNCXA	YES	4,996	101.72	49.11
ALLTEL CAROLINA INC.	PINEBLUFF	PNBLNCXA	YES	8,304	109.62	75.75
ALLTEL CAROLINA INC.	RURAL HALL	RRHLNCXA	YES	7,421	22.18	334.54
ALLTEL CAROLINA INC.	STANLEYVILLE	SLVLNCXA	YES	3,684	4.96	742.74
ALLTEL CAROLINA INC.	SANFORD	SNFRNCXA	YES	41,201	219.70	187.53
ALLTEL CAROLINA INC.	WADESBORO	WDBONCXA	YES	9,361	114.68	81.63
ALLTEL CAROLINA INC.	WAGRAM	WGRMNCXA	YES	3,627	69.10	52.49
ALLTEL CAROLINA INC.	WINGATE	WNGTNCXA	YES	7,284	26.48	275.12
ALLTEL CAROLINA INC.	WAXHAW	WXHWNCXA	YES	19,943	97.53	204.47
DENSITY OF "SERVED" WIRE CENTERS				411,145	2,185	188.18
CENTRAL TELEPHONE CO.	DOBSON	DBSNNCXB	NO	3,298	17.10	192.91
CENTRAL TELEPHONE CO.	N WILKESBORO	HAYSNCXA	NO	5,833	35.24	165.52
CENTRAL TELEPHONE CO.	N WILKESBORO	MLBYNCXB	NO	4,983	46.84	106.37
CENTRAL TELEPHONE CO.	MT AIRY	MTARNCXA	NO	26,218	76.73	341.69
CENTRAL TELEPHONE CO.	N WILKESBORO	NWBONCXA	NO	26,764	120.47	222.17
CENTRAL TELEPHONE CO.	ROARING GAP	RRGPNCXA	NO	729	18.32	39.80
CENTRAL TELEPHONE CO.	SANDY RIDGE	SNRGNCA	NO	3,579	69.08	51.81
CENTRAL TELEPHONE CO.	STATE ROAD	STRDNCXA	NO	3,407	57.72	59.02
CENTRAL TELEPHONE CO.	W JEFFERSON	WJSNNCXA	NO	5,177	26.50	195.37
DENSITY OF "UNSERVED" WIRE CENTERS				79,988	468.00	170.92
CENTRAL TELEPHONE CO.	ASHEBORO	ASBONCXA	YES	40,899	143.20	285.61
CENTRAL TELEPHONE CO.	ASHEBORO	ASBONCXB	YES	10,153	21.58	470.55
CENTRAL TELEPHONE CO.	HICKORY	BHLHNCXA	YES	7,215	26.23	275.12
CENTRAL TELEPHONE CO.	BISCOE	BISCNCA	YES	5,923	61.46	96.37
CENTRAL TELEPHONE CO.	BOONVILLE	BNVLNCXA	YES	3,702	30.32	122.10
CENTRAL TELEPHONE CO.	CANDOR	CNDRNCXA	YES	5,222	93.80	55.67
CENTRAL TELEPHONE CO.	CATAWBA	CTWBNCXA	YES	6,503	44.27	146.88
CENTRAL TELEPHONE CO.	DANBURY	DNBRNCXA	YES	4,379	96.36	45.44
CENTRAL TELEPHONE CO.	EDEN	EDENNCXA	YES	4,655	21.99	211.68
CENTRAL TELEPHONE CO.	EDEN	EDENNCXB	YES	21,601	63.68	339.24
CENTRAL TELEPHONE CO.	ELKIN	ELKNNCXA	YES	14,099	72.09	195.58
CENTRAL TELEPHONE CO.	GRANITE FALLS	GRFLNCXA	YES	18,607	52.62	353.58
CENTRAL TELEPHONE CO.	HICKORY	HCKRNCXA	YES	51,174	58.78	870.65
CENTRAL TELEPHONE CO.	HICKORY	HCKRNCXB	YES	22,736	36.78	618.15
CENTRAL TELEPHONE CO.	HILLSBOROUGH	HLBONCXB	YES	22,347	158.85	140.68
CENTRAL TELEPHONE CO.	HILDEBRAN	HILDBNCXB	YES	7,771	22.68	342.59
CENTRAL TELEPHONE CO.	MADISON	MDSNNCXA	YES	21,163	172.91	122.39

Alltel Communications, Inc.
Density Analysis of Partially Served Rural Wire Centers

STUDY AREA NAME	WIRE CENTER	CLLI CODE	SERVED	POPULATION	AREA IN SQ MILE	DENSITY PERSONS PER SQ MILE
CENTRAL TELEPHONE CO.	MOCKSVILLE	MKVLNCXA	YES	8,340	37.08	224.94
CENTRAL TELEPHONE CO.	MT GILEAD	MTGLNCXA	YES	5,407	153.46	35.23
CENTRAL TELEPHONE CO.	HICKORY	MTVWNCXA	YES	9,655	24.98	386.57
CENTRAL TELEPHONE CO.	PILOT MT	PLMTNCXA	YES	5,444	36.27	150.08
CENTRAL TELEPHONE CO.	PROSPECT HILL	PRHLNCXA	YES	1,250	42.63	29.32
CENTRAL TELEPHONE CO.	WALNUT COVE	QKGPNCXA	YES	2,641	29.03	90.97
CENTRAL TELEPHONE CO.	RAMSEUR	RMSRNCXA	YES	9,417	63.33	148.69
CENTRAL TELEPHONE CO.	ROXBORO	RXBONCXA	YES	29,169	295.17	98.82
CENTRAL TELEPHONE CO.	SEAGROVE	SEGVNCXA	YES	2,756	30.04	91.76
CENTRAL TELEPHONE CO.	SHERRILLS FORK	SHFRNCXA	YES	3,948	24.67	160.06
CENTRAL TELEPHONE CO.	STONEVILLE	STVLNCXA	YES	5,342	46.86	114.00
CENTRAL TELEPHONE CO.	ROUGEMONT	TMLKNCXA	YES	8,178	101.81	80.33
CENTRAL TELEPHONE CO.	TROY	TROYNCXA	YES	10,261	204.34	50.22
CENTRAL TELEPHONE CO.	VALDESE	VLDSCXA	YES	16,746	68.84	243.26
CENTRAL TELEPHONE CO.	W END	WENDNCXB	YES	8,374	102.48	81.71
CENTRAL TELEPHONE CO.	WALKERTOWN	WKTWNCXA	YES	12,298	47.77	257.42
CENTRAL TELEPHONE CO.	WALNUT COVE	WLCVNCXA	YES	9,476	72.08	131.47
CENTRAL TELEPHONE CO.	YANCEYVILLE	YCVLNCXA	YES	8,172	155.90	52.42
CENTRAL TELEPHONE CO.	YADKINVILLE	YDVLNCXA	YES	4,639	16.10	288.19
DENSITY OF "SERVED" WIRE CENTERS				429,662	2,730	157.36
SPRINT MID ATLANTIC	COINJOCK	CNJCNCA	NO	5,557	90.22	61.59
SPRINT MID ATLANTIC	EURE	GTVLNCXA	NO	6,336	183.72	34.49
SPRINT MID ATLANTIC	MOYOCK	MOYCNCXA	NO	4,329	54.81	78.98
SPRINT MID ATLANTIC	MOYOCK	MOYCNCXB	NO	5,681	68.80	82.57
DENSITY OF "UNSERVED" WIRE CENTERS				21,903	397.55	55.09
SPRINT MID ATLANTIC	AHOSKIE	AHSKNCXA	YES	11,466	145.45	78.83
SPRINT MID ATLANTIC	AULANDER	ALNDNCXA	YES	2,576	72.90	35.34
SPRINT MID ATLANTIC	ANGIER	ANGRNCXA	YES	17,619	70.50	249.93
SPRINT MID ATLANTIC	ATLANTIC	ATLTNCXA	YES	1,754	67.53	25.97
SPRINT MID ATLANTIC	AURORA	AURRNCXA	YES	4,243	217.42	19.52
SPRINT MID ATLANTIC	AYDEN	AYDNNCXA	YES	11,270	143.08	78.77
SPRINT MID ATLANTIC	BAILEY	BALYNCA	YES	9,162	92.28	99.28
SPRINT MID ATLANTIC	BATH	BATHNCXA	YES	2,253	43.80	51.44
SPRINT MID ATLANTIC	BETHEL	BETHNCXA	YES	2,711	59.59	45.50
SPRINT MID ATLANTIC	BEULAVILLE	BEVLNCXA	YES	8,324	121.22	68.67
SPRINT MID ATLANTIC	BLADENBORO	BLBONCXA	YES	4,829	38.59	125.13
SPRINT MID ATLANTIC	BELHAVEN	BLHNNCXA	YES	3,744	140.77	26.60
SPRINT MID ATLANTIC	BENSON	BNSNNCXA	YES	19,959	147.00	135.78
SPRINT MID ATLANTIC	BONLEE	BONLNCXA	YES	3,864	79.31	48.72
SPRINT MID ATLANTIC	BEAUFORT	BUFTNCXA	YES	12,126	159.75	75.91
SPRINT MID ATLANTIC	BUXTON	BXTNNCXA	YES	2,358	15.10	156.12
SPRINT MID ATLANTIC	BUXTON	BXTNNCXB	YES	765	4.16	183.81
SPRINT MID ATLANTIC	BAYBORO	BYBONCXA	YES	8,105	239.46	33.85
SPRINT MID ATLANTIC	CHADBOURN	CHDBNCXA	YES	9,116	116.00	78.59
SPRINT MID ATLANTIC	CLARKTON	CKTNNCXA	YES	1,805	24.60	73.37
SPRINT MID ATLANTIC	COLUMBIA	CLMANCXA	YES	3,756	355.34	10.57
SPRINT MID ATLANTIC	COLERAIN	CLRNNCXA	YES	4,544	168.40	26.98
SPRINT MID ATLANTIC	CLINTON	CLTNNCXA	YES	18,163	140.17	129.58
SPRINT MID ATLANTIC	CONWAY	CNWyNCXA	YES	4,694	145.08	32.36
SPRINT MID ATLANTIC	CARTHAGE	CRTHNCXA	YES	7,753	129.61	59.82
SPRINT MID ATLANTIC	CRESWELL	CRWLNCXA	YES	2,633	152.48	17.27
SPRINT MID ATLANTIC	CLAYTON	CYTNNCXA	YES	41,335	118.56	348.66
SPRINT MID ATLANTIC	DUNN	DUNNNCXA	YES	23,261	138.53	167.92
SPRINT MID ATLANTIC	ERWIN	DUNNNCXB	YES	12,217	65.85	185.53
SPRINT MID ATLANTIC	EDENTON	EDTNNCXA	YES	10,799	142.23	75.93
SPRINT MID ATLANTIC	ELIZABETH CITY	ELCYNCXA	YES	29,225	121.03	241.47
SPRINT MID ATLANTIC	ELM CITY	EMCYNCXA	YES	3,498	35.85	97.59
SPRINT MID ATLANTIC	ENFIELD	ENFDNCXA	YES	8,368	191.62	43.67
SPRINT MID ATLANTIC	ENGELHARD	ENGLNCXA	YES	1,548	198.06	7.82
SPRINT MID ATLANTIC	ELIZABETH TOWN	EZTWNCXA	YES	8,954	127.99	69.96
SPRINT MID ATLANTIC	FAISON	FASNNCXA	YES	2,495	43.52	57.34

Alltel Communications, Inc.
Density Analysis of Partially Served Rural Wire Centers

STUDY AREA NAME	WIRE CENTER	CLLI CODE	SERVED	POPULATION	AREA IN SQ MILE	DENSITY PERSONS PER SQ MILE
SPRINT MID ATLANTIC	FRANKLINTON	FKTNNCXA	YES	7,417	56.70	130.81
SPRINT MID ATLANTIC	FOUNTAIN	FONTNCXA	YES	1,633	29.18	55.97
SPRINT MID ATLANTIC	FUQUAY VARINA	FQVRNCXA	YES	46,037	156.12	294.89
SPRINT MID ATLANTIC	FREMONT	FRMTNCXA	YES	8,723	96.71	90.20
SPRINT MID ATLANTIC	FOUR OAKS	FROKNCXA	YES	5,278	35.98	146.68
SPRINT MID ATLANTIC	FARMVILLE	FRVLNCXA	YES	11,902	111.32	106.92
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXA	YES	63,874	265.53	240.55
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXB	YES	82,545	41.32	1,997.60
SPRINT MID ATLANTIC	FT BRAGG	FYVLNCXD	YES	43,853	118.29	370.74
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXF	YES	47,162	69.69	676.70
SPRINT MID ATLANTIC	FAYETTEVILLE	FYVLNCXG	YES	69,973	78.24	894.36
SPRINT MID ATLANTIC	GIBSONVILLE	GBVLNCXA	YES	12,316	50.90	241.96
SPRINT MID ATLANTIC	GRIFTON	GFTNNCXA	YES	5,640	60.54	93.16
SPRINT MID ATLANTIC	GOLDSTON	GLDSNCXA	YES	1,631	34.11	47.82
SPRINT MID ATLANTIC	GREENVILLE	GNVLNCXA	YES	59,412	274.24	216.64
SPRINT MID ATLANTIC	GREENVILLE	GNVLNCXB	YES	53,096	73.67	720.74
SPRINT MID ATLANTIC	GARLAND	GRLDNCXA	YES	2,819	59.35	47.50
SPRINT MID ATLANTIC	HALIFAX	HLFXNCXA	YES	2,183	62.16	35.12
SPRINT MID ATLANTIC	HOLLY RIDGE	HLRGNCXA	YES	4,307	79.11	54.44
SPRINT MID ATLANTIC	HAMILTON	HMTNNCXA	YES	2,399	99.68	24.07
SPRINT MID ATLANTIC	HENDERSON	HNSNNCXA	YES	48,369	309.27	156.40
SPRINT MID ATLANTIC	HERTFORD	HRFRNCXA	YES	7,119	129.48	54.98
SPRINT MID ATLANTIC	HAVELOCK	HVLCNCXA	YES	30,064	171.62	175.18
SPRINT MID ATLANTIC	JACKSON	JCSNNCXA	YES	1,661	44.27	37.52
SPRINT MID ATLANTIC	JACKSONVILLE	JCVLNCXA	YES	63,882	221.04	289.00
SPRINT MID ATLANTIC	JACKSONVILLE	JCVLNCXB	YES	48,483	170.63	284.15
SPRINT MID ATLANTIC	KILL DEVIL HLS	KDHLNCXA	YES	13,506	25.05	539.10
SPRINT MID ATLANTIC	KITTY HAWK	KDHLNCXB	YES	6,892	15.39	447.85
SPRINT MID ATLANTIC	KENLY	KNLYNCXA	YES	12,200	118.71	102.77
SPRINT MID ATLANTIC	KENANSVILLE	KNVLNCXA	YES	4,765	101.77	46.82
SPRINT MID ATLANTIC	KERNERSVILLE	KRVLNCXA	YES	33,274	52.71	631.33
SPRINT MID ATLANTIC	KINSTON	KSTNNCXA	YES	45,712	308.36	148.24
SPRINT MID ATLANTIC	LA GRANGE	LGRNNCXA	YES	8,804	87.57	100.54
SPRINT MID ATLANTIC	LAKE WACCAMAW	LKWCNCXA	YES	4,391	115.66	37.96
SPRINT MID ATLANTIC	LILLINGTON	LLTNNCXA	YES	22,495	160.97	139.74
SPRINT MID ATLANTIC	LOUISBURG	LSBGNCXA	YES	17,161	149.84	114.53
SPRINT MID ATLANTIC	LOUISBURG	LSBGNCXB	YES	5,351	109.89	48.69
SPRINT MID ATLANTIC	LEWISTON WOOD	LSTNNCXA	YES	3,013	174.12	17.30
SPRINT MID ATLANTIC	LITTLETON	LTTNNCXA	YES	9,552	197.91	48.26
SPRINT MID ATLANTIC	LUCAMA	LUCMNCXA	YES	4,876	46.98	103.79
SPRINT MID ATLANTIC	HARBINGER	MAMINCXA	YES	3,232	27.01	119.67
SPRINT MID ATLANTIC	MANTEO	MANTNCXA	YES	8,912	310.17	28.73
SPRINT MID ATLANTIC	STACY	MRBGNCXA	YES	2,477	92.12	26.89
SPRINT MID ATLANTIC	MURFREESBORO	MRBONCXA	YES	6,675	112.59	59.28
SPRINT MID ATLANTIC	MOREHEAD CITY	MRCYNCXA	YES	23,585	58.43	403.63
SPRINT MID ATLANTIC	DEEP RUN	MSHLNCXA	YES	2,681	44.02	60.91
SPRINT MID ATLANTIC	MAXTON	MXTNNCXA	YES	10,217	110.56	92.41
SPRINT MID ATLANTIC	MAYSVILLE	MYVLNCXA	YES	4,044	113.73	35.56
SPRINT MID ATLANTIC	NORLINA	NRLNNCXA	YES	5,759	94.45	60.97
SPRINT MID ATLANTIC	NASHVILLE	NSVLNCXA	YES	14,468	126.97	113.95
SPRINT MID ATLANTIC	NEW BERN	NWBRNCXA	YES	52,613	341.15	154.22
SPRINT MID ATLANTIC	NEWTON GROVE	NWGVNCXA	YES	5,650	103.25	54.72
SPRINT MID ATLANTIC	NEWPORT	NWPTNCXA	YES	9,528	60.89	156.47
SPRINT MID ATLANTIC	OCRACOKE	OCRCNCXA	YES	743	9.65	77.03
SPRINT MID ATLANTIC	ORIENTAL	ORNTNCXA	YES	4,506	90.26	49.92
SPRINT MID ATLANTIC	OXFORD	OXFRNCXA	YES	24,449	336.84	72.58
SPRINT MID ATLANTIC	POLLOCKSVILLE	PCVLNCXA	YES	2,407	93.82	25.66
SPRINT MID ATLANTIC	PINK HL	PKHLNCXA	YES	8,138	121.13	67.18
SPRINT MID ATLANTIC	PARKTON	PKTNNCXA	YES	4,449	32.69	136.09
SPRINT MID ATLANTIC	PLYMOUTH	PLMONCXA	YES	11,541	261.15	44.19
SPRINT MID ATLANTIC	PINEHURST	PNHRNCXA	YES	16,187	52.06	310.93
SPRINT MID ATLANTIC	PINETOPS	PNTPNCXA	YES	6,607	91.22	72.43
SPRINT MID ATLANTIC	PRINCETON	PRTNNCXA	YES	3,383	36.14	93.62

**Alltel Communications, Inc.
Density Analysis of Partially Served Rural Wire Centers**

STUDY AREA NAME	WIRE CENTER	CLLI CODE	SERVED	POPULATION	AREA IN SQ MILE	DENSITY PERSONS PER SQ MILE
SPRINT MID ATLANTIC	PITTSBORO	PTBONCXA	YES	16,498	214.23	77.01
SPRINT MID ATLANTIC	BELVIDERE	PYWDNCXA	YES	1,716	71.25	24.09
SPRINT MID ATLANTIC	RAEFORD	RAFDNCXA	YES	31,506	313.90	100.37
SPRINT MID ATLANTIC	ROBBINS	RBNSNCXA	YES	5,150	83.19	61.91
SPRINT MID ATLANTIC	ROBERSONVILLE	RBVLNCSXA	YES	4,636	85.30	54.35
SPRINT MID ATLANTIC	RICHLANDS	RCLDNCXA	YES	13,230	249.38	53.05
SPRINT MID ATLANTIC	ROCKY MT	RCMTNCSXA	YES	57,510	213.54	269.31
SPRINT MID ATLANTIC	ROCKY MT	RCMTNCSXB	YES	27,624	140.58	196.50
SPRINT MID ATLANTIC	RICH SQ	RCSQNCXA	YES	3,808	122.25	31.15
SPRINT MID ATLANTIC	RED SPGS	RDSPNCXA	YES	17,236	127.35	135.34
SPRINT MID ATLANTIC	ROANOKE RAPID	RNRPNCSXA	YES	32,618	141.72	230.16
SPRINT MID ATLANTIC	ROSEBORO	RSBONCSXA	YES	4,572	48.07	95.11
SPRINT MID ATLANTIC	ROSE HILL	RSHLNCXA	YES	7,926	125.66	63.07
SPRINT MID ATLANTIC	ROXOBEL	RXBLNCXA	YES	1,113	26.29	42.33
SPRINT MID ATLANTIC	SEABOARD	SBRDNCSXA	YES	1,714	61.47	27.89
SPRINT MID ATLANTIC	SCOTLAND NECK	SCNKNCXA	YES	7,589	213.41	35.56
SPRINT MID ATLANTIC	CAMDEN	SHLHNCXA	YES	2,798	79.10	35.37
SPRINT MID ATLANTIC	SILER CITY	SLCYNCXA	YES	17,856	177.37	100.67
SPRINT MID ATLANTIC	SMITHFIELD	SMFDNCXA	YES	30,489	192.95	158.02
SPRINT MID ATLANTIC	SUNBURY	SNBYNCXA	YES	3,759	135.69	27.70
SPRINT MID ATLANTIC	SNEADS FERRY	SNFYNCXA	YES	5,146	29.22	176.13
SPRINT MID ATLANTIC	SNOW HL	SNHLNCXA	YES	11,452	130.18	87.97
SPRINT MID ATLANTIC	SOUTHERN PINE	SPNSNCXA	YES	15,736	43.83	359.06
SPRINT MID ATLANTIC	SPG HOPE	SPRHNCXA	YES	9,532	113.48	84.00
SPRINT MID ATLANTIC	STANTONSBURG	STBGNCXA	YES	3,365	60.19	55.91
SPRINT MID ATLANTIC	SOUTH MILLS	STMLNCXA	YES	5,180	180.64	28.68
SPRINT MID ATLANTIC	ST PAULS	STPLNCXA	YES	9,323	88.17	105.74
SPRINT MID ATLANTIC	SWANQUARTER	SWNQNCXA	YES	2,774	273.19	10.15
SPRINT MID ATLANTIC	SWANSBORO	SWNSNCXA	YES	21,792	131.53	165.68
SPRINT MID ATLANTIC	EMERALD IS	EWNSNCXB	YES	3,509	5.81	604.17
SPRINT MID ATLANTIC	TABOR CITY	TBCYNCXA	YES	11,430	174.21	65.61
SPRINT MID ATLANTIC	SNEADS	TPISNCXA	YES	3,155	15.98	197.38
SPRINT MID ATLANTIC	TARBORO	TRBONCSXA	YES	19,821	201.35	98.44
SPRINT MID ATLANTIC	TRENTON	TRENCSXA	YES	3,370	181.48	18.57
SPRINT MID ATLANTIC	VASS	VASSNCXA	YES	7,457	70.58	105.66
SPRINT MID ATLANTIC	VANCEBORO	VNBONCSXA	YES	7,664	171.10	44.79
SPRINT MID ATLANTIC	WASHINGTON	WASHNCXA	YES	31,364	263.38	119.08
SPRINT MID ATLANTIC	WAVES	WAVSNCXA	YES	1,210	13.79	87.77
SPRINT MID ATLANTIC	WOODLAND	WDLNCSXA	YES	1,648	30.46	54.10
SPRINT MID ATLANTIC	WOODVILLE	WDVLNCXA	YES	6,547	96.46	67.88
SPRINT MID ATLANTIC	CARTHAGE	WHPNCSXA	YES	4,490	25.15	178.56
SPRINT MID ATLANTIC	WHITAKERS	WHTKNCXA	YES	2,617	82.06	31.89
SPRINT MID ATLANTIC	WHITEVILLE	WHVLNCXA	YES	18,775	258.83	72.54
SPRINT MID ATLANTIC	WINTON	WITNCSXA	YES	2,681	38.44	69.75
SPRINT MID ATLANTIC	WAKE FRST	WKFSNCXA	YES	46,055	166.33	276.89
SPRINT MID ATLANTIC	WEEKSVILLE	WKVLNCXA	YES	3,801	65.16	58.33
SPRINT MID ATLANTIC	TYNER	WLCHNCXA	YES	4,353	78.73	55.29
SPRINT MID ATLANTIC	WELDON	WLDNCSXA	YES	6,235	106.42	58.59
SPRINT MID ATLANTIC	WALLACE	WLLCNCXA	YES	13,922	233.35	59.66
SPRINT MID ATLANTIC	WILSON	WLSNCSXA	YES	61,861	218.30	283.37
SPRINT MID ATLANTIC	WILLIAMSTON	WMTNCSXA	YES	17,121	264.33	64.77
SPRINT MID ATLANTIC	WINDSOR	WNSDNCXA	YES	8,226	258.63	31.81
SPRINT MID ATLANTIC	WARSAW	WRSWNCXA	YES	6,687	85.22	78.47
SPRINT MID ATLANTIC	WARRENTON	WRTNCSXA	YES	10,709	259.28	41.30
DENSITY OF "SERVED" WIRE CENTERS				2,155,669	18,795	114.69
SPRINT MID ATLANTIC	BEULAH	BELHNCXA	NO	5,068	73.08	69.35
SPRINT MID ATLANTIC	LEVEL CROSS	LVCRCNCXA	NO	9,846	104.52	94.20
SPRINT MID ATLANTIC	RED BRUSH	RDBSNCXA	NO	4,969	36.62	135.69
SPRINT MID ATLANTIC	WESTFIELD	WSFDNCXA	NO	8,303	116.71	71.15
SPRINT MID ATLANTIC	ZEPHYR	ZPHYNCXA	NO	5,611	71.92	78.02
DENSITY OF "UNSERVED" WIRE CENTERS				33,797	403	83.90

Alltel Communications, Inc.
Density Analysis of Partially Served Rural Wire Centers

STUDY AREA NAME	WIRE CENTER	CLLI CODE	SERVED	POPULATION	AREA IN SQ MILE	DENSITY PERSONS PER SQ MILE
SURRY TEL MEMBERSHIP	SHOALS	SHLSNCXA	YES	2,416	32.21	75.01
DENSITY OF "SERVED" WIRE CENTER				2,416	32.21	75.01
DENSITY OF ALL "UNSERVED" WIRE CENTERS				151,579	1,435	105.62
DENSITY OF ALL "SERVED" WIRE CENTERS				2,998,892	23,743	126.31

EXHIBIT I
HIGH-COST CERTIFICATION

EXHIBIT I

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

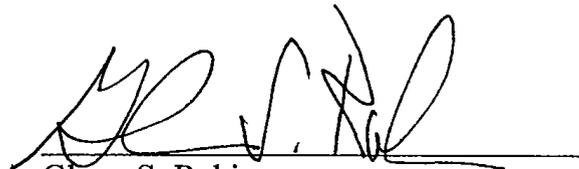
Ms. Irene Flannery
2120 L Street, N.W.
Suite 600
Washington, DC 20037

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 State of North Carolina, 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', 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 12th Street, S.W.
Room TW-B204
Washington, DC 20037

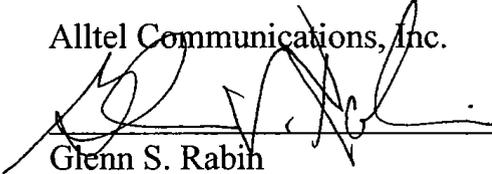
Ms. Irene Flannery
2120 L Street, N.W.
Suite 600
Washington, DC 20037

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 State of North Carolina 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

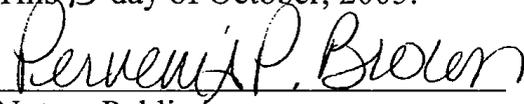
Federal Communications Counsel

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 13th day of October, 2005.


Notary Public

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