

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

_____	)	
In the Matter of	)	
	)	
Federal-State Joint Board	)	
On Universal Service	)	CC Docket No. 96-45
	)	
Farmers Cellular Telephone, Inc.	)	
	)	
Petition to Amend Eligible	)	
Telecommunications Carrier	)	
Designated Area	)	
_____	)	

To: Chief, Wireline Competition Bureau

**EXPEDITED ACTION REQUESTED**

**PETITION TO AMEND  
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATED AREA**

Gary Kirk, General Manager  
Farmers Cellular Telephone, Inc.  
450 Main Street  
Rainsville, AL 35986

Dated: December 1, 2005

## **SUMMARY**

Farmers Cellular Telephone, Inc. (the “Company”) is a commercial mobile radio service carrier that provides service in the northeast portion of the state of Alabama. In March 2003, the Federal Communications Commission (“FCC”) designated the Company as an eligible telecommunications carrier (“ETC”) in certain wire centers in its service area served by the non-rural local exchange carrier (“LEC”) BellSouth Telecommunications, Inc. (“BellSouth”).

In this petition, the Company requests the FCC to amend its designated area to include additional wire centers served by BellSouth, certain wire centers served by the non-rural LEC, CenturyTel of Alabama, L.L.C., and the entire study area of the rural LEC, Farmers Telecommunications Cooperative, Inc. As demonstrated herein, the Company meets all of the statutory and regulatory prerequisites for designation as an ETC in these areas. Furthermore, designation of the Company as an ETC in these additional areas will serve the public interest.

**FARMERS CELLULAR TELEPHONE, INC. PETITION TO AMEND  
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATED AREA**

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**ATTACHMENT 1: Wire Centers for Which Expanded Area Designation is Sought**

**ATTACHMENT 2: Five-Year Plan**

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**EXPEDITED ACTION REQUESTED**

**PETITION TO AMEND THE DESIGNATED SERVICE AREA  
OF FARMERS CELLULAR TELEPHONE, INC.**

Pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the "Act"),<sup>1</sup> Farmers Cellular Telephone, Inc. ("Farmers Cellular" or "Company"), an eligible telecommunications carrier ("ETC"), hereby petitions the Federal Communications Commission ("FCC" or "Commission") to amend its designated area to include non-rural local exchange carrier ("LEC") wire centers served by BellSouth Telecommunications, Inc. ("BellSouth") and CenturyTel of Alabama, L.L.C. ("CenturyTel") and the entire study area of the rural LEC, Farmers Telecommunications Cooperative, Inc. ("Farmers Telecommunications Cooperative").<sup>2</sup> As demonstrated below, Farmers Cellular meets all of the statutory and regulatory prerequisites for designation as an ETC in these areas. Furthermore, designation of Farmers Cellular as an ETC in these additional areas will serve the public interest.

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<sup>1</sup> 47 U.S.C. § 214(e)(6).

<sup>2</sup> See Attachment 1 listing the wire centers for which expanded area designation is sought and containing a map showing where the wire centers are located.

## I. Background

Farmers Cellular is a commercial mobile radio service (“CMRS”) carrier that provides service in the following counties in the northeast portion of the state of Alabama: Jackson, DeKalb, Marshall and Cherokee.<sup>3</sup> The Company has been in operation for over thirteen years and is wholly owned by Farmers Telecommunications Cooperative, a rural telephone company that serves portions of Jackson and DeKalb counties in Alabama.

In March 2003, the FCC designated Farmers Cellular as an ETC in certain wire centers in its service area served by the non-rural telephone company BellSouth.<sup>4</sup> Since that time, Farmers Cellular has been eligible and has received universal service funds. Farmers Cellular has used these funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, has provided service to any requesting customer within its designated ETC service area and has advertised the availability of the supported services using media of general distribution.

Subsequent to its initial designation as an ETC, Farmers Cellular has added new cell sites and enhanced its existing coverage area and now seeks ETC designation in additional BellSouth exchanges, in certain exchanges of the non-rural telephone company CenturyTel and in the entire study area of Farmers Telecommunications Cooperative.<sup>5</sup>

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<sup>3</sup> Farmers Cellular holds a cellular license that covers CMA308 – Alabama 2 – Jackson and a Personal Communications Service license that covers BTA198 – Huntsville, submarket 2.

<sup>4</sup> See *Federal-State Joint Board on Universal Service; Farmers Cellular Telephone, Inc Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Memorandum Opinion and Order, 18 FCC Rcd 182 (2003) (“Order”). These BellSouth exchanges are indicated on the map in Attachment 1.

<sup>5</sup> Because it is not necessary to separate the study area of Farmers Telecommunications Cooperative into two service areas, state commission action is not necessary for grant of this petition.

## **II. The Commission's Determination that Farmers Cellular Qualifies for Federal Universal Support Should be Extended to Additional Service Areas**

Section 254(e) of the Act provides that only an ETC designated under section 214(e) shall be eligible to receive federal universal service support.<sup>6</sup> Section 214(e)(2) gives States the primary responsibility for granting ETC status. In its Order, however, the FCC cited the Alabama Public Service Commission's letter dated January 15, 2002, in which the state commission informed Farmers Cellular that it lacked the jurisdiction to perform ETC designations for CMRS carriers<sup>7</sup> and concluded that the Commission "has authority to consider [Farmers Cellular's] petition under section 214(e)(6) of the Act."<sup>8</sup> Accordingly, because the area for which expanded ETC designation is sought is located in Alabama and Farmers Cellular has provided the Commission with the "affirmative statement" from the Alabama Commission that the Company is not subject to its jurisdiction, the Commission has the authority to consider this petition under section 214(e)(6) of the Act. Further, as demonstrated below, Farmers Cellular meets all of the requirements set forth in sections 214(e)(1) in the areas for which designation is sought.

### **A. Farmers Cellular Offers All of the Services Designated for Support in the Additional Exchanges for Which Support is Sought**

Section 214(e)(1)(A) of the Act provides that carriers designated as ETCs shall, throughout the designated service area, offer the services that are supported by federal universal support mechanisms.<sup>9</sup> The services designated for support include:

- (1) Voice grade access to the public switched network;

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<sup>6</sup> 47 U.S.C. § 254(e).

<sup>7</sup> Order at para. 6 & footnote 15 citing Farmers Cellular Telephone, Inc. Petition for Designation as an Eligible Telecommunications Carrier, filed September 6, 2002, Exhibit 1.

<sup>8</sup> Order at para. 8.

<sup>9</sup> 47 U.S.C. § 214(e)(1)(A); *see* 47 C.F.R. § 54.201(d)(1).

- (2) Local usage;
- (3) Dual tone multi-frequency signaling or its functional equivalent;
- (4) Single-party service or its functional equivalent;
- (5) Access to emergency services;
- (6) Access to operator services;
- (7) Access to interexchange service;
- (8) Access to directory assistance; and
- (9) Toll limitation for qualifying low-income consumers.

In its Order, the Commission found that Farmers Cellular “complies with the requirement of Section 214(e)(1)(A) to offer the services that are supported by the federal universal service support mechanisms under section 254(c).”<sup>10</sup> Specifically, the Commission found that Farmers Cellular provides all of the supported services and functionalities “throughout its cellular service area in Alabama,” that it will make available a universal service offering that includes all of the supported services, that it satisfies the local usage requirement by offering several service options “including varying amounts of local usage, as well as a service that includes unlimited local usage,” and that it commits to provide service to any requesting customers within its designated service area.<sup>11</sup>

The Company hereby certifies that it continues to offer all of the supported services throughout its entire service area, which includes the BellSouth, CenturyTel and Farmers Telecommunications Cooperative exchanges for which expanded service area designation is sought. In these exchanges as well as throughout its entire service area, the

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<sup>10</sup> Order at para. 9.

<sup>11</sup> *Id.*

Company satisfies the local usage requirement by providing varying amounts of local usage, including unlimited local usage in its service plans. Since becoming an ETC, the Company has made available a universal service offering that includes all of the supported services and will make this offering available in the exchanges for which expanded service area designation is sought. It also commits to providing service to any requesting customer within the enlarged designated service area.

**B. Farmers Cellular Offers the Supported Services in the Additional Exchanges Over its Own Facilities**

Section 214(e)(1)(A) also requires ETCs to offer the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.<sup>12</sup> In its Order, the Commission cited Farmers Cellular's certification that it provides the supported services "using [its] existing cellular network infrastructure, consisting of switching, trunking, cell sites, and network equipment, together with any expansions and enhancements to that network."<sup>13</sup> The Commission stated that this certification was "sufficient to satisfy the requirements of section 214(e)(1)(A)."<sup>14</sup>

Farmers Cellular uses the same facilities-based cellular network infrastructure to serve the areas for which it now seeks designation as an ETC. Accordingly, for these additional exchanges, Farmers Cellular demonstrates that it satisfies the facilities-based requirement of Section 214(e)(1)(A) in these additional areas by making the following certification:

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<sup>12</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>13</sup> Order at para. 10 citing Farmers Cellular Telephone, Inc. Petition for Designation as an Eligible Telecommunications Carrier, filed September 6, 2002.

<sup>14</sup> Order at para. 10.

Farmers Cellular provides the supported services in the exchanges enumerated in Attachment 1, using its existing cellular network infrastructure, consisting of switching, trunking, cell sites, and network equipment, together with any expansions and enhancements to that network.

**C. Farmers Cellular Will Advertise the Supported Services in the Additional Exchanges**

Section 214(e)(1)(B) of the Act provides that carriers designated as ETCs shall advertise the availability of such services and the charges therefore using media of general distribution.<sup>15</sup> In its Order, the Commission found that Farmers Cellular had met this requirement.<sup>16</sup> The Commission specifically noted that Farmers Cellular had certified that it would advertise the supported services and charges and that the Company had indicated that it would use television, radio, newspaper, and billboard advertising and expand upon these avenues of media as necessary “to ensure that customers within its designated service area are fully informed of its universal service offerings.”<sup>17</sup> The Commission found this certification to be sufficient to satisfy the requirements of section 214(e)(1)(B).<sup>18</sup> Farmers Cellular hereby makes the same certification for the additional exchanges for which it seeks ETC designation. The Company will, in the areas enumerated in Attachment 1, advertise the supported services and charges, using media of general distribution which will include television, radio, newspaper and billboard advertising and will expand upon these avenues of media as necessary to ensure that customers within

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<sup>15</sup> 47 U.S.C. § 214(e)(1)(B); *see* 47 C.F.R. § 54.201(d)(2).

<sup>16</sup> *See* Order at para. 11.

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

these areas are fully informed of the Company's universal service offerings. Further, as explained below, the Company is taking steps to ensure compliance with the expanded outreach requirements contained in the Commission's revised rules for universal service support for low income customers.<sup>19</sup>

**D. Certifications that the Company will Comply with the Act's Requirements**

In summary, Farmers Cellular hereby certifies that in the expanded areas for which it seeks designation, the Company offers all of the services designated for support by the Commission pursuant to section 254(c) using its own facilities and that it will offer and advertise the availability of such services and the charges therefore using media of general distribution throughout its expanded service area if this petition is granted. Farmers Cellular also certifies that it will use these funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

**III. Granting Farmers Cellular's Petition will Serve the Public Interest**

**A. The Act Requires the Commission to Designate ETCs in Areas Served by Non-Rural Telephone Companies if Certain Conditions are Met**

Congress requires that the Commission grant competitive ETC petitions in non-rural areas.<sup>20</sup> No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.<sup>21</sup> Thus, the Act provides that for the areas served by the non-rural telephone companies, BellSouth and CenturyTel, the

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<sup>19</sup> See *infra* Section IV(G).

<sup>20</sup> See 47 U.S.C. 214(e)(6).

<sup>21</sup> See *Id.*

Commission “shall” designate Farmers Cellular as an ETC upon finding that the company meets the nine-point list of services and that it agrees to advertise the supported services throughout the designated service area. Accordingly, because the Company has demonstrated that it meets the nine-point list of services in the expanded area for which it requests designation and has agreed to advertise the services throughout this area, the Act requires the Commission to designate Farmers Cellular as an ETC in the additional BellSouth exchanges and the exchanges of the non-rural telephone company CenturyTel which are enumerated in Attachment 1.<sup>22</sup>

**B. Expanding the Designated Service Area to Include Areas Served by the Rural Telephone Company, Farmers Telecommunications Cooperative, is in the Public Interest**

Pursuant to Section 214(e)(6), the Commission “may, in the case of an area served by a rural telephone company . . . designate more than one common carrier as an ETC for a service area designated by the Commission.”<sup>23</sup> In order for the Commission to designate an ETC in an area served by a rural telephone company, the Commission shall find that the designation is in the public interest.<sup>24</sup> The Commission has set forth a

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<sup>22</sup> Notwithstanding, the designation of Farmers Cellular as an ETC in the additional BellSouth wire centers and the CenturyTel wire centers will serve the public interest in many of the same ways that are described in the following section. See Order at paras. 12&13 (Commission finding that Farmers Cellular “had demonstrated that its designation as an ETC is consistent with the public interest, as required by section 214(e)(6)” for part of the study area of the non-rural telephone company, BellSouth).

<sup>23</sup> 47 U.S.C. § 214(e)(6).

<sup>24</sup> *Id.*

framework for determining whether the public interest will be served in these situations.<sup>25</sup>

Under this framework, the Commission considers the following:

the benefits of increased competitive choice, the impact of the designation on the universal service fund, the unique advantages and disadvantages of the competitor's service offering, any commitments made regarding quality of telephone service, and the competitive ETC's ability to satisfy its obligation to serve the designated service area within a reasonable time frame.<sup>26</sup>

As demonstrated below, Farmers Cellular meets all of these criteria and demonstrates that designation in the areas served by the rural telephone company, Farmers Telecommunications Cooperative, is in the public interest.

### **1. Benefits Derived From Including the Area Served by Farmers Telecommunications Cooperative**

Several benefits will be derived by having Farmers Cellular designated as an ETC in the service territory of its affiliated wireline company, Farmers Telecommunications Cooperative. One of these benefits will be the ability of the Company to use its wireless network to serve residences that currently do not have access to a wireline telephone. For these individuals, not only will they be able to have access to basic telecommunications services for the first time, but more importantly, they will have access to critical emergency services in the remote rural areas where they reside. Another benefit is the offering of mobile telecommunications to consumers in rural areas. Many who live in this rural part of the state often must drive significant distances to places of employment,

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<sup>25</sup> See *Federal-State Joint Board on Universal Service; Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, 19 FCC Rcd 1563, para. 1 (2004); *Federal-State Joint Board on Universal Service; Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, 19 FCC Rcd 6438, para. 33 (2004) ("Highland Cellular Order").

<sup>26</sup> Highland Cellular Order at para. 22.

stores and schools. The Company's wireless voice and data service offerings enable these consumers to stay in touch with loved ones while on the road which gives them an added sense of security as well as the ability to conduct business while in transit. If designated as an ETC in the service area of Farmers Telecommunications Cooperative, the company commits to provide better coverage as explained below and will advertise the availability of its universal service offerings to those in this rural portion of Alabama.

## **2. No "Creamskimming" Will Occur.**

"Creamskimming" occurs when competitors serve only the low-cost, high revenue customers in a rural telephone company's study area.<sup>27</sup> As demonstrated by the fact that Farmers Cellular seeks designation for the entire study area of Farmers Telecommunications Cooperative, Farmers Cellular will provide service to any requesting customer, whether they reside in a high-cost or low-cost area. Further, there is no community within the seven exchanges served by Farmers Telecommunications Cooperative that has a population of more than 5,000. Accordingly, by requesting designation for the entire Farmers Telecommunications Cooperative service area, the Company seeks designation in an area that is predominately high-cost.

## **3. Farmers Cellular's Offerings are Unique.**

In addition to offering all of the supported services and offerings similar to other wireless carriers, the Company offers its subscribers innovative calling plans which include flat-rate plans and unlimited local calling. The Company offers its subscribers unique features such as group ringing which allows the subscriber to ring several numbers at once. Additionally, unlike the large national wireless carriers, Farmers

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<sup>27</sup> *Id.* at para. 26.

Cellular is locally owned and operated and has a local office in each county that the Company serves.

**4. Farmers Cellular Provides High Quality Service and is Able to Meet the Needs of Communities in a Reasonable Time Frame.**

The Company recently deployed a new GSM voice and data network which is all digital. This network enhancement allows the Company to offer advanced services and features to its rural subscribers which are typically only offered by other wireless carriers in urban areas. Additionally, the Company has installed its own Mobile Location Center (“MLC”) which provides E-911 Phase II service along with other location-based services. The Company’s switches are CALEA compliant and number portable-capable. Because the Company is a small business and locally owned, it is able to know the needs of its customer base and react quickly to their needs. This personalized service is further enhanced by the fact that all of the Company’s employees are from the rural areas where the Company serves.

**IV. Farmers Cellular Meets New FCC ETC Requirements**

The FCC recently released a decision in which it adopted additional mandatory requirements for ETCs over which it has jurisdiction.<sup>28</sup> As demonstrated below, Farmers Cellular satisfies these new requirements in both its current designated area and in its newly designated areas.

**A. Farmers Cellular Will Provide Service to Customers Upon Reasonable Request.**

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<sup>28</sup> See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“ETC Order”).

Farmers Cellular always strives to meet the needs of its customers in a timely manner. The Company will, in a reasonable amount of time, take the following steps to provide service to expand its coverage area and/or enhance its service in areas where wireless service is weak upon request by a customer in its expanded designated service area: (1) modify or replace the requesting customer's equipment (for example replacing the customer's phone with one which would work better in his/her service area); (2) deploy a roof-mounted or outdoor antenna and/or booster at the customer's home or place of business; (3) modify or replace an antenna on the nearest cell tower or lease space on another tower; (4) adjust network or customer facilities; (5) resell services from another carrier's facilities to provide service; or (6) employ, lease, or construct an additional cell site, cell extender, repeater, or other similar equipment.

**B. Five-Year Construction Plan.**

The Company has developed a five-year network plan as required in the ETC Order. The plan includes:

- (1) A description of how the company plans to improve signal quality, coverage, or capacity over the next five years on a wire center-by-wire center basis due to the receipt of high-cost support throughout the rural telephone areas for which Farmers Cellular seeks designation

Over the next five years, the Company plans to replace older OMNI antennas with new high gain directional antennas, lease space on some existing towers to provide better in-building coverage and construct new towers in locations that have little or no service today. As noted under number (2) below and as further explained in Attachment 2, confidential information regarding improvements on a wire center-by-wire center basis

will be submitted in a supplemental filing. The Company will focus its energies in the next two years primarily on enhancing and expanding its existing coverage for all of its subscribers and anticipates shifting its focus for the remaining three years to address the needs of those subscribers that are currently using analog phones when analog service is phased by February 2008. For these subscribers, not only will they require conversion to digital phones but it is anticipated that their current coverage will shrink with the switch to digital creating a greater need to enhance coverage for these subscribers.

(2) The projected start and completion date for each improvement and the estimated amount for each project, specific geographic areas where the improvements will be made, the estimated population that will be served as a result of the improvements and, if service improvements in a particular wire center are not needed, please explain why and how funding will otherwise be used

As explained in Attachment 2, a chart and maps containing this information will be provided in a supplemental filing in which confidential treatment of the data will be requested.

### **C. Functionality in Emergencies**

Farmers Cellular has made sure that its switching facility has eight hour battery backup power along with two generators to help ensure an outage will not occur if commercial power fails and has arranged to have three types of transport to and from its switches - copper, microwave and fiber – which allows the Company the ability to reroute traffic in the event of a damaged cable or a natural disaster.

**D. Satisfaction of Consumer Protection and Service Quality Standards**

Farmers Cellular is committed to complying with the Cellular Telecommunications and Internet Association's ("CTIA's") Consumer Code for Wireless Service. Additionally, the Company has established a detailed process for handling customer complaints and trains its employees on how to implement this process. As part of this process, the customer service staff person that receives the customer's complaint completes a separate "trouble ticket" for each problem that a customer experiences and goes through a series of diagnostic questions to see if they can assist the customer. If the customer service staff person is not able to assist the customer, the problem is referred to the appropriate person in the engineering department depending upon whether the problem involves issues related to roaming, switch-related, network-related, or phone-related issues. If the problem remains unresolved, it is then escalated to the next level of management. Throughout the process, the customer is informed of the status. After the problem has been resolved, customer service staff follows up to make sure that the customer is satisfied. The Company estimates that it handles approximately 300 trouble calls each month and reports that this complaint process has addressed all types of problems encountered by the Company's customers.

**E. Offers Local Usage Plans Comparable to Farmers Telecommunications Cooperative**

As described above, Farmers Cellular offers calling plans that are similar to those offered by the incumbent rural telephone company, Farmers Telecommunications Cooperative. One of these plans is an unlimited calling plan that allows the Company's subscribers to make and receive calls from within the Company's network to any number in the two LATAs that the Company covers.

**F. Acknowledgement Regarding Possibility of Being Required to Provide Equal Access**

Farmers Cellular hereby certifies that it understands that it may be required to provide equal access in the event no other ETC is providing equal access.

**G. New Lifeline/Link-Up Requirements**

New or revised rules for universal service support for low income customers have become effective.<sup>29</sup> Because Alabama is not among the states which are considered “federal default states” the revised rules do not apply to Farmers Cellular.<sup>30</sup> Farmers Cellular, however, is in compliance with the Alabama Lifeline/Link-Up requirements including certification, verification and outreach requirements.<sup>31</sup> As part of the outreach efforts, Farmers Cellular places posters and/or placards in business offices, semi-annually publishes ads in five local newspapers and semi-annually publishes ads in “Connected,” Farmers Telecommunications Cooperative’s bi-monthly magazine that is sent to all the Cooperative’s customers.

**V. Certifications**

Farmers Cellular 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. § 862.<sup>32</sup>

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<sup>29</sup> See *Lifeline and Link-Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, FCC 04-87 (rel. April 29, 2004) (some of the rules became effective July 22, 2004 while the remaining became effective June 22, 2005).

<sup>30</sup> *Id.* at para. 5.

<sup>31</sup> Currently, the Alabama Lifeline/Link-Up requirements are under review. Farmers Cellular will comply with any changes that are made as a result of this review.

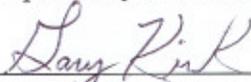
<sup>32</sup> 21 U.S.C. § 862.

On behalf of Farmers Cellular, the undersigned General Manager of Farmers Cellular hereby certifies that the statements contained herein are true, complete and correct to the best of my knowledge, information and belief.

**VI. Conclusion**

For the foregoing reasons, Farmers Cellular respectfully requests the Commission to amend the Company's designated area to include the non-rural LEC wire centers served by BellSouth and CenturyTel and the entire study area of the rural LEC, Farmers Telecommunications Cooperative, which are specified in Attachment 1 to this Application.

Respectfully Submitted,

  
\_\_\_\_\_  
Gary Kirk  
General Manager

Farmers Cellular Telephone, Inc.  
450 Main Street  
Rainsville, Alabama 35986

December 1, 2005

**ATTACHMENT 1**

**LIST OF WIRE CENTERS**  
**FOR WHICH EXPANDED AREA DESIGNATION IS SOUGHT**

Farmers Cellular Telephone, Inc. (“Farmers Cellular”) previously has been designated an eligible telecommunications carrier for part, if not all, of the following exchange areas served by the non-rural local exchange carrier (“LEC”), BellSouth Telecommunications, Inc. (“BellSouth”), in Alabama and that are wholly contained within Farmers Cellular’s licensed service area:

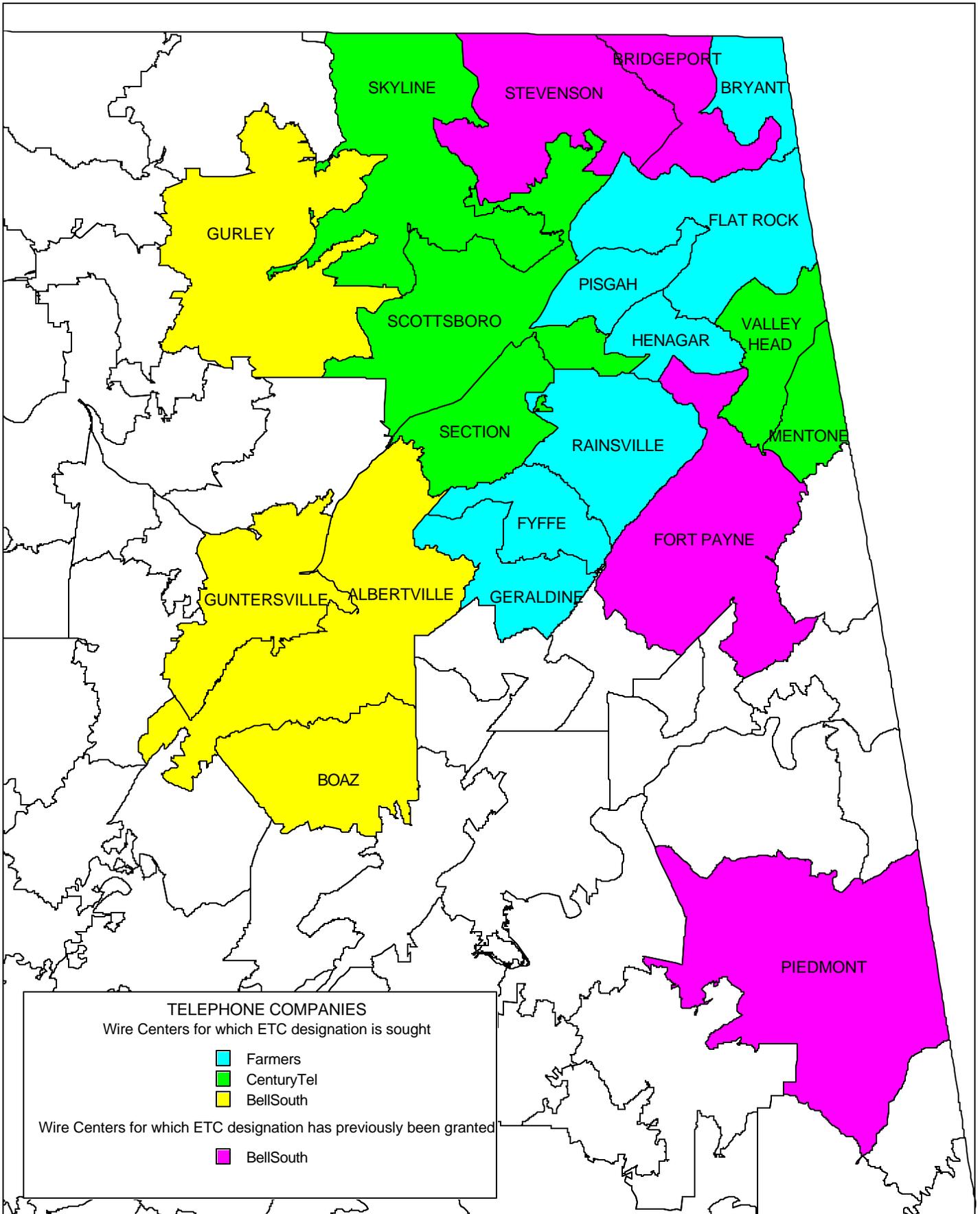
<b><u>Incumbent LEC Provider</u></b>	<b><u>Wire Center</u></b>
BellSouth	Bridgeport Fort Payne Piedmont Stevenson

In this instant petition, Farmers Cellular seeks to amend its designated area to include part, if not all, of the following wire centers in Alabama listed below which are served by the non-rural LECs, BellSouth and CenturyTel of Alabama, L.L.C. (“CenturyTel”), and the rural LEC, Farmers Telecommunications Cooperative, Inc. (“Farmers Telecommunications Cooperative”), and that are wholly contained within Farmers Cellular’s licensed service area:

<b><u>Incumbent LEC Provider</u></b>	<b><u>Wire Center</u></b>
BellSouth	Albertville Boaz Guntersville Gurley
CenturyTel	Mentone Scottsboro Section Skyline Valley Head
Farmers Telecommunications Cooperative (entire study area)	Bryant Flat Rock Fyffe Geraldine Henagar Pisgah Rainsville

# FARMERS CELLULAR TELEPHONE, INC.

## WIRE CENTERS WITHIN LICENSED WIRELESS COVERAGE AREA



## **ATTACHMENT 2**

### **FIVE YEAR PLAN**

If designated as an eligible telecommunications carrier in the expanded area requested in this application, Farmers Cellular Telephone, Inc. (“Company”) plans to make certain upgrades or new construction in the wire centers that are located in the expanded area over the next two years. A chart listing these improvements on a wire center-by-wire center basis indicating start and completion dates, estimated costs and population of the specified community in the wire center and maps showing current and projected future coverage areas where improvements are proposed will be provided in a supplemental filing in which confidential treatment of this data will be requested.

For the remaining three years, the Company anticipates shifting its focus to address the needs of those subscribers that are currently using analog phones when analog service is phased out by February 2008. For these subscribers, not only will they require conversion to digital phones but it is anticipated that their current coverage will shrink with the change to digital creating a greater need to enhance coverage for these subscribers.

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Petition to Amend the Designated Service Area of Farmers Cellular Telephone, Inc. was served this 1st day of December, 2005, by e-mailing true and correct electronic copies thereof to the following persons:

Narda Jones, Chief  
Telecommunications Access Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
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