

**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
	)	
Petition by Illinois Valley Cellular	)	DA 06-1693
RSA 2-I Partnership, Illinois Valley	)	
Cellular RSA 2-II Partnership and	)	
Illinois Valley Cellular RSA 2-III	)	
Partnership for Commission Agreement	)	
In Redefining the Service Areas of Rural	)	
Telephone Companies in the State of	)	
Illinois Pursuant to 47 C.F.R. Section	)	
54.207(c)	)	

**REPLY COMMENTS OF IVC**

Illinois Valley Cellular RSA 2-I Partnership (“IVC-I”), Illinois Valley Cellular RSA 2-II Partnership (“IVC-II”) and Illinois Valley Cellular RSA 2-III Partnership (“IVC-III”) (collectively “IVC” or “Petitioners”), hereby submit these reply comments pursuant to the Commission’s *Public Notice*<sup>1</sup> regarding IVC’s petition to redefine rural telephone company service areas in Illinois (“Petition”). No comments were filed.

Neither the local telephone companies at issue (the “Rural ILECs”) nor any other party objected to the proposed redefinition set forth in IVC’s Petition. As IVC set forth in the Petition, classifying the specified wire centers of the Rural ILECs as separate service areas will foster federal and state goals of encouraging competition in the telecommunications marketplace and

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<sup>1</sup> *Public Notice*, The Wireline Competition Bureau Seeks Comment on a Petition by Illinois Valley Cellular to Redefine the Service Areas of Rural Telephone Companies in the State of Illinois, DA 06-1693 (rel. Aug. 29, 2006) (“*Public Notice*”).

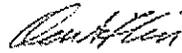
extending universal service to rural Illinois' consumers. The proposed redefinition is based on the considered decision of the Illinois Commerce Commission and is fully consistent with the Act and the FCC's rules. The Petition set forth a detailed analysis – including a cream-skimming analysis demonstrating that IVC proposes to serve the less densely populated portions of each Rural ILEC's study area – showing that no party will be harmed by the proposed redefinition. The Petition also noted that a grant of the proposed redefinition will cause IVC's designation to become effective throughout the entirety of each affected wire center, consistent with the FCC's determination that the wire center is the appropriate minimum geographic service area for ETC designations.

IVC's Petition is consistent with the goals of the Act and fully satisfies the FCC's rules and orders governing service area redefinition. A grant will promote competitive neutrality by enabling IVC to use federal high-cost support to increase the availability of high-quality wireless telecommunications to rural consumers throughout its service area. Accordingly, IVC requests that the Commission take no action and allow the proposed redefinition to become effective pursuant to Section 54.207(c) of the Commission's rules.<sup>46</sup>

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<sup>46</sup> 47 C.F.R. § 54.207(c)(3)(ii) (“If the Commission does not act on the petition within ninety (90) days of the release date of the Public Notice, the definition proposed by the state commission will be deemed approved by the Commission and shall take effect in accordance with state procedures.”)

Respectfully submitted,



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