



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

*The Voice of Rural Telecommunications*

www.ntca.org

**CC 96-45 – Cingular Wireless ETC matrix  
NTCA’s Comment Matrix Updated 12-13-06**

| <b>Commenters</b>        | <b>Positions</b>  | <b>Support/oppose</b> |
|--------------------------|---|-----------------------|
| NTCA                     | 1. ETC status is not in the public interest (Cingular is huge, has 57M subscribers, generated \$9B revenues in 3Q2006)(Granting ETC will entice other national wireless carriers, leading to collapse of USF) (Cingular did not state financial impact or reveal its methodology); 2. Denied due process re: confidential filing, abnormally short comment period (11/7-11/27-12/4-12/11); 3. Don’t use reverse auctions; 4. Do alternatives: create meaningful public interest standard, eliminate identical support rule, provide cost-based support to wireless CETCs, and expand USF contributor base to all broadband providers. Supports Embarq’s FOIA. | Oppose                |
| Cingular                 | ETC designation will allow Cingular to expand network. Should use a rulemaking proceeding if want to set new public interest standard. Wireless service is “uneconomic” in rural areas without support. ETC status is in public interest. Opposes Embarq’s FOIA. Embarq has 7M access lines, \$6.3B revenues, so size doesn’t matter. ETC will not dramatically burden the USF.   | Petitioner            |
| CTIA                     | ETC status increases availability of mobile services. VA SCC does not have jurisdiction over Cingular for ETC purposes.   | Support               |
| ITTA/WTA                 | Don’t permit another ETC without implementing new standards based on reverse auction docket info. Revise the “public interest” standard. ETC status can multiply to cause national problems.  | Oppose                |
| TDS                      | Cingular cannot provide service using its own facilities. ETC is not in public interest. Delay proceeding until universal service mechanism is reformed. Build-out plan is not disclosed. FCC must verify Cingular lives up to its promises. Foretells future petitions that will strain USF.   | Oppose                |
| Embarq                   | Too many providers in rural market can make it uneconomic to provide service. Cingular is creamskimming the low-cost, high-density areas. FOIA request for Exhibit E.   | Oppose                |
| Verizon (wireline units) | Funding Cingular will continue trend of CETCs seeking USF.  | Oppose                |



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