

- In the Application, Dobson and ACC state that they advertise the availability of the service offerings, and the associated rates, in media of general distribution in Oklahoma including radio, television, billboard, print advertising, and through a website. Staff reviewed examples of Dobson's proposed advertising in the course of Cause No. PUD 200300239 and in this Cause and finds the advertising to be acceptable. Staff suggests that Dobson and ACC also provide brochures to the Oklahoma Department of Human Services and the Federal Housing Authority for use in their field offices. These organizations routinely deal with low-income clients and should provide a very effective means of spreading the word regarding Dobson's and ACC's Lifeline offering. Staff also suggested that Dobson and ACC supplement the brochures by detailing the fact that the Lifeline offering includes unlimited local service calling.
- In Staff's view, designation of Dobson and ACC as an ETC would serve the public interest. In the Application and the testimonies of its witnesses, Dobson and ACC supported the public interest requirement of the designation by arguing that such designation will offer rural consumers affordable services comparable to those provided in urban areas, providing them a choice between USF supported service providers, and offering them the benefits of alternative telecommunications technologies. Dobson and ACC also pointed out that subscribers to wireless service are able to access emergency services while away from their homes, something traditional wireline service cannot provide. In the testimonies of its witnesses, Dobson and ACC committed to use the funding received as a result of designation as an ETC to continue to build out and upgrade their networks to improve coverage and signal quality. Dobson and ACC also committed to comply with the requirements of the Commission's rules as expressed in OAC 165:55-23-1 *et seq.* Staff agrees that designation of Dobson and ACC as an ETC is in the public interest.

Ms. Mallett testified as to Staff's position with regard to redefinition of the proposed study area. Staff noted that the RTCs formally agreed to the redefinition of Totah's study area to the exchange level in its Stipulated Agreement. Furthermore, in their testimonies, the RLECs did not argue against redefinition. When questioned by Staff, the attorney of several of the RLECs responded that there "was just no basis" to object to redefinition. In the absence of objection from the RLECs, and based on its analysis that no "cream-skimming" will result, Staff does not object to redefinition of the proposed study areas to the exchange level as required. RLEC territories requiring redefinition are the study areas of ALLTEL Oklahoma, Central Oklahoma Telephone Co., Cherokee Telephone Co., Cross Telephone Co., Hinton Telephone Co., Oklahoma ALLTEL, Inc., Oklahoma Communication Systems, Inc., Panhandle Telephone Coop., Inc., Pioneer Telephone Coop., Inc., Pottawatomie Telephone Co., Salina-Spavinaw Telephone Co., Inc., and Totah Telephone Co., Inc.

Finally, Ms. Mallett made the following recommendations on behalf of the Commission Staff:

- Dobson and ACC should be granted ETC designation in all of the exchanges and study areas listed on Attachments 1a, 1b, and 1c.
- Absent objections of the RLECs, Staff does not object to redefinition of the study areas listed on Attachment 1c.
- The ETC designation should be interim, for a period of 12 months.
- Dobson and ACC should be required to submit the following to the Director of the Public Utility Division at least 90 days prior to the end of the 12-month period:
 - a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed designated service area. Each applicant shall demonstrate how signal quality, coverage or capacity will improve due to the receipt of high-cost support; the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high-cost support; the specific geographic areas where the improvements will be made; and the estimated population that will be served as a result of the improvements. If an applicant believes that service improvements in a particular wire center are not needed, it must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area; and
 - sufficient information to demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount 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.
- Dobson should be required to submit monthly status reports to the Director of the Public Utility Division regarding its E911 Phase II turn up in Grady County until Phase II is successfully operating.
- Dobson and ACC should be required to certify that they acknowledge that the Commission may require it 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.
- Dobson and ACC should be required to accept COLR obligations throughout their service territory in Oklahoma.
- In the event that Dobson or ACC fail to satisfactorily provide the required information, plans and commitments within the allowed time, the ETC

designation in this Cause should be revoked and any funds received as a result of the expanded territory should be refunded to the federal Universal Service Fund Administrator.

- Upon Staff's review and approval of the required information, plans and commitments, Dobson's and ACC's ETC designation should be made permanent by Commission order.

POST-HEARING BRIEFING

The ALJ requested post-hearing briefing on two issues: (1) whether the new federal ETC designation requirements established by the FCC in the Report and Order issued March 17, 2005, were applicable to the proceeding and (2) whether a public interest finding to designate Dobson in certain wire centers of a redefined study area necessitates a finding that it is in the public interest to designate subsequent competitive ETC applicants in other wire centers of the redefined study area.

1. Dobson/ACC

Dobson and ACC filed a post-hearing brief on these issues on August 19, 2005, arguing that the Commission and the ALJ are not required to and cannot lawfully apply the new federal designation requirements of the Federal ETC Order in this cause. The Federal ETC Order expressly states that its ETC designation requirements apply only in proceedings before the FCC to designate ETCs pursuant to 47 U.S.C. § 214(e)(6) and are not binding on state commissions. The Federal ETC Order requirements cannot be adopted by the Commission without a rulemaking proceeding and application of them to Dobson in this cause would be impermissibly retroactive. Moreover, there is no demonstrated need or policy justification for the Commission and ALJ to apply the new FCC rules in this cause because the Commission has already adopted analogous wireless ETC rules.

With respect to the second issue, Dobson and ACC argued that the issue of whether a public interest finding to designate Dobson and ACC in certain wire centers of a redefined study area necessitates a finding that it is in the public interest to designate subsequent competitive ETC applicants in other wire centers of the redefined study area need not be determined at this time. As stated by the ALJ in the hearing, a public interest determination allowing the designation of a competitive ETC in certain wire centers of rural telephone company study areas supports the designation of subsequent competitive ETCs in those wire centers consistent with the public interest. However, such a determination does not mandate a similar public interest determination for other wire centers in that study area. Any public interest determination made in this Cause for purposes of Dobson's and ACC's designation in a redefined rural telephone company study area applies only to those wire centers of the redefined study area where Dobson and ACC are designated. Instead of speculatively considering the public interest determination to be made for another carrier in other wire centers in a future ETC proceeding, Dobson argued that the ALJ and Commission need only designate Dobson and ACC as an ETC based on the facts presented in this proceeding and the applicable law.

2. OCSI and Wyandotte

With respect to the first issue, OCSI and Wyandotte argued that although the Commission is not bound in a legal sense to adopt the FCC's additional requirements for ETC designation, it should not ignore encouragement to do so from this country's chief agency responsible for rules and policy concerning telephone companies.

OCSI and Wyandotte also argued that each Commission order must stand on its own and be supported by substantial evidence. A finding by the Commission that it is in the public interest to designate Dobson and ACC as an ETC in a redefined study area of a particular rural incumbent LEC would have no effect upon future applications for ETC designation in the additional exchanges of that particular rural incumbent LEC.

3. Atlas Telephone Company, et al.

In response to the ALJ's request for post-hearing briefing on the first issue, Atlas Telephone Company, *et al.* argued that the Commission has the jurisdiction to impose additional requirements on carriers seeking ETC designation. They cited to the *Texas PUC v. FCC* decision in which the Fifth Circuit found that the Act did not authorize the FCC to prohibit states from imposing additional requirements on carriers otherwise eligible to receive support. This provision is recognized by the FCC in the Federal ETC Order wherein the FCC encouraged state commissions to adopt the additional requirements when deciding whether a common carrier should be designated as an ETC. The FCC also notes that Section 214(e)(2) provides state commissions with the primary responsibility for designating ETCs. The Commission has the jurisdiction to require a carrier requesting ETC designation to comply with any or all of the eligibility requirements set forth by the FCC in the Federal ETC Order.

Atlas Telephone Company, *et al.* also argued that Oklahoma law requires more than a mere recital of asserted public interest, each case must stand alone on the facts presented in that specific case. The Commission's order must also be supported by substantial evidence. They argued that the Federal ETC Order shows that the FCC believes that Section 214(e)(2) demonstrates Congress' intent that state commissions evaluate factual situations in ETC cases and exercise discretion in reaching their conclusions regarding public interest, convenience and necessity as long as such determinations are consistent with state and federal law. Facts vary, and if one could take a public interest finding in one location for one company, there would never be a need to make a public interest finding again anywhere. The Commission cannot rely on facts and evidence presented in one case for a determination made in a different case because facts and circumstances change even though the parties may be the same.

4. Commission Staff

In its post-hearing brief, Commission Staff argued that the Commission may impose additional requirements, including the requirements of the Federal ETC Order, on Dobson and ACC in this Cause and urged the Commission to do so. In support of this argument, Staff cited to the Fifth Circuit decision in *Texas PUC v. FCC*, which stated that nothing in the Section 214(e)(2) mandate to designate a carrier or more than one carrier within a service area prohibits a

state commission from imposing their own eligibility requirements, especially in high-cost rural settings.

Commission Staff also argued that the issue of whether a finding that ETC designation is in the public interest for the remainder of the rural company's service territory need not be answered. The Commission may, at its discretion, include language in the ETC designation order that would specifically prohibit or allow the findings in this Cause from being used in another Cause. In this manner, the Commission may or may not direct that future ETC applications for the instant rural territories will undergo the same rigorous examination to which Dobson and ACC were subjected. Such clear direction from the Commission would prevent the inappropriate use of the Commission's findings here in another Cause.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The ALJ finds as follows:

- 1) The Commission has the discretion to apply the requirements of the FCC's March 17, 2005, ETC Requirement Order when making a determination of whether to grant Dobson and ACC ETC status in the exchanges requested in this Cause. The FCC's March 17, 2005 order encouraged states that exercise discretion over ETC designations pursuant to section 214(e)(2) of the Act to apply the same requirements when deciding whether a common carrier should be designated an ETC, because the additional requirements will allow for a more predictable ETC designation process and will improve the long-term sustainability of the universal service fund.
- 2) In determining whether it is in the public interest to designate an additional ETC within a service area, the Commission should consider the following public interest criteria, which have been used by the Commission in prior Causes to determine whether granting ETC designation in a rural telephone company's study area was in the public interest:
 - a) Will the public receive a benefit from the designation of another carrier as an ETC in this service area? (*e.g.* will competition lower the cost of basic local service or encourage the provision of advanced services?)
 - b) Will the goal of universal service be advanced by the designation of another carrier as an ETC in this service area? (*e.g.* will more customers be connected to the telecommunications network as a result of designating another ETC in this service area?)
 - c) Will customers who do not have telephone service from the ILEC be able to obtain telephone service as a result of the designation of the carrier as an ETC? (*e.g.* will the customer have the ability to get telephone service in a location not currently served by the wireline company?)

- d) Will there be any adverse effect upon the public by the designation of another carrier as an ETC in this service area? (e.g. will the additional cost to the federal universal service fund be sufficiently offset by the benefits realized by the public as a result of designating a second ETC within the service area?)
- 3) There is no requirement that the Commission find it is in the public interest prior to designating Dobson or ACC as an ETC within the service areas of Southwestern Bell Telephone Company d/b/a AT&T Oklahoma or Valor Telecommunications of Oklahoma, LLC. Therefore, the ALJ recommends the Commission designate Dobson and ACC as ETCs within the respective exchanges of AT&T Oklahoma and Valor that are identified on Exhibit A attached hereto.
- 4) Witnesses for Dobson and ACC testified that receipt of federal universal service funds would enable Dobson and ACC to continue to build-out and upgrade their networks to improve coverage and signal quality. Dobson and ACC also committed to comply with the requirements of the Commission's rules as expressed in OAC 165:55-23. The ALJ therefore recommends the Commission find it is in the public interest to designate Dobson and ACC as ETCs in the specific service areas of Oklahoma identified on the attached Exhibit A. Designation of Dobson and ACC as ETCs within the specified areas will offer rural consumers affordable services comparable to those provided in urban areas. Additionally, subscribers to wireless service are able to access emergency services while away from their homes, something traditional wireline service cannot provide.
- 5) Dobson and ACC should be required to file a 5-year build-out plan for any service areas for which they receive designation as an ETC within this Cause. This is consistent with the FCC's recommended standards set forth in the FCC's March 17, 2005, ETC Requirement Order and will enable the Commission to track the progress of Dobson and ACC as they build out their respective networks to increase the reliability and quality of service provided. This will also provide information to the Commission regarding the manner in which Dobson and ACC are utilizing the universal service funds they receive, to improve the quality and reliability of their wireless service. Unless and until such time as the Commission adopts rules that require all non-ILEC ETCs to periodically file a 5-year build-out plan, Dobson should not be required to file a 5-year build-out plan for those service areas for which it was granted designation as an ETC in PUD 200300239.
- 6) It is in the public interest to grant ETC designation for ACC in the service area of Atlas Telephone Company and to grant ETC designation for Dobson in the service area of South Central Telephone Association, Inc.--KS. In addition to the ILEC, these two companies already have at least one company designated as an ETC within their service areas. Designation of an additional ETC within these service areas will increase the competition between the ILEC and the ETC

designated wireless carriers, which should offer customers more services and create more competition based upon available services and price.

- 7) ACC has also requested designation as an ETC within the entire study areas of the following rural telephone companies: CenturyTel of NW Arkansas-Russelville, CenturyTel of NW Arkansas-Siloam Springs, Craw-Kan Telephone Coop, Inc.–KS, Grand Telephone Company, Inc., Ozark Telephone Company, Seneca Telephone Company and Wyandotte Telephone Company. The ALJ recommends the Commission find that it is in the public interest to designate ACC as an ETC within the entire study areas of each of these rural telephone companies. Designation of ACC as an ETC will permit ACC to receive funding from the federal universal service fund for the universal service products it provides, using its own facilities. Monies received from the universal service fund will enable ACC to add facilities and improve the strength of its service signal throughout the service territory of these ILECs, thereby improving the quality of choices available to customers. The ALJ finds that ACC should offer a sufficient number of local exchange minutes within the base price of any service for which it seeks cost support from the federal universal service fund. The ALJ notes that the Commission did not require Dobson to provide a minimum number of local usage minutes when it granted ETC status to Dobson in PUD 200300239. The Commission's rules do not set forth any minimum number of anytime local usage minutes that must be offered prior to receiving reimbursement from the federal and Oklahoma Universal Service Funds and it would undoubtedly create a very confusing situation for customers if ACC were to be required to develop different service plans for different areas of its service territory. Therefore, the ALJ recommends the Commission encourage ACC to provide more than a nominal number of anytime local minutes in each service product for which it seeks funding from the federal universal service fund and/or the Oklahoma Universal Service Fund; thereby creating a local usage plan comparable to the one offered by the ILEC in the service areas for which it seeks designation as an ETC.
- 8) The ALJ recommends the Commission find it is not in the public interest to grant ETC status to Dobson or ACC in the service areas of the rural telephone companies for which Dobson and ACC seek a redefinition of the study area to the wire center/exchange level. Dobson and ACC failed to demonstrate that it would be in the public interest to grant ETC status for only a portion of the exchanges of the identified ILECs. The ILECs serving territory in which Dobson and ACC seek to redefine the study area are listed on Exhibit B and include: ALLTEL Oklahoma, Central Oklahoma Telephone Company, Cherokee Telephone Company, Cross Telephone Company, Hinton Telephone Company, Oklahoma ALLTEL, Inc., Oklahoma Communications Systems, Inc., Panhandle Telephone Cooperative Inc., Pioneer Telephone Cooperative Inc., Pottawatomie Telephone Co., Salina-Spavinaw Telephone Co., Inc. and Totah Telephone Co., Inc. Dobson and ACC are already authorized to provide wireless service in portions of the service area of these rural ILECs, as a result of their authority from the FCC. Therefore, declining to redefine the service area will not prevent Dobson or ACC from continuing to offer wireless service within the exchanges of these ILECs,

but it will potentially prevent Dobson and ACC from obtaining an unfair competitive advantage over other wireless carriers that provide service within only part of the service territory of the ILEC.

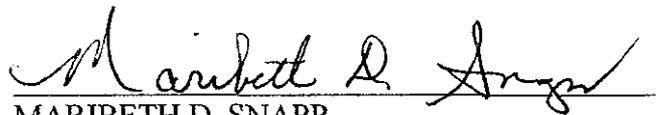
- 9) The ALJ recommends that the ETC designation recommended herein for Dobson and ACC be granted on an interim basis, for a period of twelve months. As recommended by the Commission Staff, at least 90 days prior to the end of the 12 month period, Dobson and ACC should be required to file in the Commission's Court Clerk's office the following:
 - a) a five year build-out/investment plan consistent with the FCC's March 17, 2005 Order in Docket No. 96-45;
 - b) sufficient information to demonstrate their ability to remain functional in emergency situations, consistent with the FCC's March 17, 2005 Order in Docket No. 96-45;
 - c) acknowledgement by Dobson and ACC that the FCC may require Dobson or ACC 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;
- 10) The ALJ recommends that the Commission issue a protective order in this Cause, to protect the confidentiality of Dobson's and ACC's market sensitive information that will be set forth in Dobson's and ACC's five year build-out /investment plan.
- 11) In the event that Dobson or ACC fails to satisfactorily provide the required information, plans and commitments at least 90 days prior to the expiration of the twelve month interim period, the ALJ recommends that the respective ETC designation granted to Dobson or ACC in this Cause be revoked, and any funds received as a result of the expanded territory should be refunded to the federal Universal Service Fund Administrator.
- 12) At the expiration of the twelve-month interim period, Dobson and ACC should file a motion for permanent designation as ETCs within the territory recommended for approval herein. If Dobson and ACC have filed the required information, the Commission should grant Dobson and ACC permanent designation as an ETC within the service areas recommended herein for approval.
- 13) As an ETC, Dobson and ACC will be required to advertise the availability of Lifeline and Link-Up services using media of general distribution. In addition to the proposed advertising reviewed by Staff in this Cause, Dobson and ACC should also be required to provide brochures to the Oklahoma Department of Human Services and the Federal Housing Authority for use in their field offices. The brochures should reflect that Dobson's and ACC's Lifeline offering includes unlimited local service calling.

- 14) Dobson and ACC should be required to accept COLR obligations if the ILEC in the study area relinquishes its federal Universal Service Fund eligibility.
- 15) ACC and Dobson have certified they will utilize all federal high-cost universal service support they receive on or after the date of designation only for the provision, maintenance and upgrading of facilities and services for which the support is intended pursuant to 47 U.S.C. § 254(e). Accordingly, the Commission should issue a letter to USAC and the FCC to supplement its annual certification, pursuant to 47 C.F.R. §§ 54.313(c) and 54.314(c), by separately certifying ACC's and Dobson's use of support in accordance with the form attached as Exhibit E to the Application.

RECOMMENDATION OF THE ADMINISTRATIVE LAW JUDGE

The foregoing Findings of Facts and Conclusions of Law are the Report and Recommendations of the undersigned Administrative Law Judge.

Respectfully submitted this 5th day of July, 2006.



MARIBETH D. SNAPP
Administrative Law Judge

Exhibit A
Non-Rural Telephone Company Wire Centers

Incumbent Telephone Company	Wire Center	Designated CETC
Southwestern Bell – Oklahoma	AFTNOKMA	ACC
	ALLWOKMA	ACC
	BRVLOKED	ACC
	CDWRKSLU	Dobson
	CFVLKS10	ACC
	CHTPKSBE	ACC
	CMMROKMA	ACC
	COPNOKMA	ACC
	DEWYOKMA	ACC
	DLWROKMA	ACC
	FRLDOKMA	ACC
	GRVEOKMA	ACC
	MIAMOKMA	ACC
	NOWTOKMA	ACC
	PCHROKMA	ACC
	QUPWOKMA	ACC
	THLQOKCO	ACC
	THLQOKHU	ACC
	THLQOKMA	ACC
	VINTOKMA	ACC
WSTVOKMA	ACC	
Valor Telecommunications of OK, LLC	RAMNOKXA	ACC

**Exhibit A (cont.)
Rural Telephone Company Study Areas**

Incumbent Telephone Company	Wire Centers Comprising Oklahoma Study Area	Designated CETC
Atlas Telephone Co.	BGCBOKXA	ACC
	BLJKOKXA	ACC
	WLCHOKXA	ACC
CenturyTel of NW Arkansas – Russelville	CLCROKXA	ACC
	MYVLARXA	ACC
CenturyTel of NW Arkansas – Siloam Springs	SMSPARXA	ACC
Craw-Kan Telephone Coop., Inc. – KS	BRTLKSXA	ACC
	EDNAKSXA	ACC
Grand Telephone Co. Inc.	DSNYOKXA	ACC
	JAY OKXA	ACC
Ozark Telephone Company	SWCYMOXA	ACC
Seneca Tel. Co.	SENCMOXA	ACC
	TIFFMOXA	ACC
South Central Tel. Assn. Inc – KS	BURLOKXA	Dobson
	BYRNOKXA	Dobson
Wyandotte Telephone Company	WYNDOKXB	ACC

EXHIBIT B**Rural Telephone Company Wire Centers in Which Dobson and ACC Seek Designation as a Competitive ETC Subject to Redefinition of the Service Area Requirement**

Incumbent Telephone Company	Wire Center	Designated CETC
ALLTEL Oklahoma	ASLDOKXA	Dobson
	BRFLOKXA	Dobson
	BTLROKXA	Dobson
	CANTOKXA	Dobson
	CORNOKXA	Dobson
	DLCYOKXA	Dobson
	FOSSOKXA	Dobson
	GOTBOKXA	Dobson
	GRTYOKXA	Dobson
	HMMNOKXA	Dobson
	KIOWOKXA	Dobson
	MTVWOKXA	Dobson
	RSVTOKXA	Dobson
	SNYDOKXA	Dobson
SVNNOKXA	Dobson	
Central Oklahoma Telephone Co.	BOLYOKXA	Dobson
	CSTLOKXA	Dobson
Cherokee Telephone Co.	APLROKXA	Dobson
	ATWDOKXA	Dobson
	STRTOKXA	Dobson
Cross Telephone Co.	KFTNOKXA	Dobson
	PORMOKXA	Dobson
	WBFLOKXA	Dobson
	WRNROKXA	Dobson
Hinton Telephone Co.	CLNYOKXA	Dobson
	EKLYOKXA	Dobson
	HITNOKXA	Dobson
	LOKBOKXA	Dobson
Oklahoma ALLTEL, Inc.	BARNOKXA	ACC
	STWLOKXA	ACC
Oklahoma Communication Systems, Inc.	CYRLOKXA	Dobson
	GRMTOKXA	Dobson
	VRDNOKXA	Dobson
Panhandle Telephone Cooperative, Inc.	LVRNOKXA	Dobson

EXHIBIT B (cont.)**Rural Telephone Company Wire Centers in Which Dobson and ACC Seek Designation as a Competitive ETC Subject to Redefinition of the Service Area Requirement (cont.)**

Pioneer Tel. Coop., Inc.	ALINOKXA	Dobson
	AMESOKXA	Dobson
	APCHOKXA	Dobson
	ARNTOKXA	Dobson
	BFLOOKXA	Dobson
	CHESOKXA	Dobson
	CLSPOKXA	Dobson
	CRMNOKXA	Dobson
	CRTROKXA	Dobson
	CSTROKXA	Dobson
	CVTNOKXA	Dobson
	DACMOKXA	Dobson
	DGLSOKXA	Dobson
	DRMDOKXA	Dobson
	FARGOKXA	Dobson
	FRDMOKXA	Dobson
	FTSPOKXA	Dobson
	GAGEOKXA	Dobson
	GRBROKXA	Dobson
	HLNAOKXA	Dobson
	HNTROKXA	Dobson
	HPTNOKXA	Dobson
	HRMNOKXA	Dobson
	LAHMOKXA	Dobson
	MAY OKXA	Dobson
	MENOOKXA	Dobson
	MRLDOKXA	Dobson
	MUTLOKXA	Dobson
	QNLNOKXA	Dobson
	RNWDOKXA	Dobson
	SHRNOKXA	Dobson
	SHTCOKXA	Dobson
	SLMNOKXA	Dobson
SNTNOKXA	Dobson	
WYNKOKXB	Dobson	
Pottawatomie Telephone Co.	BWLGOKXA	Dobson
	SSKWOKXA	Dobson
Salina-Spavinaw Tel. Co., Inc.	FLNTOKXA	ACC
	KNSSOKXA	ACC
Total Telephone Co., Inc.	LNPBOKXA	ACC

Dobson Cellular Systems, Inc.
ETC Designation by Oklahoma Corporation Commission
January 18, 2007

NON-RURAL TELEPHONE COMPANY DESIGNATED AREAS			
Non-Rural Telephone Company	SAC	Exchange	CLLI
Southwestern Bell – Oklahoma	435215	South Coldwater	CDWRKSLU
RURAL TELEPHONE COMPANY (Entire Study Area) DESIGNATED AREAS			
Rural Telephone Company	SAC	Exchange	CLLI
South Central Tel. Assn. Inc – OK	431831	Burlington	BURLOKXA
South Central Tel. Assn. Inc – OK	431831	Byron	BYRNOKXA
RURAL TELEPHONE COMPANY (Partial Study Area) DESIGNATED AREAS – REDEFINITION PENDING			
Rural Telephone Company	SAC	Exchange	CLLI
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Ashland	ASLDOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Burns Flat	BRFLOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Butler	BTLOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Canute	CANTOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Corn	CORNOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Dill City	DLCYOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Foss	FOSSOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Gotebo	GOTBOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Gracemont	GRTYOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Hammon	HMMNOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Kiowa	KIOWOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Mountain View	MTVWOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Roosevelt	RSVTOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Snyder	SNYDOKXA
Alltel Oklahoma (nka Windstream Oklahoma)	431965	Savanna	SVNNOKXA
Central Oklahoma Telephone Co.	431977	Bowlegs	BOLYOKXA
Central Oklahoma Telephone Co.	431977	Custer City	CSTLOKXA
Cherokee Telephone Co.	431979	Arpelar	APLROKXA
Cherokee Telephone Co.	431979	Atwood	ATWDOKXA
Cherokee Telephone Co.	431979	Stuart	STRTOKXA
Cross Telephone Co.	431985	Keefeton	KFTNOKXA
Cross Telephone Co.	431985	Porum	PORMOKXA
Cross Telephone Co.	431985	Webbers Falls	WBFLKOKXA
Cross Telephone Co.	431985	Warner	WRNRKOKXA
Hinton Telephone Co.	431995	Colony	CLNYOKXA
Hinton Telephone Co.	431995	Eakly	EKLYOKXA
Hinton Telephone Co.	431995	Hinton	HITNOKXA
Hinton Telephone Co.	431995	Lookeba	LOKBOKXA
Oklahoma Communication Systems, Inc.	431984	Cyril	CYRLOKXA
Oklahoma Communication Systems, Inc.	431984	Gracemont	GRMTOKXA
Oklahoma Communication Systems, Inc.	431984	Verden	VRDNOKXA
Panhandle Telephone Cooperative, Inc.	432016	Laverne	LVRNOKXA
Pioneer Tel. Coop., Inc.	432018	Aline	ALINOKXA
Pioneer Tel. Coop., Inc.	432018	Ames	AMESOKXA
Pioneer Tel. Coop., Inc.	432018	Apache	APCHOKXA
Pioneer Tel. Coop., Inc.	432018	Arnett	ARNTOKXA
Pioneer Tel. Coop., Inc.	432018	Buffalo	BFLOKXA
Pioneer Tel. Coop., Inc.	432018	Chester	CHESOKXA
Pioneer Tel. Coop., Inc.	432018	Cleo Springs	CLSPKOKXA
Pioneer Tel. Coop., Inc.	432018	Carmen	CRMNOKXA
Pioneer Tel. Coop., Inc.	432018	Carter	CRTRKOKXA
Pioneer Tel. Coop., Inc.	432018	Castle	CSTRKOKXA
Pioneer Tel. Coop., Inc.	432018	Covington	CVTNOKXA
Pioneer Tel. Coop., Inc.	432018	Dacoma	DACMOKXA
Pioneer Tel. Coop., Inc.	432018	Douglas	DGLSOKXA
Pioneer Tel. Coop., Inc.	432018	Drummond	DRMDOKXA
Pioneer Tel. Coop., Inc.	432018	Fargo	FARGOKXA
Pioneer Tel. Coop., Inc.	432018	Freedom	FRDMOKXA
Pioneer Tel. Coop., Inc.	432018	Fort Supply	FTSPKOKXA
Pioneer Tel. Coop., Inc.	432018	Gage	GAGEOKXA
Pioneer Tel. Coop., Inc.	432018	Garber	GRBKOKXA
Pioneer Tel. Coop., Inc.	432018	Helena	HLNAOKXA
Pioneer Tel. Coop., Inc.	432018	Hinton	HNTROKXA
Pioneer Tel. Coop., Inc.	432018	Hopeton	HPTNOKXA
Pioneer Tel. Coop., Inc.	432018	Harmon	HRMNOKXA
Pioneer Tel. Coop., Inc.	432018	Lahoma	LAHMOKXA
Pioneer Tel. Coop., Inc.	432018	May	MAYOKXA
Pioneer Tel. Coop., Inc.	432018	Meno	MENOKOKXA
Pioneer Tel. Coop., Inc.	432018	Mooreland	MRLDOKXA
Pioneer Tel. Coop., Inc.	432018	Mutual	MUTLOKXA
Pioneer Tel. Coop., Inc.	432018	Quinlan	QNLNOKXA
Pioneer Tel. Coop., Inc.	432018	Ringwood	RNWDOKXA
Pioneer Tel. Coop., Inc.	432018	Sharon	SHRNOKXA
Pioneer Tel. Coop., Inc.	432018	Shattuck	SHTCOKXA
Pioneer Tel. Coop., Inc.	432018	Selman	SLMNOKXA
Pioneer Tel. Coop., Inc.	432018	Sentinel	SNTNOKXA
Pioneer Tel. Coop., Inc.	432018	Waynoka	WYNKOKXB
Pottawatomie Telephone Co.	432020	Bowlegs	BWLKOKXA
Pottawatomie Telephone Co.	432020	Sasakwa	SSKWOKXA

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American Cellular Corporation
ETC Designation by Oklahoma Corporation Commission
January 18, 2007

NON-RURAL TELEPHONE COMPANY DESIGNATED AREAS									
Non-Rural Telephone Company	SAC	Exchange	CLLI						
Southwestern Bell – Oklahoma	435215	Afton	AFTNOKMA						
Southwestern Bell – Oklahoma	435215	Alluwe	ALLWOKMA						
Southwestern Bell – Oklahoma	435215	Bartlesville	BRVLOKED						
Southwestern Bell – Oklahoma	435215	South Coffeyville	CFVLKS10						
Southwestern Bell – Oklahoma	435215	South Cheftopa	CHTPKSBE						
Southwestern Bell – Oklahoma	435215	Commerce	CMMROKMA						
Southwestern Bell – Oklahoma	435215	Copan	COPNOKMA	The Designation Order (p. 2) mistakenly refers to the exchange as "Corn" instead of "Copan."					
Southwestern Bell – Oklahoma	435215	Dewey	DEWYOKMA						
Southwestern Bell – Oklahoma	435215	Delaware	DLWROKMA						
Southwestern Bell – Oklahoma	435215	Fairland	FRLDOKMA						
Southwestern Bell – Oklahoma	435215	Grove	GRVEOKMA						
Southwestern Bell – Oklahoma	435215	Miami	MIAMOKMA						
Southwestern Bell – Oklahoma	435215	Nowata	NOWTOKMA						
Southwestern Bell – Oklahoma	435215	Picher	PCHROKMA						
Southwestern Bell – Oklahoma	435215	Quapaw	QUPWOKMA						
Southwestern Bell – Oklahoma	435215	Tahlequah	THLQOKCO						
Southwestern Bell – Oklahoma	435215	Tahlequah	THLQOKHU						
Southwestern Bell – Oklahoma	435215	Tahlequah	THLQOKMA						
Southwestern Bell – Oklahoma	435215	Vinita	VINTOKMA						
Southwestern Bell – Oklahoma	435215	Westville	WSTVOKMA						
Valor Telecommunications of OK, LLC (nka Windstream SW-OK)	431165	Ramona	RAMNOKXA	This telephone company's name changed while the case was pending.					
RURAL TELEPHONE COMPANY (Entire Study Area) DESIGNATED AREAS									
Rural Telephone Company	SAC	Exchange	CLLI						
Atlas Telephone Co.	431966	Big Cabin	BGCBOKXA						
Atlas Telephone Co.	431966	BlueJacket	BLJKOKXA						
Atlas Telephone Co.	431966	Welch	WLCHOKXA						
CenturyTel of NW Arkansas – Russelville	401142	Colcord	CLCROKXA						
CenturyTel of NW Arkansas – Russelville	401142	West Maysville	MYVLARXA						
CenturyTel of NW Arkansas – Siloam Springs	401143	Watts	SMSPARXA						
Craw-Kan Telephone Coop., Inc. – KS	411818	South Bartlett	BRTLKSXA / EDNAKSXA						
Craw-Kan Telephone Coop., Inc. – KS	411818	South Edna	EDNAKSXA						
Grand Telephone Co. Inc.	431994	Disney	DSNYOKXA						
Grand Telephone Co. Inc.	431994	Jay	JAY OKXA						
Ozark Telephone Company	421866	Sowestcity	SWCYMOXA						
Seneca Tel. Co.	421945	West Seneca	SENCMOXA						
Seneca Tel. Co.	421945	Tiff City	TIFFMOXA						
Wyandotte Telephone Company	432034	Wyandotte	WYNDOKXB						
RURAL TELEPHONE COMPANY (Partial Study Area) DESIGNATED AREAS – REDEFINITION PENDING									
Rural Telephone Company	SAC	Exchange	CLLI						
Oklahoma ALLTEL, Inc. (nka Oklahoma Windstre	432011	Baron	BARNOKXA	This rural telephone company's name changed while the case was pending.					
Oklahoma ALLTEL, Inc. (nka Oklahoma Windstre	432011	Stilwell	STWLOKXA						
Salina-Spavinaw Tel. Co., Inc.	432022	Flint	FLNTOKXA						
Salina-Spavinaw Tel. Co., Inc.	432022	Kansas	KNSSOKXA						
Totah Telephone Co., Inc. (nka Totah Communications)	432030	Lenapah	LNPHOKXA	This rural telephone company's name changed while the case was pending.					