

**CC Docket No. 96-45, DA 07-158**  
**Cingular Wireless LLC, now AT&T Mobility LLC's, Georgia ETC petition**  
**NTCA's Comment Matrix updated 3-14-07**

<b>Commenter</b>	<b>Position</b>	<b>Support/Oppose</b>
NTCA – 2-6-07 Comment, 2-27-07 Reply Comment	Commission should deny the Cingular Petition. Granting the Petition would increase the high-cost universal fund unnecessarily. The FCC's designation of Cingular wireless as an ETC will only set a very dangerous precedent enticing all national wireless providers to seek federal USF support at the FCC and at state commissions in all 50 states. The Commission should finally eliminate the identical support rule. The identical support rule allows competitive eligible telecommunications carriers (CETCs) to receive the same per-line support as rural ILECs based on the ILECs' costs. The Commission should also require Cingular to publicly disclose the total federal universal service support Cingular expects to receive in Georgia if this application were granted. There is nothing commercially sensitive about the overall impact amount, and this information is not protected under 5 U.S.C. § 552(b)(4). Commission should deny Cingular's request to conceal Exhibit E and information about Cingular's USF support for ten years, because that time frame is unjustifiable and well beyond the term of the improvement plan. Furthermore, the Commission should grant TDS Telecommunications Corp.'s Motion for Protective Order.	Deny the Cingular/AT&T Mobility Petition.  Eliminate Identical Support Rule.  Support TDS Motion for Protective Order.  Reveal total support request.  Deny 10 year concealment.
Embarq – 2-15-07 Ex parte	Embarq estimates that granting AT&T Mobility's Georgia and Virginia ETC petitions could lead to a \$250 million annual impact on the USF. The potential impact on federal annual USF is approximately \$400 million if the ETC petitions pending before the Commission were to be granted and AT&T Mobility were also to be granted ETC status throughout the United States.	Consider USF impact.
Georgia Telephone Association – 2-27-07 Reply Comment	GTA joins with the overwhelming number of parties commenting in this proceeding in urging the Commission to dismiss the Petition and to eliminate the identical support rule. Using USAC data, Cingular would receive approximately \$23.41 per line for the second quarter of 2007 for nineteen of the twenty-three rural study areas in Georgia. If Cingular has 1% of its nationwide subscribers in these rural study areas, Cingular would have received for second quarter 2007 approximately \$13.3 million for the second quarter of 2007 which, when projected over an annual basis, is at least \$53.2 million for the year.	Deny Petition.  Eliminate identical support rule.

Frontier – 2-6-07 Comment	ATT does not need high cost support. USF will go out of control. Deny the current application at this time, and place a moratorium on wireless ETC designations in general until it can consider the entire picture of universal service funding and universal service support, and adopt consistent reforms that will actually promote universal service as opposed to increasing the profits of the nation’s largest wireless carriers at the expense of all other carriers and their customers.	Deny Petition.
ITTA/WTA – 2-6-07 Comment	Import the record produced in the reverse auctions proceeding to its decision on the instant Petition. Part of the Commission’s revision of universal service regulations should include elimination of the identical support rule. CETCs should receive only support based on their own costs in serving the designated areas. Adopt metrics that define the public interest in a manner that advances the goal of ensuring the long-term integrity of the program.	Import record.  Eliminate identical support rule.  Define “public interest.”
OPASTCO – 2-6-07 Comment	Deny Cingular’s petition for ETC designation in Georgia, as it is readily apparent that the costs of their designation would far outweigh any benefits to the public. Stay consideration of the petition until after the open proceeding on reform of the high-cost support mechanism has been completed. Finally, elimination of the identical support rule in rural service areas would target the root cause of the rapid and unnecessary growth in the rural High-Cost program. Cingular chose not to reveal information because it would illustrate the excessive burden their designation would impose on the Fund.	Deny Petition.  Eliminate identical support rule.
TDS – 2-20-07 Comment	Reject Cingular’s petition based on the available information because it does not satisfy the Commission’s ETC designation criteria and will not serve the public interest. Cingular’s Petition for ETC status relies on confidential data that commenting parties have not been granted access to, despite a request from TDS for such access, and as a consequence these comments lack the benefit of full information which the Administrative Procedure Act and fundamental due process require. As a result, TDS reiterates its request that the Commission: (1) make such information available, and (2) allow for an extended comment period for interested parties to review the available data and submit redacted comments.	Oppose Petition.  Extend comment period.  Make info available.
Verizon – 2-20-07 Comment AT&T Mobility – 2-27-07 Reply	Oppose petition. Defer action until implement bidding process (reverse auctions). Unnecessary to subsidize Cingular.  AT&T has met the requirements for designation as an eligible telecommunications carrier (“ETC”) and has shown that the public	Deny Petition. Defer. Support its own Petition

Comment	interest would be served by its designation. ETC designation will allow AT&T to expand its network coverage, improving wireless service in rural and high-cost areas in Georgia.	
CTIA – 2-20-07 Comment	Since Cingular is a commercial mobile radio service (“CMRS”) provider not subject to the authority of the Georgia Public Service Commission (“Georgia Commission”), the FCC has the authority to grant ETC status to Cingular pursuant to 47 U.S.C. § 214(e)(6). Granting the Cingular Petition will serve the public interest.	Support Petition
TDS – 1-26-07 Motion for Protective Order	TDS requests that the Bureau enter a protective order that will allow interested parties such as TDS to analyze and, if necessary, comment on the information included in the SIP. Because access to the information contained in Exhibit E is necessary to determine whether Cingular’s petition complies with the new, more stringent ETC designation criteria recently adopted by the Commission, parties cannot conduct an informed analysis of Cingular’s petition without access to this information.	TDS Motion for Protective Order
AT&T Mobility -- 2-23-07 Oppose TDS Motion for Protective Order	AT&T’s SIP contains highly sensitive commercial information, the release of which would put AT&T at a significant disadvantage with respect to competitors, suppliers, and landlords. As such, it is protected from FOIA release. Such information is not “customarily released to the public,” and release would substantially undermine AT&T’s competitive position. Second, the SIP need not and should not be released to AT&T’s competitors subject to a protective order.	Oppose TDS Motion for Protective Order
TDS – 3-7-07 Reply re Protective Order Motion	AT&T’s claims that the SIP is somehow uniquely sensitive in that it outlines AT&T’s “future competitive plans” are contradicted both by the Commission’s recent Cingular – VA / Embarq Order and by its routine adoption of protective orders for equally sensitive material in other contexts such as mergers.	Support TDS Motion for Protective Order  Time to review