

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|   |   |                     |
|---|---|---------------------|
| In the Matter of                        | ) |                     |
|   | ) |                     |
| Federal-State Joint Board on            | ) | CC Docket No. 96-45 |
| Universal Service                       | ) |                     |
|   | ) |                     |
| Northwest Missouri Cellular             | ) | DA 07-1571          |
| Limited Partnership                     | ) |                     |
|   | ) |                     |
| Petition for FCC Agreement to           | ) |                     |
| Redefine the Study Areas of Three Rural | ) |                     |
| Telephone Companies in Missouri         | ) |                     |
|   | ) |                     |

**To: Wireline Competition Bureau**

**Reply Comments of Northwest Missouri Cellular Limited Partnership**

Northwest Missouri Cellular Limited Partnership (“NWMC”), by its attorneys, pursuant to Sections 1.415 and 1.419 of the Commission’s Rules,<sup>1</sup> hereby responds to comments filed on behalf of CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, d/b/a CenturyTel (collectively, “CenturyTel”)<sup>2</sup> in the above-referenced proceeding.<sup>3</sup> CenturyTel’s opposition does not specifically address NWMC’s redefinition request in the rural telephone company areas served by Alltel Missouri, Inc. (“Alltel”), Grand River Mutual Telephone Corporation (“Grand River”), and Sprint

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<sup>1</sup> 47 C.F.R. §§ 1.415 and 1.419.

<sup>2</sup> Comments of CenturyTel of Missouri, LLC and Spectra Communications Group, *Northwest Missouri Cellular Limited Partnership Petition for FCC Agreement to Redefine the Study Areas of Three Rural Telephone Companies in Missouri*, CC Docket No. 96-45, DA 07-1571 (April 16, 2007) (“CenturyTel Comments”).

<sup>3</sup> *The Wireline Competition Bureau Seeks Comment on a Petition by Northwest Missouri Cellular Limited Partnership to Redefine the Study Areas of Three Rural telephone Companies in Missouri*, Public Notice, CC Docket No. 96-45, DA 07-1571 (April 2, 2007).

Missouri, Inc. (“Sprint”). Instead, CenturyTel attempts to link NWMC’s reasonable and explicit request to general, over-arching universal service policy issues that have been in flux since the passage of the Telecommunications Act of 1996 (“Act”). NWMC urges the Federal Communications Commission’s (“FCC” or “Commission”) Wireline Competition Bureau (“Bureau”) to recognize CenturyTel’s non-germane opposition, complete with its request for postponement until some future Federal-State Joint Board decision, an additional proceeding, and a written decision,<sup>4</sup> as the blatant attempt at delay that it is.

NWMC notes that CenturyTel’s generalized universal service concerns have also been vetted and rejected by the Missouri Public Service Commission (“MPSC”) which has determined that it is in the public interest to redefine the service areas of Alltel, Grand River, and Sprint.<sup>5</sup> CenturyTel’s comments simply repeat its stock opposition to *any* additional ETCs *anywhere* without addressing the merits of redefinition in the three distinct rural telephone company service areas in Missouri. CenturyTel’s generic universal service arguments provide no rationale for an additional proceeding regarding NWMC’s specific request.<sup>6</sup> NWMC notes that Alltel, Grand River, and Sprint have not opposed the redefinition of their respective study areas. With no opposition from the

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<sup>4</sup> See CenturyTel Comments at 3.

<sup>5</sup> See *In the Matter of the Application of Northwest Missouri Cellular Limited Partnership for Designation as a Telecommunications Company Carrier Eligible for Federal Universal Service Support Pursuant to § 254 of the Telecommunications Act of 1996*, Order Granting Motion to Amend Report and Order, MPSC Case No. TO-2005-0466 (March 1, 2007) (“Amended Order”).

<sup>6</sup> The Commission has previously refused to delay a redefinition grant notwithstanding similar generalized universal service arguments made by CenturyTel. See *in re Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Petition for FCC Agreement in Redefining the Service Areas of Rural Telephone Companies in the State of Oregon*, DA 04-2111, Comments of CenturyTel of Oregon, Inc. and CenturyTel of Eastern Oregon, Inc. (July 26, 2004).

