

**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
	)	
United States Cellular Corporation	)	
	)	
Amended Petition for Designation as an	)	
Eligible Telecommunications Carrier in	)	
Additional Areas in the State of Tennessee	)	

**REPLY COMMENTS OF U.S. CELLULAR**

On August 6, 2008, United States Cellular Corporation, on behalf of its subsidiary licensees, Tennessee RSA No. 3 Limited Partnership, United States Cellular Telephone Company (Greater Knoxville), L.P., and United States Cellular Operating Company of Knoxville d/b/a U.S. Cellular (“U.S. Cellular” or “Petitioner”), filed a request to amend its eligible telecommunications carrier (“ETC”) designation in portions of the Citizens Communications Company Tennessee d/b/a Frontier Communications of Tennessee, LLC (“Frontier”) and Twin Lakes Telephone Cooperative Corp. (“Twin Lakes”) study areas.<sup>1</sup> The Commission previously denied ETC designation to U.S. Cellular in these study areas due to creamskimming concerns.

In attempting to alleviate the Commission’s prior creamskimming concerns, U.S. Cellular proposed the deletion of the following three wire centers from its proposed ETC designated area: (1) the Cookeville wire center in the Frontier service area; (2) the

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<sup>1</sup> See Amended Petition for Designation as an Eligible Telecommunications Carrier in Additional Areas in the State of Tennessee, CC Docket No. 96-45 (filed Aug. 6, 2008); *see also* Public Notice, DA 08-1894 (rel. Aug. 12, 2008).

Cookeville South wire center in the Twin Lakes service area; and (3) the Halls Cross Roads wire center in the Tennessee Telephone Co. service area.<sup>2</sup> U.S. Cellular also provided the Commission with revised population density data for each study area to support its Amended Petition and demonstrate that there is no longer any risk of creamskimming in the Frontier, Twin Lakes or Tennessee Telephone Co. study areas.

While the Commission expressed no prior concerns about U.S. Cellular's commitment to fulfill all ETC obligations in designating U.S. Cellular as an ETC in portions of Tennessee, U.S. Cellular again expressed its commitment to fulfill all ETC obligations throughout the proposed expanded ETC service area. In that regard, U.S. Cellular committed to file a detailed schedule/exhibit showing the actual dollar amounts expended by U.S. Cellular in the provision, maintenance, upgrading, plant additions and associated infrastructure costs for its wireless service within its entire Tennessee ETC service area, as well as all required construction plans, and has certified to the FCC that it will use the support it receives from these study areas for its intended purpose.

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<sup>2</sup> As noted in U.S Cellular's Amended Petition, the company is no longer seeking ETC status in the Halls Cross Roads (HCRDTNXA) wire center and is no longer seeking ETC designation in any Tennessee Telephone Co. wire center, thereby eliminating any risk of creamskimming in the Tennessee Telephone Co. study area.

U.S. Cellular has satisfied all of the regulatory requirements to be designated an ETC in the additional Tennessee service areas requested and no party has opposed U.S. Cellular's Amended Petition. As a result, U.S. Cellular requests expeditious action by the Commission so that the company can be designated as an ETC in the Frontier and Twin Lakes study areas and use the universal service funding that comes with such the designation to improve its network in order to better serve consumers in these areas.

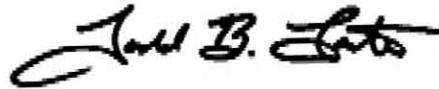
Respectfully submitted,

UNITED STATES CELLULAR CORPORATION,  
on behalf of its subsidiary licensees:

TENNESSEE RSA NO. 3 LIMITED  
PARTNERSHIP

UNITED STATES CELLULAR TELEPHONE  
COMPANY (GREATER KNOXVILLE), L.P.

UNITED STATES CELLULAR OPERATING  
COMPANY OF KNOXVILLE



By: \_\_\_\_\_

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