

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Mobi PCS, Inc. and Cricket Communications,  
Inc. Petition Requesting the Federal  
Communications Commission To Provide  
Guidance to the Universal Service  
Administrative Company

WC Docket No. 05-337

**Reply Comments of SouthernLINC Wireless**

Southern Communications Services, Inc. d/b/a SouthernLINC Wireless

(“SouthernLINC Wireless”), by its counsel, hereby submits these reply comments in the above-captioned proceeding in support of the petition filed by Mobi PCS, Inc. and Cricket Communications, Inc. (together, the “Petitioners”) requesting that the Federal Communications Commission (“Commission”) provide guidance to the Universal Service Administrative Company (“USAC”) regarding permissible implementations of Section 54.307(b) of the Commission’s Rules, 47 C.F.R. § 54.307(b) (the “Rule”). SouthernLINC Wireless agrees with the Petitioners that the public interest would be served by providing the requested guidance to USAC.

SouthernLINC Wireless operates a commercial digital 800 MHz ESMR system using Motorola’s proprietary Integrated Digital Enhanced Network (iDEN) technology to provide dispatch, interconnected voice, Internet access, and data transmission services over mobile phone handsets. SouthernLINC Wireless is licensed by the Commission to provide cellular communications services in Alabama, Georgia, the panhandle of Florida, and Southeast Mississippi, where it serves nearly 250,000 subscribers over 127,000 square miles. SouthernLINC Wireless is committed to offering high-quality telecommunications services to

rural and underserved areas, and approximately half of the total handsets SouthernLINC Wireless supports are used by subscribers located outside of major metropolitan areas. SouthernLINC Wireless is also the wireless service provider to the state of Alabama and to many government agencies in Georgia. In fact, approximately 30% of the total handsets SouthernLINC Wireless serves are used by public employees, first responders, or utility personnel, which illustrates how important the services of SouthernLINC Wireless are to residents in those areas, particularly in times of crisis. In its role as an ETC, SouthernLINC offers Lifeline services to customers throughout its service territory.

As explained in the Petition, the Rule requires competitive ETCs to report the number of lines served in each rural ILEC's service area based on the customer's billing address. As highlighted in the Comments of the USA Coalition, however, in rural, insular and high-cost service areas, residents and business frequently must use P.O. Boxes for their billing addresses. Ambiguity regarding compliance with the Rule in cases when the billing address contains a P.O. Box or is otherwise unclear adversely affects those who most need USF support.<sup>1</sup> Thus, it is in the public interest for the Commission to provide guidance to USAC, particularly because USAC lacks authority to interpret the Commission's rules.<sup>2</sup>

SouthernLINC Wireless supports the two reasonable means for implementing the Rule outlined in the Petition: (1) relying on customer provided information; or (2) when a single rural ILEC serves most, if not all, of the customers whose billing addresses contain P.O. Boxes

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<sup>1</sup> Comments of USA Coalition at 2 (citing 47 C.F.R. § 54.702(c) (“The Administrator may not make policy, interpret unclear provisions of the statute or rules, or interpret the intent of Congress. Where the Act or the Commission's rules are unclear, or do not address a particular situation, the Administrator shall seek guidance from the Commission.”)).

<sup>2</sup> *Id.* at 3, citing 47 C.F.R. § 54.702(c).

from the same Post Office, reporting all such billing addresses as being located within that rural ILEC's study area. SouthernLINC also supports the "Zip Code Centroid Method" described by Smith Bagley, Inc. ("SBI") in its Comments whereby mapping and geocoding software tools locate P.O. Box addresses according to the centroid or the physical location of the post office itself.<sup>3</sup> These interpretations are reasonable under the circumstances and should be acknowledged to be acceptable interpretations of the Rule. That said, SouthernLINC Wireless agrees with both the USA Coalition and SBI that the requested guidance letter should not constitute an exhaustive list of permissible interpretations of the Rule, but rather should clarify that carriers may choose other methods that comply with the applicable rules.

Therefore, SouthernLINC Wireless urges the Commission to provide USAC with the guidance requested in the Petition as soon as possible.

Respectfully submitted,



Todd D. Daubert

Melissa Conway

KELLEY DRYE & WARREN LLP

Washington Harbour, Suite 400

3050 K Street, NW

Washington, DC 20007-5108

(202) 342-8400

(202) 342-8451 (facsimile)

tdaubert@kelleydrye.com

*Counsel for SouthernLINC Wireless*

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<sup>3</sup> Comments of Smith Bagley, Inc. at 5-7.