PUBLIC COPY

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

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	WC Docket No. 09-197
	)	
Advantage Cellular Systems, Inc.	)	
	)	
Application for Designation as an Eligible Telecommunications Carrier in the State of Tennessee	)	

ANNUAL COMPLIANCE FILING OF ADVANTAGE CELLULAR SYSTEMS, INC.

Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), by its attorneys, hereby submits its annual compliance filing required by Section 54.209 of the Federal Communications Commission's ("FCC" or "Commission") Rules[1] and the Commission Order designating Advantage as an eligible telecommunications carrier ("ETC").[2]

I. Progress Report on Quality Improvement Plan Progress and Use of Support and Additional Five-Year Outlook

Pursuant to Section 54.209 of the FCC's Rules, Advantage must submit at the wire center level "A progress report on its five-year service quality improvement plan, including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled."[3]

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[1] 47 C.F.R. § 54.209.
[2] *In re Federal-State Joint Board on Universal Service, Advantage Cellular Systems, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, FCC Docket No. 96-45, Order, DA 04-3357 (October 22, 2004) ("*Designation Order*").
[3] 47 C.F.R. § 54.209(a)(1).

[redacted]

[redacted]

[redacted]

[redacted]

II. Outage Report

Between July 1, 2009 and June 30, 2010, Advantage had no service outages of at least 30 minutes in duration for any facility or tower within Advantage's ETC designated service area that potentially affects at least 10 percent of the end users served in such designated area, or that potentially affects a 911 facility, pursuant to the Commission's *Outage Reporting Order*[4] and Section 4.5(e) of the Commission's rules.[5]

Advantage performs routine maintenance checks on its system to ensure quality service. In order to perform these maintenance checks, Advantage must turn off its service for a maximum of two to three minutes. Advantage performs these checks at night during periods of very low call volume so as not to interrupt service. Except in emergency situations, Advantage will notify its customers in advance of the maintenance check and possible service disruptions.

III. Service Requests

Between July 1, 2009 and June 30, 2010, Advantage did not have any unfulfilled service requests from potential customers.

IV. Number of Complaints Per 1,000 Handsets or Lines

Between July 1, 2009 and June 30, 2010, Advantage received no complaints filed with the FCC or the Tennessee Regulatory Authority.

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[4] *See New Part 4 of the Commission's Rules Concerning Disruptions to Communications Report and Order and Further Notice of Proposed Rulemaking,* 199 FCC Rcd 16830, 16923-24, § 4.5 (2004) *("Outage Reporting Order"). See also* 47 C.F.R. § 54.209(a)(2).
[5] 47 C.F.R. § 4.5(e).

V. Certifications

Pursuant to Sections 54.209(a)(5)-(8) of the Commission's rules,[6] attached hereto are certifications attesting that Advantage: (1) complies with applicable service quality standards and consumer protection rules; (2) is able to function in emergency situations as set forth in §54.201(a)(2); (3) offers a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas; and (4) acknowledges that the Commission may require Advantage to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

VI. Conclusion

Based on the foregoing information, Advantage hereby satisfies its annual reporting requirements set forth in the *Designation Order* and Section 54.209 of the Commission's rules and maintains its continued eligibility to receive federal universal service support.

Respectfully submitted,

ADVANTAGE CELLULAR SYSTEMS, INC.

By: Kc. Ah

Kenneth C. Johnson
Michael R. Bennet
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814
(202) 551-0015

Its Attorneys

Dated: September 29, 2010

4825-7621-6583, v. 1

[6] *See* 47 C.F.R. § 54.209(a)(5)-(8).

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EXHIBIT A

REDACTED

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in the State of Tennessee	)	

To: Wireline Competition Bureau

REQUEST THAT MATERIALS AND INFORMATION
SUBMITTED TO THE COMMISSION BE WITHHELD FROM PUBLIC INSPECTION

Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), by its attorneys, pursuant to Section 0.459 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"),[1] and consistent with the provisions of the Freedom of Information Act ("FOIA"),[2] hereby requests that the Commission treat as confidential and withhold from public inspection certain commercial and financial data submitted with this request.

Concurrently herewith, Advantage is filing its "Annual Compliance Filing of Advantage Cellular Systems, Inc." In that filing, Advantage submits proprietary documentation containing commercial and financial information.

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[1] *See* 47 C.F.R. § 0.459.
[2] *See* 5 U.S.C. § 552.

The financial and commercial information submitted in its letter for which confidential treatment is sought is competitively sensitive, proprietary data not otherwise made publicly available. The information contains Advantage's cost estimates for the collocation on and construction of tower space and maintenance and upgrade of related equipment necessary to serve rural, unserved areas. Each page of the filing that contains information for which confidential treatment is sought is marked: "CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE."

FOIA recognizes that "trade secrets and commercial or financial information obtained from a person and privileged or confidential" should be protected and are therefore exempt from the disclosure requirements.[3] Pursuant to Section 0.459 of the Commission's rules and in support of its request for confidential treatment, Advantage provides the following statement of the reasons for withholding certain information from inspection and the relevant facts upon which this request is based, including: (1) identification of the specific information for which confidential treatment is sought; (2) a description of the circumstances giving rise to the submission; (3) explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged; (4) explanation of the degree to which the information concerns a service that is subject to competition; (5) explanation of how disclosure of the information could result in substantial competitive harm; (6) identification of any measure taken by the submitting party to prevent unauthorized disclosure; (7) identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties; (8) justification of the period during which the submitting party asserts that materials should not be available for public disclosure; and (9) any other information that the

[3] 5 U.S.C. § 552(b)(4).

party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

1. Advantage Seeks Confidential Treatment for Its Commercial and Financial Information.

Confidential treatment is sought with respect to detailed, competitively sensitive commercial and business information relating to Advantage's cost estimates and schedule for collocation on and construction of tower space and maintenance and upgrade of related equipment necessary to serve rural, unserved areas as an eligible telecommunications carrier ("ETC"). The confidential information, as noted above, is labeled: "CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE."

2. Because Some Information Being Submitted in Advantage's Letter Contains Proprietary Information, Advantage Requests Confidentiality.

Pursuant to the Commission's 2005 Universal Service Order,[4] Advantage, as an ETC under the FCC's jurisdiction, must submit information on its progress towards meeting its five-year service quality improvement plan. In compliance with this requirement, Advantage is submitting documentation concerning Advantage's cost estimates for collocation on and construction of tower space and maintenance and upgrade of related equipment necessary to serve rural, unserved areas as well as its plan and timetable for making these improvements. The information submitted, if disclosed, will give Advantage's competitors an unfair competitive advantage in that Advantage does not have reciprocal commercial or financial information of its competitors.

[4] *In re Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, FCC 05-46 (March 17, 2005).

3. Advantage Considers Its Business and Commercial Information Competitively Sensitive and Highly Confidential.

Advantage is seeking confidential treatment of detailed, competitively sensitive commercial and financial information. Advantage treats this information as commercially significant, proprietary, and not available to the public.

4. The Confidential Information Relates to a Competitive Service Offering.

The information for which confidential treatment is sought relates to Advantage's cost estimates for collocation on and construction of tower space and maintenance and upgrade of related equipment necessary to serve rural, unserved areas. The information also identifies the location of Advantage's planned deployments and its schedule for implementing its proposed upgrades. If Advantage is required to disclose this information, the Commission would put Advantage at a competitive disadvantage by revealing proprietary, business and commercial information which its competitors could use to their advantage.

5. Because Advantage's Business and Commercial Information is Competitively Sensitive, Disclosure Could Cause Significant Competitive Harm.

As noted above, the information for which Advantage seeks confidential treatment relates to Advantage's business and commercial information. The information contains site-specific information regarding collocation, construction, utility and equipment expenditures and the location and timetable for implementing its proposed network improvements. If Advantage's competitors are able to obtain such proprietary information, they can use this information to aid in their business planning and investment decisions, and to disrupt Advantage's build-out plans. Advantage would be competitively disadvantaged because its competitors protect their own business and commercial coordination plans from being revealed to their own competitors like Advantage.

6. Advantage Has Taken Measures to Prevent Unauthorized Disclosure of Its Confidential Information.

The information for which Advantage is seeking confidential treatment is treated by Advantage as commercially significant and proprietary and not available for public access. Access to such information even by Advantage employees is limited on a "need-to-know" basis.

7. The Information for Which Advantage Seeks Confidential Treatment is Not Available to the Public.

Advantage's commercial and business information which it seeks to protect is not available to the public. As stated above, it is treated, even within the company itself, as confidential and proprietary information. Advantage would not intentionally make such data available in any proceeding without a request for confidential treatment.

8. The Commission Should Protect Advantage's Confidential Information Indefinitely.

Due to the commercially and competitively sensitive nature of the information, Advantage believes that its confidential information should be treated pursuant to a protective order for an unlimited amount of time. Therefore, Advantage requests that the Commission grant its request for confidentiality for an indefinite amount of time.

9. The Commission Should Follow Past Precedent and Grant Advantage's Request for Confidentiality of Its Highly Competitive Information.

The Commission has granted requests for confidentiality and protective orders involving commercially sensitive information.[5] Advantage requests that the Commission follow its past

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[5] *See, e.g., In re Federal-State Joint Board on Universal Service NEP Cellcorp, Inc., Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania*, CC Docket No. 96-45, Protective Order, DA 07-3628 (August 15, 2007); *In re Implementation of Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, 17 FCC Rcd 5877 (March 28, 2002); *In re Motorola Inc. and Teledesic, LLC*, 16 FCC Rcd 17056 (September 25, 2001). *See* 47 C.F.R. § 0.459. *See also In re*

precedent, as well as the Commission's confidentiality rules, and grant Advantage's request for confidentiality.

Because of the competitively sensitive nature of the business and commercial information contained in Advantage's submission, inspection of this information by anyone outside the Commission should be limited, and should be subject to a protective order like the one submitted as Attachment A. Advantage also seeks sufficient advance notice of any proposed disclosure to allow Advantage to take action to protect its interests in the confidentiality of the information.

Advantage understands that, in accordance with Section 0.459(g) of the Commission's rules, it will receive both telephone and written notification from the Commission if the instant request is denied. Should the Commission have any questions with respect to this request, it is directed to communicate directly with our communications counsel, Robert A. Silverman at Bennet & Bennet, PLLC, 4350 East West Highway, Suite 201, Bethesda, MD 20814, (202) 371-1500.

Respectfully submitted,

ADVANTAGE CELLULAR SYSTEMS, INC.

By: _____

Kenneth C. Johnson
Robert A. Silverman
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814
(202) 371-1500

Its Attorneys

Dated: September 29, 2010

Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission, Report and Order, 13 FCC Rcd 24816 (1998).

Before the
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In the Matter of	)	
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Federal-State Joint Board on	)	
Universal Service	)	CC Docket No. 96-45
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Application for Designation as an	)	
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PROTECTIVE ORDER

This Protective Order is intended to facilitate and expedite the review of documents containing trade secrets and commercial information obtained from a person and which is privileged or confidential. It reflects the manner in which "Confidential Information," as that term is defined herein, is to be treated. The Order is not intended to constitute a resolution of the merits concerning whether any Confidential Information would be released publicly by the Commission upon a proper request under the Freedom of Information Act or other applicable law or regulation, including Section 0.442 of the Commission's rules.

1. *Definitions.*

a. Authorized Representative. "Authorized Representative" shall have the meaning set forth in Paragraph seven.

b. Commission. "Commission" means the Federal Communications Commission or any arm of the Commission acting pursuant to delegated authority.

c. Confidential Information. "Confidential Information" means (i) information submitted to the Commission by the Submitting Party that has been so designated by the Submitting Party and which the Submitting Party has determined in good faith constitutes trade secrets or commercial or financial information which is privileged or confidential within the meaning of Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4); (ii) information submitted to the Commission by the Submitting Party that has been so designated by the Submitting Party and which the Submitting Party has determined in good faith falls within the terms of Commission orders designating the items for treatment as Confidential Information; and (iii) information that the Commission has allowed to be examined off-site and that otherwise complies with the requirements of this paragraph. Confidential

Information includes additional copies of and information derived from Confidential Information.

d. Declaration. "Declaration" means Attachment A to this Protective Order.

e. Reviewing Party. "Reviewing Party" means a person or entity participating in this proceeding or considering in good faith filing a document in this proceeding.

f. Submitting Party. "Submitting Party" means a person or entity that seeks confidential treatment of Confidential Information pursuant to this Protective Order.

2. *Claim of Confidentiality.* The Submitting Party may designate information as "Confidential Information" consistent with the definition of that term in Paragraph 1 of this Protective Order. The Commission may, sua sponte or upon petition, pursuant to 47 C.F.R §§ 0.459 & 0.461, determine that all or part of the information claimed as "Confidential Information" is not entitled to such treatment.

3. *Procedures for Claiming Information is Confidential.* Confidential Information submitted to the Commission shall be filed under seal and shall bear on the front page in bold print, "CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION - DO NOT RELEASE." Confidential Information shall be segregated and/or redacted by the Submitting Party from all non-confidential information submitted to the Commission. To the extent a document contains both Confidential Information and non-confidential information, the Submitting Party shall designate the specific portions of the document claimed to contain Confidential Information and shall, where feasible, also submit a redacted version not containing Confidential Information.

4. *Storage of Confidential Information at the Commission.* The Secretary of the Commission or other Commission staff to whom Confidential Information is submitted shall place the Confidential Information in a non-public file. Confidential Information shall be segregated in the files of the Commission, and shall be withheld from inspection by any person not bound by the terms of this Protective Order, unless such Confidential Information is released from the restrictions of this Order either through agreement of the parties, or pursuant to the order of the Commission or a court having jurisdiction.

5. *Access to Confidential Information.* Confidential Information shall only be made available to Commission staff, Commission consultants and to counsel to the Reviewing Parties, or if a Reviewing Party has no counsel, to a person designated by the Reviewing Party. Before counsel to a Reviewing Party or such other designated person designated by the Reviewing Party may obtain access to Confidential Information, counsel or such other designated person must execute the attached Declaration. Consultants under contract to the Commission may obtain access to Confidential Information only if they have signed, as part of their employment contract, a non-disclosure agreement or if they execute the attached Declaration.

6. Counsel to a Reviewing Party or such other person designated pursuant to Paragraph 5 may disclose Confidential Information to other Authorized Representatives to whom disclosure is permitted under the terms of paragraph 7 of this Protective Order only after advising such Authorized Representatives of the terms and obligations of the Order. In addition, before Authorized Representatives may obtain access to Confidential Information, each Authorized Representative must execute the attached Declaration.

7. *Authorized Representatives shall be limited to*:

a. Counsel for the Reviewing Parties to this proceeding, including in-house counsel actively engaged in the conduct of this proceeding, and their associated attorneys, paralegals, clerical staff and other employees, to the extent reasonably necessary to render professional services in this proceeding;

b. Specified persons, including employees of the Reviewing Parties, requested by counsel to furnish technical or other expert advice or service, or otherwise engaged to prepare material for the express purpose of formulating filings in this proceeding; or

c. Any person designated by the Commission in the public interest, upon such terms as the Commission may deem proper.

8. *Inspection of Confidential Information*. Confidential Information shall be maintained by a Submitting Party for inspection at two or more locations, at least one of which shall be in Washington, D.C. Inspection shall be carried out by Authorized Representatives upon reasonable notice (generally not to exceed one business day) during normal business hours.

9. *Copies of Confidential Information*. The Submitting Party shall provide a copy of the Confidential Material to Authorized Representatives upon request and may charge a reasonable copying fee not to exceed twenty-five cents per page. Authorized Representatives may make additional copies of Confidential Information but only to the extent required and solely for the preparation and use in this proceeding, Authorized Representatives must maintain a written record of any additional copies made and provide this record to the Submitting Party upon reasonable request. The original copy and all other copies of the Confidential Information shall remain in the care and control of Authorized Representatives at all times. Authorized Representatives having custody of any Confidential Information shall keep the documents properly secured at all times.

10. *Filing of Declaration*. Counsel for Reviewing Parties shall provide to the Submitting Party and the Commission a copy of the attached Declaration for each Authorized Representative within five (5) business days after the attached Declaration is executed, or by any other deadline that may be prescribed by the Commission.

11. *Use of Confidential Information*. Confidential Information shall not be used by any person granted access under this Protective Order for any purpose other than for use in this proceeding (including any subsequent administrative or judicial review) unless otherwise ordered

by the Commission or a court of competent jurisdiction, shall not be used for competitive business purposes, and shall not be used or disclosed except in accordance with this Order. This shall not preclude the use of any material or information that is in the public domain or has been developed independently by any other person who has not had access to the Confidential Information nor otherwise learned of its contents.

12. *Pleadings Using Confidential Information.* Submitting Parties and Reviewing Parties may, in any pleadings that they file in this proceeding, reference the Confidential Information, but only if they comply with the following procedures:

a. Any portions of the pleadings that contain or disclose Confidential Information must be physically segregated and/or redacted from the remainder of the pleadings and filed under seal;

b. The portions containing or disclosing Confidential Information must be covered by a separate letter referencing this Protective Order;

c. Each page of any Party's filing that contains or discloses Confidential Information subject to this Order must be clearly marked: "CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE;" and

d. The confidential portion(s) of the pleading, to the extent they are required to be served, shall be served upon the Secretary of the Commission, the Submitting Party, and those Reviewing Parties that have signed the attached Declaration. Such confidential portions shall be served under seal. They shall not be placed in the Commission's Public File unless the Commission directs otherwise (with notice to the Submitting Party and an opportunity to comment on such proposed disclosure). A Submitting Party or a Reviewing Party filing a pleading containing Confidential Information shall also file a redacted copy of the pleading containing no Confidential Information, which copy shall be placed in the Commission's public files. A Submitting Party or a Reviewing Party may provide courtesy copies of pleadings containing Confidential Information to Commission staff so long as the notation required by subsection c. of this paragraph is not removed.

13. *Violations of Protective Order.* Should a Reviewing Party that has properly obtained access to Confidential Information under this Protective Order violate any of its terms, it shall immediately convey that fact to the Commission and to the Submitting Party. Further, should such violation consist of improper disclosure or use of Confidential Information, the violating party shall take all necessary steps to remedy the improper disclosure or use. The Violating Party shall also immediately notify the Commission and the Submitting Party, in writing, of the identity of each party known or reasonably suspected to have obtained the Confidential Information through any such disclosure. The Commission retains its full authority to fashion appropriate sanctions for violations of this Protective Order, including but not limited to suspension or disbarment of attorneys from practice before the Commission, forfeitures, cease

and desist orders, and denial of further access to Confidential Information in this or any other Commission proceeding. Nothing in this Protective Order shall limit any other rights and remedies available to the Submitting Party at law or equity against any party using Confidential Information in a manner not authorized by this Protective Order.

14. *Termination of Proceeding*. Unless otherwise ordered by the Commission or a court of competent jurisdiction, within two weeks after final resolution of this proceeding (which includes any administrative or judicial appeals), Authorized Representatives of Reviewing Parties shall destroy or return to the Submitting Party all Confidential Information as well as all copies and derivative materials made. Authorized representatives shall certify in a writing served on the Commission and the Submitting Party that no material whatsoever derived from such Confidential Information has been retained by any person having access thereto, except that counsel to a Reviewing Party may retain two copies of pleadings submitted on behalf of the Reviewing Party and other attorney work product. Any Confidential Information contained in any copies of pleadings retained by counsel to a Reviewing Party or in materials that have been destroyed pursuant to this paragraph shall be protected from disclosure or use indefinitely in accordance with paragraphs 9 and 11 of this Protective Order unless such Confidential Information is released from the restrictions of this Order either through agreement of the parties, or pursuant to the order of the Commission or a court having jurisdiction.

15. *No Waiver of Confidentiality*. Disclosure of Confidential Information as provided herein shall not be deemed a waiver by the Submitting Party of any privilege or entitlement to confidential treatment of such Confidential Information. Reviewing Parties, by viewing these materials: (a) agree not to assert any such waiver; (b) agree not to use information derived from any confidential materials to seek disclosure in any other proceeding; and (c) accidental disclosure of Confidential Information shall not be deemed a waiver of any privilege.

16. *Additional Rights Preserved*. The entry of this Protective Order is without prejudice to the rights of the Submitting Party to apply for additional or different protection where it is deemed necessary or to the rights of Reviewing Parties to request further or renewed disclosure of Confidential Information.

17. *Effect of Protective Order*. This Protective Order constitutes an Order of the Commission and an agreement between the Reviewing Party, executing the attached Declaration, and the Submitting Party.

18. *Authority*. This Protective Order is issued pursuant to Sections 4(i) and 4(j) of the Communications Act as amended, 47 U.S.C. §§ 154(i), (j) and 47 C.F.R. § 0.457(d).

Before the
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in the State of Tennessee	)	

DECLARATION

I, _____, hereby declare under penalty of perjury that I have read the Protective Order in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

_____

_____, Title

Dated:

4829-1877-0439, v. 1

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September 29, 2010

Via Hand Delivery

Karen Majcher
Vice President, High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Re: Annual Compliance Filing of Advantage Cellular Systems, Inc.
WC Docket No. 09-197

Dear Ms. Majcher:

Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), by its attorneys and pursuant to the Federal Communications Commission's Order designating Advantage as an eligible telecommunications carrier, hereby submits documentation detailing: (1) its progress towards meeting its build-out plans; (2) the number of complaints per 1,000 handsets; and (3) how many requests for service from potential customers were unfulfilled for the period between July 1, 2009 to June 30, 2010.

Also enclosed is a pink copy of Advantage's compliance filing. Please date-stamp and return the pink copy to the courier.

If you have any questions regarding this information, please contact the undersigned.

Sincerely,

Kenneth C. Johnson

Enclosures

cc: Marlene H. Dortch, Office of the Secretary
Federal Communications Commission (via hand delivery and electronic filing)