



Federal Communications Commission  
Washington, D.C. 20554

October 19, 2011

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

In order to comprehensively reform and modernize the universal service fund (USF) and intercarrier compensation (ICC) system in light of recent technological, market, and regulatory changes, on February 4, 2011, the Commission released the *Universal Service and Intercarrier Compensation Transformation Notice of Proposed Rulemaking (USF-ICC Transformation NPRM)*.<sup>1</sup> To provide additional transparency, over and above legal notice requirements, the Bureau previously submitted two letters to the Record specifically identifying public information it may consider as part of this proceeding.<sup>2</sup>

Consistent with the first and second letters, in this third letter the Bureau provides a list of publicly available information the Commission may consider as part of this proceeding. Also included is

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<sup>1</sup> *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, 26 FCC Rcd 4554 (2011). Previously, on October 14, 2010, the Commission released the *Universal Service Reform – Mobility Fund Notice of Proposed Rulemaking (Mobility Fund NPRM)*, which proposed to expand mobile voice and data service availability by using a market-based mechanism to award one-time support from accumulated USF reserves. On August 3, 2011, the Wireline Competition Bureau released a PN seeking additional comment. *Further Inquiry into Certain Issues in the Universal Service-Intercarrier Compensation transformation Proceeding*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, Public Notice, DA 11-1348 (Wireline Comp. Bur. rel. Aug. 3, 2011) (*August 3 PN*).

<sup>2</sup> Letter from Jennifer Prime, Wireline Competition Bureau, Federal Communications Commission, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 10-90, 07-135 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45 (filed October 7, 2011); Letter from Jennifer Prime, Wireline Competition Bureau, Federal Communications Commission, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 10-90, 07-135 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45 (filed October 17, 2011).

a summary of staff analysis of areas where mobile service is available only from a small or regional provider receiving high-cost support. Please enter the attached appendices into the Record.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Prime".

Jennifer Prime  
Legal Counsel  
Wireline Competition Bureau

## APPENDIX I: Publicly Available Sources

1. *Bipartisan Energy and Commerce Leaders Release Information on Universal Service Fund*, House Comm on Enegy and Commerce, 112th Cong. (July 27, 2011), available at <http://democrats.energycommerce.house.gov/index.php?q=news/bipartisan-energy-and-commerce-leaders-release-information-on-universal-service-fund>.
2. List of Projects Receiving Recovery Act Broadband Grant Awards (USDA 2010), available at [http://www.usda.gov/documents/ARRA\\_PDF\\_09-14-2010.pdf](http://www.usda.gov/documents/ARRA_PDF_09-14-2010.pdf).
3. List of Projects Receiving Recovery Act Broadband Grant Awards (USDA 2010), available at [http://www.whitehouse.gov/sites/default/files/microsites/20100818\\_Broadband\\_Awards.pdf](http://www.whitehouse.gov/sites/default/files/microsites/20100818_Broadband_Awards.pdf).
4. List of Projects Receiving Recovery Act Broadband Grant Awards (USDA 2010), available at [http://www.whitehouse.gov/sites/default/files/rss\\_viewer/broadband\\_project\\_descriptions.pdf](http://www.whitehouse.gov/sites/default/files/rss_viewer/broadband_project_descriptions.pdf).
5. Agriculture Secretary Vilsack Announces Recovery Act Broadband Projects to Bring Jobs, Economic Opportunity to Rural Communities, news release (USDA Sept. 13, 2010), available at <http://www.usda.gov/wps/portal/usda/usdahome?contentidonly=true&contentid=2010/09/0461.xml>.
6. *Vice President Biden Announces Recovery Act Investments in Broadband Projects to Bring Jobs, Economic Opportunity to Communities Nationwide*, news release (USDA Aug. 18, 2010), available at <http://www.usda.gov/wps/portal/usda/usdahome?contentidonly=true&contentid=2010/08/0411.xml>.
7. *Agriculture Secretary Vilsack Announces Over 120 Recovery Act Broadband Projects to Bring Jobs, Economic Opportunity to Rural Communities*, press release (USDA August 4, 2010), available at <http://www.rurdev.usda.gov/STELPRD4005543.html>.
8. *Advancing Broadband a Foundation for Strong Rural Communities* (USDA January 2011), available at [http://www.rurdev.usda.gov/supportdocuments/RBBreport\\_V5ForWeb.pdf](http://www.rurdev.usda.gov/supportdocuments/RBBreport_V5ForWeb.pdf).
9. Letter from Jason J. Dandridge, CEO, Palmetto Rural Telephone Cooperative, to Albert M. Lewis, Chief, Pricing Policy Division, Wireline Competition Bureau, WC Docket No. 01-92 (dated September 9, 2009).
10. T.R. Beard, G.S Ford, R.C. Hill & R. Saba, *The flow through of cost changes in competitive telecommunications: Theory and evidence*, Empirical Economics (2005).
11. D. Besanko, J.P. Dubé, & S. Gupta, *Own-Brand and Cross-Brand Retail Pass-Through* Marketing Science 24 (2005).
12. T.J. Besley, T.J. & H.S. Rosen, *Sales Taxes and Prices: An Empirical Analysis*, National Bureau of Economic Research Working Paper No. 6667 (1998), available at <http://www.nber.org/papers/w6667>.
13. E.G. Weyl & Michal Fabinger,(2009), *Pass-through as an Economic Tool*, working paper, University of Chicago (2009).
14. J Hausman & G. Leonard, G, *Efficiencies from the Consumer Viewpoint*, 7 Geo. Mason Law Rev. 707. (1999).
15. Busse, Silva-Risso & Zettelmeyer, *\$1,000 cash back: The pass-through of auto manufacturer promotions*, Amer. Economic. Rev. 96 (2006).
16. Orley Ashenfelter, David Ashmore, Jonathan B. Baker & Signe-Mary McKernan, *Identifying the Firm-Specific Cost Pass-Through Rate* (Jan. 1998), available at <http://www.ftc.gov/be/workpapers/wp217.pdf>.

**APPENDIX II: Summary of Staff Analysis of  
Areas Where Mobile Service is Available Only from a Small or Regional Provider  
Receiving High-Cost Support**

Commission staff performed an analysis to determine the extent to which there are geographic areas where mobile service is available only from a wireless provider that receives high-cost support. The following summarizes the methodology used to identify areas not served by an unsubsidized mobile provider where the only mobile service is provided by small or regional wireless competitive eligible telecommunications carriers (ETCs). The methodology also provides an estimate of the amount of universal service support currently going to those wireless competitive ETCs for the areas identified. For purposes of this analysis, “small or regional competitive ETCs” were defined as all competitive ETCs other than the four nationwide mobile service providers (AT&T, Verizon Wireless, T-Mobile, and Sprint).

1. For each incumbent local exchange carrier (ILEC) Study Area (Study Area), staff mapped census blocks from the 2000 Census into the Study Area.<sup>3</sup> Study Area boundaries were determined from the Tele Atlas data base which provides geographic descriptions of ILEC Study Areas. A census block was included in a Study Area if the census block centroid was located within the Study Area.<sup>4</sup> Staff manually developed cross-references between Study Area Codes used to identify Study Areas for universal service purposes and the Operating Company Numbers used in the Tele Atlas database.<sup>5</sup>
2. For each Study Area, staff determined, on a census block-by-block basis, the number of unique small and regional wireless competitive ETCs with coverage.
  - a. Staff first associated provider-specific American Roamer coverage maps with Census 2000 census blocks. If the centroid of a census block was located within the provider’s coverage area, it was included in the coverage area. Then, staff overlaid this provider-specific wireless coverage census block data on each Study Area to map out which particular wireless providers covered all or part of the Study Area.<sup>6</sup>
  - b. For each Study Area, staff identified which wireless providers are competitive ETCs. The Universal Service Administrative Company (USAC) provided the Commission with a list of all wireless competitive ETCs, by Study Area Code.<sup>7</sup> Staff then exercised

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<sup>3</sup> Only the 50 states and Puerto Rico were included in this analysis. Other U.S. territories were excluded due to a lack of Study Area boundaries for the outlying territories.

<sup>4</sup> Sources: Census 2000 data available at <http://www.census.gov/main/www/cen2000.html>; Tele Atlas Telecommunications Suite 2010.6.

<sup>5</sup> Source: Staff analysis showing the mapping of SACs to OCNs, available at <http://transition.fcc.gov/wcb/iatd/neca.html>.

<sup>6</sup> Source: American Roamer CoverageRight, October 2010.

<sup>7</sup> We note that in some instances the StudyAreaName does not accurately reflect the current ownership or control of a competitive ETC. The ownership or control of a particular ETC is not relevant to this analysis, as the purpose of the analysis is solely to determine whether a wireless provider is providing service in the area.

judgment to match those names with the wireless carrier names as listed in American Roamer. There may be a small number of carriers that receive high-cost support that staff could not properly match up with their counterpart in American Roamer.<sup>8</sup>

3. Using service locations identified in step 2, above, staff identified any census block in which (a) a small or regional wireless competitive ETC (*i.e.*, a competitive ETC other than AT&T, Verizon Wireless, Sprint, or T-Mobile) provided mobile service, and (b) no other wireless provider (including AT&T, Verizon Wireless, Sprint, T-Mobile or any other unsubsidized wireless carrier) provided mobile service. A census block meeting these criteria was classified as a qualified census block and any Study Area with at least one qualified census block was classified as a qualified Study Area.
  - a. Staff then aggregated the qualified census blocks across Study Areas. For the aggregated census blocks, staff determined the total land area, population, and number of households. Using these data, staff also calculated the percent of land area, population, and number of households that the selected aggregated census blocks represent out of the nationwide total.<sup>9</sup>
  - b. For each qualified Study Area, staff identified the wireless competitive ETCs that provided service in the blocks identified in 3.a.
  - c. Staff tabulated the total amount of high-cost support going to the competitive ETCs identified in 3.b. in each of the qualified Study Areas.<sup>10</sup> Staff then identified the holding company for each of the competitive ETCs in the spreadsheet and totaled the competitive ETC-based high-cost support going to each holding company in qualified Study Areas. To the extent a competitive ETC serves both qualified and non-qualified census blocks in a qualified Study Area, any support associated with the non-qualified census blocks was included in the tabulation due to limited ability to disaggregate support to the census block level.

Support disbursed to the 17 competitive ETCs identified in 3.b. in the qualified Study Areas totaled \$45 million in 2010.

This methodology may overestimate or underestimate the amount of support flowing in 2010 to areas where there might not be mobile coverage, but for the presence of a small or regional competitive ETC. On the one hand, staff included the support amount for the entire Study Area in which there were both qualified and non-qualified census blocks because in many Study Areas, actual support amounts could not

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<sup>8</sup> Source: List of wireless competitive ETCs provided by USAC included below. Although USAC does not routinely collect information regarding whether a competitive ETC is a wireless provider, it used available resources, including ETC designation orders and Form 499 filings to identify wireless competitive ETCs.

<sup>9</sup> Source: Census 2000 SF1.

<sup>10</sup> Source: Competitive ETC Support by Incumbent Study Area by Month as Provided by USAC (Attachment C Report 5, submitted pursuant to Memorandum of Understanding between Federal Communications Commission and the Universal Service Administrative Company), available at <http://transition.fcc.gov/wcb/iatd/neca.html>.

be identified at a further disaggregated level, which would tend to overstate the amount of support associated with the areas where there are no nationwide mobile providers or unsubsidized mobile providers. On the other hand, as the Commission has noted in the past, our analysis of mobile network coverage based on coverage maps provided by American Roamer likely overstates the coverage actually experienced by consumers, because American Roamer reports advertised coverage as reported to it by many mobile wireless service providers, each of which uses a different definition or determination of coverage.<sup>11</sup> Thus, there may be areas reported by American Roamer as served by a nationwide provider or an unsubsidized wireless provider that may not in fact be covered by those providers, but only by a small or regional competitive ETC. And, similarly, there may be areas reported by American Roamer as served by a small or regional competitive ETC where that provider does not actually provide service.

In addition, we note that Tele Atlas boundaries may not be accurate in every instance, although we are not aware of any systematic bias that would impact the results of our analysis in one direction or another. In certain western states, for example, the Tele Atlas boundaries appear larger than those seen in other sources. This could increase the chance of finding a census block served only by funded small or regional competitive ETCs, creating upward bias in the results. However, because we cannot assess the inaccuracies in the Tele Atlas boundaries in a comprehensive way, it is impossible to determine the overall direction of their impact.

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<sup>11</sup> Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, *Fifteenth Report*, 26 FCC Rcd 9664, 9669 n. 5 (2011).

**USAC Provided List of Wireless Competitive ETCs**

<b>StudyAreaCode</b>	<b>State</b>	<b>StudyAreaName</b>
109001	ME	RCC MINNESOTA, INC.
109002	ME	UNITED STATES CELLULAR CORPORATION
129001	NH	RCC MINNESOTA, INC.
129002	NH	UNITED STATES CELLULAR CORPORATION
149001	VT	RCC ATLANTIC, INC.
159007	NY	NPCR, INC.
159009	NY	SPRINT SPECTRUM, LP
159014	NY	ST. LAWRENCE SEAWAY CELLULAR PARTNERSHIP
159015	NY	NEW YORK RSA 2 CELLULAR PARTNERSHIP
179004	PA	NPCR, INC.
179010	PA	NEP CELLCORP, INC.
199001	VA	VIRGINIA CELLULAR LLC
199002	VA	HIGHLAND CELLULAR, INC.
199003	VA	NPCR, INC.
199004	VA	UNITED STATES CELLULAR CORPORATION
199005	VA	SPRINT SPECTRUM, LP
199006	VA	ALLTEL COMMUNICATIONS, INC.
199008	VA	VIRGINIA PCS ALLIANCE, LC DBA NTELOS
199009	VA	CINGULAR WIRELESS (VA)
199011	VA	ALLTEL COMMUNICATIONS, LLC
199014	VA	CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
209002	WV	FIBERNET, LLC
209003	WV	HIGHLAND CELLULAR, INC.
209005	WV	U.S. CELLULAR (HARDY CELLULAR TELEPHONE CO.)
209006	WV	EASTERBROOKE CELLULAR CORPORATION
209007	WV	SPRINT SPECTRUM, LP
209008	WV	ALLTEL COMMUNICATIONS, INC.
209011	WV	AMERICAN CELLULAR CORPORATION
209012	WV	NEW CINGULAR WIRELESS PCS, LLC
209909	WV	WEST VIRGINIA PCS ALLIANCE
219001	FL	NPCR, INC.
219013	FL	T-MOBILE SOUTH LLC
219902	FL	SPRINT SPECTRUM L.P. (FL)
219903	FL	ALLTEL COMMUNICATIONS, INC. (FL)
229001	GA	NPCR, INC.
229002	GA	PUBLIC SERVICE CELLULAR, INC.
229003	GA	SPRINT SPECTRUM, LP
229004	GA	ALLTEL COMMUNICATIONS, INC.
229006	GA	SOUTHERN COMMUNICATIONS SERVICES, INC.
229008	GA	ALLTEL COMMUNICATIONS, LLC
229009	GA	GEORGIA RSA #8 PARTNERSHIP
229013	GA	ALLIED WIRELESS COMM. CORP

229014	GA	GA RSA #8 PARTNERSHIP
239001	NC	ALLTEL COMMUNICATIONS, LLC
239002	NC	SPRINT SPECTRUM, LP
239003	NC	CELLCO PARTNERSHIP FKA ALLTEL
239004	NC	CAROLINA WEST WIRELESS, INC.
239005	NC	T-MOBILE USA, INC.
239006	NC	UNITED STATES CELLULAR CORPORATION
239023	NC	ALLIED WIRELESS COMM. CORP.
249001	SC	CRICKET COMMUNICATIONS, INC
249002	SC	FTC COMMUNICATIONS, LLC
249004	SC	HORRY TELEPHONE COOPERATIVE INC
259001	AL	RCC MINNESOTA, INC.
259002	AL	PINE BELT CELLULAR, INC.
259004	AL	CELLULAR SOUTH LICENSES, LLC
259005	AL	CORR WIRELESS COMMUNICATIONS, LLC
259006	AL	FARMERS CELLULAR TELEPHONE, INC.
259007	AL	NPCR, INC.
259010	AL	SOUTHERN COMMUNICATIONS SERVICES, INC.
259017	AL	ALLTEL COMMUNICATIONS, LLC
259029	AL	CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
259790	AL	SPRINT SPECTRUM, LP
259791	AL	PUBLIC SERVICE CELLULAR, INC.
259792	AL	ALLTEL COMMUNICATIONS, INC.
259908	AL	AT&T WIRELESS (AL)
269002	KY	NPCR, INC.
269005	KY	CUMBERLAND CELLULAR, INC.
269007	KY	EAST KENTUCKY NETWORK, LLC DBA APPALACHIAN WIRELESS
269008	KY	BLUEGRASS CELLULAR
269010	KY	WEST VIRGINIA PCS ALLIANCE DBA NTELOS
269024	KY	T-MOBILE CENTRAL LLC AND POWERTEL/MEM
269905	KY	NEW CINGULAR WIRELESS PCS
279001	LA	CENTENNIAL BEAUREGARD CELLULAR LLC
279002	LA	CENTENNIAL CALDWELL CELLULAR CORP.
279003	LA	CENTENNIAL HAMMOND CELLULAR LLC
279004	LA	CENTENNIAL MOREHOUSE CELLULAR LLC
279005	LA	CENTENNIAL LAFAYETTE COMMUNICATIONS LLC
279006	LA	NPCR, INC.
279008	LA	SPRINT SPECTRUM, LP
279009	LA	ALLTEL COMMUNICATIONS, INC.
279010	LA	NEW CINGULAR WIRELESS PCS, LLC
279012	LA	KAPLAN TELEPHONE CO. DBA PACE COMMUNICATIONS
279028	LA	CENTENNIAL HAMMOND CELLULAR LLC
279029	LA	CENTENNIAL BEAUREGARD CELLULAR LLC
279030	LA	CENTENNIAL BEAUREGARD CELLULAR LLC
279041	LA	CENTRAL LOUISIANA CELLULAR, LLC
289001	MS	CELLULAR SOUTH LICENSES, LLC

289002	MS	RCC MINNESOTA, INC.
289004	MS	CENTENNIAL CLAIRBORNE CELLULAR CORP.
289005	MS	CENTENNIAL CELLULAR TRI-STATE OPERATING PARTNERSHIP - MS
289006	MS	NPCR, INC.
289008	MS	SPRINT SPECTRUM, LP
289010	MS	ALLTEL COMMUNICATIONS, INC.
289912	MS	NEW CINGULAR WIRELESS PCS, LLC
299002	TN	NPCR, INC.
299004	TN	SPRINT SPECTRUM, LP
299010	TN	UNITED STATES CELLULAR TELEPHONE CO. (GREATER KNOXVILLE) LP
299905	TN	ADVANTAGE CELLULAR SYSTEMS, INC.
319001	MI	RFB CELLULAR, INC.
319005	MI	THUMB CELLULAR LLC
319006	MI	CENTENNIAL MICHIGAN RSA 6 CELLULAR CORP.
319007	MI	CENTENNIAL MICHIGAN RSA 7 CELLULAR CORP.
319008	MI	MICHIANA METRONET, INC. - MI
319009	MI	NPI-OMNIPOINT WIRELESS, LLC
319010	MI	ALLTEL COMMUNICATIONS, INC.
319012	MI	AMERICAN CELLULAR CORP. (MI)
319017	MI	SPRINT SPECTRUM L.P. (DBA SPRINT PCS)
319018	MI	ALLTEL COMMUNICATIONS, LLC
319019	MI	MI RSA #9 LIMITED PARTNERSHIP
319026	MI	NEW CINGULAR WIRELESS PCS, LLC, D/B/A AT&T MOBILITY
319912	MI	DOBSON CELLULAR SYSTEMS, INC. (MI)
329001	IN	SOUTH BEND METRONET, INC.
329002	IN	ELKHART METRONET, INC.
329003	IN	MEGA COMM LLC
329004	IN	CENTENNIAL RANDOLPH CELLULAR LLC
329005	IN	CENTENNIAL CELLULAR TRI-STATE OPERATING PARTNERSHIP - IN
329006	IN	MICHIANA METRONET, INC. - IN
329008	IN	NPCR, INC.
329910	IN	SPRINT SPECTRUM,L.P. (IN)
339001	WI	CTC TELCOM, INC.
339006	WI	MIDWEST WIRELESS WISCONSIN, LLC
339007	WI	UNITED STATES CELLULAR CORPORATION
339009	WI	NPCR, INC.
339010	WI	WISCONSIN RSA #4 LIMITED PARTNERSHIP
339011	WI	WAUSAU CELLULAR TELEPHONE COMPANY, LP
339012	WI	WISCONSIN RSA #10 LIMITED PARTNERSHIP
339013	WI	METRO SOUTHWEST PCS, LLP
339014	WI	BROWN COUNTY MSA CELLULAR LTD. PARTNERSHIP
339015	WI	NSIGHTTEL WIRELESS, LLC
339016	WI	WISCONSIN RSA #3 LIMITED PARTNERSHIP
339017	WI	ALLTEL COMMUNICATIONS, INC.
339020	WI	AIRADIGM COMMUNICATIONS INC.
339023	WI	WI RSA #1 LIMITED PARTNERSHIP

339024	WI	WI RSA #7 LIMITED PARTNERSHIP
339920	WI	NEW CINGULAR WIRELESS PCS, LLC (AT&T MOBILITY)
349007	IL	UNITED STATES CELLULAR CORPORATION
349008	IL	ILLINOIS VALLEY CELLULAR RSA 2 - I
349009	IL	ILLINOIS VALLEY CELLULAR RSA 2 - II
349010	IL	ILLINOIS VALLEY CELLULAR RSA 2 - III
349011	IL	CELLULAR PROPERTIES DBA CELLULAR ONE OF EAST CENTRAL ILLINOI
359004	IA	WINNEBAGO COOPERATIVE TELEPHONE ASSOCIATION (FKA FOREST CITY)
359008	IA	SOUTH SLOPE COOPERATIVE
359010	IA	MIDWEST WIRELESS IOWA, LLC
359016	IA	UNITED STATES CELLULAR
359017	IA	WESTERN WIRELESS CORP.
359027	IA	IOWA WIRELESS SERVICES, L.P.
359028	IA	MAC WIRELESS, LLC
359029	IA	SOUTHEAST WIRELESS, INC.
359030	IA	COOPERATIVE TELEPHONE CO.
359031	IA	OLIN TELEPHONE CO., INC.
359032	IA	CST COMMUNICATIONS, INC
359033	IA	MONTEZUMA MUTUAL TELEPHONE CO.
359034	IA	MILL VALLEY WIRELESS
359036	IA	EAST BUCHANAN TELEPHONE COOPERATIVE
359037	IA	KCTC PCS
359038	IA	SHARON TELEPHONE COMPANY
359039	IA	WELLMAN COOP. TELEPHONE ASSOC.
359041	IA	WAPSI WIRELESS, LLC
359042	IA	BENTON/LINN WIRELESS LLC
359043	IA	NORTHEAST IOWA TELEPHONE CO.
359044	IA	COMMUNITY DIGITAL WIRELESS, LLC
359045	IA	SEI WIRELESS LLC
359046	IA	CEDAR COUNTY PCS, LLC
359047	IA	BROOKLYN MUTUAL TELEPHONE CO.
359053	IA	IOWA RSA NO. 2 LIMITED PARTNERSHIP
359054	IA	RSA 1 LIMITED PARTNERSHIP
359056	IA	NSP, LC DBA CELLCOM
359057	IA	IOWA RSA #12, LLC DBA CELLCOM
359058	IA	IOWA RSA #3, LLC DBA CELLCOM
359060	IA	NPCR, INC.
359064	IA	GREAT LAKES OF IOWA, INC.
359070	IA	IOWA RSA 7
359071	IA	IOWA RSA 8
359072	IA	IOWA RSA 10
359075	IA	BARNES CITY COOPERATIVE TELEPHONE COMPANY
359081	IA	D-C COMMUNICATIONS
359082	IA	FMTC WIRELESS
359083	IA	DUMONT WIRELESS

359084	IA	CEDAR-WAPSIE COMMUNICATIONS, INC.
359086	IA	ROCKWELL COOPERATIVE TELEPHONE ASSOCIATION WIRELESS
359087	IA	BALDWIN NASHVILLE TELEPHONE COMPANY WIRELESS
359088	IA	ONSLow COOPERATIVE TELEPHONE ASSOCIATION WIRELESS
359089	IA	OGDEN TELEPHONE COMPANY
359090	IA	CENTER JUNCTION TELEPHONE CO.
359091	IA	VAN BUREN WIRELESS COMPANY, INC.
359092	IA	RADCLIFFE TELEPHONE CO., INC. (WIRELESS)
359093	IA	WINNEBAGO COOPERATIVE TELEPHONE ASSOCIATION
359098	IA	COMM 1 WIRELESS INC.
359100	IA	HARDIN COUNTY WIRELESS
359101	IA	LONG LINES WIRELESS, LLC
359102	IA	CCM WIRELESS, INC.
359103	IA	BERNARD COMMUNICATIONS, INC.
359107	IA	NORTH CENTRAL WIRELESS
359109	IA	MODERN COMMUNICATIONS
359110	IA	DALLAS COUNTY WIRELESS
359111	IA	CLAY COUNTY COMMUNICATIONS
359112	IA	HOSPERS TELEPHONE COMPANY
359113	IA	SKYLINK, LC
359114	IA	PREMIER WIRELESS, INC.
359115	IA	ALLTEL COMMUNICATIONS, LLC
359117	IA	TERRIL COMMUNICATIONS, LLC
359118	IA	C-M-L TEL COOPERATIVE ASSN
359119	IA	RINGSTED COMMUNICATIONS COMPANY
359120	IA	SCRANTON TELEPHONE COMPANY
359121	IA	LAKES AREA WIRELESS, L.C.
359122	IA	MINERVA VALLEY WIRELESS, INC.
359124	IA	SAC COUNTY MUTUAL TELEPHONE COMPANY
369001	MN	WESTERN WIRELESS
369002	MN	MIDWEST WIRELESS COMMUNICATIONS, LLC
369004	MN	RCC MINNESOTA
369005	MN	WIRELESS ALLIANCE, LLC
369009	MN	RCC MINNESOTA, INC. (SMN)
369012	MN	ALLTEL COMMUNICATIONS, LLC
369013	MN	ALLTEL COMMUNICATIONS, LLC
369909	MN	AMERICAN CELLULAR CORPORATION (MN)
369911	MN	CELLULAR MOBILE SYSTEMS OF ST. CLOUD
379004	NE	NEBRASKA TECH. & TELECOMMUNICATIONS, INC.
379008	NE	NORTH EAST COLORADO CELLULAR, INC.
379013	NE	ALLTEL COMMUNICATIONS OF NEBRASKA, INC.
379019	NE	USCOC OF NEBRASKA/KANSAS LLC DBA U.S. CELLULAR
379021	NE	ALLTEL COMMUNICATIONS, LLC
389001	ND	WESTERN WIRELESS
389004	ND	NORTH DAKOTA NETWORK COMPANY
389005	ND	BISMARCK MSA LP

389006	ND	NORTH CENTRAL RSA 2 OF NORTH DAKOTA LP
389007	ND	NORTHWEST DAKOTA CELLULAR OF NORTH DAKOTA LP
389008	ND	NORTH DAKOTA RSA 3 LP
389009	ND	BADLANDS CELLULAR OF ND LP
389010	ND	NORTH DAKOTA 5 - KIDDER LP
389013	ND	SAGEBRUSH CELLULAR, INC.
389014	ND	STANDING ROCK TELECOMMUNICATIONS, INC
399001	SD	WESTERN WIRELESS (PINE RIDGE RESERVATION) - CL
399002	SD	WESTERN WIRELESS
399003	SD	RCC MINNESOTA, INC.
399004	SD	WIRELESS ALLIANCE, LLC
399009	SD	BROOKINGS MUNICIPAL UTILITIES D/B/A SWIFTEL COMMUNICATIONS
399014	SD	JAMES VALLEY WIRELESS, LLC
399015	SD	AT&T MOBILITY (PINE RIDGE)
399016	SD	LONG LINES WIRELESS, LLC
399018	SD	CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
409001	AR	SPRINT SPECTRUM DBA SPRINT PCS
409002	AR	NPCR, INC.
409003	AR	CELLCO PARTNERSHIP FKA ALLTEL
409004	AR	CINGULAR WIRELESS (AR)
419001	KS	WESTERN WIRELESS
419002	KS	SPRINT SPECTRUM LP / PHILLIECO LP (DBA SPRINT PCS)
419003	KS	RCC MINNESOTA, INC.
419009	KS	EPIC TOUCH COMPANY
419010	KS	NEX-TECH WIRELESS, LLC
419011	KS	UNITED WIRELESS COMMUNICATION INC.
419012	KS	USCOC OF NEBRASKA/KANSAS LLC
419014	KS	CELLULAR NETWORK PARTNERSHIP DBA PIONEER CELLULAR
419015	KS	WESTLINK COMMUNICATIONS, LLC
419020	KS	NE COLORADO CELLULAR, INC. D/B/A VIAERO WIRELESS
419905	KS	ALLTEL COMMUNICATIONS (WIRELESS KS)
429007	MO	UNITED STATES CELLULAR CORPORATION
429789	MO	NORTHWEST MISSOURI CELLULAR
429790	MO	MISSOURI RSA NO. 5 PARTNERSHIP
439004	OK	UNITED STATES CELLULAR CORPORATION
439005	OK	DOBSON CELLULAR SYSTEMS, INC.
439008	OK	PANHANDLE TELECOMMUNICATIONS SYSTEMS, INC.
439010	OK	AMERICAN CELLULAR CORPORATION
439011	OK	EPIC TOUCH CO.
439012	OK	PINE CELLULAR PHONES, INC. - CL
439013	OK	CELLULAR NETWORK PARTNERSHIP
439017	OK	CROSS WIRELESS LLC DBA SPROCKET WIRELESS LLC - CL
439019	OK	CROSS VALLIANT CELLULAR PARTNERSHIP - CL
439024	OK	OKLAHOMA WESTERN TELEPHONE CO., DBA OKLAHOMA WESTERN CE - CL
439026	OK	OKLAHOMA INDEPENDENT RSAS PARTNERSHIP

439031	OK	CELLULAR NETWORK PARTNERSHIP - CL
439032	OK	PANHANDLE TELECOMMUNICATION SYSTEMS INC. - CL
439035	OK	UNITED STATES CELLULAR CORP - CL
439039	OK	OKLAHOMA INDEPENDENT RSA-5 PARTNERSHIP - CL
449003	TX	WESTERN WIRELESS
449017	TX	SPRINT SPECTRUM, LP
449018	TX	CT CUBE LP
449019	TX	PANHANDLE TELECOMMUNICATION SYSTEMS, INC.
449022	TX	NEW CINGULAR WIRELESS PCS, LLC
449026	TX	MID-TEX CELLULAR LTD.
449031	TX	TEXAS RSA 1 LIMITED PARTNERSHIP DBA XIT WIRELESS
449032	TX	CAPROCK CELLULAR LIMITED PARTNERSHIP
449034	TX	ALLTEL COMMUNICATIONS, INC.
449036	TX	TEXAS RSA 8 SOUTH LIMITED PARTNERSHIP DBA WESTEX WIRELESS
449037	TX	PLATEAU TELECOMMUNICATIONS, INC. (TEXAS RSA 3 LIMITED PARTNE
449041	TX	ETEX COMMUNICATIONS, LP DBA ETEX WIRELESS
449043	TX	CGKC&H #2 RURAL LIMITED PARTNERSHIP DBA WEST CENTRAL WIRELES
449046	TX	CGKC&H #1 L. P. FIVE STAR WIRELESS
449048	TX	PEOPLES WIRELESS SERVICES
459001	AZ	SMITH BAGLEY, INC. - CL
459002	AZ	SMITH BAGLEY, INC. (NON-RESERVATION)
459003	AZ	SPRINT SPECTRUM, LP
469001	CO	NORTHEAST COLORADO CELLULAR, INC.
469003	CO	WESTERN WIRELESS
469007	CO	ALLTEL COMMUNICATIONS, LLC
479006	ID	EDGE WIRELESS, LLC
479008	ID	SYRINGA WIRELESS, LLC
479009	ID	CTC TELECOM, INC
479011	ID	GOLD STAR COMMUNICATIONS LLC
479012	ID	ALLIED WIRELESS COMMUNICATIONS CORP
489001	MT	MID-RIVERS TEL. COOP.
489004	MT	WESTERN WIRELESS - MT
489005	MT	CABLE & COMMUNICATIONS CORPORATION
489006	MT	SAGEBRUSH CELLULAR, INC.
489009	MT	MTPCS, LLC D/B/A CHINOOK WIRELESS
489010	MT	SAGEBRUSH CELLULAR, INC. - CL
489011	MT	MTPCS, LLC DBA CELLULAR ONE - CL
499001	NM	SMITH BAGLEY
499003	NM	WESTERN WIRELESS
499004	NM	SPRINT SPECTRUM, LP
499006	NM	NEW MEXICO RSA 2
499007	NM	NEW MEXICO RSA 4-EAST LIMITED PARTNERSHIP
499009	NM	SMITH BAGLEY, INC. - CL
499010	NM	NEW MEXICO RSA 6-II
509002	UT	SMITH BAGLEY, INC. - CL

509003	UT	SPRINT SPECTRUM, LP
519002	WY	WESTERN WIRELESS
519005	WY	GOLD STAR COMMUNICATIONS, LLC
519007	WY	WWC HOLDING CO., DBA CELLULAR ONE
519905	WY	UNION TELEPHONE CO. DBA UNION CELLULAR
529001	WA	UNITED STATES CELLULAR CORPORATION
529002	WA	RCC MINNESOTA, INC.
529003	WA	WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP
529004	WA	EASTERN SUB-RSA LIMITED PARTNERSHIP
529008	WA	SPRINT SPECTRUM, LP
529013	WA	T-MOBILE WEST CORPORATION
529910	WA	CINGULAR WIRELESS, LLC D/B/A AT&T WIRELESS (WA)
539001	OR	RCC MINNESOTA, INC.
539002	OR	UNITED STATES CELLULAR CORPORATION
539004	OR	EDGE WIRELESS
539006	OR	CINGULAR WIRELESS (OR)
539007	OR	EAGLE TELEPHONE SYSTEMS, INC. DBA SNAKE RIVER PCS
549002	CA	WESTERN WIRELESS
559001	NV	WESTERN WIRELESS
559002	NV	CC CELLULAR D/B/A CC COMMUNICATIONS
559004	NV	ALLTEL COMMUNICATIONS, LLC
559005	NV	COMMNET OF NEVADA, LLC
559007	NV	COMMNET OF NEVADA, LLC
619002	AK	ALASKA DIGITEL LLC - CL
619003	AK	MATANUSKA-KENAI, INC. - CL
619004	AK	DOBSON CELLULAR SYSTEMS, INC.
619005	AK	ALASKA COMMUNICATIONS SYSTEMS HOLDING, INC. - CL
619006	AK	COPPER VALLEY WIRELESS, INC. - CL
619007	AK	CORDOVA WIRELESS COMMUNICATIONS, INC. - CL
619008	AK	BRISTOL BAY CELLULAR PARTNERSHIP
619009	AK	UNICOM, INC. - CL
619010	AK	ASTAC WIRELESS LLC - CL
619011	AK	OTZ TELECOMMUNICATIONS, INC.
619012	AK	WINDY CITY CELLULAR
619013	AK	TELALASKA CELLULAR, INC.
619014	AK	GCI COMMUNICATION CORP.
629001	HI	NPCR, INC.
629002	HI	CORAL WIRELESS DBA MOBI PCS
629003	HI	T-MOBILE WEST CORPORATION
639001	PR	CENTENNIAL PUERTO RICO OPERATIONS CORP.
639002	PR	SPRINT SPECTRUM, LP
639003	PR	SUNCOM WIRELESS PUERTO RICO OPERATING CO. LLC
639005	PR	CINGULAR WIRELESS
639006	PR	PUERTO RICO TELEPHONE COMPANY D/B/A VERIZON WIRELESS PUERTO
639007	PR	PR WIRELESS INC.

649001	VI	CENTENNIAL USVI OPERATIONS CORPORATION
649002	VI	CHOICE COMMUNICATIONS, LLC
659001	MP	GUAM CELLULAR AND PAGING, INC.
659002	MP	PTI PACIFICA, INC.
669001	GU	GUAM CELLULAR AND PAGING, INC. DBA GUAMCELL COMMUNICATIONS
669002	GU	IT&E OVERSEAS, INC.
669003	GU	PULSE MOBILE, LLC
669004	GU	PTI PACIFICA, INC. DBA IT&E
679000	AS	AST TELECOM, LLC DBA BLUE SKY COMMUNICATIONS
679001	AS	AMERICAN SAMOA TELECOMMUNICATIONS AUTHORITY WIRELESS DIVISION