

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible for)	
Universal Service Support)	
)	CC Docket No. 09-197
i-wireless, LLC)	
)	
Petition for Limited Designation as an Eligible)	
Telecommunications Carrier in the States of)	
Alabama, Connecticut, Delaware, New Hampshire)	
New York, North Carolina, Tennessee,)	
the Commonwealth of Virginia, and)	
the District of Columbia)	

**SUPPLEMENT TO THE PETITION FOR LIMITED DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATES OF
ALABAMA, CONNECTICUT, DELAWARE, NEW HAMPSHIRE, NEW YORK,
NORTH CAROLINA, TENNESSEE, THE COMMONWEALTH OF VIRGINIA, AND
THE DISTRICT OF COLUMBIA**

On August 24, 2010, i-wireless, LLC (“i-wireless”) filed a petition (“Petition”) seeking limited designation as an Eligible Telecommunications Carrier (“ETC”) in the States of Alabama, Connecticut, Delaware, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia (collectively, the “Non-Jurisdictional States”) pursuant to Section 214(e)(6) of the Communications Act and Section 54.201 of the rules of the Federal Communications Commission (“FCC” or “Commission”), solely for the purposes of offering services supported by the Universal Service Fund’s (“USF”) Low-Income program. In this Supplement to the Petition (“Supplement”), i-wireless provides additional information in order to further illustrate how it satisfies the requirements for designation as an

ETC in the Non-Jurisdictional States.¹ In particular, i-wireless (1) more fully describes its authorized service area in the Non-Jurisdictional States in which it seeks ETC designation, including the service areas of the non-rural and rural telephone companies that i-wireless's service area encompasses; (2) commits to providing the supported services throughout its proposed designated service area in conformity with Commission rules; (3) commits to remaining functional in emergencies; (4) certifies that it will satisfy applicable consumer protection and service quality standards; (5) describes how its calling plans offer local usage comparable to the relevant incumbent local exchange carriers' ("ILECs") plans; and (6) acknowledges that the Commission may require i-wireless to provide equal access under certain circumstances. In addition, i-wireless provides a declaration regarding the truth and accuracy of the Petition and Supplement.²

I. I-WIRELESS REQUESTS ETC DESIGNATION IN ITS SERVICE AREAS IN THE NON-JURISDICTIONAL STATES FOR PARTICIPATION IN THE LIFELINE PROGRAM

As discussed in its Petition and consistent with prior orders granting other Mobile Virtual Network Operators ETC status,³ i-wireless requests ETC designation for its entire service area in Alabama, Connecticut, Delaware, the District of Columbia, New Hampshire, New York, North Carolina, Tennessee, and Virginia (*i.e.*, the area served by the facilities-based carriers from

¹ The Wireline Competition Bureau sought comment on i-wireless' application. *See* Public Notice, Comment Sought on i-wireless, LLC Petition For Designation As An Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia, DA 10-1676, 25 FCC Rcd 12669 (rel. Sept. 2, 2010). No party objected to grant of the Petition.

² *See* Exhibit 2.

³ *See* *Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005).

whom it obtains wholesale service), but excluding any Tribal Areas. i-wireless understands that its services area overlaps with several rural carriers' service areas, but maintains that the public interest factors described in its Petition justify its designation in these service areas, especially since it only seeks ETC designation for purposes of participation in the Lifeline program. i-wireless does not seek ETC status in any Tribal Areas. Attached at Exhibit 1 is a chart reflecting the service areas of the non-rural and rural telephone companies that i-wireless's authorized service area covers.

II. I-WIRELESS COMMITS TO PROVIDE THE SERVICES THROUGHOUT ITS PROPOSED DESIGNATED SERVICE AREA IN CONFORMITY WITH COMMISSION RULES (47 C.F.R. § 54.202(a)(1)(i))

i-wireless commits to provide the supported services throughout the proposed designated service area, consistent with applicable requirements including the Commission's ETC service provisioning requirements listed in 47 C.F.R. § 54.202. When a potential customer requests service within the proposed designated service area, but outside of i-wireless's network coverage, i-wireless will follow the process specified in 47 C.F.R. § 54.202(a)(1)(i). Specifically, i-wireless will determine, in cooperation with its vendors to the extent necessary, if service can be provided at reasonable cost by: (1) modifying or replacing the requested customer's equipment; (2) reselling from another carrier's facilities to provide service; or (3) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment.

III. I-WIRELESS WILL REMAIN FUNCTIONAL IN EMERGENCIES (47 C.F.R. § 54.202(a)(2))

i-wireless commits to remaining functional during emergency situations. As described in the Petition, i-wireless purchases wireless network services on a wholesale basis from Sprint Nextel, a large, national carrier that is itself subject to various regulatory requirements to remain

functional in emergencies. Furthermore, i-wireless is subject to its own 911 requirements in 47 C.F.R. 20.18(m), and has committed to specific 911 and E911-related requirements – including with respect to E911 handsets – as part of its Compliance Plan previously approved by the Commission.⁴

IV. I-WIRELESS WILL SATISFY APPLICABLE CONSUMER PROTECTION AND SERVICE QUALITY STANDARDS (47 C.F.R. § 54.202(a)(3))

i-wireless commits to continuing compliance with all applicable service quality standards and consumer protection rules. i-wireless will comply with all applicable state and federal consumer protection and service quality standards, as well as the CTIA Consumer Code for Wireless Service. i-wireless has already adopted this code for its existing operations, and will honor the code in the proposed designated service area.

V. I-WIRELESS'S CALLING PLANS OFFER LOCAL USAGE COMPARABLE TO THE RELEVANT ILECS' PLANS (47 C.F.R. §54.202(a)(4))

i-wireless's calling plans provide local calling capability comparable to that offered by the relevant ILECs in i-wireless's operating areas. i-wireless's wireless minutes may be used to call anywhere in the United States, which includes local calls. i-wireless's offerings will be more attractive than the ILEC calling plans, therefore, because i-wireless is offering a much larger, nationwide calling plan, in addition to mobility and additional features. Furthermore, in its Commission-approved Compliance Plan, i-wireless committed offer at least one Lifeline plan that provides consumers with at least 250 included minutes-of-use per month at the lowest end user rate permitted under FCC rules.⁵

⁴ See i-wireless LLC's Revised Compliance Plan, CC Docket No. 96-45, WC Docket No. 09-197 (filed Sept. 9, 2011) ("Compliance Plan") at 3-4; *i-wireless, LLC Petition for Forbearance from 47 USC. §214(e)(1)(A)*, CC Docket No. 96-45, WC Docket No. 09-197, DA 11-1763, 2011 WL 5038791, at *2 ¶ 3 and n. 12 (rel. Oct. 21, 2011) ("*Compliance Plan Order*").

⁵ Compliance Plan at 12; *Compliance Plan Order* at ¶ 4(p).

VI. I-WIRELESS ACKNOWLEDGES THAT THE COMMISSION MAY REQUIRE IT TO PROVIDE EQUAL ACCESS UNDER CERTAIN CIRCUMSTANCES (47 C.F.R. §54.202(a)(5))

The Commission has determined that wireless carriers, such as i-wireless, are not currently required to provide equal access to interexchange service, but may be required to provide equal access under certain circumstances.⁶ i-wireless will comply with all Commission orders regarding any future obligations of wireless carriers to provide equal access.

⁶ See *In Re Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776 (FCC rel. May 8, 1997).

VII. CONCLUSION

As discussed above and in the underlying Petition, designation of i-wireless as an ETC in the Non-Jurisdictional States accords with the requirements of Section 214(e)(6) of the Act and is in the public interest.

For all of the forgoing reasons, i-wireless respectfully requests that the Commission designate i-wireless as an ETC in the Non-Jurisdictional States.

Respectfully submitted,

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December 6, 2011

EXHIBIT 1

State	SAC	Study Area Name	Rural (R) or Non- Rural (N)
AL	250282	BLOUNTSVILLE TEL CO	R
AL	250283	BRINDLEE MOUNTAIN	R
AL	250284	BUTLER TEL CO	R
AL	250285	CASTLEBERRY TEL CO	R
AL	250286	NATIONAL OF ALABAMA	R
AL	250290	FARMERS TELECOM COOP	R
AL	250295	GRACEBA TOTAL COMM	R
AL	250298	GULF TEL CO - AL	R
AL	250299	HAYNEVILLE TEL CO	R
AL	250300	HOPPER TELECOMM. CO.	R
AL	250301	FRONTIER-LAMAR CNTY	R
AL	250302	WINDSTREAM AL	R
AL	250304	MILLRY TEL CO	R
AL	250305	MON-CRE TEL COOP	R
AL	250306	FRONTIER COMM.-AL	R
AL	250307	MOUNDEVILLE TEL CO	R
AL	250308	NEW HOPE TEL COOP	R
AL	250311	OAKMAN TEL CO (TDS)	R
AL	250312	OTELCO TELEPHONE LLC	R
AL	250314	PEOPLES TEL CO	R
AL	250315	PINE BELT TEL CO	R
AL	250316	RAGLAND TEL CO	R
AL	250317	ROANOKE TEL CO	R
AL	250318	FRONTIER COMM-SOUTH	R
AL	250322	UNION SPRINGS TEL CO	R
AL	255181	SO CENTRAL BELL-AL	N
AL	259788	CENTURYTEL-AL-SOUTH	N
AL	259789	CENTURYTEL-AL-NORTH	N
CT	132454	THE WOODBURY TEL CO	R
CT	135200	SOUTHERN NEW ENGLAND	N
DC	575020	VERIZON WA, DC INC.	N
DE	565010	VERIZON DELAWARE INC	N
NC	230468	ATLANTIC MEMBERSHIP	R
NC	230469	BARNARDSVILLE TEL CO	R
NC	230470	CAROLINA TEL & TEL	R
NC	230471	CENTEL OF NC	R
NC	230473	CITIZENS TEL CO	R
NC	230474	CONCORD TEL CO	R
NC	230476	WINDSTREAM NC	R
NC	230478	ELLERBE TEL CO	R
NC	230479	FRONTIER COMMUNICATIONS OF THE CAROLINAS, INC.	N
NC	230483	LEXCOM TELEPHONE CO.	R
NC	230485	MEBTEL, INC.	R

NC	230491	N.ST. DBA N. ST.COMM	R
NC	230494	PINEVILLE TEL CO	R
NC	230495	RANDOLPH TEL CO	R
NC	230496	RANDOLPH MEMBERSHIP	R
NC	230497	PIEDMONT MEMBERSHIP	R
NC	230498	SALUDA MOUNTAIN TEL	R
NC	230500	SERVICE TEL CO	R
NC	230501	SKYLINE MEMBERSHIP	R
NC	230502	STAR MEMBERSHIP CORP	R
NC	230503	SURRY MEMBERSHIP	R
NC	230505	TRI COUNTY TEL MEMBR	R
NC	230509	FRONTIER COMMUNICATIONS OF THE CAROLINAS, INC.	N
NC	230510	WILKES MEMBERSHIP	R
NC	230511	YADKIN VALLEY TEL	R
NC	230864	VERIZON SOUTH INC. DBA NORTH CAROLINA	N
NC	235193	SOUTHERN BELL-NC	N
NH	120038	BRETTON WOODS TEL CO	R
NH	120039	GRANITE STATE TEL	R
NH	120042	DIXVILLE TEL CO	R
NH	120043	DUNBARTON TEL CO	R
NH	120045	KEARSARGE TEL CO	R
NH	120047	MERRIMACK COUNTY TEL	R
NH	120049	UNION TEL CO	R
NH	120050	WILTON TEL CO - NH	R
NH	123321	MCTA, INC.	R
NH	125113	NORTHERN NEW ENGLAND TELEPHONE OPERATIONS LLC	N
NY	150071	ARMSTRONG TEL CO-NY	R
NY	150072	FRONTIER-AUSABLE VAL	R
NY	150073	BERKSHIRE TEL CORP	R
NY	150076	CASSADAGA TEL CORP	R
NY	150077	CHAMPLAIN TEL CO	R
NY	150078	CHAUTAUQUA & ERIE	R
NY	150079	CHAZY & WESTPORT	R
NY	150081	CITIZENS HAMMOND NY	R
NY	150084	TACONIC TEL CORP	R
NY	150085	CROWN POINT TEL CORP	R
NY	150088	DELHI TEL CO	R
NY	150089	DEPOSIT TEL CO	R
NY	150091	DUNKIRK & FREDONIA	R
NY	150092	EDWARDS TEL CO	R
NY	150093	EMPIRE TEL CORP	R
NY	150095	FISHERS ISLAND TEL	R
NY	150097	GERMANTOWN TEL CO	R
NY	150099	HANCOCK TEL CO	R
NY	150100	FRONTIER COMM OF NY	R
NY	150104	MARGARETVILLE TEL CO	R
NY	150105	MIDDLEBURGH TEL CO	R

NY	150106	WINDSTREAM NY-FULTON	R
NY	150107	NEWPORT TEL CO	R
NY	150108	NICHOLVILLE TEL CO	R
NY	150109	WINDSTREAM-JAMESTOWN	R
NY	150110	OGDEN TEL DBA FRNTER	R
NY	150111	ONEIDA COUNTY RURAL	R
NY	150112	ONTARIO TEL CO, INC.	R
NY	150113	WINDSTREAM RED JACKT	R
NY	150114	ORISKANY FALLS TEL	R
NY	150116	PATTERSONVILLE TEL	R
NY	150118	PORT BYRON TEL CO	R
NY	150121	FRONTIER-ROCHESTER	N
NY	150121	FRONTIER-ROCHESTER	R
NY	150122	FRONTIER-SENECA GORH	R
NY	150125	STATE TEL CO	R
NY	150128	FRONTIER-SYLVAN LAKE	R
NY	150129	TOWNSHIP TEL CO	R
NY	150131	TRUMANSBURG TEL CO.	R
NY	150133	VERNON TEL CO	R
NY	150135	WARWICK VALLEY-NY	R
NY	154532	CITIZENS-FRONTIER-NY	R
NY	154533	CITIZENS-FRONTIER-NY	R
NY	154534	CITIZENS-FRONTIER-NY	R
NY	155130	VERIZON NEW YORK	N
TN	290280	ARDMORE TEL CO	R
TN	290552	CENTURYTEL-ADAMSVILL	R
TN	290553	BEN LOMAND RURAL	R
TN	290554	BLED SOE TEL COOP	R
TN	290557	CENTURY-CLAIBORNE	R
TN	290559	CONCORD TEL EXCHANGE	R
TN	290561	CROCKETT TEL CO	R
TN	290562	DEKALB TEL COOP	R
TN	290565	HIGHLAND TEL COOP-TN	R
TN	290566	HUMPHREY'S COUNTY	R
TN	290567	UNITED INTER-MT-TN	R
TN	290570	LORETTO TEL CO	R
TN	290571	MILLINGTON TEL CO	R
TN	290573	NORTH CENTRAL COOP	R
TN	290574	CENTURYTEL-OOLTEWAH	R
TN	290575	TENNESSEE TEL CO	R
TN	290576	PEOPLES TEL CO	R
TN	290578	TELLICO TEL CO	R
TN	290579	TWIN LAKES TEL COOP	R
TN	290580	CTZENS-FRNTR-VOL ST	R
TN	290581	UTC OF TN	R
TN	290583	WEST TENNESSEE TEL	R
TN	290584	YORKVILLE TEL COOP	R

TN	290598	WEST KENTUCKY RURAL TELEPHONE	R
TN	294336	CITIZENS-FRONTIER-TN	R
TN	295185	SO. CENTRAL BELL -TN	N
VA	190217	AMELIA TEL CORP	R
VA	190219	BUGGS ISLAND COOP	R
VA	190220	BURKE'S GARDEN TEL	R
VA	190225	CITIZENS TEL COOP	R
VA	190226	NTELOS, INC.	R
VA	190233	VERIZON S-VA(CONTEL)	N
VA	190237	HIGHLAND TEL COOP	R
VA	190238	MGW TEL. CO. INC.	R
VA	190239	NEW HOPE TEL COOP	R
VA	190243	PEMBROKE TEL COOP	R
VA	190244	PEOPLES MUTUAL TEL	R
VA	190248	SCOTT COUNTY COOP	R
VA	190249	ROANOKE & BOTETOURT	R
VA	190250	SHENANDOAH TEL CO	R
VA	190253	VIRGINIA TEL CO	R
VA	190254	CENDEL OF VIRGINIA	R
VA	190479	VERIZON SOUTH-VA	R
VA	190567	UNITED INTER-MT-VA	R
VA	193029	NEW CASTLE TEL. CO.	R
VA	195040	VERIZON VIRGINIA INC	N
VA	197251	SHENANDOAH TELEPHONE COMPANY - NR	R

EXHIBIT 2

Declaration of i-wireless, LLC

I, Paul McAleese, do hereby declare under penalty of perjury as follows:

1. I am Chief Executive Officer of i-wireless, LLC, a North Carolina limited liability company with its principal place of business at 1 Levee Way, Suite 3104, Newport, Kentucky 41071.
2. I have read the i-wireless, LLC Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia ("Petition") and Supplement to the Petition ("Supplement"), and confirm the information contained therein to be true and correct to the best of my knowledge. In particular, I confirm that the following information is true and correct to the best of my knowledge and make the following certifications:
 - a. I certify that i-wireless is not subject to the jurisdiction of a state commission in each of the states for which ETC designation is sought, as provided on pages 7 through 9 of the Petition.
 - b. I certify that i-wireless provides all services designated for support by the Commission, as provided on pages 11 through 16 of the Petition.
 - c. I certify that i-wireless offers the supported services using resale, as permitted by *i-wireless, LLC Petition for Forbearance from 47 USC. §214(e)(1)(A)*, 25 FCC Rcd 8784 (2010), and *i-wireless, LLC Petition for Forbearance from 47 USC. §214(e)(1)(A)*, DA 11-1763, 2011 WL 5038791 (rel. October 21, 2011).
 - d. Pages 16 through 17 of the Petition accurately describe how i-wireless advertises the availability of the supported services and the charges using media of general distribution.
3. To the best of my knowledge, the Petitioner referred to in the foregoing Petition and Supplement, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) are not subject to denial of federal benefits, including Federal Communications Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 1, 2011.



Paul McAleese
Chief Executive Officer