

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
WWW.WBKLAU.COM

JENNIFER L. KOSTYU
202.383.3384
JKOSTYU@WBKLAU.COM

March 28, 2012

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Allied Wireless Communications Corporation Eligible Telecommunications
Carrier Certification and 2012 Annual Report
WC Docket No. 10-90

Dear Ms. Dortch:

On behalf of Allied Wireless Communications Corporation (“AWCC”) and pursuant to Sections 54.313 and 54.314 of the Commission’s rules,¹ enclosed please find the redacted, public version of AWCC’s Eligible Telecommunications Carrier Certification and 2012 Annual Report (“Annual Report”) relating to its designation as an eligible telecommunications carrier in certain areas in North Carolina. A confidential version of the Annual Report also is being submitted to your office under separate cover, including a request for confidential treatment pursuant to Section 0.459 of the Commission’s rules.²

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

Very truly yours,

/s/ Jennifer L. Kostyu

Jennifer L. Kostyu
*Counsel to Allied Wireless
Communications Corporation*

Enclosures

¹ 47 C.F.R. §§ 54.313, 54.314.

² *Id.* § 0.459.

REDACTED PUBLIC VERSION

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)
)
Connect America Fund) **WC Docket No. 10-90**
)

**ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION
AND 2012 ANNUAL REPORT ON BEHALF OF
ALLIED WIRELESS COMMUNICATIONS CORPORATION**

APRIL 1, 2012

REDACTED PUBLIC VERSION

I. INTRODUCTION

Pursuant to 47 U.S.C. §§54.313 and 314, Allied Wireless Communications Corporation (“AWCC” or “Company”) -with Study Area Code 239023 - submits this Eligible Telecommunications Carrier (“ETC”) Certification and 2012 Annual Report with regards to its operations in the state of North Carolina and respectfully requests the Commission to certify its eligibility to receive high-cost support from the federal universal service fund during calendar year 2013. The data in this report and the attached exhibits represent commercial and financial trade secrets regarding AWCC’s network build-out plans and other matters that are highly sensitive due to the competitive nature of the commercial wireless industry. Accordingly, AWCC respectfully requests that the Commission treat this data as confidential and withhold it from public inspection, pursuant to Sections 0.457(d)(1) and 0.459 of the Commission’s Rules.

II. BACKGROUND

Pursuant to 47 U.S.C. § 214(e)(6), the Commission has designated AWCC as an ETC in certain non-rural wire centers of Bell South/AT&T and the rural study areas of Central Telephone Company of North Carolina and Ellerbe Telephone Company, Inc.¹ A complete listing of the areas in which AWCC has been designated as an ETC, and is requesting federal universal service support, is contained in **Exhibit A** (“Designated Area”). 47 U.S.C. § 54.313(j) requires the Company to submit this report annually, no later than April 1 of each year.

III. AWCC’S ANNUAL REPORT IN ACCORDANCE WITH SECTION 54.313

47 U.S.C. § 54.313(a) requires a recipient of high cost universal service support to annually report certain information no later April 1 of each calendar year. By an Order issued February 3, 2012, the Wireline Competition Bureau clarified that only high-cost recipients that

¹ *Petition of Allied Wireless Communications Corporation for ETC Designation in the State of North Carolina*, Order, DA No. 10-1652, WC Docket No. 09-197, (rel. Aug. 30, 2010) (“*Designation Order*”).

REDACTED PUBLIC VERSION

have been designated with ETC status by the Commission pursuant to 47 U.S.C. § 214(e)(6) are required to submit the report identified above on April 1, 2012.² Accordingly, AWCC respectfully submits the following information for North Carolina in satisfaction of the Commission's annual reporting requirement.

A. Progress Report on its Service Improvement Plan

47 U.S.C. § 54.313(a)(1) requires an ETC to file a progress report on its Service Improvement Plan. 47 U.S.C. § 54.313(a)(1) specifically requires:

A progress report on its five-year service quality improvement plan pursuant to § 54.202(a), 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. The information shall be submitted at the wire center level or census block as appropriate.

AWCC submitted its proposed Five-Year Service Improvement Plan ("Service Improvement Plan"), which covers the time period January 1, 2010 through December 31, 2015, as Confidential Attachment B to its Certification and Annual Report filed October 1, 2010. Attached hereto as **Confidential Exhibit B** is AWCC's progress report on the Service Improvement Plan for calendar year 2011. AWCC's progress report includes a map detailing its progress toward meeting its plan targets in 2011, an explanation of how much universal service support was received in 2011 and how the support was used to improve signal quality, coverage or capacity on a wire center-by-wire center basis in 2011. Further, AWCC will continue to utilize federal high-cost universal service support it receives for the provision, maintenance and upgrading of facilities and service for which the support is intended consistent with §254(e) of the Telecommunications Act of 1996 and §54.7 of the Commission's rules.

² *Connect America Fund*, Order, DA No. 12-147, WC Docket No. 10-90, ¶¶ 7, 10 (rel. Feb. 3, 2012).

REDACTED PUBLIC VERSION

B. Network Outages In Designated Area

47 U.S.C. § 54.313(a)(2) requires an ETC to annually report network outages within its Designated Area. 47 U.S.C. § 54.313(a)(2) specifically requires:

detailed information on any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) at least ten percent of the end users served in a designated service area; or (ii) a 911 special facility, as defined in 47 C.F.R. § 4.5(e). Specifically, the eligible telecommunications carrier's annual report must include information detailing: (A) the date and time of onset of the outage; (B) a brief description of the outage and its resolution; (C) the particular services affected; (D) the geographic areas affected by the outage; (E) steps taken to prevent a similar situation in the future; and (F) the number of customers affected.

The pertinent information for the period January 1, 2011 through December 31, 2011 is attached hereto as **Confidential Exhibit C**.

C. Unfulfilled Requests For Service

47 U.S.C. § 54.313(a)(3) requires an ETC to annually report the number of requests for service from potential customers within the ETC's designated area that were unfulfilled during the past year. The filing must also detail how the ETC attempted to provide service to those potential customers. The required information concerning AWCC's unfulfilled requests for service within the Designated Area from January 1, 2011 through December 31, 2011 is contained in **Confidential Exhibit D**.

REDACTED PUBLIC VERSION

D. Complaints Per 1,000 Connections

47 U.S.C. § 54.313(a)(4) requires an ETC to annually report the number of complaints per 1,000 connections in the prior calendar year. AWCC received .77 complaints³ per 1,000 handsets between January 1, 2011 and December 31, 2011 in the Designated Area.

E. Certification Regarding Applicable Service Quality Standards And Consumer Protection Rules

47 U.S.C. § 54.313(a)(5) requires an ETC to certify that it is complying with applicable service quality standards and consumer protection rules. The Commission found that a wireless carrier's compliance with the CTIA Consumer Code for Wireless Service ("CTIA Code") satisfies this requirement. By the attached certification, AWCC certifies that the company is compliant with the provisions outlined identified in the CTIA Code.

F. Certification Regarding Ability to Function in Emergency Situations

47 U.S.C. § 54.313(a)(6) requires an ETC to certify to its ability to function in emergency situations as set forth in FCC Rule 54.202(a)(2). By the attached certification, as outlined in the Company's Petition for Designation as an ETC in North Carolina, AWCC certifies that is able to remain functional in emergency situations as set forth FCC Rule 54.202(a)(2).

G. AWCC Price Offerings

47 U.S.C. § 54.313(a)(7) requires an ETC to provide its price offerings in a format specified by the Wireline Competition Bureau. Although the Wireline Competition Bureau has not yet specified the format for such pricing information, AWCC includes in Exhibit E a list of its currently offered rate plans.

³ Complaints consist of written complaints from AWCC customers to the FCC, North Carolina Utilities Commission, the North Carolina Attorney General, the Better Business Bureau or other third party agency and AWCC's Executive Complaint Department.

REDACTED PUBLIC VERSION

H. Holding Company, Operating Company, Affiliate and Brand Name Information

47 U.S.C. § 54.313(a)(8) requires an ETC to identify the recipient's holding company, operating companies, affiliates and any branding, as well as universal service identifiers for each such entity by Study Area Codes. The pertinent information is attached hereto as Exhibit F.

IV. CONCLUSION

Based on the foregoing information, AWCC respectfully requests the Commission to certify the Company's eligibility to receive federal high-cost universal service support for Study Area Code 239023 in accordance with 47 C.F.R. §§ 54.313 and 54.314.

March 28, 2012



Rohan Ranaraja
Director – Regulatory Compliance
Allied Wireless Communications Corporation
1001 Technology Drive
Little Rock, Arkansas 72223
(501) 448-1249

REDACTED PUBLIC VERSION

9. The facts stated therein are true and correct to the best of my present knowledge, information and belief.

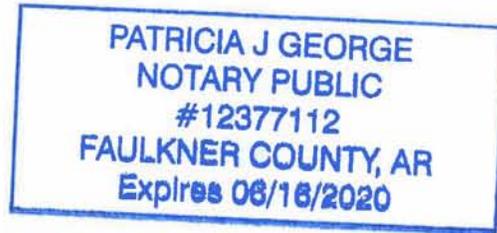


Jeffrey Humiston

Subscribed and sworn to before me
this 27 day of March, 2012

(NOTARY SEAL)


Notary Public



REDACTED PUBLIC VERSION

SUMMARY OF EXHIBITS

Exhibit A – Designated Service Area for Study Area Code 239023.

Confidential Exhibit B – 2011 Progress Report on Service Improvement Plan.

Confidential Exhibit C – 2011 Network Outage Report.

Confidential Exhibit D – 2011 Unfulfilled Requests for Service

Exhibit E – AWCC Price Offerings

Exhibit F – Holding Company, Operating Company, Affiliate and Brand Name Information.

Exhibit A
ETC Designated Area

Allied Wireless Communications Corporation
Study Area Code 239023
Exhibit A - ETC Designated Area in the State of North Carolina

Incumbent SAC	Company	Wirecenter
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMTNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DNVRNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DVSNNCPO
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GBSNNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GRVRNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HMLTNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KGMTNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LENRNCHA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LENRNCHU
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LNTNNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LNTNNCVA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LRBGNMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LTMRNCC
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LWDLNCCE
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MADNNCC
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MGTNNCGL
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MGTNNCGR
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWTNNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	RCHMNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SHLBNMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SSVLNCJE
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SSVLNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STPNNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TRMNNCMA
235193	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TYVLNCMA
230471	CENTRAL TEL. CO. OF NC	BHLHNCXA
230471	CENTRAL TEL. CO. OF NC	BISCNCXA
230471	CENTRAL TEL. CO. OF NC	CNDRNCXA
230471	CENTRAL TEL. CO. OF NC	CTWBNCXA
230471	CENTRAL TEL. CO. OF NC	GRFLNCXA
230471	CENTRAL TEL. CO. OF NC	HCKRNCXA
230471	CENTRAL TEL. CO. OF NC	HCKRNCXB
230471	CENTRAL TEL. CO. OF NC	HLDBNCXB
230471	CENTRAL TEL. CO. OF NC	MTGLNCXA
230471	CENTRAL TEL. CO. OF NC	MTVWNCXA
230471	CENTRAL TEL. CO. OF NC	SEGVNCXA
230471	CENTRAL TEL. CO. OF NC	SHFRNCXA
230471	CENTRAL TEL. CO. OF NC	TROYNCXA
230471	CENTRAL TEL. CO. OF NC	VLDSNCXA
230471	CENTRAL TEL. CO. OF NC	WENDNCXB
230478	ELLERBE TELEPHONE CO., INC.	ELRBNCXA

Exhibit E
AWCC Price Offerings



**BEST
JUST GOT
BETTER!**

BEST VALUE Unlimited

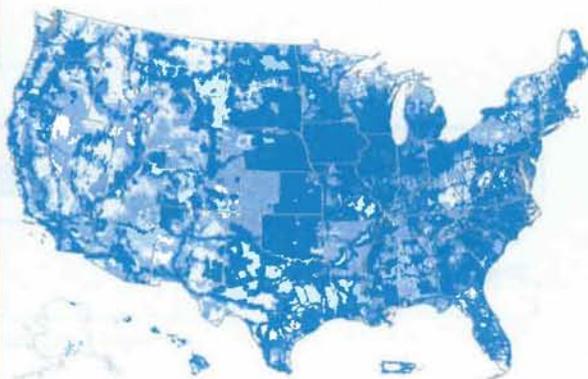
Contract & No Contract

**new
low
price**

BEST VALUE Unlimited

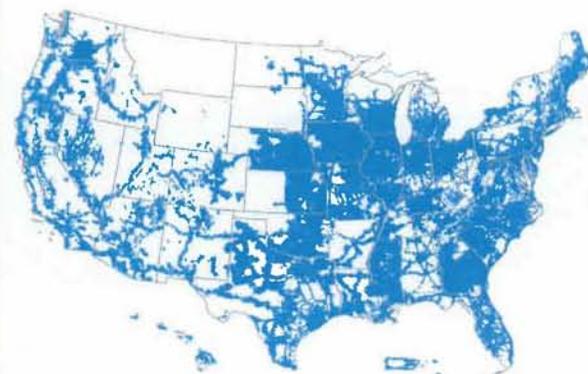
\$45_{/mo} Unlimited Talk & Text
Mobile Web* included

Contract



■ Voice and Broadband (3G or 1x) ■ Voice and High Speed (1x) □ No Coverage

No Contract



■ Voice and Broadband (3G or 1x) □ No Coverage

Add up to 4 family lines—\$40/mo per line

No credit check, no deposits

Preferred phone pricing

No roaming or long-distance charges

Smartphone Data Plans*
\$30/mo per line-2GB
\$20/mo-Mobile Hotspot

Smartphone Data Plans*
\$15/mo-100MB
\$30/mo-1GB

Convenient electronic billing* included

Refill online or at thousands of convenient refill locations: alltelwireless.com/storelocator

Manage your account online at alltelwireless.com/myaccount

* **Mobile Web:** allows access to your feature phone's browser and third party services for purchases of ringtones, graphics and other media applications but does not provide a full web browsing experience. **Data:** required with purchase of a Smartphone. Additional data 2¢ per MB for contract; 15¢ per MB for no contract. Additional 15¢ per minute calls, 10¢ per text message & 25¢ per picture message rates apply if full refill is not made on no contract plan. **Electronic billing:** required for contract plan. Paper billing available for \$2 per mo.

See additional Wireless Plans on reverse side.

Contract Plan Add Ons

Voice2TXT

Plan	Price
Turn your voicemail into text messages. Read & respond to missed calls in situations when you can't answer the phone	\$2 ⁹⁹ /mo

Phone Insurance

Plan	Price
PlatinumGuardSM Plus (covers phones \$300+) PlatinumGuard SM Plus combines insurance coverage and an enhanced warranty covering loss, theft, damage, electrical/mechanical malfunctions or defects during and after the manufacturer's warranty has expired. Insurance claim deductible: \$95.*	\$7/mo
ProductGuardSM Plus (covers phones \$299 or less) ProductGuard SM Plus combines insurance coverage and an enhanced warranty covering loss, theft, damage, electrical/mechanical malfunctions or defects during and after the manufacturer's warranty has expired. Insurance claim deductible: \$50.*	\$5/mo



1-800-alltel-1
alltelwireless.com

Contract Plans

See reverse for coverage map

Anytime Minutes	My Circle Numbers	Free Fridays	Plan	Add a Line	Text Messages	Picture Messages	Feature Phone Unlimited Messages	Smartphone Data (per line)
1000	1	-	\$39.99/mo	\$20/mo	15¢ per text	25¢ per picture	\$10/mo	-
900	15	FREE	\$59.99/mo	\$9.99/mo	15¢ per text	25¢ per picture	\$10/mo	\$30/mo-2GB
1400	15	FREE	\$79.99/mo	\$9.99/mo	15¢ per text	25¢ per picture	\$10/mo	\$30/mo-2GB
2100	25	FREE	\$99.99/mo	\$9.99/mo	15¢ per text	25¢ per picture	\$10/mo	\$30/mo-2GB

All plans include **FREE** Mobile-to-Mobile, **FREE** Long Distance and **Unlimited** Nights & Weekends

No Contract Plans

See reverse for coverage map

Pay Per Minute

Just pay for the minutes you use – 15¢ a minute all the time.

Customize your plan – Add 300 text messages for \$5/mo or 750 text messages for \$10/mo.

Pay Per Day

Choose up to four unlimited features for one low rate and get 10¢ a minute any time.

UNLIMITED Nights & Weekends	2 Features - \$0.75/day
UNLIMITED Mobile-to-Mobile	3 Features - \$1.00/day
UNLIMITED Messaging	4 Features - \$1.25/day
UNLIMITED Favorite Number Calling	

Plus any unlimited feature that is not chosen as a part of your rate plan package is only 10¢ per minute or message.

Pay Per Month

Anytime Minutes	Mobile-to-Mobile	Nights & Weekends	Plan	Text Messages	Picture Messages	Ringback Tones	Mobile Web	Data
300	UNLIMITED	1000	\$29.99/mo	10¢ per text	25¢ per picture	99¢ Monthly Subscription	\$5.99/mo \$1.99/day	\$15/mo-100MB \$30/mo-1GB

Customize your plan: Add 300 Text Messages for \$5/mo or 750 Text Messages for \$10/mo. Add Unlimited Favorite Number Calling for \$5/mo.

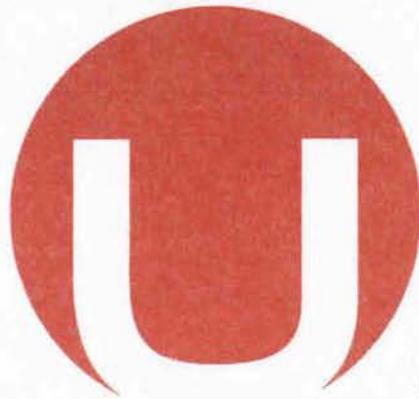
Manage your account online with My Account

- Check your balance
- Make a payment
- Check minutes of use
- View rate plan
- Get detailed phone information

Register at alltelwireless.com/myaccount

SUBJECT TO ALLTEL TERMS & CONDITIONS; see store or alltelwireless.com. Taxes & government charges apply. \$25 non-refundable activation fee and possible \$200 early termination fee apply per line. 411 directory assistance calls are currently charged \$1.99 per call plus airtime when on the Alltel network. Maps are a general representation of coverage for illustrative purposes only. We charge you a **REGULATORY COST RECOVERY CHARGE** of up to \$2.19/mo to help us defray our cost of compliance with government regulations and offset charges to us; this is neither a tax nor required by government. **Features:** all features may not be available in all areas. If not included in your plan, features are available for an additional charge. **Certain Plan Details:** usage outside of your calling plan/coverage area is subject to additional roaming, minute & long-distance charges. Nights are Mon-Thurs 9:00 pm-5:59 am. Weekends are Fri 9:00 pm-Mon 5:59 am. Mobile-to-Mobile Minutes apply to calls between eligible Alltel Wireless customers that begin & end in your plan's calling area. Call forwarding and voice mail calls excluded and use airtime. **Free Fridays** action required. Eligible customers must request this feature to be added to their account by either visiting a retail store or calling 1-800-alltel-1. Available for a limited time on current select plans \$59.99 & up. "Free Fridays" provides unlimited voice minutes beginning at 7 or 9 pm Thursday (depending on your plan & features) & ending 5:59 am Monday. **Add a Line:** limited to 4 additional lines; all share voice minutes & calling features only. ©2011 Allied Wireless Communications Corporation. All rights reserved.

PlatinumGuard and ProductGuard are services provided to subscribers of Alltel e-Securitel is the agent and provides claims servicing under this program. New Hampshire Insurance Company is the underwriter of this product. *Deductibles only apply for claims filed for lost, stolen or damaged equipment. A \$50 Processing Fee only applies to claims filed for electrical/mechanical malfunction or defect outside the 12-month manufacturer warranty period. At no time will a Processing Fee and Deductible be charged for the same claim; it's either one or the other based on the claim type (malfunction, lost, stolen, or damage). Deductibles/Processing Fees are non-refundable and payable at the time you receive your replacement. This amount is based on the non-subsidized or non-contract retail value of the phone or device at the time of purchase. Qualifying Alltel rate plan, credit approval & approved handset required.



Lifeline
prepaid wireless

Government Assisted Program

Ask a representative if you qualify.

FREE

phone

FREE

activation

FREE

first month of service

- **500** Anytime Minutes
- **500** Text Messages
- **Unlimited** Mobile-to-Mobile

all for just
\$10 per month
(10c per additional minute)

More Information:

Quick Tips for U Lifeline Payments & Refills:

- **By Phone** – #PAY (#729)
- **Refill Card or PIN** – Check your local grocery store, gas station or shopping mart for Alltel  Prepaid Refill Cards/PINs.

Pay-Per-Month details: To ensure continuous service & to receive your package benefits, you must replenish your account before your expiration date or bill cycle date. **Voice Mail:** Using & checking voice mail will reduce your account balance. If you don't set up a voice mail greeting within 60 days, your mailbox will be deleted. **Directory Assistance:** 411 calls are charged \$1.99 per call plus airtime when on the Alltel network. **Data Services:** Not included. **Georgia Residents:** Unresolved complaints concerning Lifeline/Link-Up service availability can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at (800) 282-5813. Federal, state (such as E911) & local taxes, if applicable, will be added. **Additional Information:** Off network, roaming rates vary. Bonus minutes awarded may only be used while account is in active status. This offer may be limited or withdrawn by Alltel at any time. Usage rounded up to the next full minute. All features may not be available in all areas. Checks will not be accepted for replenishments at Alltel retail locations. Subject to the Alltel Terms & Conditions for Communications Services available at any Alltel store or alltelwireless.com. ©2012 AWCC. All rights reserved.

Exhibit F

**Holding Company, Operating Company, Affiliate and Brand Name
Information**

ALLIED WIRELESS COMMUNICATIONS CORPORATION
EXHIBIT - E

