

**Revenue & Expense Data for  
Each Cell Site for Three Most Recent  
Fiscal Years**

**Exhibit 7**

**Redacted—For Public Inspection**

**Projected Revenues & Expenses on  
Cell-Site Basis for Five Years  
With & Without the Waiver**

**Exhibit 8**

**Redacted—For Public Inspection**

**List of Services Other Than Voice  
Telephone Services Provided Over  
Universal Service Supported Plan**

**Exhibit 9**

For reference, attached is a list of additional services provided to WCC subscribers. WCC rate plans for 2011 in Exhibit 4 were all-inclusive and did not charge subscribers extra for services other than voice. Thus, 100 percent of WCC subscribers used all the services, including SMS, data and roaming. WCC is in the process of implementing its 2012 rate plans that will charge for additional services. However, during the period for which the Commission is seeking this data, all the rate plans included additional services at no extra cost.

**Windy City Cellular, LLC  
List of Services Other Than Voice  
Provided Over USF Plant**

**In Addition to cellular voice services WCC provides the following over the cellular network:**

**Long Distance Calling - state and national  
Roaming - In Network and Out of Network  
SMS - Text Messaging Prepaid and Post Paid  
Data Transmission - Prepaid and Post Paid  
Voicemail services**

# **Procedures for Allocating Shared or Common Costs**

## **Exhibit 10**

**Redacted—For Public Inspection**

**Audited Financial Statements & Notes  
for Most Recent Three Years**

**Exhibit 11**

**Redacted—For Public Inspection**

# **Information on Outstanding Loans**

## **Exhibit 12**

**NO OUTSTANDING LOANS**

**Identification of Facilities to  
Be Taken Out of Service  
Absent Grant of Waiver**

**Exhibit 13**

**All WCC Facilities  
Will Be Taken Out of Service  
Absent Grant of Waiver**

**Additional Information About  
Operating, Economic, Other  
Conditions or Reasons  
Warranting Relief**

**Exhibit 14**

For reference, included in this Exhibit are the following:

- The Regulatory Commission of Alaska Order Designating WCC as an Eligible Telecommunications Carrier
- WCC Annual ETC Report for Year Ending Dec. 31, 2010
- WCC Annual ETC Report for Year Ending Dec. 31, 2011
- WCC Annual ETC Report for Year Ending Dec. 31, 2012

**Regulatory Commission of Alaska  
Order Designating WCC as  
Eligible Telecommunications Carrier**

1 STATE OF ALASKA

2 THE REGULATORY COMMISSION OF ALASKA

3 Before Commissioners:

4 Robert M. Pickett, Chairman  
5 Kate Giard  
6 Mark K. Johnson  
7 Anthony A. Price  
8 Janis W. Wilson

9 In the Matter of the Request by Windy City )  
10 Cellular, LLC for Designation as an Eligible )  
11 Telecommunications Carrier in the Study Area )  
12 Served by ADAK EAGLE ENTERPRISES LLC )  
13 d/b/a ADAK TELEPHONE UTILITY )

U-08-67

ORDER NO. 2

14 ORDER DESIGNATING ELIGIBLE TELECOMMUNICATIONS CARRIER  
15 STATUS, SUBJECT TO CONDITIONS; ACCEPTING DATA RESPONSE AND  
16 AFFIDAVIT; AND CLOSING DOCKET

17 BY THE COMMISSION:

18 Summary

19 We designate Windy City Cellular, LLC (WCC) as an eligible  
20 telecommunications carrier (ETC) in the study area served by Adak Eagle Enterprises  
21 d/b/a Adak Telephone Utility (AEE), subject to conditions. We accept the data response  
22 and affidavit filed by WCC. We close this docket.

23 Background

24 WCC filed an application for designation as an ETC in the AEE study  
25 area.<sup>1</sup> We issued public notice of the request.<sup>2</sup> No comments were filed. We required

26 <sup>1</sup>Windy City Cellular LLC's Application for Designation as an Eligible  
Telecommunications Carrier, filed June 6, 2008 (Application); Errata to Windy City  
Cellular LLC's Application for Designation as an Eligible Telecommunications Carrier,  
filed June 24, 2008 (WCC Errata to Application).

<sup>2</sup>Notice of Utility Petition, dated June 17, 2008.

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1 supplemental information through Letter Order No. L0800360.<sup>3</sup> WCC filed its  
 2 response.<sup>4</sup> We required additional information through Letter Order No. L0800477.<sup>5</sup>  
 3 WCC filed its response.<sup>6</sup>

4 WCC filed a supplement to its application for the limited purpose of  
 5 providing a 2008 federal universal service fund (USF) data response and affidavit.<sup>7</sup>  
 6 WCC asks for our acceptance of the filing, but it does not ask for any affirmative action  
 7 related to the filing.<sup>8</sup>

8 Discussion

9 Request for ETC Designation

10 ETC status allows a carrier to receive support from federal and state  
 11 universal service funding to provide, maintain, and upgrade facilities and services for  
 12 which the support is intended.<sup>9</sup> The supported services are described in  
 13 47 C.F.R. § 54.101(a)(1)-(9). Under the Telecommunications Act of 1996,<sup>10</sup> a state  
 14 commission designates a common carrier as an ETC.<sup>11</sup> An ETC must provide the  
 15

16 <sup>3</sup>Letter Order No. L0800360, dated July 3, 2008 (L0800360).

17 <sup>4</sup>*Windy City Cellular LLC's Response to Letter Order No. L0800360*, filed  
 July 17, 2008 (WCC Response to L0800360).

18 <sup>5</sup>Letter Order No. L0800477, dated September 30, 2008 (L0800477).

19 <sup>6</sup>*Windy City Cellular LLC's Response to Letter Order No. L0800477*, filed  
 October 15, 2008 (WCC Response to L0800477).

20 <sup>7</sup>*Windy City Cellular LLC's Supplement to Application for Designation as an*  
 21 *Eligible Telecommunications Carrier to Provide Data Response and Affidavit*, filed  
 September 22, 2008 (Data Response Filing).

22 <sup>8</sup>Data Response Filing at 3.

23 <sup>9</sup>47 U.S.C. § 254(e).

24 <sup>10</sup>Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996),  
 amending the Communications Act of 1934, 47 U.S.C. §§ 151 *et seq.* (the Act).

25 <sup>11</sup>47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201.

26

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1 supported universal telecommunications services throughout a defined service area.<sup>12</sup>  
2 An applicant must meet the following criteria for ETC status: (a) demonstrate that it  
3 owns some facilities; (b) demonstrate that it is capable of and committed to providing  
4 the nine basic services required by Federal Communications Commission (FCC)  
5 regulation;<sup>13</sup> (c) reasonably show that granting designation as an ETC is in the public  
6 interest; and (d) show that upon obtaining ETC status, the applicant will be able to offer  
7 and will advertise the availability of the services supported by the federal USF.<sup>14</sup>

8 Designated Service Area

9 WCC affirms that it is a common carrier authorized by the FCC to operate  
10 as an A Block cellular telecommunications carrier.<sup>15</sup> WCC provided the range and  
11

12 <sup>12</sup>47 C.F.R. § 54.201(d).

13 <sup>13</sup>The nine basic services are defined at 47 C.F.R. § 54.101.

14 <sup>14</sup>47 U.S.C. § 214(e)(1) and (2) of the Act provide:

15 (1) Eligible telecommunications carriers

16 A common carrier designated as an eligible telecommunications carrier  
17 under paragraph (2), (3), or (6) shall be eligible to receive universal service  
18 support in accordance with section 254 of this title and shall, throughout the  
19 service area for which the designation is received --

20 (A) offer the services that are supported by Federal universal service  
21 support mechanisms under section 254(c) of this title, either using its own  
22 facilities or a combination of its own facilities and resale of another carrier's  
23 services (including the services offered by another eligible  
24 telecommunications carrier); and

25 (B) advertise the availability of such services and the charges therefor  
26 using media of general distribution.

(2) Designation of eligible telecommunications carriers

... Before designating an additional eligible telecommunications carrier for  
an area served by a rural telephone company, the State commission shall  
find that the designation is in the public interest.

<sup>15</sup>Application at 8, Ex. C at 2.

1 township description for the AEE study area and filed maps showing that its proposed  
 2 coverage area will include the service area boundaries for the AEE study area.<sup>16</sup>

3 Ownership of Facilities

4 WCC intends to provide wireless service throughout the AEE study area  
 5 using its own facilities. WCC is currently providing all supported services to Adak  
 6 customers with its existing downtown cell site.<sup>17</sup> We find that WCC meets the facilities  
 7 requirement for designation as an ETC in the AEE study area.

8 Capability of Providing Supported Services

9 WCC states that it will provide voice grade access to the public switched  
 10 network through an interconnection agreement with AEE.<sup>18</sup> WCC will offer a variety of  
 11 calling plans to meet consumers' calling needs and certifies that it will comply with any  
 12 minimum offering requirement we may establish.<sup>19</sup> WCC will offer a basic starting  
 13 package with 500 minutes of use for \$50 per month.<sup>20</sup> Customers will receive voice  
 14 mail and other calling features at no additional charge. WCC's starting plan is  
 15 reasonably comparable to the basic wireline local service offering of the incumbent local  
 16 exchange carrier (ILEC), AEE, which is offered at a residential rate of \$40.60 not  
 17 including voicemail or calling features.<sup>21</sup>

18 <sup>16</sup>Application, Exs. A-B.

19 <sup>17</sup>WCC Response to L0800477 at 4.

20 <sup>18</sup>Application at 16. See Order U-08-62(2), *Order Approving Negotiated*  
 21 *Interconnection Agreement and Closing Docket*, dated September 3, 2008.

22 <sup>19</sup>Application at 16.

23 <sup>20</sup>*Id.* at 17. WCC will charge \$0.35 per minute for excess minutes and \$0.20 per  
 24 minute for long distance calls. WCC Response to L0800477 at 6.

25 <sup>21</sup>The commission approved revised rates for AEE including a reduction in the  
 26 residential rate from \$71.50. See Order U-07-144(5), *Order Accepting Stipulation*  
*Subject to Condition and Closing Docket*, dated September 17, 2008, as corrected by  
*Errata Notice to Order U-07-144(5)*, dated October 2, 2008.

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 701 West Eighth Avenue, Suite 300  
 Anchorage, Alaska 99501  
 (907) 276-6222; TTY (907) 276-4533

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1 Federal rules require an ETC to provide 911 and enhanced 911 (E911)  
 2 service to the extent the local government has implemented 911 or E911 systems.<sup>22</sup>  
 3 WCC states that 911 calls are routed to the local public safety answering point (PSAP)  
 4 via a trunk set up with the local exchange carrier.<sup>23</sup> While the local PSAP has not  
 5 requested E911 services, WCC states that it will be capable of providing both Phase I  
 6 and Phase II E911 service.<sup>24</sup>

7 WCC states that it will provide Lifeline and Link Up services in accordance  
 8 with our regulations.<sup>25</sup> WCC will offer Lifeline customers a calling plan for \$39.50 per  
 9 month which, after discounts are applied, will be reduced to \$1.00 a month.<sup>26</sup> The plan  
 10 includes 500 minutes of use and includes voice mail, Caller ID, and other features.<sup>27</sup>

11 WCC states that it is capable of providing the remaining supported  
 12 services: dual tone multi-frequency signaling, single party service, access to operator  
 13 services, access to interexchange service, access to directory assistance, and toll  
 14 limitation services.<sup>28</sup>

15 Although they are not yet in effect, WCC filed information addressing the  
 16 ETC regulations we recently adopted in Order R-06-3(3).<sup>29</sup> WCC states that it will have  
 17 at least eight hours of back-up power for its cell sites to ensure functionality without an

18  
 19 <sup>22</sup>47 CFR 54.101(a)(5).

20 <sup>23</sup>Application at 18.

21 <sup>24</sup>*Id.*

22 <sup>25</sup>3 AAC 53.390; Application at 20.

23 <sup>26</sup>Application at 20.

24 <sup>27</sup>*Id.* at 17.

25 <sup>28</sup>Application at 12-13; WCC Response to L0800477 at 4.

26 <sup>29</sup>Application at 32-43. Order R-06-3(6), *Order Adopting Regulations*, dated August 28, 2008 (Order R-06-3(6)).

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1 external source of power.<sup>30</sup> Additionally, WCC described the redundancy of coverage it  
 2 will have from its three planned towers which will reduce likelihood of service loss if one  
 3 tower is disabled.

4 WCC committed to comply with the CTIA Consumer Code which specifies  
 5 terms and conditions of service that will benefit consumers.<sup>31</sup> WCC acknowledged that  
 6 it may be required to provide equal access if no other ETC provides equal access within  
 7 the study area.<sup>32</sup>

8 Based on the record, we find that WCC is capable of providing the  
 9 supported services in the AEE study area with its current facilities.

10 Commitment to Serve Throughout the Study Area

11 Network Plan

12 WCC filed a Proposed Network Improvement Plan that details the projects  
 13 WCC proposes to complete with USF support.<sup>33</sup> WCC asserts that the best way to  
 14 serve both the local population and the influx of seasonal workers is to deploy a network  
 15 that will support both Code Division Multiple Access (CDMA) and Global System for  
 16 Mobile communication technology (GSM).<sup>34</sup> WCC states that it is making a solid

17 \_\_\_\_\_  
 18 <sup>30</sup>Application at 25.

19 <sup>31</sup>*Id.* at 24. The CTIA Consumer Code requires carriers to disclose rates and  
 20 terms of service to customers; make available maps showing where service is generally  
 21 available; provide contract terms to customers and confirm changes in service; allow a  
 22 trial period for new service; provide specific disclosures in advertising; separately  
 23 identify carrier charges from taxes on billing statements; provide customers the right to  
 terminate service for changes to contract terms; provide ready access to customer  
 service; promptly respond to consumer inquiries and complaints received from  
 government agencies; and abide by policies for protection of consumer privacy. The  
 CTIA Consumer Code is available at [http://files.ctia.org/pdf/The\\_Code.pdf](http://files.ctia.org/pdf/The_Code.pdf).

24 <sup>32</sup>Application at 24.

25 <sup>33</sup>Application, Ex. D.

26 <sup>34</sup>*Id.* at 4, Ex. at 2, 4.

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1 business decision to offer both technologies using a software-based system to serve  
 2 both permanent and seasonal customers in a cost-efficient manner.<sup>35</sup>

3 WCC plans to install three cell sites to serve the Adak area. WCC states  
 4 that three towers will prevent interruptions that would otherwise occur if one cell site has  
 5 operational problems.<sup>36</sup> WCC notes that Adak Island has some of the most severe  
 6 weather patterns in all of Alaska and that cell towers and antennae are particularly  
 7 susceptible to severe winds.<sup>37</sup> WCC claims that three towers will enhance reliability of  
 8 service in addition to increasing service quality and mobility throughout the study area.<sup>38</sup>  
 9 Further, WCC notes that customers in Adak consist of fishermen, government workers,  
 10 fish and wildlife employees, and others who have need for cellular communications  
 11 beyond the geographic boundaries of the AEE study area and that WCC's proposed  
 12 facilities will provide that coverage.<sup>39</sup>

13 WCC's Proposed Network Improvement Plan shows investment of  
 14 \$3 million in the first year to install three cell sites.<sup>40</sup> WCC plans to add a data solution  
 15 to the network in the second year of operations for an investment of \$200,000. WCC  
 16 estimates that it will not require additional investment but will incur operating expenses  
 17 of roughly \$980,000 per year after the network is installed. Based on service to an  
 18 estimated one hundred fifty to two hundred customers, WCC projects that it will not  
 19  
 20

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21 <sup>35</sup>WCC Response to L0800360 at 5-6.

22 <sup>36</sup>*Id.* at 4.

23 <sup>37</sup>*Id.*

24 <sup>38</sup>*Id.*

25 <sup>39</sup>*Id.* at 5.

26 <sup>40</sup>Application, Ex. D at 6-7, Attachment 1.

1 receive USF support for the first two years but will receive roughly \$2.6 million over the  
 2 subsequent three-year period.<sup>41</sup>

3 We determine that WCC's network deployment plan reflects a reasonable  
 4 means for providing quality wireless services throughout the AEE study area.

5 Providing Supported Services Throughout the Study Area

6 WCC states that it will provide the supported services using its own  
 7 facilities and will employ the seven-step approach in response to any request from  
 8 outside the coverage area of its facilities.<sup>42</sup> WCC states that it is doubtful that it will  
 9 need to rely on the seven-step approach because of the overlapping coverage area of  
 10 its three proposed cell sites.<sup>43</sup> Even without the installation of its two additional planned  
 11 cell sites, WCC is confident that it can provide service to the entire study area using its  
 12 current cell site without reliance on resale or roaming agreements.<sup>44</sup>

13 We find that WCC has demonstrated the capability and commitment to  
 14 provide the supported services throughout the AEE study area.

15 Public Interest

16 Before designating a carrier as an ETC in a rural area, we must find the  
 17 request to be in the public interest.<sup>45</sup> Historically, we have required requesting carriers  
 18 to show that their designation will increase consumer choice, provide high quality and  
 19  
 20  
 21

22 <sup>41</sup>Application at 5. WCC states that it will finance the initial investment with a  
 loan from the Rural Utility Service.

23 <sup>42</sup>Application at 22-23.

24 <sup>43</sup>*Id.* at 23.

25 <sup>44</sup>WCC Response to L0800360 at 4; WCC Response to L0800477 at 2.

26 <sup>45</sup>47 U.S.C. § 214(e)(2).

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 Anchorage, Alaska 99501  
 (907) 276-6222; TTY (907) 276-4533

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 (907) 276-6222; TTY (907) 276-4533

1 affordable service, improve public safety, and provide service to underserved and  
 2 unserved areas or achieve some other substantive public benefit.<sup>46</sup>

3 WCC states that its designation will serve the public interest by providing  
 4 affordable facilities-based mobile services to the Adak area.<sup>47</sup> WCC states that its  
 5 offering of dual technology service (GSM and CDMA) serves the public interest because  
 6 it extends wireless service to the substantial seasonal population that might otherwise  
 7 not have access to wireless service. WCC claims that the overlapping coverage area of  
 8 its three proposed cell sites will provide superior signal strength, fewer dropped calls,  
 9 advanced features such as Caller ID, text messaging, and wireless data service.<sup>48</sup> By  
 10 providing a coverage area larger than the AEE service area boundaries and providing  
 11 wireless access to 911, WCC states that its designation will provide a public safety  
 12 benefit.<sup>49</sup> Further, WCC noted that it is an affiliate of the ILEC and as such is familiar  
 13 with service provisioning in Adak and with the needs of Adak consumers.<sup>50</sup> WCC  
 14 claims this experience in Adak further shows that its designation as an ETC is in the  
 15 public interest.<sup>51</sup>

16 We find that WCC has reasonably shown that its designation as an ETC in  
 17 the AEE study area is in the public interest.

18 <sup>46</sup>See Order U-06-3(2), *Order Approving Request for Eligible*  
 19 *Telecommunications Carrier Status and Requiring Filings*, dated November 2, 2006;  
 20 Order U-06-4(2), *Order Approving Request for Eligible Telecommunications*  
 21 *Carrier Status and Requiring Filings*, dated November 2, 2006; Order U-06-41(2), *Order*  
 22 *Approving Application for Eligible Telecommunications Carrier Status, Subject to*  
 23 *Conditions; and Requiring Filings*, dated November 14, 2006.

22 <sup>47</sup>Application at 28.

23 <sup>48</sup>*Id.* at 28-29.

24 <sup>49</sup>*Id.* at 30.

25 <sup>50</sup>WCC Response to L0800360 at 8-9.

26 <sup>51</sup>*Id.*

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1 Ability to Offer and Advertise Services Upon Designation

2 WCC is currently offering the supported services in the AEE study area  
 3 and has stated a commitment to advertise the availability of supported services  
 4 throughout the AEE study area in accordance with advertising requirements imposed in  
 5 prior ETC proceedings.<sup>52</sup> We find that WCC meets the requirement to offer and  
 6 advertise the availability of the supported services upon designation as an ETC.

7 ETC Designation

8 We find that WCC has met the requirements for designation as an ETC in  
 9 the AEE study area. Therefore, we designate WCC as an ETC, subject to the following  
 10 conditions. We will monitor WCC's progress in its network upgrade compared to the  
 11 build-out schedule provided in its ETC petition. We require WCC to notify us if it is  
 12 unable to provide service to a customer upon request. We require WCC to report to us  
 13 if it receives a request for E911 service from a local PSAP and is unable to provide the  
 14 service. We monitor the continued appropriate use of universal service funding in our  
 15 rural markets by requiring annual certification by all designated ETCs, including wireless  
 16 carriers. Accordingly, we require WCC to file the same information required of all other  
 17 rural ETCs in Alaska through our annual use-of-funds certification process.

18  
 19  
 20  
 21 <sup>52</sup>Application at 25:

- 22 (1) once every two year, WCC will perform community outreach through  
 23 appropriate community agencies by notifying those agencies of its available  
 24 services; (2) once every two years, WCC will post a list of its services on a  
 25 school or community center bulletin board in each of the utility's exchanges;  
 26 (3) once a year, WCC will provide a bill insert indicating its available services;  
 and (4) once a year, WCC will advertise its services through a general  
 distribution newspaper at the locations it serves in the requested service  
 area.

1 Docket R-06-3

2 We recently adopted regulations governing ETCs in Order R-06-3(6).  
3 Once effective, the new regulations will govern WCC's obligations as an ETC.

4 Acceptance of Data Response and Affidavit

5 WCC asked for us to accept a 2008 federal universal fund data response  
6 and affidavit that it filed into this docket.<sup>53</sup> WCC does not ask for any affirmative action  
7 related to the filing beyond this acceptance. Accordingly, we accept the data response  
8 and affidavit filed by WCC.

9 Final Order

10 This order constitutes the final decision in this proceeding. This decision  
11 may be appealed within thirty days of the date of this order in accordance with  
12 AS 22.10.020(d) and the Alaska Rules of Court, Rule of Appellate Procedure  
13 (Ak. R. App. P.) 602(a)(2). In addition to the appellate rights afforded by  
14 AS 22.10.020(d), a party has the right to file a petition for reconsideration as permitted  
15 by 3 AAC 48.105. If such a petition is filed, the time period for filing an appeal is then  
16 calculated under Ak. R. App. P. 602(a)(2).

17 Docket Closure

18 No substantive or procedural matters remain in this proceeding and there  
19 are no allocable costs under AS 42.05.651 and 3 AAC 48.157. Accordingly, we close  
20 this docket.

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25 <sup>53</sup>Data Response Filing at 1, 3.

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ORDER

THE COMMISSION FURTHER ORDERS:

1. Windy City Cellular, LLC is designated as an eligible telecommunications carrier in the study area served by Adak Eagle Enterprises d/b/a Adak Telephone Utility, effective the date of this order, subject to conditions, as further described in the body of this order.

2. The Data Response and Affidavit submitted as an appendix to *Windy City Cellular LLC's Supplement to Application for Designation as an Eligible Telecommunications Carrier to Provide Data Response and Affidavit*, filed September 22, 2008, by Windy City Cellular LLC is accepted.

3. Docket U-08-67 is closed.

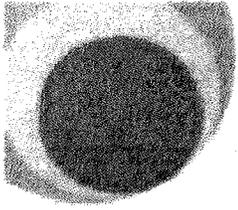
DATED AND EFFECTIVE at Anchorage, Alaska, this 3rd day of December, 2008.

BY DIRECTION OF THE COMMISSION  
(Commissioners Anthony A. Price and Janis W. Wilson,  
not participating.)



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701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501  
(907) 276-6222; TTY (907) 276-4533

**WCC Annual ETC Report  
For Year Ending Dec. 31, 2009**



**WINDY CITY CELLULAR**

1410 Rudakof Cir.  
Anchorage, AK 99508  
(907) 222-0844 fax (907) 222-0845

10 MAR 31 PM 2:43

March 31, 2010

Robert M. Pickett, Chairman  
Regulatory Commission of Alaska  
701 W Eighth Avenue Suite 300  
Anchorage, Alaska 99501

RE: Windy City Cellular  
ETC Reporting Requirement in Compliance with 3 AAC 53.460

Dear Mr. Pickett:

Enclosed are eleven copies (an original and ten (10) copies) of the Annual ETC Report in Compliance with 3 AAC 53.460 for Windy City Cellular, LLC for the year ended December 31, 2009.

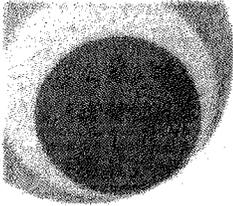
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry D. Mayes".

Larry D. Mayes  
President/Chief Executive Officer  
Windy City Cellular, LLC

Encl:

cc: Andilea Weaver, Vice President/Chief Operations Officer  
Dean Thompson, Esq.  
KET, Inc.



**WINDY CITY CELLULAR**

1410 Rudakof Cir.  
Anchorage, AK 99508  
(907) 222-0844 fax (907) 222-0845

ETC Reporting Requirement in compliance with 3 AAC 53.460  
For Windy City Cellular CPCN:

53.460 Reporting requirements below

(a) A common carrier designated as an eligible telecommunications carrier shall provide on or before March 31 of each year

(1) An update of the common carrier's network deployment plan that details services provided within the eligible telecommunications carrier service area and includes

(A) Maps detailing progress towards meeting network deployment plan targets;

See Attachment A1 - Windy City Cellular Downtown Cell Site location is operational providing service to approximately 99 phones; A2 - Attachment demonstrates two additional proposed site locations. White Alice Cell Site will be constructed to complete the FCC requirements for the Bethel AK-2/RSA-316A serving area license. If additional signal coverage is needed, the Clam Lagoon cell site will be constructed to complete the Windy City Cellular system.

(B) The amount of universal service support received;

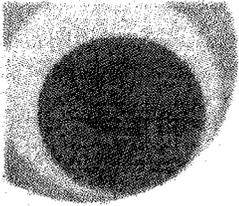
Lifeline Discounts \$36.00 and Link Up \$30.00 only in 2009 totaling \$66.00

(C) An explanation of how universal service support was used in the previous year to improve service quality, coverage, or capacity;

Lifeline and Link UP discounts were used to offset the cost of services for low income families applying for cell service. No other funds were received from USAC in 2009.

(D) An explanation regarding network improvement targets that have not been fulfilled and identification of any unserved areas; and

Windy City Cellular has not been able to complete the build for the second or third cell sites needed for coverage requirements due to the lack of USF funding in 2009 and the pending request for RUS loan funds to complete the build. The existing Windy City Cellular Downtown site location covers 100% of the populated area on Adak Island and approximately 60% of the total RSA designated area. The second cell site will potentially cover the rest of the outlying areas on the Island that currently do not have coverage. After the White Alice cell site is



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completed, signal coverage test will be done to determine the need for the Clam Lagoon site for FCC requirements for the RSA site coverage and also for redundant coverage to protect the cellular network from system outages due to weather conditions or equipment failure.

(E) An explanation of any revisions to the previously filed network deployment plan;

No revisions from original application for network deployment with the exception of the delay in funding to complete the cellular network build.

(2) a certification that the common carrier provided service throughout its eligible telecommunications carrier service area in the past calendar year to all customers requesting service except as described in (3) of this subsection;

I hereby certify that Windy City Cellular has provided service throughout its eligible telecommunications carrier service area in the past calendar year to all customers requesting service except as described in (3) of this subsection.

Larry D. Mayes, President/Chief Executive Officer

(3) an explanation of each instance in which a customer was denied supported services and a detailed explanation of the steps taken to provide service;

There were no instances in which a customer was denied supported services in 2009. In the instances where a customer failed to provide adequate credit history for cellular service, pre-paid cellular plan options were made available.

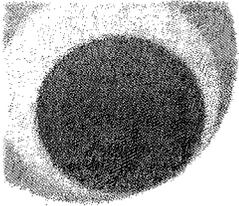
(4) the number of complaints to the commission or the Federal Communications Commission by study area and service area, comparing the number of complaints to the total number of handsets or lines served by the carrier by study area and service area;

No complaints were filed at the commission or the Federal Communications Commission for Windy City Cellular's service area in 2009.

(5) a certification that the common carrier is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450;

I certify that Windy City Cellular is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450 as follows:

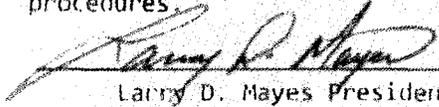
(1) Maintains a business office at 1410 Rudakof Circle, Anchorage, Alaska with toll free calling from Adak Island by utilizing 1-888-328-4222 or 611 to reach



WINDY CITY CELLULAR

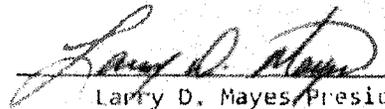
1410 Rudskaf Ct  
Anchorage, AK 99508  
(907) 222-0844 fax (907) 222-0845

the customer service call center; (2) Discloses rates and terms of service to customers by posting information on their website and by clearly documented statements on the customer application; (3) Has coverage maps available at the customer service center and also will be posting them on the website and providing them at the service center on Adak Island; (4) Provides contract terms to customers and confirms changes in services; (5) Allowing a 14 days trial period for new services; (6) Provides specific disclosures in advertising material necessary to clearly communicate all conditions and terms of service offering; (7) Separately identifies carrier charges from taxes on billing statements; (8) Provides the customers the right of termination of service for changes to contract terms; (9) Provides ready access to customer service through toll free 1-888 number and 611 access; (10) Responding promptly to customer inquiries and complaints received from government agencies; and (11) Abides by policies for protection of consumer privacy as set out in Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service as stated in 3 AAC 53.450(b). Windy City Cellular commits to maintaining, in an easily accessible location on the company's website, consumer complaint procedures

  
Larry D. Mayes President/Chief Executive Officer

(6) A certification that the common carrier complies with requirements set out in 3 AAC 53.410(a) (12) regarding functionality in emergency situations;

I hereby certify that Windy City Cellular complies with requirements set out in 3 AAC 53.410(a) (12) regarding functionality in emergency situations by the following: (1) Maintaining at least eight hours of backup power to ensure functionality without local alternating current (AC) commercial power; (2) Establishing to the extent feasible the ability to reroute traffic around damaged facilities and to manage traffic spikes resulting from emergency situations by the use of IP satellite facilities or re-route through interconnection with IXC facilities on the Island; (3) Establishing procedures for employees to follow in an emergency to prevent or minimize interruption or impairment of services.

  
Larry D. Mayes, President/Chief Executive Officer

(7) Copies of any outage reports mandated by the commission or the Federal Communications Commission;

Windy City Cellular is not required to report outages to the Commission or the Federal Communications Commission.

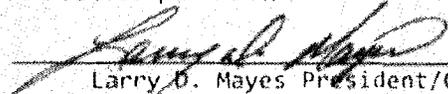
(8) a certification that the common carrier complies with 3 AAC 53.410(a) (14) by offering one or more calling plans comparable to those of the incumbent local

**WINDY CITY CELLULAR**

1410 Hudakof Cir.  
 Anchorage, Ak 99508  
 (907) 222-0844 fax (907) 222-0845

exchange carrier, including a calling plan with at least 500 free minutes of local usage per month; and

I hereby certify that Windy City Cellular complies with requirements set out in 3 AAC 53.410(a) (14) offering one or more calling plans comparable to those of the incumbent exchange carrier, including a calling plan with at least 500 free minutes of local usage per month. Adak Telephone Utility (ATU) is the local exchange carrier. The local calling area is basically the same as Windy City Cellular. ATU local service rate is Business Line \$53.60 and Residential Line \$40.60 per month with unlimited local usage. Windy City Cellular (WCC) offers multiple plans that compare to the ATU rates. WCC's Smart plan offers unlimited local service, unlimited long distance, unlimited text messaging, and voicemail with 200 U. S. Roaming minutes for \$20.00 per month. WCC's Smarter plan offers unlimited local service, long distance, text messaging, and voicemail with 600 U. S. Roaming minutes for \$30.00 per month. WCC's Smartest plan offers unlimited local service, long distance, text messaging, voicemail and unlimited US Roaming for \$50.00 per month.

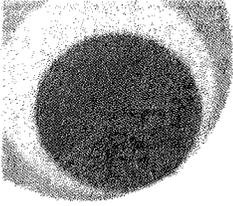
  
 \_\_\_\_\_  
 Larry D. Mayes President/Chief Executive Officer

(9) Affidavits of publication from the prior calendar year demonstrating that the common carrier advertised the availability of supported services throughout the eligible telecommunications carrier service area.

There are no options for formal publication of advertisements on Adak Island. Windy City Cellular advertises the availability of supported services throughout the eligible telecommunications carrier service area through continued website posting, community channel through local television provider station. Windy City Cellular personnel on multiple occasions have hung posters in local establishments on Adak Island publicizing service offerings and rate plans available to the consumers in the service area. Examples of posters and publications handed out and hung at business establishments are attached in Attachment 8.

(b) A common carrier designated as an eligible telecommunications carrier before July 12, 2009 must submit an initial annual report that includes a certification that the carrier will comply with 3 AAC 53.410(a) (7), (16), and (17).

I hereby certify that Windy City Cellular is committed to provide service on a timely basis to requesting customers throughout the common carrier's eligible telecommunications carrier service area using its own facilities or a combination of its own facilities and resale in accordance with the common carrier's network



**WINDY CITY CELLULAR**

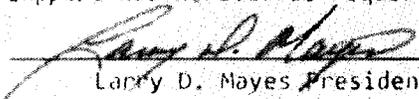
1410 Rudolph Cir.  
Anchorage, AK 99508  
(907) 222-0844 fax (907) 222-0845

deployment plan filed with its original ETC application Docket U-08-067 and approved by the Commission. 3 AAC 53.410 (a) (7) (A)

I hereby certify that Windy City Cellular is committed to file a report in accordance with 3 ACC 53.460(a) (3) of any instance in which the carrier is unable to fulfill a customer request for service as required by 3 AAC 53.410(a) (7) (A).

I hereby certify that Windy City Cellular acknowledges it may be required to provide equal access to long distance carriers if no other eligible telecommunications carrier provides equal access within the eligible telecommunications carrier service area as required in 3 AAC 53.410 (a) (16).

I hereby certify that Windy City Cellular, with respect to Universal Service Support for high-cost areas, is committed to use that high-cost universal service support for the provision, maintenance, and upgrade of facilities and services that benefit the eligible telecommunications carrier service area from which the support was derived as required in 3 AAC 53.410(a) (17).

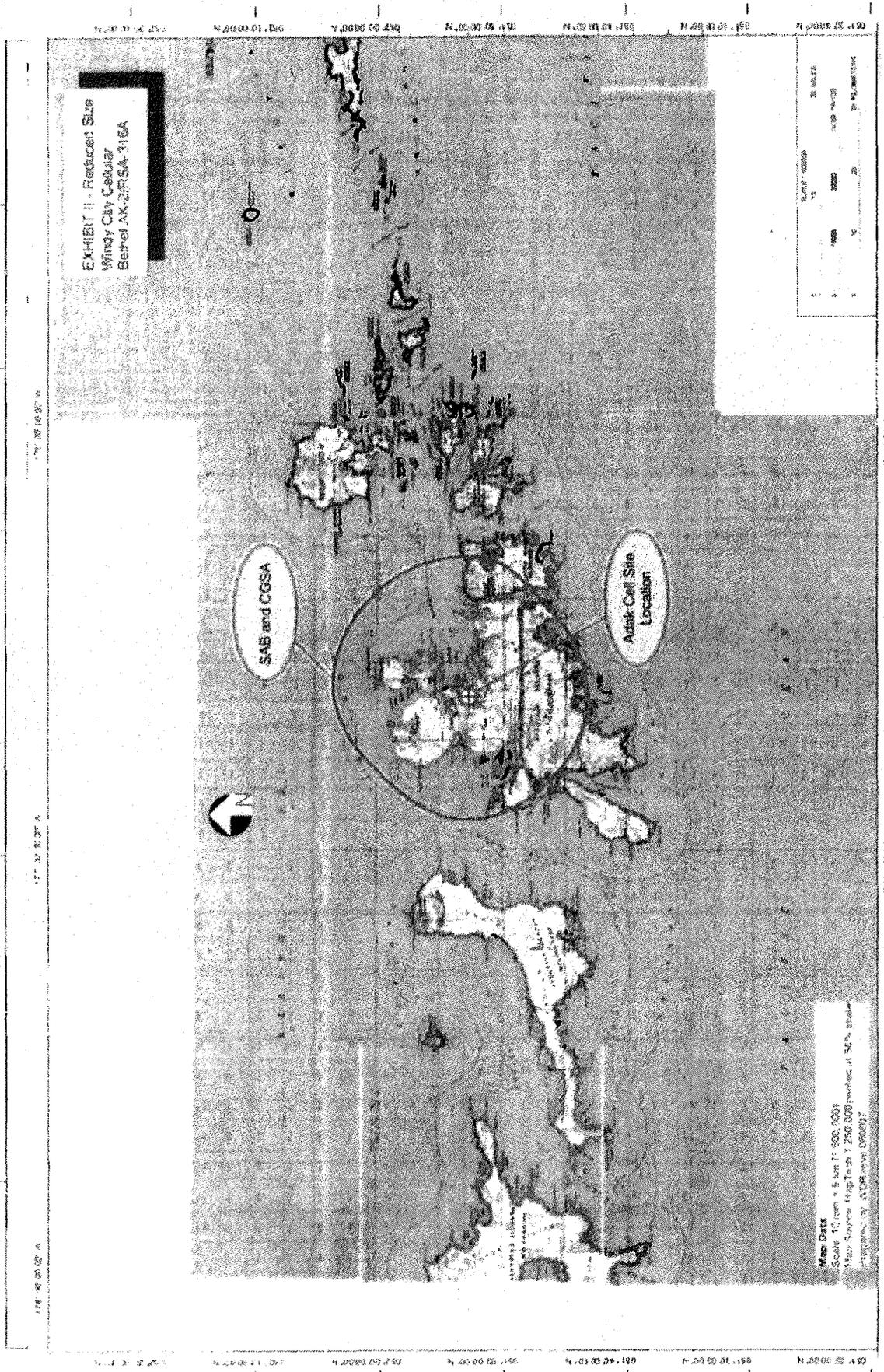
  
Larry D. Mayes President/Chief Executive Officer

(c) An eligible telecommunications carrier that is a carrier of last resort for local exchange service is not required to file the information specified in (a)(1)(A) And (D) of this section.

**Windy City Cellular  
ETC Report in Compliance with  
3 AAC 53.460**

**Attachment A1  
Attachment A2**

Attachment A1





**Windy City Cellular  
ETC Report in Compliance with  
3 AAC 53.460**

**Attachment B**

- Unlimited Calling!
- No Activation Fee!
- FREE Phone!

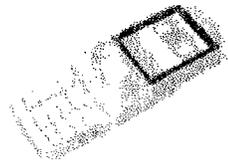
PLAN FEATURES

- 
- 
- 
- 
- 
- 
- 

12/10/09

Limited Time Offer!

Add up to 3 additional lines for family members for only \$5.00 each per month! No activation fee and FREE phone.



# WINDY CITY CELLULAR

IS PROUD TO OFFER CELL SERVICE IN ADAK!!

Windy City Cellular brings you quality service at a competitive rate.

Choose your plan and how you pay.

Free Activation, Free Phones, Free Service

Sign up now!

Get a lot of Broadband discounts... Ask how!!

PLANS	MINUTES	MONTHLY	NIGHTS & WEEKENDS	ROAMING	ADD'L MINUTES	TEXT MSGS	LONG DISTANCE
Emergency	20	\$12.00	Included	Included	\$0.10	\$0.10	\$0.70
Plan 1	500	\$15.00	Included	Included	\$0.35	\$0.10	\$0.20
Plan 2	1000	\$17.00	Included	Included	\$0.35	\$0.10	\$0.20
Plan 3	1500	\$19.00	Included	Included	\$0.35	\$0.10	\$0.20
Plan 4	2000	\$21.00	Included	Included	\$0.35	\$0.10	\$0.20
Unlimited	Unlimited	\$29.00	Included	Included	Included	\$0.10	\$0.20

- Any time minutes can be used anywhere
- Roll over minutes do not expire
- Text messaging option available for all
- No peak air time! It's all the same!

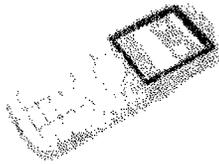
PREPAID PLANS	MINUTES	COST	LONG DISTANCE	ROAMING	TEXT MSGS	COST PER MINUTE
PINKS	500	\$8.00	Included	Included	\$0.10	\$0.10
SILVER	1000	\$10.00	Included	Included	\$0.10	\$0.10
REDS	1500	\$12.00	Included	Included	\$0.10	\$0.10
KINGS	2000	\$15.00	Included	Included	\$0.10	\$0.10
ADAK	500	\$10.00	Included	Included	\$0.10	\$0.10
EAGLE	1000	\$12.00	Included	Included	\$0.10	\$0.10
DIAMOND	1500	\$15.00	Included	Included	\$0.10	\$0.10



© 2009 Windy City Cellular. All rights reserved. Windy City Cellular is a registered trademark of Windy City Cellular. Windy City Cellular is not responsible for any damages or losses resulting from the use of this service. Windy City Cellular is not responsible for any damages or losses resulting from the use of this service.

Jan 2009

# WINDY CITY CELLULAR



IS PROUD TO OFFER CELL SERVICE IN ADAKI!!

Windy City Cellular brings you quality service at a competitive rate.

Choose your plan and how you pay.

Free Activation, Free Phones, Free Service

Big Deals, There's More!

Get Cash or Broadband discounts... Ask how!!



Call us at 1-800-555-1234

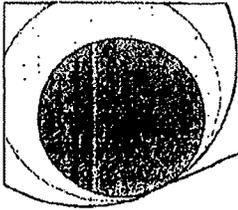
or visit our website at www.windy-city-cellular.com

Thank you!

Windy City Cellular

We're here to help you get the most out of your service!

**WCC Annual ETC Report  
For Year Ending Dec. 31, 2010**



**WINDY CITY CELLULAR**

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(907) 222-0844 fax (907) 222-0845

R.C.A.  
RECEIVED

11 MAR 31 AM 10:56

March 31, 2011

Robert M. Pickett, Chairman  
Regulatory Commission of Alaska  
701 W Eighth Avenue Suite 300  
Anchorage, Alaska 99501

RE: Windy City Cellular  
ETC Reporting Requirement in Compliance with 3 AAC 53.460

Dear Mr. Pickett:

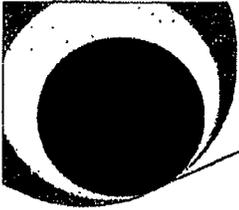
Enclosed are eleven copies (an original and ten (10) copies) of the Annual ETC Report in Compliance with 3 AAC 53.460 for Windy City Cellular, LLC for the year ended December 31, 2010.

Respectfully submitted,

Larry D. Mayes  
President/Chief Executive Officer  
Windy City Cellular, LLC

Encl:

cc: Andilea Weaver, Vice President/Chief Operations Officer  
Dean Thompson, Esq.  
KET, Inc.



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ETC Reporting Requirement in compliance with 3 AAC 53.460  
For Windy City Cellular CPCN:

53.460 Reporting requirements below

(a) A common carrier designated as an eligible telecommunications carrier shall provide on or before March 31 of each year

(1) An update of the common carrier's network deployment plan that details services provided within the eligible telecommunications carrier service area and includes

(A) Maps detailing progress towards meeting network deployment plan targets;

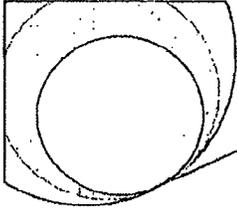
See Attachment A1 - Windy City Cellular Downtown Cell Site location is operational providing service to approximately 99 phones; A2 - Attachment demonstrates two additional proposed site locations. White Alice Cell Site will be constructed in 2011 to complete the FCC requirements for the Bethel AK-2/RSA-316A serving area license. If additional signal coverage is needed, the Clam Lagoon cell site will be constructed to complete the Windy City Cellular system.

(B) The amount of universal service support received;

Windy city Cellular received a total of \$668,019.00 in high cost loop universal service support in 2010.

(C) An explanation of how universal service support was used in the previous year to improve service quality, coverage, or capacity;

During 2010 Windy City Cellular (WCC) used universal service support for multiple projects to expand and improve network facilities and service to users. WCC used the universal service support received in 2010 to repay amounts owed for the building of the Downtown Cell Site in 2009 which launched the cellular service on Adak, Island and begin engineering the launch of the White Alice Cell Site which will expand coverage area toward the harbor and beyond for incoming sea vessels. WCC also expanded its handset offerings to provide units capable of additional functionality for the consumer. WCC focused on offering a Low Income service package to the customers and new rate plans including ala carte roaming and long distance options. WCC also offered Prepaid Cellular options for the transient traffic on the island during 2010 which was a huge benefit to the government and environmental contractors working temporarily on Adak Island.



**WINDY CITY CELLULAR**

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(D) An explanation regarding network improvement targets that have not been fulfilled and identification of any unserved areas; and

Windy City Cellular has not been able to complete the build for the second or third cell sites needed for coverage requirements due to the lack of USF funding in 2009 and the pending request for RUS loan funds to complete the build. The existing Windy City Cellular Downtown site location covers 100% of the populated area on Adak Island and approximately 60% of the total RSA designated area. The White Alice cell, under construction in early 2011, will cover the rest of the outlying areas on the Island that currently do not have coverage. After the White Alice cell site is completed, signal coverage test will be done to determine the need for the Clam Lagoon site for FCC requirements for the RSA site coverage and also for redundant coverage to protect the cellular network from system outages due to weather conditions are equipment failure.

(E) An explanation of any revisions to the previously filed network deployment plan;

No revisions from original application for network deployment with the exception of the delay in funding to complete the cellular network build. The second cell site was under construction by the end of 2010.

(2) a certification that the common carrier provided service throughout its eligible telecommunications carrier service area in the past calendar year to all customers requesting service except as described in (3) of this subsection;

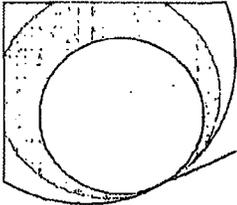
I hereby certify that Windy City Cellular has provided service throughout its eligible telecommunications carrier service area in the past calendar year to all customers requesting service except as described in (3) of this subsection.

Larry D Mayes, President/Chief Executive Officer

(3) an explanation of each instance in which a customer was denied supported services and a detailed explanation of the steps taken to provide service;

There were no instances in which a customer was denied supported services in 2010. In the instances where a customer failed to provide adequate credit history for cellular service, pre-paid cellular plan options were made available.

(4) the number of complaints to the commission or the Federal Communications Commission by study area and service area, comparing the number of complaints to the total number of handsets or lines served by the carrier by study area and service area;



**WINDY CITY CELLULAR**

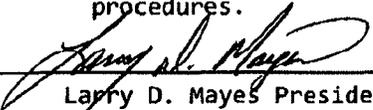
1410 Rudakof Cir.  
 Anchorage, AK 99508  
 (907) 222-0844 fax (907) 222-0845

No complaints were filed at the commission or the Federal Communications Commission for Windy City Cellular's service area in 2010.

(5) a certification that the common carrier is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450;

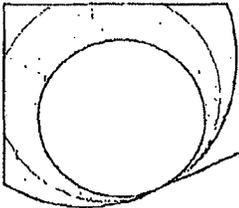
I certify that Windy City Cellular is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450 as follows:

(1) Maintains a business office at 1410 Rudakof Circle, Anchorage, Alaska with toll free calling from Adak Island by utilizing 1-888-328-4222 or 611 to reach the customer service call center; (2) Discloses rates and terms of service to customers by posting information on their website and by clearly documented statements on the customer application; (3) Has coverage maps available at the customer service center providing them at a location on Adak Island; (4) Provides contract terms to customers and confirms changes in services; (5) Provides specific disclosures in advertising material necessary to clearly communicate all conditions and terms of service offering; (6) Separately identifies carrier charges from taxes on billing statements; (7) Provides the customers the right of termination of service for changes to contract terms; (8) Provides ready access to customer service through toll free 1-888 number and 611 access; (9) Responding promptly to customer inquiries and complaints received from government agencies; and (10) Abides by policies for protection of consumer privacy as set out in Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service as stated in 3 AAC 53.450(b). Windy City Cellular commits to maintaining, in an easily accessible location on the company's website, consumer complaint procedures.

  
 Larry D. Mayes President/Chief Executive Officer

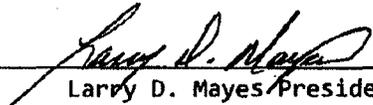
(6) A certification that the common carrier complies with requirements set out in 3 AAC 53.410(a) (12) regarding functionality in emergency situations;

I hereby certify that Windy City Cellular complies with requirements set out in 3 AAC 53.410(a) (12) regarding functionality in emergency situations by the following: (1) Maintaining at least eight hours of backup power to ensure functionality without local alternating current (AC) commercial power; (2) Establishing to the extent feasible the ability to reroute traffic around damaged facilities and to manage traffic spikes resulting from emergency situations by the use of IP satellite facilities or re-route through interconnection with IXC facilities on the Island; (3) Establishing procedures for employees to follow in an emergency to prevent or minimize interruption or impairment of services.



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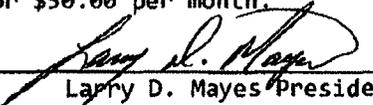
  
 Larry D. Mayes President/Chief Executive Officer

(7) Copies of any outage reports mandated by the commission or the Federal Communications Commission;

Windy City Cellular is not required to report outages to the Commission or the Federal Communications Commission.

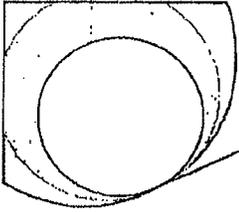
(8) a certification that the common carrier complies with 3 AAC 53.410(a) (14) by offering one or more calling plans comparable to those of the incumbent local exchange carrier, including a calling plan with at least 500 free minutes of local usage per month; and

I hereby certify that Windy City Cellular complies with requirements set out in 3 AAC 53.410(a) (14) offering one or more calling plans comparable to those of the incumbent exchange carrier, including a calling plan with at least 500 free minutes of local usage per month. Adak Telephone Utility (ATU) is the local exchange carrier. The local calling area is basically the same as Windy City Cellular. ATU local service rate is Business Line \$53.60 and Residential Line \$40.60 per month with unlimited local usage. Windy City Cellular (WCC) offers multiple plans that compare to the ATU rates. WCC's Smart plan offers unlimited local service, unlimited long distance, unlimited text messaging, and voicemail with 200 U. S. Roaming minutes for \$20.00 per month. WCC's Smarter plan offers unlimited local service, long distance, text messaging, and voicemail with 600 U. S. Roaming minutes for \$30.00 per month. WCC's Smartest plan offers unlimited local service, long distance, text messaging, voicemail and unlimited US Roaming for \$50.00 per month.

  
 Larry D. Mayes President/Chief Executive Officer

(9) Affidavits of publication from the prior calendar year demonstrating that the common carrier advertised the availability of supported services throughout the eligible telecommunications carrier service area.

There are no options for formal publication of advertisements on Adak Island. Windy City Cellular advertises the availability of supported services throughout the eligible telecommunications carrier service area through continued website posting, community channel through local television provider station. Windy City Cellular personnel on multiple occasions have hung posters in local establishments on Adak Island publicizing service offerings and rate plans available to the consumers in the service area. Examples of posters and publications handed out and hung at business establishments are attached in Attachment B.



**WINDY CITY CELLULAR**

1410 Rudakof Cir.  
Anchorage, AK 99508  
(907) 222-0844 fax (907) 222-0845

(b) A common carrier designated as an eligible telecommunications carrier before July 12, 2009 must submit an initial annual report that includes a certification that the carrier will comply with 3 AAC 53.410(a) (7), (16), and (17).

I hereby certify that Windy City Cellular is committed to provide service on a timely basis to requesting customers throughout the common carrier's eligible telecommunications carrier service area using its own facilities or a combination of its own facilities and resale in accordance with the common carrier's network deployment plan filed with its original ETC application Docket U-08-067 and approved by the Commission. 3 AAC 53.410 (a) (7) (A)

I hereby certify that Windy City Cellular is committed to file a report in accordance with 3 ACC 53.460(a) (3) of any instance in which the carrier is unable to fulfill a customer request for service as required by 3 AAC 53.410(a) (7) (A).

I hereby certify that Windy City Cellular acknowledges it may be required to provide equal access to long distance carriers if no other eligible telecommunications carrier provides equal access within the eligible telecommunications carrier service area as required in 3 AAC 53.410 (a) (16).

I hereby certify that Windy City Cellular, with respect to Universal Service Support for high-cost areas, is committed to use that high-cost universal service support for the provision, maintenance, and upgrade of facilities and services that benefit the eligible telecommunications carrier service area from which the support was derived as required in 3 AAC 53.410(a) (17).

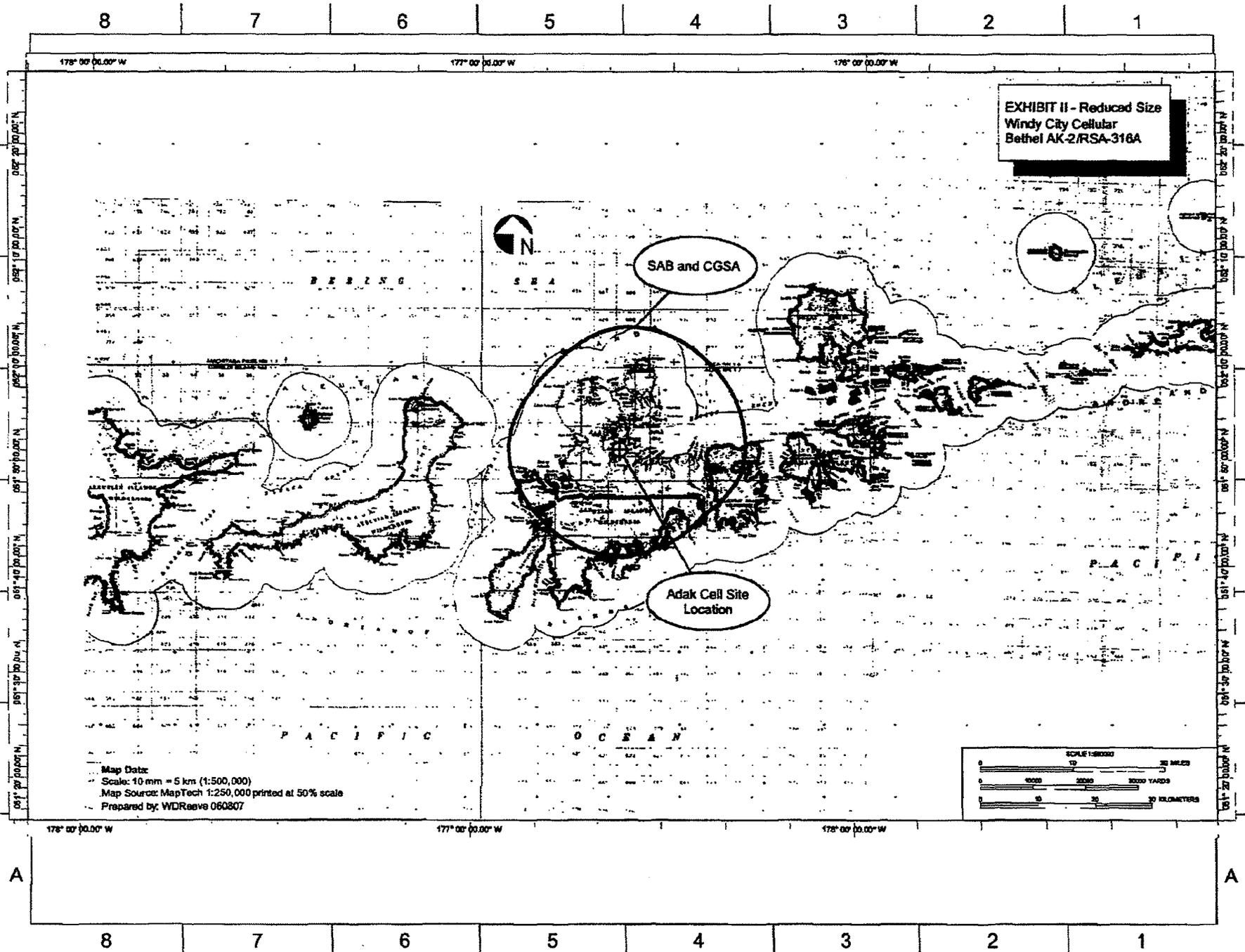
Larry D. Mayes President/Chief Executive Officer

(c) An eligible telecommunications carrier that is a carrier of last resort for local exchange service is not required to file the information specified in (a)(1)(A) And (D) of this section.

# WINDY CITY CELLULAR

ETC Report in Compliance with  
3AAC 53.460

ATTACHMENT A1  
ATTACHMENT A2





# WINDY CITY CELLULAR

## ETC Report in Compliance with 3AAC 53.460

### ATTACHMENT B

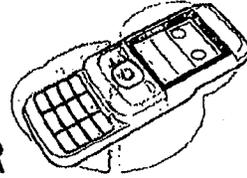
# Windy City Cellular

- Unlimited Calling!
- No Activation Fee!
- FREE Phone!

	ADAK'Smart	ADAK'Smarter	ADAK'Smartest
PLAN FEATURES	\$20.00	\$30.00	\$50.00
Unlimited Local	●	●	●
Unlimited Long Distance	●	●	●
Unlimited Text Messaging	●	●	●
Unlimited Voicemail	●	●	●
Unlimited Web Access		●	●
U.S. Roaming Minutes	200	600	UNLIMITED

Limited Time Offer!

Add up to 3 additional lines for family members for only \$5.00 each per month! No activation fee and FREE phone.



**WINDY CITY CELLULAR**

**IS PROUD TO OFFER CELL SERVICE IN ADAK!!**

Windy City Cellular brings you quality service at a competitive rate.

Choose your plan and how you pay.

**Free Activation, Free Phones, Free Service**

**Sign up now!**

**Get Cable or Broadband discounts....Ask how!?**

PLANS	MINUTES	MONTHLY	NIGHTS & WEEKENDS	ROAMING	ADD'L MINUTES	TEXT MSGS	LONG DISTANCE
Emergency	20	\$12.00	Included	Included	\$0.60	\$0.10	\$0.20
Plan 1	500	\$50.00	Included	Included	\$0.35	\$0.10	\$0.20
Plan 2	950	\$76.00	Included	Included	\$0.35	\$0.10	\$0.20
Plan 3	1300	\$91.00	Included	Included	\$0.35	\$0.10	\$0.20
Plan 4	2000	\$100.00	Included	Included	\$0.35	\$0.10	\$0.20
	Unlimited	\$150.00	Included	Included	Included	\$0.10	\$0.20

- o Any time minutes can be used anywhere
- o Roll over minutes do not expire
- o Text messaging option available for all
- o No peak air time! It's all the same!

PREPAID PLANS	MINUTES	COST	LONG DISTANCE	ROAMING	TEXT MSGS	COST PER MINUTE
PINKS	200	\$60.00	Included	Included	\$0.10	\$0.30
SILVER	300	\$90.00	Included	Included	\$0.10	\$0.30
REDS	400	\$100.00	Included	Included	\$0.10	\$0.25
KINGS	700	\$105.00	Included	Included	\$0.10	\$0.15
ADAK	1000	\$150.00	Included	Included	\$0.10	\$0.15
EAGLE	1500	\$225.00	Included	Included	\$0.10	\$0.15
DENALI	2000	\$300.00	Included	Included	\$0.10	\$0.15



**Dial 611 today for more information!**

## Windy City Cellular Prepaid Rate Plan

### PREPAID PLANS

Phones (includes sim)

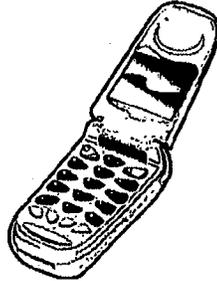
Sim only: \$25.00



<u>PLANS</u>	<u>MINUTES</u>	<u>COST</u>	<u>LONG DISTANCE</u>	<u>ROAMING</u>	<u>COST PER MINUTE</u>
<b>PINKS</b>	200	\$60.00	Included	Included	\$0.30
<b>SILVER</b>	300	\$90.00	Included	Included	\$0.30
<b>REDS</b>	400	\$100.00	Included	Included	\$0.25
<b>KINGS</b>	700	\$105.00	Included	Included	\$0.15
<b>ADAK</b>	1000	\$150.00	Included	Included	\$0.15
<b>EAGLE</b>	1500	\$225.00	Included	Included	\$0.15
<b>DENALI</b>	2000	\$300.00	Included	Included	\$0.15

# Attention Cellular Customers!

**\*Public Service Announcement\***



Affective May 2010, Cell phone numbers are being released to telemarketing companies. These telemarketing companies obtain cell numbers from National Databases and **not** your cellular provider.

\*

To prevent this, call the following number from your cell phone:

**1-888-382-1222.**

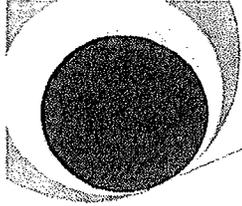
This is the National DO NOT CALL LIST. It will only take a minute of your time. This blocks your cell number for five (5) years. You must make this call from your cell to be effective.

<https://www.donotcall.gov/default.aspx>

Notice courtesy of Windy City Cellular

**WCC Annual ETC Report  
For Year Ending Dec. 31, 2011**

**WCC Annual ETC Report  
For Year Ending Dec. 31, 2011**



**WINDY CITY CELLULAR**

R.C.A.  
RECEIVED

12 MAR 30 PM 3: 50

1410 Rudakof Cir.  
Anchorage, AK 99508  
(907) 222-0844 fax (907) 222-0845

March 30, 2012

Robert M. Pickett, Chairman  
Regulatory Commission of Alaska  
701 W Eighth Avenue Suite 300  
Anchorage, Alaska 99501

RE: Windy City Cellular  
ETC Reporting Requirement in Compliance with 3 AAC 53.460

Dear Mr. Pickett:

Enclosed are six copies (an original and five (5) copies) of the Annual ETC Report in Compliance with 3 AAC 53.460 for Windy City Cellular, LLC for the year ended December 31, 2011.

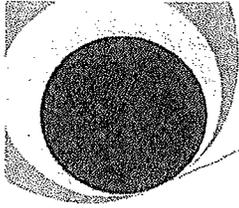
Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Larry D. Mayes".

Larry D Mayes  
President/Chief Executive Officer  
Windy City Cellular, LLC

Encl:

cc: Andilea Weaver, Vice President/Chief Operations Officer  
Dean Thompson, Esq.  
KET, Inc.



**WINDY CITY CELLULAR**

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ETC Reporting Requirement in compliance with 3 AAC 53.460  
 For Windy City Cellular:

53.460 Reporting requirements:

(a) A common carrier designated as an eligible telecommunications carrier shall provide on or before March 31 of each year

(1) An update of the common carrier's network deployment plan that details services provided within the eligible telecommunications carrier service area and includes

(A) Maps detailing progress towards meeting network deployment plan targets;

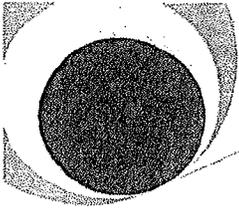
See Attachment A1. Windy City Cellular, LLC's (WCC's) Downtown Cell Site location is operational and is providing wireless service to approximately 99 phones (as well as to many other phones that roam on WCC's network). The White Alice Cell Site was constructed in 2011 and turned up 01/31/12 to complete the FCC requirements for the Bethel AK-2/RSA-316A serving area license.

(B) The amount of universal service support received;

In 2011, WCC received \$839,265 in High Cost Loop Support; \$515,283 in Interstate Common Line Support; \$300,048 in Carrier Common Line Support; and \$544 in Lifeline/Linkup Support, for a total of \$1,655,140 of federal universal service support. WCC did not receive any Alaska universal service support in 2011.

(C) An explanation of how universal service support was used in the previous year to improve service quality, coverage, or capacity;

During 2011, WCC used universal service support for multiple projects to expand and improve network facilities and services provided to users. WCC used a portion of the universal service support received in 2011 to repay final amounts owed associated with construction of the Downtown Cell Site in 2009, which launched the cellular service on Adak, Island. WCC also completed construction of the White Alice Cell Site. That new site has expanded coverage (1) toward the harbor and beyond for incoming sea vessels; (2) to the far West side of Adak Island (used by environmental researchers and contractors) where coverage was previously been blocked by Mt Reed and Mt. Moffett; and (3) to other areas on the eastern coast of the Island. WCC also made additional plant investment for cellular voice and data traffic backhaul to outside of Adak. WCC opened a retail store space on Adak Island to help facilitate the payment of customer's bills, sale of prepaid and post paid services, and activation of cell phones and



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accessories by new and existing customers on Adak. WCC also expanded its handset offerings to provide units capable of additional functionality for the consumer. WCC invested in inventory purchases for cellular phones and accessories that are broadband capable for texting and accessing the Internet. WCC made additional investments in special purpose vehicles for access to the White Alice Site during the repeated snow storms that are a common part of the winter weather on the Island. Universal service support was also used to help offset operating expenses, which allowed calling plans to be reasonably priced for cellular service on Adak Island.

(D) An explanation regarding network improvement targets that have not been fulfilled and identification of any unserved areas; and

All network improvement targets have been fulfilled other than construction of a third cell site (Clam Lagoon) and the addition of CDMA cellular services (to supplement the current GSM services). WCC will continue to consider implementation of those projects if and to the extent that funding is available. As the network currently exists, there are no unserved areas in the study area.

(E) An explanation of any revisions to the previously filed network deployment plan;

There have been no revisions to WCC's originally filed network improvement plan. However, WCC's ability to complete additional network improvements in the future has been significantly affected by the FCC's recent Connect America order.

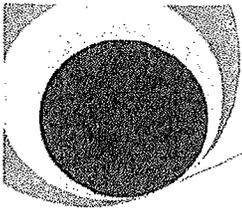
(2) a certification that the common carrier provided service throughout its eligible telecommunications carrier service area in the past calendar year to all customers requesting service except as described in (3) of this subsection;

WCC certifies that it has provided service throughout its eligible telecommunications carrier service area in the past calendar year to all customers requesting service.

(3) an explanation of each instance in which a customer was denied supported services and a detailed explanation of the steps taken to provide service;

There were no instances in which a customer was denied supported services in 2011. In the instances where a customer failed to provide adequate credit history for cellular service, pre-paid cellular plan options were made available.

(4) the number of complaints to the commission or the Federal Communications Commission by study area and service area, comparing the number of complaints to the total number of handsets or lines served by the carrier by study area and service area;



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No complaints were filed at the Regulatory Commission of Alaska or the Federal Communications Commission for WCC's service area in 2011.

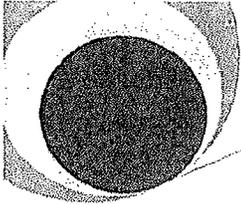
(5) a certification that the common carrier is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450;

WCC certifies that it is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450(a), (b), and (c), as follows:

(a) Maintains at least one business office, with toll-free calling if necessary, staffed during commission business hours, to provide customers with access to personnel who can timely provide information on services and rates, accept and process service application, explain and adjust bills, and generally represent the carrier.

(b) Complies with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service by

- (1) disclosing rates and terms of service to customers;
- (2) making available maps showing where service is generally available;
- (3) providing contract terms to customers and confirming changes in services;
- (4) allowing a trial period for new service;
- (5) providing specific disclosures in advertising;
- (6) separately identifying carrier charges from taxes on billing statements;
- (7) providing customers the right to terminate service for changes to contract terms;
- (8) providing ready access to customer service;
- (9) promptly responding to customer inquiries and complaints received from government agencies; and
- (10) abiding by policies for protection of consumer privacy.



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- (c) Commits to maintaining, in an easily accessible location on the company's website, consumer complaint procedures.

(6) A certification that the common carrier complies with requirements set out in 3 AAC 53.410(a)(12) regarding functionality in emergency situations;

WCC certifies that it complies with requirements set out in 3 AAC 53.410(a)(12) regarding functionality in emergency situations by: (A) maintaining at least eight hours of backup power to ensure functionality without local alternating current (AC) commercial power; (B) establishing to the extent feasible the ability to reroute traffic around damaged facilities and to manage traffic spikes resulting from emergency situations; and (C) establishing procedures for employees to follow in an emergency to prevent or minimize interruption or impairment of services.

(7) Copies of any outage reports mandated by the commission or the Federal Communications Commission;

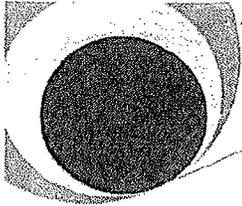
There were no such reports in 2011.

(8) a certification that the common carrier (8) complies with 3 AAC 53.410(a)(14) by offering one or more calling plans comparable to those of the incumbent local exchange carrier, including a calling plan with at least 500 free minutes of local usage per month; and

WCC certifies that it complies with requirements set out in 3 AAC 53.410(a)(14) by offering one or more calling plans comparable to those of the incumbent local exchange carrier, including a calling plan with at least 500 free minutes of local usage per month.

(9) Affidavits of publication from the prior calendar year demonstrating that the common carrier advertised the availability of supported services throughout the eligible telecommunications carrier service area.

There are no options for formal publication of advertisements on Adak Island. WCC advertised the availability of supported services throughout the eligible telecommunications carrier service area through continued website posting and local television community channel posting. WCC also on multiple occasions posted posters in local establishments on Adak Island. Examples of posters and publications handed out and hung at business establishments are attached in Attachment B. In addition, on two occasions, notices regarding Lifeline options were sent to all WCC customers in a separate publication. (See Attachments)



**WINDY CITY CELLULAR**

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(b) A common carrier designated as an eligible telecommunications carrier before July 12, 2009 must submit an initial annual report that includes a certification that the carrier will comply with 3 AAC 53.410(a)(7), (16), and (17).

WCC certifies that it:

(1) is committed to

(A) provide service on a timely basis to requesting customers throughout the common carrier's eligible telecommunications carrier service area using its own facilities or a combination of its own facilities and resale in accordance with the common carrier's network deployment plan filed under 3 AAC 53.420 and revised under 3 AAC 53.460(a)(1); and

(B) to file a report in accordance with 3 ACC 53.460(a)(3) of any instance in which the carrier is unable to fulfill a customer request for service;

(2) acknowledges it may be required to provide equal access to long distance carriers if no other eligible telecommunications carrier provides equal access within the eligible telecommunications carrier service area; and

(3) with respect to universal service support for high-cost areas, is committed to use that high-cost universal service support for the provision, maintenance, and upgrade of facilities and services that benefit the eligible telecommunications carrier service area from which the support was derived.

A handwritten signature in cursive script, appearing to read "Larry D. Mayes", written over a horizontal line.

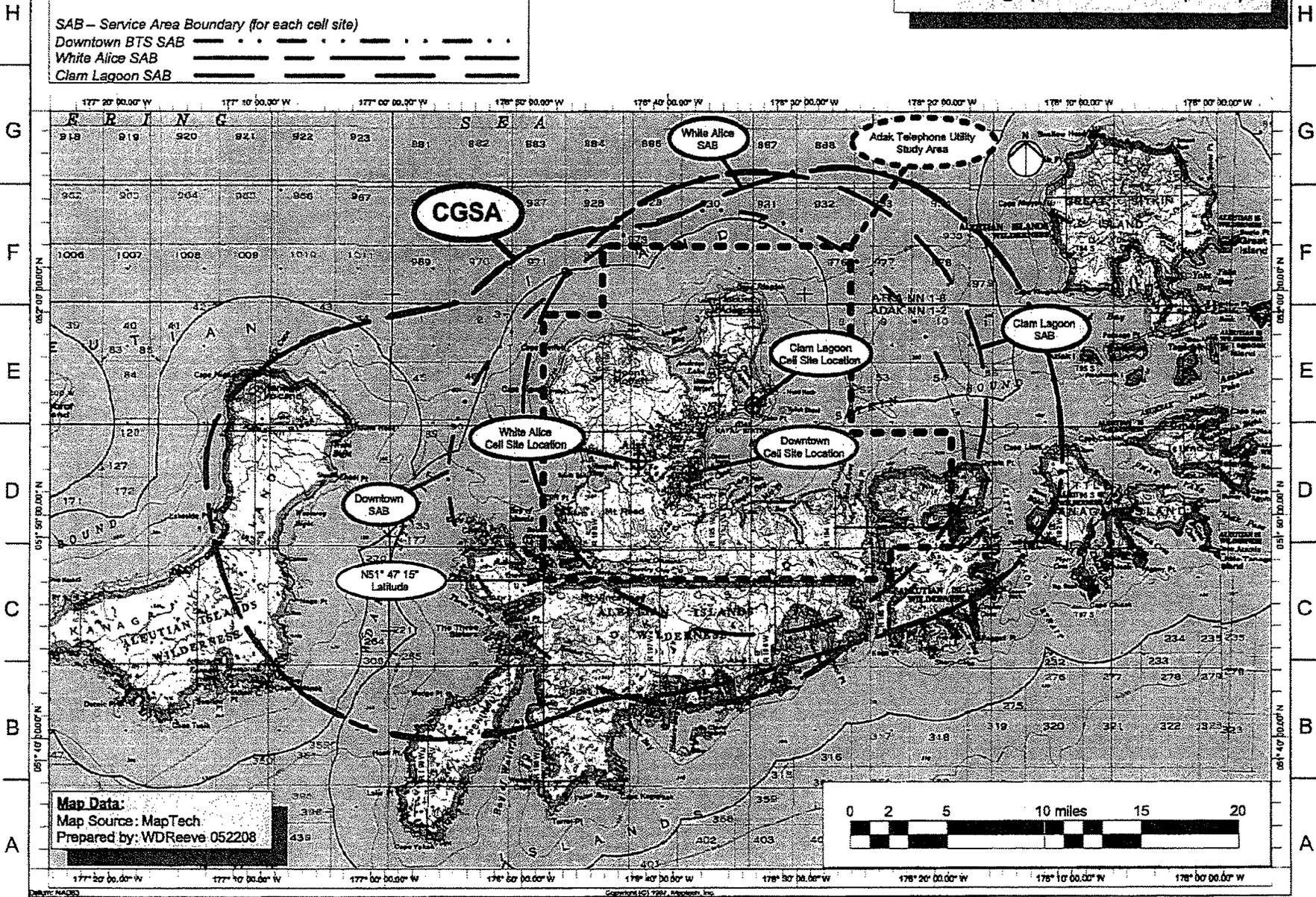
Larry D. Mayes  
President/Chief Executive Officer

Date: 5/30/2012

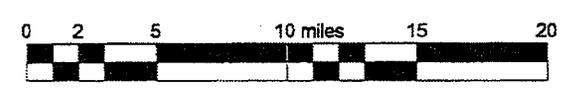
8 7 6 5 4 3 2 1

**Key:**  
 CGSA – Cellular Geographic Service Area (Composite of all cell sites)  
 CGSA   
 SAB – Service Area Boundary (for each cell site)  
 Downtown BTS SAB   
 White Alice SAB   
 Clam Lagoon SAB 

**Windy City Cellular  
 Cellular Geographic Service Area (CGSA)**



**Map Data:**  
 Map Source: MapTech  
 Prepared by: WDRieve 052208



8 7 6 5 4 3 2 1

REDACTED - FOR PUBLIC INSPECTION

*To Learn More, Visit:*  
*www.usac.org*  
*www.LifelineSupport.org*

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Universal Service Administrative Company  
*Helping Keep Americans Connected*

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1-907-222-0844

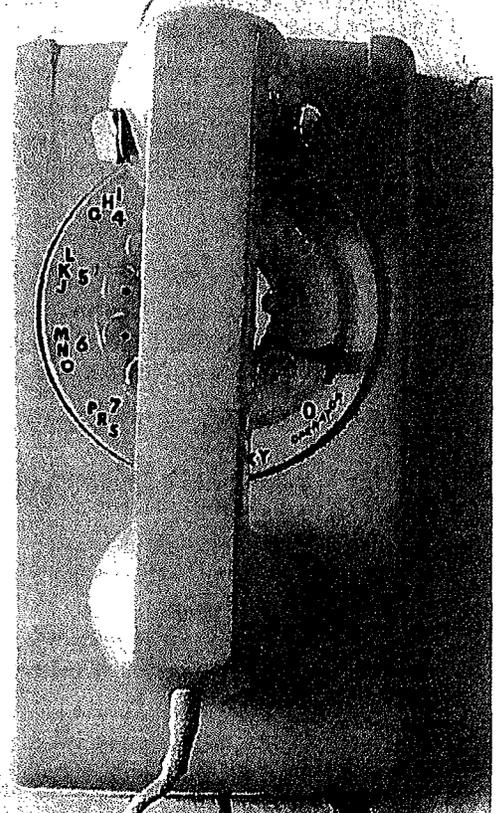
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1-907-222-0844

*To Apply Call*  
*Your Phone Company*

A publication of the Universal Service Administrative Company  
2000 L Street, N.W., Suite 200  
Washington, DC 20036

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April 2011

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OPENING SPECIAL!**

**CONNECT TO THE WORLD  
WITH OUR SEASON OPENING  
PACKAGE AND SAVE BIG!**

**PACKAGE INCLUDES:**

- TELEPHONE WITH ADDED  
CALLING FEATURES
- "LOCAL CHOICE" CABLE  
PACKAGE
- ADAK SMART CELLULAR PLAN
- RESIDENTIAL SILVER BROAD  
BAND

**YOUR SAVINGS INCLUDE:**

- DEPOSITS WAIVED ON CABLE  
AND BROADBAND
- HALF PRICE INSTALLATION  
OF CABLE AND BROAD  
BAND (A \$125 SAVINGS!)
- WORK ORDER FEES WAIVED  
ON CABLE AND BROADBAND  
(A \$60 SAVINGS!)
- \$5.00 A MONTH SAVINGS  
ON EACH CABLE, CELLULAR  
AND BROADBAND PACKAGES



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Phone: Toll-Free 1-888-328-4222  
Phone: 1-907-222-0844  
611 from any Adak Landline  
Adaktu.net



**COMMUNICATIONS**  
ADAK TELEPHONE  
WINDY CITY CELLULAR

**ENTERTAINMENT**  
ADAK CABLEVISION

**CONNECTIVITY**  
WINDY CITY BROADBAND

**"KEEPING OUR ADAK  
COMMUNITY CONNECTED"**

Dial 611 from any  
Landline Telephone or  
Call 1-888-328-4222

*Mailed to customers July Bill :-)*

**KEEP  
CONNECTED GET  
A PRE PAID PHONE**

- \*Free Phone \* Free Minutes
- \* No Activation
- \*Free Texting \* Free Local
- \* Free Long Distance

Extra Minutes to keep you connected  
Please see MIKE at the Telex  
9:00am-3:00pm

**KEEP  
CONNECTED GET  
A PRE PAID PHONE**

- \*Free Phone \* Free Minutes
- \* No Activation
- \*Free Texting \* Free Local
- \* Free Long Distance

Extra Minutes to keep you connected  
Please see MIKE at the Telex  
9:00am-3:00pm



ATTACHMENT A4

*Put on doors, windshields and on Adak Bonds 7-7-11*

**Declarations Under  
Penalty of Perjury**

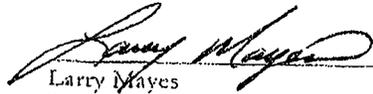
**Exhibit 15**

DECLARATION OF LARRY MAYES  
WINDY CITY CELLULAR, LLC

I, Larry Mayes, declare the following is true and correct to the best of my knowledge and belief:

I am the President and Chief Executive Officer of Windy City Cellular, LLC. I have reviewed the Petition for Waiver and attached Exhibits and attest, under penalty of perjury, that the facts contained therein are known to me and are accurate.

Executed on this 3<sup>rd</sup> day of April 2012.



Larry Mayes  
President and Chief Executive Officer  
Windy City Cellular, LLC

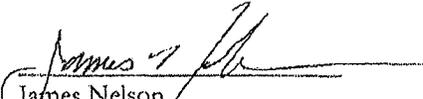
DECLARATION OF JAMES NELSON  
MID-STATE CONSULTANTS

I, James Nelson, declare that the following is true and correct to the best of my knowledge and belief:

1. I am a Project Engineer with Mid-State Consultants. Mid-State Consultants provides consulting on a full range of communications engineering services including telephony, data and video networks, computerized mapping and conversion, and construction supervision. Mid-State Consultants has experience working for a broad spectrum of clientele including local exchange carriers, inter-exchange carriers, competitive access providers, internet service providers, cellular and cable television operators.
2. I was engaged by Windy City Cellular, LLC ("WCC") to prepare maps in support of WCC's Petition for Waiver. The methodology used for preparing the maps was as follows:  

Cellular signal strength data was measured and recorded by WCC personnel at various places on Adak Island and provided to Mid-State Consultants, along with maps and field notes depicting the area where the signal strength data was taken. I combined all the data onto one scaled map, and estimated the coverage areas based on this information.
3. I have reviewed the Petition for Waiver and attached Maps contained in Exhibits 2, 5, and 6 and attest that the Maps are the Maps I prepared and are accurate.

I declare the foregoing under penalty of perjury. Executed on this 3<sup>rd</sup> day of April 2012.

  
James Nelson  
Project Engineer  
Mid-State Consultants

DECLARATION OF MICHAEL EICKHOFF  
ADAK EAGLE ENTERPRISES, LLC

I, Michael Eickhoff, declare that the following is true and correct to the best of my knowledge and belief:

1. I am the Plant Manager of Adak Eagle Enterprises, LLC ("AEE"). AEE is the only carrier of local exchange telecommunications services on Adak, Alaska. It provides modern local exchange, broadband, and Internet services in Adak through a digital fiber-optic network.
2. On behalf of Windy City Cellular, LLC ("WCC"), an affiliate of AEE, I performed drive tests of the WCC service area versus the service area of Alaska Wireless in the Adak area.

The methodology used for the drive tests was as follows:

A single Nokia phone containing a Netmonitor Field Test application that measures Receive (Rx) levels in decibels (dB) was used to perform the drive tests. Netmonitor Field Test 101 was used to measure receive levels. Netmonitor Test 109 was used to identify the source. At each test location, an Alaska Wireless sim card and a WCC sim card were alternately inserted and receive levels were then recorded. The drive-test chart found in Exhibits 2, 5 and 6 shows highlighted in yellow the locations where the drive tests indicate that Alaska Wireless has no signal. There is no detectable voice or data service in these locations provided by Alaska Wireless. Conversely, receive data shows that WCC is able to offer both voice and data service in all of these locations.

3. I have reviewed the Petition for Waiver and attached Drive Test Data contained in Exhibits 2, 5, and 6 and attest that the facts stated therein are accurate.

I declare the foregoing under penalty of perjury. Executed on this 3<sup>rd</sup> day of April 2012.



Michael Eickhoff  
Plant Manager  
Adak Eagle Enterprises, LLC