

INLAND CELLULAR TELEPHONE COMPANY

Corporate Offices

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P.O. Box 688
Roslyn, WA 98941
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2006 SEP 27 AM 9:57
IDAHO PUBLIC
UTILITIES COMMISSION

September 26, 2006

Via Federal Express overnight delivery

INC-T-06-02

Ms. Jean Jewel, Executive Secretary
Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720
Boise, ID 83720-0074
(208) 375-7382

Dear Ms. Jewel:

Enclosed please find one original and seven (7) copies of the Petition of Inland Cellular for Designation as Eligible Telecommunications Carrier – Supplement to be added to the Petition of Inland Cellular for Designation as Eligible Telecommunications Carrier (“Petition”) that was filed on June 26, 2006. Inland Cellular Telephone Company (“ICTC”) is the sole general partner of Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular). ICTC is submitting the Petition on behalf of the partnership.

If there are any questions concerning the foregoing, please contact me at (509) 649-2500. Thank you for your consideration of this Petition.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. Brooks".

James K. Brooks
Treasurer/Controller

Enclosures

cc: Grace Seaman (IPUC Staff)

**Before the
Idaho Public Utilities Commission**

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IDAHO PUBLIC
UTILITIES COMMISSION

In the Matter of the Petition of)	
)	Case No. INC-T-06-02
Inland Cellular)	
)	PETITION OF INLAND CELLULAR
For Designation as Eligible)	FOR DESIGNATION AS ELIGIBLE
Telecommunications Carriers)	TELECOMMUNICATIONS CARRIER
Under 47 U.S.C. § 214(e)(2))	- SUPPLEMENT

On June 29, 2006, Inland Cellular Telephone Company ("ICTC"), on behalf of Washington RSA No. 8 Limited Partnership d/b/a Inland Cellular (hereinafter referred to as "Inland Cellular" or the "Partnership"), filed a Petition to the Idaho Public Utilities Commission ("IPUC") for Designation of Inland Cellular as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Telecommunications Act of 1934, as amended ("Act"), 47 U.S.C. § 214(e)(2), and Section 54.201 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 54.201. To benefit the residents and promote business growth within Inland Cellular's Idaho service area, benefit the State, further competition, and to provide lifeline service, ICTC requested that Inland Cellular be designated as eligible to receive all available support from the federal Universal Service Fund ("USF") including, but not limited to, support for rural, insular and high-cost areas and low-income customers. On August 29, 2006, Idaho Public Utilities Commission ("IPUC") Staff requested further clarifications and noted deficiencies to the Petition. This filing is a supplement made to clarify the June 29, 2006; correcting any deficiencies that were contained therein. In support of this Petition, the following is respectfully submitted:

I. Name and Address of Petitioner

1. The name and address of Petitioner is Inland Cellular Telephone Company, 103 South 2nd Street, P.O. Box 688, Roslyn, Washington 98941. James K. Brooks shall be the designated representative with the same mailing address as Petitioner. Official documents to be sent electronically, are to be sent to jbrooks@inlandnet.com.

II. Typographical Error

2. In the June 29, 2006 filing, the paragraphs were out of sequence, jumping from paragraph 7 to paragraph 10. This was merely a typographical error and the paragraphs should have remained in sequence.

III. Paragraph 13. Voice Grade Access

3. In the June 29, 2006 filing, paragraph 13 read as follows, "The Partnership provides voice grade access to the public switched network through interconnection arrangements with local telephone companies. The Partnership offers its subscribers this service at bandwidth between 300 and 3,000 hertz as required by 47 C.F.R. 54.101(a)(1), thereby providing voice grade access." The applicable interconnection agreements (and/or reciprocal traffic exchange agreements) referred to are with Qwest, Verizon and Inland Telephone Company. It is anticipated to have a traffic exchange agreement with TDS by year-end 2006.

4. Inland Cellular holds 20,000 numbers groups (208-790 and 208-791) in Lewiston, Idaho, a 10,000 numbers group (208-827) in Orofino, Idaho, a 10,000 numbers group (208-507) in Grangeville, a 10,000 numbers group (208-669) in Moscow, Idaho, 13,000 numbers groups (509-330, 509-336-1000 through 1999, and 509-338-1000 through 2999) in Pullman, Washington, and 4,000 numbers groups (509-552-000 through 0999, 509-552-2000 through 2999, and 509-751-6000 through 7999) in Clarkston, Washington. These numbers groups were acquired from and assigned by Neustar through the North American Numbering Plan and through them and the agreements, Inland Cellular customer's can call the Cottonwood,

Grangeville, Moscow, Lewiston, Lapwai, Leon and Lenore wire centers in Idaho as local calls and through wholesale rates terminate to all other Verizon exchanges; a charge not explicitly passed on to Inland Cellular customers. As customer demand increases, Inland Cellular applies for more numbers.

IV. Paragraph 14. Local Usage

5. In the June 29, 2006 filing, paragraph 14 read as follows, “The Partnership has a variety of rate plans that provide local usage consistent with 47 C.F.R. § 54.101(a)(2). To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue.¹⁰ As it relates to local usage, the *October 1998 NPRM* sought comment on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comment on how much, if any, local usage should be required to be provided to customers as part of a universal service offering.¹¹ In the *First Report and Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide.¹² Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs, and the Partnership will comply with any and all minimum local usage requirements adopted by the FCC or the IPUC.”

6. As a cellular provider, “local usage plans” are difficult to determine since most plans include toll and roaming; features generally requested and wanted by consumers. Inland

¹⁰ See *Guam Cellular and Paging, Inc.*, CC Docket No. 96-45, DA 02-174 at para. 11 (C.C.B. rel. Jan. 25, 2002) (“*Guamcell*”); *Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) (“*October 1998 NPRM*”).

¹¹ See *October 1998 NPRM*, 13 FCC Rcd at 21277-21281.

¹² See *First Report and Order*, 12 FCC Rcd at 8813.

Cellular does keep what are close to a “minimum” local usage plans in its prepaid offerings. Although seldom subscribed to, the Q150 plan is geared toward consumers that generally only want local calling. For a one-time set-up fee of \$20 and \$19.95 a month, the customer receives 150 minutes of use, is charged \$0.28 for additional minutes and charged \$0.18 per minute of long distance usage. An alternative for a “minimum” local usage plan may be the Tek Pak. For \$29.95 per month, the customer receives 200 anytime minutes, unlimited incoming calls, unlimited cell-to-cell (Inland Cellular) calls, unlimited nights and weekend minutes and is charged \$0.18 per minute for long distance. Although the monthly rate is \$10.00 greater, it affords the customer with much greater minutes.

7. The term “local” is still precarious for Inland Cellular, since local service is anywhere within the Inland Cellular service territory which includes the portion in Idaho relating to this filing as well as a large portion of the eastern side of State of Washington. What Inland Cellular believes to be its most popular rate plan is its U.S.A. 500 Plan. For \$44.95 per month, the customer receives 500 anytime minutes, 50-state roaming, 5,000 incoming minutes, 5,000 cell-to-cell (Inland Cellular) minutes and no long distance.

8. Local usage is really not determined by what is offered by Inland Cellular in its calling plans but by what the consumer wants, needs and fits their diverse lifestyles and calling patterns. For the cellular provider, it is all about consumer choices and competition as emphasized by the Telecommunications Act of 1996.

V. Paragraph 22. Lifeline and Link-up Advertising

9. In the June 29, 2006 filing, paragraph 22 read as follows, “Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. § 54.201, the Partnership will advertise the availability of each of the supported services detailed above, throughout its licensed service area, by media of general distribution. The methods of advertising utilized may include television, radio,

newspaper, magazine, direct mailings, public exhibits and displays, bill inserts, and telephone directory advertising. [The] ETC designation will also enable Inland Cellular the ability to offer and advertise the availability of Lifeline and Link-Up Assistance Programs.”

10. Inland Cellular’s marketing efforts will be similar to what is currently being done in another jurisdiction where the Partnership has received the ETC designation. Inland Cellular’s over-all marketing expenses for 2005 were approximately \$1.7 million and are budgeted to be approximately \$1.85 million. As previously mentioned, cellular is a highly competitive business, requiring constant advertising to attain and retain customers.

11. There is no set budget for ETC advertising; it all falls into the marketing budget. Inland Cellular makes specific ETC advertising bi-annually, for a one-week period; placing advertisements in all known publications within its designated ETC service area. This advertising has included placing ads in weekly and sometimes bi-weekly publications in small rural towns. Depending upon the publication, the ads have been as large as a half page and as small as three columns. Attached as Exhibit A, is a copy of the ad, in its actual size, as seen in the Franklin County Gazette. This is a weekly publication and it cost Inland Cellular approximately \$400 to run this for two consecutive weeks. This is an example of the ad that we also placed in 18 other publications throughout the Inland Cellular designated ETC service area.

12. Besides the bi-annual publications, Inland Cellular has created posters for our commercial sales offices. These posters are 2 ½ feet by 3 feet and cover the “Lifeline and Link-up Programs” portion of the ad and start out with “Do you qualify for a discount?” These posters are not currently in our Moscow and Lewiston sales offices for fear that we would have to explain to our Idaho customers why we cannot offer these programs to them. Inland Cellular’s customer care representatives are also aware and are prepared to offer these programs to

qualifying customers. Attached as Exhibit's B and B1, are the forms that were prepared by our attorney to certify a customer for qualification.

VI. Paragraph 26. Two-year plan.

13. In the June 29, 2006 filing, paragraph 26 read as follows, "Its two-year plan, 2006 and 2007, involves an estimated investment of \$2,100,000 in Idaho; budgeted sites or site improvements at Genesee, Kamiah, Nuxall (near Kooskie), Troy, Track (outside of Moscow), Highway 95 North and Highway 95 Summit. These sites will increase the availability of service for rural Idaho and although not specifically addressed by the FCC or the IPUC, the majority of the Idaho sites should be data capable (1XRTT platform) and then upgraded to broadband data capable (EVDO) in the near future. Inland Cellular has budgeted for 19 sites to be upgraded to EVDO (approximately \$1,500,000) in 2006-2007, but have not committed to which sites. This is in addition to the aforementioned \$2,100,000 in Idaho sites. In addition, traffic loads are constantly reviewed and additional carrier investment is added when the need is determined."

14. To expand on Inland Cellular's budget to cover the years 2007 and 2008, it is now known, that the EVDO upgrade will not happen until 2007, with 6 known sites in and around Lewiston and Moscow being the first to be upgraded. As previously stated, 1XRTT was the first step for data capabilities, however the upgrade also increased efficiencies and distance of coverage. Inland Cellular believes that the EVDO upgrade will further those efficiencies and distances as well as give Inland Cellular its initial steps toward providing broadband services over the cellular network.

15. It is also now known, that although budgeted for 2006, the Troy (covering Troy and over-lap Joel), Track (outside of Moscow), Highway 95 North (covering Joel and Viola) and Highway 95 Summit (covering Potlatch and Onaway) sites will not be built until 2007. This is normal for Inland Cellular since it operates practically debt free and redirecting funds toward

other sites, sites that require improvement, expansion or new sites that are needed because of demand, is standard operating procedure. As emphasized previously, cellular is a highly competitive industry and in order to answer demand, the Company must have this flexibility in order to remain competitive.

16. The Genesee site should be able to cover Genesee, Kendrick and Juliaetta, and Inland Cellular's Orofino site would also over-lap Juliaetta.

17. Aside from the hold-overs from the 2006 budget, Inland Cellular has current proposed new sites for 2007 and 2008, at Grangville (covering Grangeville and portions of White Bird and Elk City), Lapwai, Culatesac and Lewiston for an estimated \$1.4 million investment. This is not a complete list since the capital improvement budget for 2008 has yet to be completed and approved.

18. Besides capital improvements, Inland Cellular has budgeted expenses for facilities, trunks, numbering resources, special access circuits, E911, etc, of approximately \$3.8 million and \$4.2 million for 2007 and 2008, respectively, and for plant operations and maintenance expenses, \$600,000 and \$650,000 for 2007 and 2008, respectively. These budgeted expense figures are for the total of Washington RSA No. 8 Limited Partnership with approximately forty percent of these expenses attributable to Idaho operations.

VII. Paragraph 27. The Ability to Remain Functional in Emergencies.

19. In the June 29, 2006 filing, paragraph 27 read as follows, "Inland Cellular has battery back-up and a standby generator at the central office, as well as at all cell sites. The generators are checked regularly and are alarmed for failure. Inland Cellular maintains redundant routes to connect to the outside world should one route be cut-off. Inland Cellular has technicians on call should trouble develop at any time."

20. The battery back-up can sustain power for no less than 4 hours. Initially, when the power is lost, an alarm signals to the monitoring company (wirelessly) the power outage and a crew is dispatched to the location.

21. On a local network basis, should a cell-site go completely dead, the service is out. This can be likened to if a wireline switch or carrier cabinet were to go completely out; a true catastrophic event. There is no re-routing if the location is dead. Unlike a wireline customer however, the wireless customer could receive service from any of Inland Cellular's roaming partners should their service remain in tact and a signal can be obtained. The wireless customer could also get into their automobile with their cellular phone until a signal is indicated on their device. So as to provide the best possible service, Inland Cellular try's to over-lap it's cellular site signals.

22. Should one of Inland Cellular's regulated microwave facilities that transport signals between cell sites and back to the switch go completely dead, the customer may be completely stranded. This would be similar to a complete cable cut between a wireline subscriber cabinet and the wireline central office. The customer is generally without service until the cut is repaired. Unlike the wireline customer, the cellular subscriber may obtain signal from any of Inland Cellular's roaming partners should their service remain in tact and a signal can be obtained. The wireless customer could also get into their automobile with their cellular phone until a signal is indicated on their device.

23. As was stated, should a route go down between the switch location and Lewiston, which is Inland Cellular's main connection to the world, there is a redundant route. This scenario did happen this year and the redundancy worked; automatically re-routing traffic to the alternative route.

24. Inland Cellular constantly monitors the traffic on its cell sites in order to minimize congestion and dropped calls. As we near the 75 percent capacity mark, even if spiked, the site is evaluated for anomalies and additional carrier is added to the site if the site is capable and deemed appropriate. If the site is deemed to not be capable, an additional site is added in the over-lapping vicinity. Such is the case in Lewiston with currently four sites. It is planned in early 2007 to add an addition site in Lewiston as well as one in Washington near Asotin that will be capable of serving a portion of the west side of Lewiston (up to the airport).

VIII. Paragraph 28. A Commitment to Consumer Protection and Service.

25. In the June 29, 2006 filing, paragraph 28 read as follows, "Customer service is very important to Inland Cellular. It is the one portion of our business that we believe distinguishes us from our competition in a highly competitive business. Although it can be time consuming, we like for our customers to have a face for them to talk to should questions arise. Pursuant to FCC regulations, Inland Cellular must certify that it complies with the Consumer Proprietary Network Information rules, set forth in 47 CFR §64.2001 through 64.2009, to protect consumer information."

26. As members of the Cellular Telecommunications and Internet Association ("CTIA"), Inland Cellular is aware of, agrees to comply with and will become signatories to CTIA's, Consumer Code for Wireless Service. According to the Code, wireless carriers will:

1. Disclose rates and terms of service to consumers;
2. Make available maps showing where service is generally available;
3. Provide contract terms to consumers and confirm changes in service;
4. Allow a trial period for new service (no less than 14 days);
5. Provide disclosures in advertising;

6. Separately identify carrier charges from taxes on billing statements (Truth in Billing);
7. Provide customers the right to terminate service for changes to contract terms;
8. Provide ready access to customer service;
9. Promptly respond to consumer inquiries and complaints from government agencies, and;
10. Abide by policies for protection of consumer privacy.

27. It is Inland Cellular's belief that it currently complies with the CTIA Code. For Idaho, Inland Cellular has customer service locations in Moscow and two in Lewiston. The office in Moscow is located in the Renaissance Mall, at 627 W. Pullman Road. Its office hours are Monday through Friday, 8:00 a.m. to 6:00 p.m. and Saturday, 10:00 a.m. to 3:00 p.m. The office in Lewiston, located at 1332 G Street, is open Monday through Friday, 8:00 a.m. to 5:00 p.m. The office in Lewiston, located at 2331 Thain Grade, Suite 101, is open Monday through Saturday, 9:00 a.m. to 6:00 p.m. Besides having local telephone numbers, customer support may also be reached toll free at (800) 248-8822.

IX. Paragraph 29. Description of the Local Usage Plans

28. In the June 29, 2006 filing, paragraph 29 read as follows, "Inland Cellular offers many calling plans for consumers to choose from that should fit their calling needs. The post-pay plans range from \$29.95 for unlimited minutes of in-network calling (within the Inland Cellular calling area network cell-to-cell) per month and 200 other minutes to \$789.95 for 5,000 minutes of in-network calling per month, 5,000 minutes of incoming calls per month and 8,000 minutes of calling per month within the 50 United States for no additional charges (i.e. no toll or roaming when on another carriers network). Exhibit [C] lists the various calling plans offered by

Inland Cellular and are posted on its website (www.inlandcellular.com) as well as the coverage areas and other service offerings.”

29. The previous paragraph should be corrected to mention the post-pay plan of \$19.95 for 150 minutes of non-toll usage. The monthly charge could also be \$0.0, if the customer elects to have pre-pay service and only charges their phone with minutes as needed at \$0.10 per minute. Rates for the various incumbent local exchange carriers (“ILEC’s”) are included as Exhibits C1 (Verizon), C2 (Qwest), C3 (Inland Telephone Company), C4 (Potlatch Telephone Company) and C5 (Citizens Telephone Co. d/b/a Frontier Communications) for comparative purposes as well as Inland Cellular’s rate plans (Exhibit C). Although the majority of these ILEC’s offer expanded coverage at an additional charge, they still do not afford the customer with the convenience of mobility or the calling area that Inland Cellular can provide.

X. Statement of Need

30. Many residents of Idaho live in rural areas where it is cost-prohibitive for a competitive wireline telecommunications company to offer service. As a result, consumers generally have only one service provider from which to choose. The Partnership seeks to offer citizens of Idaho in its service area an alternative to traditional wireline service. In order for the Partnership’s network to expand into underserved areas, federal high-cost funding must be provided so that needed infrastructure can be fully deployed and competitive service can be delivered.

31. By granting ETC status to the Partnership, this Commission will expedite the provision of competitive telephone service to the people living in remote areas and provide a meaningful choice for many subscribers who have access to only one service provider.

XI. Grant of ICTC’s Application Would Serve the Public Interest

32. In areas served by non-rural LECs, the Commission can designate Inland Cellular as an ETC upon finding that the company meets the nine-point checklist and that it agrees to advertise the supported services.¹⁶ In areas served by a rural telephone company, the Commission must also determine whether granting ETC status to a competitor would serve the public interest.¹⁷ In numerous cases decided by the FCC and state commissions, the answer has been in the affirmative.¹⁸

33. Designation of the Partnership as an ETC will promote competition and facilitate the provision of advanced communications services to the residents of rural Idaho. Residents in many rural areas have long trailed urban areas in receiving competitive local exchange service and advanced telecommunications services. In many rural areas, no meaningful choice of local exchange carrier exists.

34. To date, a number of wireless carriers have been designated as ETCs in multiple states.¹⁹ Recognizing the advantages wireless carriers can bring to the universal service program, the FCC has found that "imposing additional burdens on wireless entrants would be particularly harmful to competition in rural areas, where wireless carriers could potentially offer service at

¹⁶ See *Cellular South Licenses, Inc.*, Docket No. 01-UA-0451 (Dec. 18, 2001) (Mississippi).

¹⁷ See 47 U.S.C. § 214(e)(2).

¹⁸ See, e.g., *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 48, 55 (2000) ("*Western Wireless*"), *aff'd*, 24 CR 1216 (Oct. 19, 2001) ("*Western Wireless Recon. Order*"); *Smith Bagley, Inc., Final Order*, Utility Case No. 3026 (Feb. 19, 2002) (New Mexico).

¹⁹ See, e.g., *Yelm Telephone Company et al., Order Designation Eligible Telecommunications Carriers*, Docket Nos. UT-970333 et al. (Dec. 23, 1997) (Washington); *Guamcell, supra*; *Cellular South Licenses, Inc., supra*; *N.E. Colorado Cellular, Inc.*, Docket No. 00A-315T (Dec. 21, 2001) (Colorado); *Minnesota Cellular Corporation's Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. P5695/M-98-1285 (Oct. 27, 1999) (Minnesota).

much lower costs than traditional wireline service."²⁰ One of the principal goals of the Telecommunications Act of 1996 was to "promote competition and reduce regulation in order to secure lower prices and high-quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies."²¹ Competition in rural areas increases facilities and spurs development of advanced communications as carriers vie for a consumer's business.

35. The FCC recognized that rural customers will benefit from the increased availability of wireless service in its initial decision designating Western Wireless as an ETC in the State of Wyoming, observing: "Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."²² Similarly, in designating the cellular carrier Smith Bagley, Inc. as an ETC in Arizona, the state commission found competitive entry to provide additional consumer choice and a potential solution to "health and safety risks associated with geographic isolation."²³ By designating a wireless carrier as an ETC, the IPUC will foster competition and provide a meaningful choice of services and service providers to the residents of Idaho.

36. The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural telephone companies emphasizes competition and consumer benefit,

²⁰ *First Report and Order*, 12 FCC Rcd at 8881-82.

²¹ Telecommunications Act of 1996, Public Law, 104-104, 100 Stat. 56 (1996).

²² *Western Wireless Corporation*; *supra*, 16 FCC Rcd at 55.

²³ *Smith Bagley, Inc., Order*, Decision No. 63269, Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000) (Arizona).

not incumbent protection. In considering the impact that Western Wireless' ETC designation in Wyoming would have on rural telephone companies, the FCC said:

We do not believe that it is self-evident that rural telephone companies cannot survive competition from wireless providers. Specifically, we find no merit to the contention that designation of an additional ETC in areas served by rural telephone companies will necessarily create incentives to reduce investment in infrastructure, raise rates, or reduce service quality to consumers in rural areas. To the contrary, we believe that competition may provide incentives to the incumbent to implement new operating efficiencies, lower prices, and offer better service to its customers.²⁴

Further, Congress has mandated that universal service provisions be “competitively neutral” and “necessary to preserve and advance universal service.” *See* 47 U.S.C. § 253(b). The Partnership will provide consumers with wider local calling areas, mobile communications, a variety of service offerings, high-quality service, and competitive rates. By offering customers new choices, the incumbent LECs will have an incentive to introduce new, innovative, or advanced service offerings.

37. In most rural areas, wireless telephone service is today a convenience, but it will not emerge as a potential alternative to wireline service unless high-cost support is made available to drive infrastructure investment. Indeed, without the high-cost program it is doubtful that many rural areas would have wireline telephone service even today; in fact there are areas within Inland Cellular’s service area where wireline service is not available today. Provision of high-cost support to Inland Cellular will begin to level the playing field with the incumbent LECs and make available for the first time a potential competitor for primary telephone service in remote areas of Idaho in the Idaho 1 (B-2) RSA and the Idaho 2 (B-2) RSA.

²⁴ *Western Wireless, supra*, 16 FCC Rcd at 57.

38. The consumer benefits of designating a competitive ETC are already becoming evident. In South Dakota, shortly after WWC License, LLC entered the market as a competitive carrier, the incumbent LEC lowered its prices and upgraded its switch. Competitive carriers in Arizona and Mississippi have earmarked high-cost support funds for additional channel capacity, new cell sites, and expedited upgrading of facilities from analog to digital.

39. With high-cost support, Inland Cellular will have an opportunity to create a network that is capable of convincing customers to rely on wireless service as their primary phone.

XII. High-Cost Certification

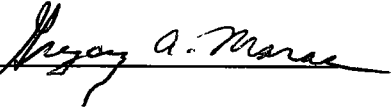
40. Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify with the FCC and the Universal Service Administrative Corporation ("USAC") their compliance with Section 254(e) of the Federal Telecommunications Act of 1996. 47 C.F.R. §§ 54.313, 54.314. ICTC has attached hereto its affidavit containing certifications pursuant to IPUC Order No. 29841. ICTC respectfully requests that the IPUC issue a finding that the Partnership has met the high-cost certification requirement and that the Partnership is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.²⁵

WHEREFORE, pursuant to Section 214(e)(2) of the Act, ICTC respectfully requests that the Commission, (1) enter an Order designating the Partnership as an ETC for its requested ETC service area as shown on the map in its previous Exhibit A, and (2) certify to the FCC that the Partnership will use the support for its intended purpose.

²⁵ See, e.g. *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, CC Docket 96-45 (filed Feb. 6, 2002).

Respectfully submitted,

**Inland Cellular Telephone Company
As General Partner for
Washington RSA No. 8 Limited Partnership**

By: 

Gregory A. Maras
Secretary

INLAND CELLULAR ADVERTISEMENT

Inland Cellular (Inland Cellular is the trade name of both Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership) has been a local cellular telephone provider in eastern Washington since approximately 1992. In Washington, Inland Cellular's service area covers the eastern half of Grant County and the majority of Adams, Asotin, Columbia, Garfield, Lincoln, Whitman, and Walla Walla Counties and a minor portion of Franklin County.

During the intervening years, we have worked hard to build a cellular system that would provide high quality telecommunications services to the communities we serve. We have done this, notwithstanding the higher costs of serving rural areas in the State of Washington and are always striving to provide even better service.

We have served and intend to continue to serve both residential and business customers in our service area with high quality telecommunications services at attractive and affordable rates.

In addition to our basic cellular telephone services, we offer throughout our service area advanced telecommunications services, including special calling features.

The basic services offered by Inland Cellular in the aforementioned calling area are comprised of several components. At a minimum, these include:

Service Offered

Single-party, voice grade access to the public switched network, including a range of local usage from 0 minutes to unlimited calling (basic general service) monthly.

Monthly Calling Plan Charges*

Residence - Range from \$0 to \$789.95 per month

Business - Range from \$0 to \$789.95 per month

*The monthly charge may be \$0 with a Pre-Paid Calling Plan; calling plans vary based on customer preference.

Access to emergency 911 services - There is no additional charge by Inland Cellular to end user customers for the ability to access emergency 911 services.

Access to operator services - There is no additional charge by Inland Cellular to end user customers for the ability to call the operator. However, the call may involve a charge depending on the service requested and the rates of the company whose operator handles the call, as well as location of the call origination.

Access to Directory Assistance - There is no additional charge by Inland Cellular to end user customers for the ability to call the Directory Assistance. However, the call may involve a Directory Assistance charge, the amount of which depends on the area called and the rates of the company whose operator is accessed, as well as location of the call origination.

Lifeline and Link-Up Programs: Do you qualify for a discount?

Inland Cellular participates in the Federal Lifeline and Link-Up programs. You may qualify if:

- > Your household income is at or below 135% of the Federal poverty guidelines; or,
- > You participate in one of the following programs:
 - > Low-Income Home Energy Assistance Program (LIHEAP) or any Official Home Energy Assistance Program;

CERTIFICATION BY CUSTOMER IN ORDER TO RECEIVE FEDERAL LIFELINE/LINK-UP SUPPORT

I certify that I qualify for Lifeline/Link-Up Support and am currently participating in one or more of the programs listed that I have checked below and have provided proof of my participation.

I certify that I qualify for Lifeline/Link-Up Support under the Federal income requirements for qualification listed and checked below and have provided proof of my qualifications.

It is understood that by participating in the Lifeline/Link-Up program, the support that I receive is not an actual payment to me but a discount that will appear on my monthly bill. Participating in Lifeline does not protect me from collection procedures if I do not pay my phone bill. If I voluntarily elect toll blocking, Inland Cellular may not collect a service deposit in order to initiate Lifeline service. This discount, as well as the criteria for participation in the Lifeline/Link-Up program, may change and I may no longer qualify or the amount of support may increase or decrease.

As the Certifying Subscriber, (i) the service is for me and not a member of the household; (ii) I am not listed as a dependent on someone else's tax return; and, (iii) the service address is my primary residence. If for any reason I should no longer participate in any of the programs or qualify by income, it is my responsibility to notify Inland Cellular. I further certify that the service that I receive from the Inland Cellular is my main line of service and I do not receive Lifeline Support for any other telecommunications service. I understand that if I no longer qualify for support for any reason, I am not entitled to receive such support and that in order to continue to receive this support, I must annually certify my eligibility and that the Inland Cellular may randomly require proof of eligibility in the interim.

I further understand that if I have made any misleading statements in order to receive support, I will be liable for any support received and service may be discontinued as well as be subject to Federal perjury.

- | | |
|--|---|
| <input type="checkbox"/> Low-income Home Energy Assistance Program (LIHEAP) or any Official Home Energy Assistance Program | <input type="checkbox"/> Supplemental Security Income (SSI) |
| <input type="checkbox"/> Federal Public Housing Assistance or Section 8 | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Medicaid | <input type="checkbox"/> National School Lunch free lunch program |
| <input type="checkbox"/> Food Stamps | <input type="checkbox"/> Household Income <u>At or Below</u> 135% of the Federal Poverty Guidelines |

Consumers living on Indian reservations or tribal lands may establish eligibility by participating in any of the following additional programs:

- | | |
|--|---|
| <input type="checkbox"/> Bureau of Indian Affairs (BIA) general assistance | <input type="checkbox"/> Head Start (if Income Eligible) |
| <input type="checkbox"/> Tribal Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Free meals under the National School Lunch Program |

Name of Reporting Service Carrier	
Signature of Certifying Subscriber	Date
Printed name of Certifying Subscriber	
Service address of Certifying Subscriber	
Mailing address of Certifying Subscriber	
Telephone number of Certifying Subscriber	
Social Security No. of Certifying Subscriber	

FOR OFFICIAL USE ONLY

Company Service Market	
Printed name of Customer Care Rep	
Signature of Customer Care Rep	

Proof of eligibility from customer is required (check all that apply):

- Copy of document to verify participation in any of the above listed programs
- This form signed under penalty of perjury that consumer receives benefits from one of the federal programs that comprises the federal eligibility criteria.
- Copy of tax return for _____ year.
- Case Number _____
- Other _____

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

ATTACHMENT A

*For Inland Cellular Internal Distribution ONLY***CONSUMER DOCUMENTATION REQUIRED FOR LIFELINE INCOME ELIGIBILITY**

When requesting Lifeline based on income eligibility (i.e., the consumer's household income is at or below 135% of the federal poverty guidelines), the consumer must provide documentation of income eligibility at the time of enrollment. Any one of the following documents are acceptable to be used by Inland Cellular to verify income eligibility for Lifeline:

- > Federal, State or Tribal Tax Return; or,
- > Divorce Decree documenting income; or,
- > Child Support Document documenting income; or,
- > Federal or Tribal Notice Letter of Participation in the Bureau of Indian Affairs General Assistance

OR:

- > Documents Spanning Three Recent Consecutive Months for:
 - > Income Statement from Employer or Paycheck Stub; or,
 - > Social Security Statement of Benefits; or,
 - > Veterans Administration Statement of Benefits; or,
 - > Retirement/Pension Statement of Benefits; or,
 - > Unemployment/Worker's Compensation Statement of Benefits.

2006 Estimated Income Requirements for a Household <u>AT</u> or <u>BELOW</u> 135% of the Federal Poverty Guidelines			
Size of Family Unit or Household	48 Contiguous States & DC	Alaska	Hawaii
1	\$13,230	\$16,538	\$15,215
2	\$17,820	\$22,275	\$20,493
3	\$22,410	\$28,013	\$25,772
4	\$27,000	\$33,750	\$31,050
5	\$31,590	\$39,488	\$36,329
6	\$36,180	\$45,225	\$41,607
7	\$40,770	\$50,963	\$46,886
8	\$45,360	\$56,700	\$52,164
For each additional person, add	\$4,590	\$5,381	\$5,279

**INLAND CELLULAR
CALLING PLANS AND PREPAID SERVICE**

Plan	Lines	Minutes Included	Monthly Rate	Add'l Mins	50 State Roaming**	Incoming Calls**	Cell to Cell**	Long Distance	500 Night & Weekend Mins**	Voice Mail	Standard T-Mail	Add'l Lines	Free Add'l Mins
Tek Pak	1	200	\$ 29.90	\$ 0.26	N/A	Unlimited	Unlimited	\$ 0.18	Unlimited	Included	Included	N/A	N/A
U.S.A. 350*	1	350	\$ 39.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 500*	1	500	\$ 44.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 750*	1	750	\$ 64.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 1000*	1	1000	\$ 89.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 1250*	1	1250	\$ 114.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 1500*	1	1500	\$ 139.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 3000*	1	3000	\$ 289.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 4500*	1	4500	\$ 439.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 6000*	1	6000	\$ 589.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 8000*	1	8000	\$ 789.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
Twins U.S.A.* ++	2	500	\$ 69.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
Trips U.S.A.* ++	3	1000	\$ 99.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
Quad U.S.A.* ++	4	1250	\$ 124.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A

NOTE: All applicable Federal, State, and local taxes, surcharges, and fees will apply.

NOTE: Service is not available in all areas. We have agreements with other service providers in most areas across the U.S. Service in those areas is provided by a different carrier and Inland Cellular does not guarantee their service.

* To get service on a U.S.A. plan, you must have a Tri-Mode CDMA phone that is compatible with our service and has the most current PRL loaded. See store for details.

** Applies only to calls made or received within our Home Service Area on our towers. Cell to cell calls to other Inland Cellular customers within our Home Service Area only. Weekends: 12:01 a.m. Saturday to midnight on Sunday. Night: 7:01 p.m. to 6:59 a.m. Monday-Thursday; Friday 7:01 p.m. to 12:00 a.m.

++ Shared minutes

Prepaid Plan	Setup Fee	Monthly Access Fee	Included Minutes	Add'l Mins	Long Distance	Roaming Rate	Minimum Replenish	Voice Mail
Q Plan	20	\$ -	0	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included
Q 150	20	\$ 19.95	150	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included
Q 300	20	\$ 29.95	300	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included
Q 500	20	\$ 39.95	500	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included

NOTE: All applicable Federal, State, and local taxes, surcharges, and fees will apply.

ALL CALLING PLANS INCLUDE CALL WAITING, CONFERENCE CALLING, AND CALL FORWARDING.

Exhibit C1

NON-RURAL LEC WIRE CENTERS

LEC: Verizon Northwest, Inc. – ID – SAC 472416

Wire Center : Bovil
Deary
Genesee
Moscow
Orofino
Peck
Pierce
Potlatch (GTE)
Weippe

Section 4
 Original Sheet 6

LOCAL SERVICE

NETWORK ACCESS LOCAL SERVICE OPTIONS

LOCAL CALLING AREA		MEASURED RATE LOCAL CALLING AREA				
EXCHANGE AND SERVICE OPTION	MONTHLY RATE	UNLIMITED USAGE SERVICE AREA	MEASURED RATE LOCAL CALLING AREA			
			ZONE 0	ZONE 1	ZONE 2	ZONE 3
<u>BOVILL</u>						
<u>Basic Calling Service</u>		None	Bovill	Deary	None	Moscow, ID Potlatch
Residence One-Party	\$11.35					
Business One-Party	15.35					
Business Multi-Line	17.35					
Central Office Located Trunk	10.73					
CentraNet [®] CustoPAK	30.90					
<u>Community Calling Service</u>		Bovill Deary	None	None	None	Moscow, ID Potlatch
Residence One-Party	\$14.60					
Business One-Party	19.43					
Business Multi-Line	21.36					
Central Office Located Trunk	14.74					
CentraNet [®] CustoPAK	34.91					
Public Access Line	19.43					
Coin Line Service	21.48					
<u>Community Plus Service</u>		Bovill Deary	None	None	None	None
Residence One-Party	\$19.10					
Business One-Party	38.35					
Business Multi-Line	41.35					
Central Office Located Trunk	34.73					
CentraNet [®] CustoPAK	54.90					
<u>Premium Calling Service</u>	Not Available	Not Available				

Advice No. 05-13

Issued: November 21, 2005
 Issued by Verizon Northwest Inc.
 By David S. Valdez, Executive Director – Public Policy and External Affairs

Effective: December 1, 2005

