

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Federal-State Joint Board on
Universal Service
ALLTEL Communications, Inc.
Petition for Designation as an Eligible
Telecommunications Carrier in the state of
Alabama
Petition for Designation as an Eligible
Telecommunications Carrier in the state of Florida
Petition for Designation as an Eligible
Telecommunications Carrier in the state of
Georgia
Petition for Designation as an Eligible
Telecommunications Carrier in the state of North
Carolina
Petition for Designation as an Eligible
Telecommunications Carrier in the
Commonwealth of Virginia
CC Docket No. 96-45

ORDER

Adopted: September 24, 2004

Released: September 24, 2004

By the Chief, Wireline Competition Bureau:

I. INTRODUCTION

1. In this Order, we grant the petitions of ALLTEL Communications, Inc. (ALLTEL) to be designated as an eligible telecommunications carrier (ETC) for the requested service areas in Alabama, Florida, Georgia, North Carolina, and Virginia, pursuant to section 214(e)(6) of the Communications Act of 1934, as amended (the Act).¹ In so doing, we conclude that ALLTEL, a commercial mobile radio

¹See Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Alabama, filed April 14, 2003 (Alabama Petition); First Amendment to the Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Alabama, filed May 21, 2003 (Alabama Amendment); Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Florida, filed November 20, 2003 (Florida Petition); Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Georgia, filed August 26, 2003 (Georgia Petition); Amendment to Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Georgia, filed September 15, 2003 (Georgia Amendment); Application of ALLTEL Communications, Inc. for Designation as an

(continued....)

service (CMRS) carrier, has satisfied the statutory eligibility requirements of section 214(e)(1) to be designated as an ETC.²

II. BACKGROUND

A. The Act

2. Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support.”³ Pursuant to section 214(e)(1), a common carrier designated as an ETC must offer and advertise the services supported by the federal universal service mechanisms throughout the designated service area.⁴

3. Section 214(e)(2) of the Act provides state commissions with the primary responsibility for performing ETC designations.⁵ Section 214(e)(6), however, directs the Commission, upon request, to designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission.”⁶ Under section 214(e)(6), the Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience, and necessity, so long as the requesting carrier meets the requirements of section 214(e)(1).⁷ Before designating an additional ETC for an area served by a rural telephone company, the Commission must determine that the designation is in the public interest.⁸ The Wireline Competition Bureau (Bureau) has delegated authority to perform ETC designations.⁹

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Eligible Telecommunications Carrier in the State of North Carolina, filed August 26, 2003 (North Carolina Petition); Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Virginia, filed April 14, 2003 (Virginia Petition); First Amendment to the Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Virginia, filed May 21, 2003 (Virginia Amendment); Letter from Glenn S. Rabin, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated March 1, 2004 (ALLTEL March 1, 2004 Supplement); Letter from Cheryl A. Tritt, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated September 20, 2004. *See also* 47 U.S.C. § 214(e)(6).

²47 U.S.C. § 214(e)(1).

³47 U.S.C. § 254(e).

⁴47 U.S.C. § 214(e)(1).

⁵47 U.S.C. § 214(e)(2). *See also Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, CC Docket No. 96-45, 15 FCC Rcd 12208, 12255, para. 93 (2000) (*Twelfth Report and Order*).

⁶47 U.S.C. § 214(e)(6). *See, e.g., Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, 19 FCC Rcd 1563 (2004) (*Virginia Cellular Order*); *Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, 19 FCC Rcd 6422 (2004) (*Highland Cellular Order*).

⁷47 U.S.C. § 214(e)(6).

⁸*Id.*

⁹*See Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, Public Notice, CC Docket No. 96-45, 12 FCC Rcd 22947, 22948 (1997) (*Section 214(e)(6) Public Notice*). The Wireline Competition Bureau was previously named the Common Carrier Bureau.

B. Commission Requirements for ETC Designation

4. An ETC petition must contain the following: (1) a certification and brief statement of supporting facts demonstrating that the petitioner is not subject to the jurisdiction of a state commission; (2) a certification that the petitioner offers or intends to offer all services designated for support by the Commission pursuant to section 254(c); (3) a certification that the petitioner offers or intends to offer the supported services “either using its own facilities or a combination of its own facilities and resale of another carrier’s services;” (4) a description of how the petitioner “advertise[s] the availability of [supported] services and the charges therefor using media of general distribution;” and (5) if the petitioner meets the definition of a “rural telephone company” pursuant to section 3(37) of the Act, the petitioner must identify its study area, or, if the petitioner is not a rural telephone company, it must include a detailed description of the geographic service area for which it requests an ETC designation from the Commission.¹⁰

5. On June 30, 2000, the Commission released the *Twelfth Report and Order* which, among other things, set forth how a carrier seeking ETC designation from the Commission must demonstrate that the state commission lacks jurisdiction to perform the ETC designation.¹¹ Carriers seeking designation as an ETC for service provided on non-tribal lands must provide the Commission with an “affirmative statement” from the state commission or a court of competent jurisdiction that the carrier is not subject to the state commission’s jurisdiction.¹² The requirement to provide an “affirmative statement” ensures that the state commission has had “a specific opportunity to address and resolve issues involving a state commission’s authority under state law to regulate certain carriers or classes of carriers.”¹³

6. On January 22, 2004, the Commission released the *Virginia Cellular Order*, which granted in part and denied in part the petition of Virginia Cellular, LLC (Virginia Cellular) to be designated as an ETC throughout its licensed service area in the Commonwealth of Virginia.¹⁴ In that Order, the Commission utilized a new public interest analysis for ETC designations and imposed ongoing conditions and reporting requirements on Virginia Cellular.¹⁵ The Commission further stated that the framework enunciated in the *Virginia Cellular Order* would apply to all ETC designations for rural areas pending further action by the Commission.¹⁶ Following the framework established in the *Virginia Cellular Order*, on April 12, 2004, the Commission released the *Highland Cellular Order*, which granted in part and denied in part the petition of Highland Cellular, Inc. to be designated as an ETC in portions of its licensed service area in the Commonwealth of Virginia.¹⁷ In the *Highland Cellular Order*, the Commission concluded, among other things, that a telephone company in a rural study area may not be designated as a competitive ETC below the wire center level.¹⁸

¹⁰See Section 214(e)(6) Public Notice, 12 FCC Rcd at 22948-49 (1997); 47 U.S.C. § 3(37). See also *Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, Declaratory Ruling, CC Docket No. 96-45, 15 FCC Rcd 15168 (2000) (*Declaratory Ruling*), recon. pending.

¹¹See *Twelfth Report and Order*, 15 FCC Rcd at 12255-65, paras. 93-114.

¹²*Id.*, 15 FCC Rcd at 12255, para. 93.

¹³*Id.*

¹⁴See *Virginia Cellular Order*, 19 FCC Rcd at 1564, para. 1.

¹⁵See *id.*, 19 FCC Rcd at 1565, 1575-76, 1584-85, paras. 4, 27, 28, 46.

¹⁶See *id.*, 19 FCC Rcd at 1565, para. 4.

¹⁷See *Highland Cellular Order*, 19 FCC Rcd at 6422, para. 1.

¹⁸See *id.*, 19 FCC Rcd at 6438, para. 33.

C. ALLTEL Petitions

7. Pursuant to section 214(e)(6), ALLTEL filed with this Commission five petitions and amendments thereto, seeking designation as an ETC in study areas served by both rural and non-rural incumbent local exchange carriers (LECs) in the states of Alabama, Florida, Georgia, North Carolina, and Virginia.¹⁹ ALLTEL subsequently bifurcated its petitions into separate requests for ETC designation in non-rural and rural service areas, and later voluntarily withdrew the portions of those petitions seeking ETC designation in rural service areas, without prejudice to any subsequent refile of those requests.²⁰ The Bureau released public notices seeking comment on these petitions.²¹ Throughout this process, several parties filed comments and oppositions.²² In light of the new ETC designation framework established in the *Virginia Cellular Order*, on March 1, 2004, ALLTEL filed a supplement to its ETC petitions.²³ On April 2, 2004, the Bureau released a public notice seeking comment concerning all supplemented ETC petitions, including the petitions filed by ALLTEL.²⁴

III. DISCUSSION

8. After careful review of the record before us, we find that ALLTEL has met all the requirements set forth in section 214(e)(1) and (e)(6) to be designated as an ETC by this Commission for its licensed service areas described herein. ALLTEL's ETC designation for the non-rural service areas of Alabama, Florida, Georgia, North Carolina, and Virginia is effective immediately.

A. Commission Authority to Perform the ETC Designation

9. We find that ALLTEL has demonstrated that the Commission has authority to consider ALLTEL's petitions under section 214(e)(6) of the Act.²⁵ ALLTEL's petitions each include an affirmative statement from the relevant state commission stating that requests for designation as eligible

¹⁹See *supra* note 1.

²⁰See Letter from Cheryl A. Tritt, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated November 10, 2003; Letter from Cheryl A. Tritt, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated May 21, 2004; *infra* para. 19. Accordingly, our analysis here is limited to the non-rural service areas in Alabama, Florida, Georgia, North Carolina, and Virginia for which ALLTEL seeks ETC designation.

²¹See *Wireline Competition Bureau Seeks Comment on ALLTEL Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier In the State of Alabama*, Public Notice, CC Docket No. 96-45, 18 FCC Rcd 11339 (2003); *Wireline Competition Bureau Seeks Comment on ALLTEL Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier and Rural Service Area Redefinition In the State of Georgia*, Public Notice, CC Docket No. 96-45, 18 FCC Rcd 24989 (2003); *Wireline Competition Bureau Seeks Comment on ALLTEL Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier and Rural Service Area Redefinition In the State of North Carolina*, Public Notice, CC Docket No. 96-45, 18 FCC Rcd 24985 (2003); *Wireline Competition Bureau Seeks Comment on ALLTEL Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier In the State of Virginia*, Public Notice, CC Docket No. 96-45, 18 FCC Rcd 11336 (2003); *Parties are Invited to Comment on Supplemented Petitions for Eligible Telecommunications Carrier Designations*, Public Notice, CC Docket No. 96-45, 19 FCC Rcd 6405 (2004).

²²See Appendix A for a list of entities filing comments, reply comments, and oppositions associated with the five petitions for ETC designation.

²³See ALLTEL March 1, 2004 Supplement.

²⁴See *Parties are Invited to Comment on Supplemented Petitions for Eligible Telecommunications Carrier Designations*, Public Notice, CC Docket 96-45, 19 FCC Rcd 6405 (2004).

²⁵47 C.F.R. § 214(e)(6).

telecommunications carriers should be sought from the Commission.²⁶

B. Offering and Advertising the Supported Services

10. Offering the Services Designated for Support. ALLTEL has demonstrated through the required certifications and related filings that it now offers, or will offer upon designation as an ETC, the services supported by the federal universal service mechanism. As noted in its petitions, ALLTEL is authorized to provide cellular radiotelephone service in Alabama, Florida, Georgia, North Carolina, and Virginia.²⁷ ALLTEL certifies that it now provides or will provide throughout its designated service area the services and functionalities enumerated in section 54.101(a) of the Commission's rules.²⁸ ALLTEL has also certified that, in compliance with rule section 54.405, it will make available and advertise Lifeline service to qualifying low-income consumers.²⁹ Furthermore, ALLTEL made commitments that closely track those set forth in the *Virginia Cellular Order* and the *Highland Cellular Order*, including: (1) annual reporting of progress towards buildout plans, unfulfilled service requests, and complaints per 1,000 handsets; (2) specific commitments to provide service to requesting customers in the area for which it is designated, including those areas outside existing network coverage; and (3) specific commitments to construct new cell sites in areas outside its network coverage.³⁰

11. We reject the claims of certain commenters that ALLTEL does not provide the required services and functionalities supported by the universal service mechanism. First, commenters argue that ALLTEL should be required to offer unlimited local calling to mirror the services offered by wireline

²⁶Alabama Petition at 2-3 & Exhibit A; Florida Petition at 3-4 & Exhibit B; Georgia Petition at 2-3 & Exhibit B; North Carolina Petition at 3-4 & Exhibit B; Virginia Petition at 3 & Exhibit A. *See also* CTIA Georgia Comments at 3-4; CTIA North Carolina Comments at 3-4; CTIA Virginia Comments at 2-3;

²⁷Alabama Petition at 1; Florida Petition at 2; Georgia Petition at 1; North Carolina Petition at 1; Virginia Petition at 1.

²⁸Alabama Petition at 1-2; Florida Petition at 2; Georgia Petition at 1-2; North Carolina Petition at 1-2; Virginia Petition at 1.

²⁹Alabama Petition at 4-6; Florida Petition at 4-8; Georgia Petition at 4-8; North Carolina Petition at 5-8; Virginia Petition at 4-7; ALLTEL March 1, 2004 Supplement at 6; ALLTEL Alabama/Virginia Reply at 15. 47 C.F.R. § 54.405. We note that ETCs must comply with state requirements in states that have Lifeline programs. *See Lifeline and Link-Up*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 03-109, 19 FCC Rcd 8302, 8320 at para. 29 (2003).

³⁰ALLTEL March 1, 2004 Supplement at 4-6; Letter from Cheryl A. Tritt, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated July 9, 2004 (July 9, 2004 Letter). ALLTEL has provided detailed information on how it will use universal service support to construct cell sites throughout the states in which it is designated as an ETC. ALLTEL March 1, 2004 Supplement at Exhibit B. Specifically, ALLTEL provides the location by study area of new cell sites and the cost of build-out plans, which ALLTEL projects will be carried out within one year of receiving ETC designation. *See id.* at 5-6 and Exhibit B. In addition, ALLTEL has provided the figures on the populations that will be served by each new cell site that ALLTEL proposes to construct using ETC funds. *July 9, 2004 Letter* at Attachment A. According to these plans, within 12 months of receiving ETC designation, ALLTEL will use universal service support to begin construction of 12 cell sites in Alabama, seven cell sites in Florida, five cell sites in Georgia, 20 cell sites in North Carolina, and 19 cell sites in Virginia. ALLTEL March 1, 2004 Supplement at Exhibit B. The proposed cell sites in Alabama will serve 753,118 people; the proposed cell sites in Florida will serve 1,553,253 people; the proposed cell sites in Georgia will serve 360,834 people; the proposed cell sites in North Carolina will serve 5,216,571 people; and the proposed cell sites in Virginia will serve 1,583,495 people. *July 9, 2004 Letter* at Attachment A. We recognize that these plans may change over time depending on consumer demand, fluctuation in universal service support, and related factors. *See, e.g., Virginia Cellular Order*, 19 FCC Rcd at 1571, para. 16.

carriers.³¹ No such requirement is necessary because the Commission has not established a minimum local usage requirement and ALLTEL has pledged compliance with any and all minimum local usage requirements required by applicable law.³² In any event, we note that ALLTEL includes local usage in all of its calling plans.³³ Second, we disagree that ETC designation would be improper in this case due to the mobile nature of ALLTEL's services. Specifically, certain commenters contend that the service area in which a customer resides may bear no relationship to the location where wireless support will be actually used by ALLTEL and therefore undermines the purpose of the universal service fund.³⁴ The Commission has found previously, however, that universal service offerings enable competitive wireless ETCs to provide benefits to customers that do not have access to wireline phones, such as consumers that often must drive significant distances to places of employment, stores, schools, and other critical community locations.³⁵ We also note that the Commission is currently seeking comment on this and related issues.³⁶ Third, we reject the argument that ETC designation is unwarranted because ALLTEL has failed to demonstrate that it currently offers certain supported services, such as voice grade access to the public switched network, and ALLTEL has not shown that it will effectively advertise the Lifeline and Link-Up programs.³⁷ We are satisfied by ALLTEL's statements that it will provide all the services supported by the universal service program, including access to the public switched telephone network, and commits to participate in and advertise the Lifeline and Link-Up programs.³⁸

12. Offering the Supported Services Using a Carrier's Own Facilities. ALLTEL has demonstrated that it satisfies the requirement of section 214(e)(1)(A) that it offer the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.³⁹ ALLTEL states that it intends to provide the supported services using its existing network infrastructure.⁴⁰

13. Advertising Supported Services. ALLTEL has demonstrated that it satisfies the requirement of section 214(e)(1)(B) to advertise the availability of the supported services and the charges therefor using media of general distribution.⁴¹ In addition to its current advertising,⁴² ALLTEL has

³¹CenturyTel Reply at 10-11; NASUCA Comments at 3; CenturyTel Supplemental Comments at 5-6. *See also* Alabama Rural LEC Comments at 26.

³²Alabama Petition at 4-5; Florida Petition at 5-6; Georgia Petition at 4-5; North Carolina Petition at 5-6; Virginia Petition at 4-5.

³³Alabama Petition at 4-5; Florida Petition at 5-6; Georgia Petition at 5; North Carolina Petition at 5-6; Virginia Petition at 4-5.

³⁴Alabama Rural LECs Comments at 15; CenturyTel Reply at 12-13; CenturyTel Supplemental Comments at 6.

³⁵*See Highland Cellular Order*, 19 FCC Rcd at 6432-33, para. 23.

³⁶*Federal-State Joint Board on Universal Service*, Notice of Proposed Rulemaking, CC Docket No. 96-45, FCC 04-127 (rel. June 8, 2004) (*ETC High-Cost NPRM*).

³⁷Alabama Rural LECs Comments at 24-25, 27-28.

³⁸Alabama Petition at 4-6; Florida Petition at 4-8; Georgia Petition at 4-8; North Carolina Petition at 5-8; Virginia Petition at 4-7; ALLTEL March 1, 2004 Supplement at 6; ALLTEL Alabama/Virginia Reply at 15. *See also* 47 C.F.R. §§ 54.101, 54.405.

³⁹47 C.F.R. § 214(e)(1)(A).

⁴⁰*See* Alabama Petition at 7; Florida Petition at 8-9; Georgia Petition at 8; North Carolina Petition at 8-9; Virginia Petition at 7.

⁴¹47 C.F.R. § 214(e)(1)(B).

⁴²Alabama Petition at 7; Florida Petition at 9; Georgia Petition at 8; North Carolina Petition at 9; Virginia Petition at 7.

committed to specific methods to publicize the availability of Lifeline and Link-up service and improved service in unserved or underserved areas.⁴³

C. Public Interest Analysis

14. We conclude that it is “consistent with the public interest, convenience, and necessity” to designate ALLTEL as an ETC throughout its licensed non-rural service areas in the states of Alabama, Florida, Georgia, North Carolina, and Virginia.⁴⁴ In determining whether the public interest is served, the Commission places the burden of proof upon the ETC applicant.⁴⁵ We conclude that ALLTEL has satisfied the burden of proof in establishing that its universal service offering in these five states will provide benefits to non-rural consumers.

15. We conclude, as required by section 214(e)(6) of the Act, that it is “consistent with the public interest, convenience, and necessity” to designate ALLTEL as an ETC for its requested service area that is served by non-rural telephone companies, as provided in Appendix B.⁴⁶ We note that the Bureau previously has found designation of additional ETCs in areas served by non-rural telephone companies to be *per se* in the public interest based upon a demonstration that the requesting carrier complies with the statutory eligibility obligations of section 214(e)(1) of the Act.⁴⁷ In the *Virginia Cellular Order* and the *Highland Cellular Order*, however, the Commission determined that designation of an additional ETC in a non-rural telephone company’s study area based merely upon a showing that the requesting carrier complies with section 214(e)(1) of the Act does not necessarily satisfy the public interest in every instance.⁴⁸ While some commenters argue that ALLTEL has failed to demonstrate that its designation as an ETC would serve the public interest,⁴⁹ nearly all these objections are to ALLTEL’s applications for ETC status in rural areas, and these applications have been withdrawn.⁵⁰ ALLTEL’s public interest showing here is sufficient based on the detailed commitments ALLTEL has made to ensure that it provides high quality service throughout the proposed non-rural service areas. Specifically, despite only seeking designation in areas served by non-rural carriers, ALLTEL has made the same or similar commitments to those made by ETCs in rural areas in the *Virginia Cellular Order* and the *Highland Cellular Order*, including setting forth a specific plan for responding to requests for service, agreeing to provide the Commission with data on how high-cost support funds were used, and committing to inform customers of its services, including Lifeline and Link-up, through a variety of media.⁵¹ In addition, ALLTEL has also made service quality commitments comparable to those made in the *Virginia Cellular Order* and the *Highland Cellular Order*, including compliance with the Cellular Telecommunications Industry Association (CTIA) Code for Wireless Service and a commitment to provide the Commission

⁴³See ALLTEL March 1, 2004 Supplement at 6.

⁴⁴47 U.S.C. § 214(e)(6). See Appendix B.

⁴⁵See *Virginia Cellular Order*, 19 FCC Rcd at 1574-75, para. 26; *Highland Cellular Order*, 19 FCC Rcd 6431, para. 20.

⁴⁶See 47 U.S.C. § 214(e)(6). See also Appendix B.

⁴⁷See, e.g., *Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, CC Docket No. 96-45, 16 FCC Rcd 39 (2000).

⁴⁸See *Virginia Cellular Order*, 19 FCC Rcd at 1575, para. 27; *Highland Cellular Order*, 19 FCC Rcd at 6431-32, para. 21.

⁴⁹Alabama Rural Local Exchange Carriers Comments at 5-18; CenturyTel Reply at 4-13; OPASTCO Reply at 2-8;

⁵⁰See *infra* para. 19.

⁵¹*Virginia Cellular Order*, 19 FCC Rcd at 1575-1580, paras. 28-35; *Highland Cellular Order*, 19 FCC Rcd at 6432-38, paras. 22-33; ALLTEL March 1, 2004 Supplement at 4-6.

with consumer complaint data.⁵² Certainly, if ALLTEL is willing to meet these requirements in areas served by non-rural carriers, it would be hard to find that ALLTEL's application in the present case fell short of meeting the public interest standard. We therefore find that ALLTEL has demonstrated that its designation as an ETC in these non-rural study areas is consistent with the public interest, as required by section 214(e)(6).⁵³

16. The Commission is seeking comment on the *Recommended Decision* of the Federal Joint-Board on Universal Service (Joint Board) concerning the process for designation of ETCs and the Commission's rules regarding high-cost universal service support.⁵⁴ Verizon argues that, in light of the impact that ETC designations have on the universal service fund, the Commission should not rule on any pending ETC petitions until the completion of the rulemaking proceeding.⁵⁵ Although Verizon raises important issues, we decline to delay ruling on pending ETC petitions at this time. We believe that grant of these ETC designations will not dramatically burden the universal service fund. For example, even assuming that ALLTEL captures each and every customer located in the affected study areas, the overall size of the high-cost support mechanisms would not significantly increase.⁵⁶ Nevertheless, we continue to be mindful on the impact on the universal service fund due to the rapid growth in the number of competitive ETCs. We note that the outcome of the rulemaking proceeding could potentially impact, among other things, the amount of support that ALLTEL and other competitive ETCs receive in the future.

17. We further disagree with Verizon's argument that we should not designate any additional competitive ETCs because it could have a significant impact on the access charge plan established by the Commission's *CALLS Order*.⁵⁷ In the voluntarily negotiated *CALLS* plan, price cap carriers, *inter alia*, agreed to establish a \$650 million target for interstate access support. Similar to other types of universal service support, interstate access support is portable to competitive ETCs.⁵⁸ Consequently, because interstate access support is targeted to \$650 million, when a competitive ETC receives interstate access support, there is a corresponding reduction in support available to incumbent carriers. As the *CALLS* plan was being considered, portability of support to competitive ETCs and its relation to the \$650 million

⁵²ALLTEL March 1, 2004 Supplement at 4. Under the CTIA Consumer Code, wireless carriers agree to: (1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (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 received from government agencies; and (10) abide by policies for protection of consumer privacy.

⁵³See 47 U.S.C. § 214(e)(6).

⁵⁴*ETC High-Cost NPRM*, *supra* n. 36; *Federal-State Joint Board on Universal Service*, Recommended Decision, CC Docket No. 96-45, 19 FCC Rcd 4257 (2004) (*Joint Board Recommended Decision*). Among other things, the Joint Board recommended that the Commission adopt permissive federal guidelines for states to consider when designating ETCs under section 214 of the Act. *Joint Board Recommended Decision*, 19 FCC Rcd at 4258, para. 2.

⁵⁵See Verizon Comments at 1-5.

⁵⁶For example, out of the five states in which ALLTEL seeks designation, the incumbent carriers in Florida receive the most high-cost support. The total amount of high-cost support reserved by such carriers is approximately 1.52% of the total high cost support available to all ETCs.

⁵⁷See generally Verizon Opposition; CenturyTel Reply at 7-8; CenturyTel Supplemental Comments at 4. See *Access Charge Reform*, Sixth Report and Order, CC Docket Nos. 96-262 and 94-1, Report and Order, CC Docket No. 99-249, Eleventh Report and Order, CC Docket No 96-45, 15 FCC Rcd 12962 (2000) (*subsequent history omitted*) (*CALLS Order*).

⁵⁸See 47 C.F.R. § 54.307(a).

target was contemplated.⁵⁹ Accordingly, the CALLS plan is functioning as contemplated by the agreement. We further note that the CALLS plan was designed for a five-year period, which ends in 2005.⁶⁰ As part of its consideration of the appropriate regulatory mechanism to replace the CALLS plan, the Commission can examine whether the interstate access support mechanism remains sufficient.⁶¹

D. Designated Service Areas

18. We designate ALLTEL as an ETC in the requested service areas in Alabama, Florida, Georgia, North Carolina, and Virginia served by non-rural telephone companies, as listed in Appendix B.⁶² This designation is effective immediately.

E. ALLTEL's Request for Withdrawal

19. In its petitions, ALLTEL also sought designation as an ETC in study areas served by rural incumbent LECs in each of the five states.⁶³ On November 10, 2003, ALLTEL bifurcated its petitions into separate requests for ETC designation in non-rural and rural service areas, "to allow separate and expeditious consideration of . . . the non-rural [incumbent LEC] study areas covered" by these petitions.⁶⁴ On May 21, 2004, ALLTEL voluntarily withdrew the portions of those petitions seeking ETC designation in rural service areas, without prejudice to any subsequent refiling of those requests.⁶⁵ We grant ALLTEL's request for partial withdrawal.

F. Regulatory Oversight

20. ALLTEL is obligated under section 254(e) of the Act to use high-cost support "only for the provision, maintenance, and upgrading of facilities and services for which support is intended" and is required under section 54.313 of the Commission's rules to certify annually that it is in compliance with this requirement.⁶⁶ ALLTEL has certified to the Commission that, consistent with section 54.313 of the Commission's rules, all federal high-cost support will be "used for the provision, maintenance and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e)" of the Act in the area for which ALLTEL is designated as an ETC.⁶⁷ ALLTEL has further requested that the Commission find that ALLTEL has met the appropriate certification filing deadline in order for it to begin

⁵⁹See CTIA Reply Comments at 4-5 (*quoting* Comments of Coalition for Affordable Local and Long Distance Services (CALLS), CC Docket Nos. 94-1, 96-45, 96-262, 99-249, filed Nov. 12, 1999); Sprint Reply at 3 (*quoting* same).

⁶⁰See *CALLS Order*, 15 FCC Rcd at 12977, 13046, paras. 35-36, 201.

⁶¹See *id.*, 15 FCC Rcd at 12977, para. 36 ("[A]s the term of the CALLS Proposal nears its end, we envision that the Commission will conduct a proceeding to determine whether and to what degree it can deregulate price cap LECs to reflect the existence of competition. At that time, the Commission can also examine whether the interstate access universal service support mechanism remains sufficient.").

⁶²See Appendix B.

⁶³See *supra* note 1.

⁶⁴See Letter from Cheryl A. Tritt, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated November 10, 2003.

⁶⁵Letter from Cheryl A. Tritt, Counsel for ALLTEL Communications, Inc. to Marlene H. Dortch, Secretary, FCC, dated May 21, 2004.

⁶⁶47 C.F.R. § 54.313.

⁶⁷Alabama Petition at Exhibit F; Florida Petition at Exhibit F; Georgia Petition at Exhibit G; North Carolina Petition at Exhibit G; Virginia Petition at Exhibit F.

receiving support as of its ETC designation date.⁶⁸ Accordingly, we treat ALLTEL's certifications as timely so that it can begin receiving universal service support as of the date of its ETC designation.⁶⁹

21. Separate and in addition to its annual certification filing under rule section 54.313, ALLTEL has committed to submit records and documentation on an annual basis detailing: (1) its progress towards meeting its build-out plans; (2) the number of complaints per 1,000 handsets; and (3) information detailing how many requests for service from potential customers were unfulfilled for the past year.⁷⁰ We require ALLTEL to submit these additional data to the Commission and USAC on October 1 of each year beginning October 1, 2005.⁷¹ We find that reliance on ALLTEL's commitments is reasonable and consistent with the public interest, the Act, and the Fifth Circuit decision in *Texas Office of Public Utility Counsel v. FCC*.⁷² We conclude that fulfillment of these additional reporting requirements will further the Commission's goal of ensuring that ALLTEL satisfies its obligation under section 214(e) of the Act to provide supported services throughout its designated service area. We note that the Commission may institute an inquiry on its own motion to examine any ETC's records and documentation to ensure that the high-cost support it receives is being used "only for the provision, maintenance, and upgrading of facilities and services" in the areas where it is designated as an ETC.⁷³ ALLTEL will be required to provide such records and documentation to the Commission and USAC upon request. We further emphasize that if ALLTEL fails to fulfill the requirements of the statute, the Commission's rules, or the terms of this Order after it begins receiving universal service support, the Commission has authority to revoke its ETC designation.⁷⁴ The Commission also may assess forfeitures for violations of Commission rules and orders.⁷⁵

IV. ANTI-DRUG ABUSE ACT CERTIFICATION

22. Pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, no applicant is eligible for any new, modified, or renewed instrument of authorization from the Commission, including authorizations issued pursuant to section 214 of the Act, unless the applicant certifies that neither it, nor

⁶⁸Alabama Petition at 13; Florida Petition at 14-15; Georgia Petition at 16; North Carolina Petition at 16; Virginia Petition at 13.

⁶⁹Section 54.313 provides that the certification must be filed by October 1 of the preceding calendar year to receive support beginning in the first quarter of a subsequent calendar year. 47 C.F.R. § 54.313(d). If the October 1 deadline for first quarter support is missed, the certification must be filed by January 1 for support to begin in the second quarter, by April 1 for support to begin in the third quarter, and by July 1 for support to begin in the fourth quarter. *See id.* In instances where carriers are not subject to the jurisdiction of a state, the Commission allows an ETC to certify directly to the Commission and USAC that federal high-cost support will be used in a manner consistent with section 254(e). *See* 47 C.F.R. § 54.313(b). Moreover, although we accept ALLTEL's certification as timely so that it can receive support as of its ETC designation date, consistent with the Commission's rules, the relevant state commissions are not precluded from filing future certifications on behalf of ALLTEL stating that universal service support is being used for its intended purposes. *See* 47 C.F.R. § 54.313.

⁷⁰*See* ALLTEL March 1, 2004 Supplement at 4-6.

⁷¹ALLTEL's initial submission concerning consumer complaints per 1,000 handsets and unfulfilled service requests will include data from the date ETC designation is granted through June 30, 2005. Future submissions concerning consumer complaints and unfulfilled service requests will include data from July 1 of the previous calendar year through June 30 of the reporting calendar year.

⁷²*Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 417-18 (5th Cir. 1999).

⁷³47 U.S.C. §§ 220, 403; 47 C.F.R. § 54.313.

⁷⁴*See Declaratory Ruling*, 15 FCC Rcd at 15174, para. 15. *See also* 47 U.S.C. § 254(e).

⁷⁵*See* 47 U.S.C. § 503(b).

any party to its application, is subject to a denial of federal benefits, including Commission benefits.⁷⁶ This certification must also include the names of individuals specified by section 1.2002(b) of the Commission's rules.⁷⁷ ALLTEL has provided a certification consistent with the requirements of the Anti-Drug Abuse Act of 1988.⁷⁸ We find that ALLTEL has satisfied the requirements of the Anti-Drug Abuse Act of 1988, as codified in sections 1.2001-1.2003 of the Commission's rules.⁷⁹

V. ORDERING CLAUSES

23. Accordingly, IT IS ORDERED that, pursuant to the authority contained in section 214(e)(6) of the Communications Act, 47 U.S.C. § 214(e)(6), and the authority delegated in sections 0.91 and 0.291 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.291, ALLTEL Communications, Inc. IS DESIGNATED AN ELIGIBLE TELECOMMUNICATIONS CARRIER throughout its licensed non-rural service area in the states of Alabama, Florida, Georgia, North Carolina, and Virginia to the extent described herein.

24. IT IS FURTHER ORDERED that a copy of this Memorandum Opinion and Order SHALL BE transmitted by the Wireline Competition Bureau to the Alabama Public Service Commission, Florida Public Service Commission, Georgia Public Service Commission, North Carolina Utilities Commission, Virginia State Corporation Commission, and the Universal Service Administrative Company.

25. IT IS FURTHER ORDERED, pursuant to the authority delegated under sections 0.91 and 0.291 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.291, that the request by ALLTEL Communications, Inc. to withdraw its petitions for designation as an Eligible Telecommunications Carrier with regard to areas served by rural telephone companies in the states of Alabama, Florida, Georgia, North Carolina, and Virginia IS GRANTED, as described herein.

FEDERAL COMMUNICATIONS COMMISSION

Jeffrey J. Carlisle
Chief
Wireline Competition Bureau

⁷⁶47 U.S.C. § 1.2002(a); 21 U.S.C. § 862.

⁷⁷See *ETC Procedures PN*, 12 FCC Rcd at 22949. Section 1.2002(b) provides that a "party to the application" shall include: "(1) If the applicant is an individual, that individual; (2) If the applicant is a corporation or unincorporated association, all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting/and or non-voting) of the petitioner; and (3) If the applicant is a partnership, all non-limited partners and any limited partners holding a 5% or more interest in the partnership." 47 C.F.R. § 1.2002(b).

⁷⁸See Alabama Petition at 13 and Exhibit G; Florida Petition at 15 and Exhibit G; Georgia Petition at 16 and Exhibit H; North Carolina Petition at 16 and Exhibit H; Virginia Petition at 13 and Exhibit G.

⁷⁹47 C.F.R. §§ 1.2001-2003.

Appendix A

Parties Filing Comments, Reply Comments, Oppositions, Supplemental Comments

**Petition for Designation as an
Eligible Telecommunications Carrier
in the state of Alabama**

Comments

Alabama Rural Local Exchange Carriers (Alabama Rural LECs)

Reply Comments

ALLTEL Communications, Inc. (ALLTEL)

CenturyTel of Alabama, LLC (CenturyTel)

Organization for the Promotion and Advancement of Small Telecommunications Companies
(OPASTCO)

Sprint Corporation (Sprint)

Opposition

Verizon Communications, Inc. (Verizon)

Supplemental Comments

CenturyTel

Supplemental Reply Comments

ALLTEL

**Petition for Designation as an
Eligible Telecommunications Carrier
in the state of Florida**

Reply Comments

ALLTEL

**Petition for Designation as an
Eligible Telecommunications Carrier
in the state of Georgia**

Comments

Cellular Telecommunications & Internet Association (CTIA)

National Association of State Utility Consumer Advocates (NASUCA)

OPASTCO

Reply Comments

ALLTEL

Opposition

Verizon

**Petition for Designation as an
Eligible Telecommunications Carrier
in the Commonwealth of North Carolina**

Comments

Cellular Telecommunications & Internet Association (CTIA)
National Association of State Utility Consumer Advocates (NASUCA)
OPASTCO

Reply Comments

ALLTEL

Opposition

Verizon

**Petition for Designation as an
Eligible Telecommunications Carrier
in the Commonwealth of Virginia**

Comments

CTIA
Virginia Rural Southside Telephone Companies

Reply Comments

ALLTEL
OPASTCO
Sprint

Opposition

Verizon

Supplemental Reply Comments

ALLTEL

Appendix B

Non-Rural Wire Centers for Inclusion in ALLTEL's ETC Service Area

ALABAMA
BELLSOUTH SAC 255181

PRVLALMA	BYMNALMA	FRHPALMA
MOBLALSF	CYTNALMA	EUFLALMA
CNVIALMA	WBTNALNM	CLANALMA
MPVLALMA	JCSNALNM	THVLALMA
EVRGALMA	GDWRALMA	SELMALMT
HLVIALMA	MTGMALMB	WTMPALMA
BRTOALMA	FTDPALMA	TSKGALMA
CTRNALNM	MOBLALSE	MOBLALAZ
MOBLALPR	MOBLALSK	MOBLALAP
MOBLALSH	MOBLALOS	MOBLALSA
MTVRALMA	BLFNALMA	MOBLALTH
MOBLALBF	MTGMALNO	MTGMALMT
MTGMALDA	MARNALNM	UNTWALNM
TROYALMA	ALCYALMT	DDVLALMA
MCINALMA		

ALABAMA
VERIZON NORTH SAC 259789⁸⁰

JMSNALXA	THRSALXA	CFVLALXA
RCFRALXA	ORVLALXA	TLLSALXA
NTSLALXA	BLBTALXA	FWRVALXA
DPISALXA	GDBAALXA	IRSEALXA
ALBRALXA	PNHLALXA	

ALABAMA
VERIZON SOUTH SAC 259788⁸¹

CLIOALXA	LSVLALXA	FRHMALXA
GRGNALXA	GNVLALXA	MCKNALXA
ELBAALXA	ENTRALXA	KSTNALXA
NWBCALXA	ANDSALXA	GNTTALXA
OPPALXA	RDLVALXA	BTLVALXA
DOZRALXA	LVRNALXA	ARITALXA
DLVLALXA	MLCYALXA	ECHOALXA
NWTNALXA	OZRKALXA	GENVALXA
HRFRALXA	SMSNALXA	SLCMALXA

⁸⁰On August 1, 2002, these wire centers were transferred to CenturyTel of Alabama.⁸¹On August 1, 2002, these wire centers were transferred to CenturyTel of Alabama.

ABVLALXA	HDLDALXA	NWVIALXA
CLMAALXA	DTHNALXA	WCBGALXA
BNKSALXA	BRNDALXA	

**FLORIDA
VERIZON FLORIDA SAC 210328**

BRBAFLXA	ENWDFLXA	VENCFLXS
VENCFLXA	NRPTFLXA	OSPRFLXA
SEKYFLXA	SSDSFLXA	SARKFLXA
LGBKFLXA	SRSTFLXA	NRSDFLXA
SPRGFLXA	ANMRFLXA	PLSLFLXA
BRTNFLXX	PLMTFLXA	MYCYFLXA
SGBEFLXA	PRSHFLXA	SPBGFLXS
PSDNFLXA	SKWYFLXA	NGBHFLXA
SPBGFLXA	INRKFLXX	BAYUFLXA
LLMNFLXA	RSKNFLXA	LRGOFLXA
GNDYFLXA	PNLSFLXA	FHSDFLXA
WIMMFLXA	CLWRFLXA	BYSHFLXA
DNDNFLXA	CNSDFLXA	WLCRFLXA
ALFAFLXA	BHPKFLXA	STGRFLXA
OLDSFLXA	WSSDFLXA	HYPKFLXA
SWTHFLXA	TAMPFLXX	YBCTFLXA
TRSPFLXA	SMNLFLXA	TAMPFLXE
SLSPFLXA	BRNDFLXA	BRJTFLXA
KYSTFLXA	PNCRFLXA	CRWDFLXA
UNVRFLXA	TMTRFLXA	SNSPFLXA
THNTFLXA	NPRCFLXA	MLBYFLXA
LUTZFLXA	PTCYFLXA	BARTFLXA
FRSTFLXA	HDSNFLXA	LNLKFLXA
HGLDFLXA	MNLKFLXA	ALTRFLXA
WLCHFLXA	LKLDLFLXA	BBPKFLXA
LKLDLFLXE	LKWFLFLXA	ZPHYFLXA
LKLDLFLXN	WNHNFLXC	CYGRFLXA
INLKFLXA	ABDLFLXA	LKWFLFLXE
DUNDFLXA	LKALFLXA	PKCYFLXA
HNCYFLXA	HNCYFLXN	POINFLXA

**FLORIDA
BELLSOUTH SAC 215191**

KYHGFLMA	KYWSFLMA	SGKYFLMA
BGPIFLMA	MRTHFLVE	ISLMFLMA
KYLRFLMA	KYLRFLLS	NKLRFLMA
PNSCFLPB	PNSCFLWA	GLBRFLMC
PNSCFLBL	PNSCFLHC	PNSCFLFP
CNTMFLLE	HLNVFLMA	PACEFLPV

MLTNFLRA	WWSPFLSH	WWSPFLHI
PCBHFLNT	PNCYFLMA	BKVLFLJF
PNCYFLCA	JAY FLMA	LYHNFLOH
MNSNFLMA	CDKYFLMA	YNTWFLMA
YNFNFLMA	SYHSFLCC	VERNFLMA
DNLNFLWM	CHPLFLJA	CFLDFLMA
CSCYFLBA	OLTWFLLN	BRSNFLMA
TRENFLMA	GCVLFLMA	ARCHFLMA
NWBYFLMA	MCNPFLMA	HAVNFLMA
GSVLFLNW	GSVLFLMA	HWTHFLMA
WELKFLMA	PMPKFLMA	PLTKFLMA
LKCYFLMA	MDBGFLPM	GCSPLCN
STAGFLSH	STAGFLBS	MXVLFLMA
STAGFLMA	ORPKFLRW	BLDWFLMA
MNDRFLLW	ORPKFLMA	MNDRFLLO
JCVLFLWC	JCVLFLNO	MNDRFLAV
JCVLFLRV	JCVLFLSJ	JCVLFLJT
JCVLFLSM	JCVLFLCL	JCVLFLAR
JCVLFLBW	PNVDFLMA	JCVLFLLF
JCBHFLSP	JCVLFLFC	JCBHFLAB
JCBHFLMA	JCVLFLOW	JCVLFLIA
FTGRFLMA	YULEFLMA	FRBHFLFP
FMTNALMT		

**GEORGIA
BELL SOUTH SAC 225192**

BNBRGAMA	CLQTGAES	THVLGAMA
PLHMGAMA	ARTNGAES	LKPKGAMA
CMLLGAMA	NWTNGAHD	VLDSGAMA
LERYGAMA	BCTNGAMA	SPRKGAMA
ALBYGAMA	SYLVGAES	LSBGGAMA
TFTNGAMA	SMVLGAMA	WYCRGAMA
CORDGAMA	BLCSGAES	HZLHGAMA
LMCYGAMA	BXLYGAES	ESMNGAES
CCHRGAMA	JHCRGAES	VDALGAMA
LYNSGAMA	DBLNGAMA	CXTNGAMA
WGVLGAES	SWBOGAES	SVNHGAWB
SVNHGASI	SVNHGADE	POLRGAMA
SVNHGABS	SVNHGAWI	SVNHGAGC
SNVLGAES	TBISGAMA	WDLYGAMA
LSVLGAMA	MLLNGAMA	GBSNGAES
WRNSGAMA	WRTNGAMA	WYBOGAES
SRDSGAES	THSNGAMA	HRLMGAMA
HPHZGAES	APNGGAES	AGSTGAFL
AGSTGAU	AGSTGATH	AGSTGAMT

**NORTH CAROLINA
BELLSOUTH SAC 235193**

ACMENCMA	ARSNNCMA	APEXNCCE
ATSNNCMA	BLMTNCCE	BSCYNCMA
BRGWNCMA	BURLNCDA	BURLNCHA
CRBHNCCE	CARYNCCE	CARYNCWS
CSHYNCMA	CPHLNCRO	CHRLNCER
CHRLNCCR	CHRLNCRE	CHRLNCLP
CHRLNCBO	CHRLNCOD	CHRLNC SH
CHRLNCTH	CHRLNCCA	CHRLNCCE
CHRLNCMI	CHRLNCDE	CHRLNCUN
CHVLNCCE	CLMTNCMA	CLEVNCMA
GSTANCD A	DVSNNCPO	DNVRNCMA
BURLNCEL	FAMTNCMA	RLGHNCGA
GSTANCSO	LWLLNCMA	GTWDNCMA
GBSNNCMA	GLBONCMA	GLBONCAD
SXPHNCMA	GNHMNCMA	GNBONCPG
GNBONCAP	GNBONCAS	GNBONCEU
GNBONCLA	GNBONCHO	GNBONCMC
GRVRNCMA	HMLTNCMA	SCHLNCHA
HSVLCCE	JULNNCMA	KGMTNCMA
KNDLNCCE	LTMRNCCE	LRBGNCMA
LWDLNCCE	LENRNCHU	LENRNCHA
LNTNNCMA	LCSTNCMA	LNBNHCMA
LMTNNCMA	MADNNCCE	MLTNNCMA
MNTINCMA	MGTNNCGL	MGTNNCGR
MTHLNCMA	MTOLNCCE	NWTNNCMA
PMBRNCCE	RLGHNCJO	RLGHNCMO
RLGHNCGL	RLGHNC SB	RLGHNCHO
RLGHNC SI	RDVLNC SI	RDVLNCMA
RCHMNCMA	RWLDNCMA	RFFNNCMA
SLBRNCMA	SCHLNCMA	SELMNCMA
SHLBN CMA	SOPTNCCE	STNLNCCE
SSVLNCMA	SSVLNCJE	STPNNCMA
SRFDNCCE	TYVLNCMA	TRMNNCMA
LNTNNCVA	WNDLNCPI	WLMGNCLE
WLMGNCFO	WLMGNCWI	WGVLNCMA
WNSLNCCL	WNSLNCAR	WNSLNCVI
WNSLNCWA	WNSLNCLE	WNSLNCFI
WNSLNCWH	WNSLNCGL	ZBLNNCCE

**NORTH CAROLINA
VERIZON SOUTH NC SAC 234334**

CRDMNCXA	CRDMNCXM	DRHMNCXE
DRHMNCXB	DRHMNCXG	DRHMNCXM
DRHMNCXD	DRHMNCXA	DRHMNCXT
DRHMNCXC	ALTNNCXA	MONRNCXA
GSKNCXA	DRHMNCXH	

**NORTH CAROLINA
VERIZON SOUTH NC (CONTEL) SAC 230509**

KNISNCXA		
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**NORTH CAROLINA
NORTH STATE SAC 230491**

HGPNNCXE	HGPNNCXB	HGPNNCXA
HGPNNCXD	HGPNNCXF	HGPNNCXC
RNMNNCXA	THVLNCXB	THVLNCXA

**VIRGINIA
VERIZON S VA (CONTEL) SAC 190233**

ALBRVAXA	AMHRVAXA	APMTVAXA
BMNVAXA	BYKNVAXA	CPRNVAXA
CRTDVAXA	CSCYVAXA	HCKRVAXA
GRBRVAXA	CLVLVAXA	CRLDVAXA
DNDRVAXA	DSPAVAXA	DSWLVAXA
EMPRVAXA	EPFKVAXA	FKLVVAXB
GLDSVAXA	GLCSVAXA	GRBRVAXB
SBWKVAXA	HNVRVAXA	HAYSVAXA
IVORVAXA	JRNAXA	LRVLVAXA
OLCHVAXA	ALWDVAXA	SMFDVAXA
CLMTVAXA	STCKVAXA	HLLDVAXA
CHKTVAXA	SRRWAXA	PRANVAXB
PUNGVAXA	PRANVAXA	WKFDVAXA
WNDSVAXA		

VIRGINIA
VERIZON VA, INC. SAC 195040

APLCVAAP	PNRWAPR	ASLDVAAS
BDFRVABD	BTHIVABT	BGISVABI
BSGPVABG	DCVLVADV	CHCYVACC
CHHMVACH	CHSKVACD	CHSKVAGU
CHSKVADC	CHESVACR	WHOKVAWO
CLWDVACW	CLNCVACL	CLVRVACL
COBNVACB	CLHGVACO	CNCRVACN
CGVLVACL	CLPPVARV	CLPPVACU
CLPPVAGR	DANNVADA	DAVLVAFP
DVPNADP	DNWDVADW	FIFEVAFI
GCLDVAGO	GNWDVAGW	HMPNVAWD
HMPNVAQN	HMPNVADC	HMPNVAAB
HYSIVAHY	HNKRVAHK	HPWLVAHW
JNVLVAJV	LBNNVALB	SWCKVASC
CLPPVALI	LVTNVALN	LYBGVACV
LYBGVAYB	LYBGVANL	LYBGVATM
LYBGVAOF	LYBGVACH	LYBGVAMH
MDSNVAMA	MNKNVAMN	MCKWAMK
MCHWAMV	MDLNAMD	NLFRVANF
NWNWVAJF	NWNWVAHU	NWNWVAYK
NWNWVAHV	NWNWVAND	NRFLVAGS
NRFLVAWC	NRFLVABS	NRFLVASP
NRFLVABL	NRFLVAOD	NRFLVAOV
NRTNVANO	PNGPVAPG	PONDVAPO
PTBGVACD	PTBGVAPB	PTMOVAHS
PTMOVAHF	PWHNAPW	PRFRVAPF
QNTNVAQN	VARNVAVR	RCMDVACG
RCMDVAIT	RCMDVALS	RCMDVAHL
RCMDVAGK	RCMDVAPS	RCMDVASR
RCMDVAGY	RCMDVAGR	RCMDVARA
RCMDVAPE	RCMDVAHS	RCMDVASN
RCMDVAHR	RCMDVATC	RNGLVARG
RKVLVARK	RSHLVALE	LBNNVARD
SNTNVASS	STCHVASC	STPLVASP
SNMTVASM	DRVRVADR	SFFLVASK
WHVLVAWH	TOANVATO	VRBHVAIR
VRBHVAIL	VRBHVASR	VRBHVACC
VRBHVAPT	VRBHVARC	VRBHVAVB
SWVLVASV	VRBHVACT	VRBHVAGN
WVRLVAWV	WLBGVAWM	WNTRVAWG
WISEVAWI		