

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

In the Matter of
Federal-State Joint Board on Universal Service
Sprint Corporation
Application for Designation as an Eligible Telecommunications Carrier in the State of Alabama
Application for Designation as an Eligible Telecommunications Carrier in the State of Florida
Application for Designation as an Eligible Telecommunications Carrier in the State of Georgia
Application for Designation as an Eligible Telecommunications Carrier in the State of New York
Application for Designation as an Eligible Telecommunications Carrier in the State of North Carolina
Application for Designation as an Eligible Telecommunications Carrier in the State of Tennessee
Application for Designation as an Eligible Telecommunications Carrier in the State of Virginia

ORDER

Adopted: November 18, 2004

Released: November 18, 2004

By the Chief, Wireless Telecommunications Bureau:

I. INTRODUCTION

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

1See Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of Alabama, filed September 5, 2003 (Alabama Petition); Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of Florida, filed October 10, 2003 (Florida Petition); Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of Georgia, filed September 8, 2003 (Georgia Petition); Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of New York, filed September 2, 2003 (New York Petition); Application of
(continued...)

mobile radio 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

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Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of North Carolina, filed November 5, 2003 (North Carolina Petition); Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of Tennessee, filed September 3, 2003 (Tennessee Petition); Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of Virginia, filed August 29, 2003 (Virginia Petition); Sprint Reply Comments, filed November 20, 2003 (Sprint Reply); Sprint Reply Comments for the State of Florida, filed March 1, 2004 (Sprint Florida Reply); Sprint Reply Comments for the State of North Carolina, filed March 25, 2004 (Sprint North Carolina Reply); Sprint Corporation Supplementary Filing for Designation as an Eligible Telecommunications Carrier, filed May 14, 2004 (Sprint Supplement); Sprint Corporation Reply to Comments on Supplemental Filing, filed June 9, 2004 (Sprint Supplemental Reply); Letter from Luisa L. Lancetti, Vice President, Wireless Regulatory Affairs, Sprint, to Marlene H. Dortch, Secretary, FCC (September 29, 2004) (Sprint September 29, 2004 Letter); Letter from David L. Sieradzki, Counsel for Sprint Corporation, Hogan & Hartson, L.L.P., to Marlene H. Dortch, Secretary, FCC (November 4, 2004) (Sprint November 4, 2004 Letter); *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 Subscriberhip 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.*

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, an identification of the petitioner’s study area, or, if the petitioner is not a rural telephone company, a detailed description of the geographic service area for which it requests an ETC designation from the Commission.⁹

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.¹⁰ 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.¹¹ 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.”¹²

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.¹³ In that Order, the Commission utilized a new public interest analysis for ETC designations and imposed ongoing conditions and reporting requirements on Virginia Cellular.¹⁴ 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.¹⁵ 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.¹⁶ 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.¹⁷

⁹See 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), recon. pending.

¹⁰See *Twelfth Report and Order*, 15 FCC Rcd at 12255-65, paras. 93-114.

¹¹*Id.*, 15 FCC Rcd at 12255, para. 93.

¹²*Id.*

¹³See *Virginia Cellular Order*, 19 FCC Rcd at 1564, para. 1.

¹⁴See *id.*, 19 FCC Rcd at 1565, 1575-76, 1584-85, paras. 4, 27, 28, 46.

¹⁵See *id.*, 19 FCC Rcd at 1565, para. 4.

¹⁶See *Highland Cellular Order*, 19 FCC Rcd at 6422, para. 1.

¹⁷See *id.*, 19 FCC Rcd at 6438, para. 33.

C. Sprint Petitions

7. Pursuant to section 214(e)(6), Sprint filed with this Commission seven petitions and supplements thereto, seeking designation as an ETC in study areas served by non-rural incumbent local exchange carriers (LECs) in the states of Alabama, Florida, Georgia, New York, North Carolina, Tennessee and Virginia.¹⁸ The Wireline Competition Bureau (WCB) released public notices seeking comment on these petitions.¹⁹ In response, a number of parties filed comments and oppositions.²⁰ On April 12, 2004, the WCB released a public notice inviting parties with pending ETC petitions, including Sprint, to supplement their petitions in light of the new ETC designation framework established in the *Virginia Cellular Order*.²¹ Sprint filed a supplement to its ETC petitions on May 14, 2004, four parties filed additional comments responsive to the Sprint petitions, and Sprint filed a supplemental reply on June 9, 2004.²²

III. DISCUSSION

8. After careful review of the record before us, we find that Sprint 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. Sprint's ETC designation for these service areas is effective immediately.

A. Commission Authority to Perform the ETC Designations

9. We find that Sprint has demonstrated that the Commission has authority to consider Sprint's petitions under section 214(e)(6) of the Act.²³ Sprint's petitions each include an affirmative statement from the relevant state commission stating that requests for designation as eligible

¹⁸See *supra* note 1. Sprint also filed an eighth application for ETC designation in certain study areas in Pennsylvania. See Application of Sprint Corporation for Designation as an Eligible Telecommunications Carrier in the State of Pennsylvania, filed September 4, 2003. This application is not addressed herein and remains pending. See Sprint November 4, 2004 Letter at 2 (Sprint does not object to separate treatment of Pennsylvania petition).

¹⁹See *Wireline Competition Bureau Seeks Comment on Sprint 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 19493 (2003); *Wireline Competition Bureau Seeks Comment on Sprint Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier In the State of Florida*, Public Notice, CC Docket No. 96-45, 19 FCC Rcd 282 (2004); *Wireline Competition Bureau Seeks Comment on Sprint 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 19505 (2003); *Wireline Competition Bureau Seeks Comment on Sprint Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier and Rural Service Area Redefinition In the State of New York*, Public Notice, CC Docket No. 96-45, 18 FCC Rcd 19502 (2003); *Wireline Competition Bureau Seeks Comment on Sprint 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, 19 FCC Rcd 285 (2004); *Wireline Competition Bureau Seeks Comment on Sprint Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier In the State of Tennessee*, Public Notice, CC Docket No. 96-45, 18 FCC Rcd 19496 (2003); *Wireline Competition Bureau Seeks Comment on Sprint 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 19508 (2003).

²⁰See Appendix A for a list of entities filing comments, reply comments, and oppositions associated with the seven petitions for ETC designation.

²¹*Parties are Invited to Update the Record Pertaining to Pending Petitions for Eligible Telecommunications Carrier Designations*, Public Notice, CC Docket No. 96-45, 19 FCC Rcd 6409 (2004).

²²See Appendix A.

²³47 C.F.R. § 214(e)(6).

telecommunications carriers should be sought from the Commission.²⁴

B. Offering and Advertising the Supported Services

10. Offering the Services Designated for Support. Sprint 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, Sprint is authorized to provide broadband personal communications service in the relevant portions of Alabama, Florida, Georgia, New York, North Carolina, Tennessee and Virginia.²⁵ Sprint 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.²⁶ Sprint has also certified that, in compliance with rule section 54.405, it will make available and advertise Lifeline service to qualifying low-income consumers.²⁷ Furthermore, Sprint has 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.²⁸

11. We reject the claims of certain commenters that Sprint does not provide the required services and functionalities supported by the universal service mechanism. First, commenters argue that

²⁴Alabama Petition at 3-4 & Exhibit D; Florida Petition at 3-4 & Exhibit D; Georgia Petition at 3-4 & Exhibit D; New York Petition at 3-4 & Exhibit D; North Carolina Petition at 3-4 & Exhibit D; Tennessee Petition at 3-4 & Exhibit D; Virginia Petition at 3-4 & Exhibit D. *See also* CTIA Alabama Comments at 2-3; CTIA Florida Comments at 2-3; CTIA Georgia Comments at 2-3; CTIA New York Comments at 2-3; CTIA North Carolina Comments at 2-3; CTIA Tennessee Comments at 2-3; CTIA Virginia Comments at 2-3.

²⁵Alabama Petition at 2 and Attachment A at 1; Florida Petition at 2 and Attachment A at 1; Georgia Petition at 2 and Attachment A at 1; New York Petition at 2 and Attachment A at 1; North Carolina Petition at 2 and Attachment A at 1; Tennessee Petition at 2 and Attachment A at 1; Virginia Petition at 2 and Attachment A at 1.

²⁶Alabama Petition at 5-9 and Attachment A at 1-2; Florida Petition at 5-8 and Attachment A at 1-2; Georgia Petition at 5-8 and Attachment A at 1-2; New York Petition at 5-8 and Attachment A at 1-2; North Carolina Petition at 5-8 and Attachment A at 1-2; Tennessee Petition at 5-8 and Attachment A at 1-2; Virginia Petition at 5-8 and Attachment A at 1-2.

²⁷Alabama Petition at 8-9 and Attachment A at 2-3; Florida Petition at 8-9 and Attachment A at 2-3; Georgia Petition at 8-9 and Attachment A at 2-3; New York Petition at 8-9 and Attachment A at 2-3; North Carolina Petition at 8-9 and Attachment A at 2-3; Tennessee Petition at 8-9 and Attachment A at 2-3; Virginia Petition at 8-9 and Attachment A at 2-3; Sprint Supplement, May 14, 2004 at 8-11. 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).

²⁸Sprint Supplement, May 14, 2004 at 7-11. Sprint 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. Sprint November 4, 2004 Letter. Specifically, Sprint provides a list of over 500 planned new and over 500 planned upgraded cell sites, showing (for each site) the location, estimated population within the cell site service contour, proposed on-air date by calendar quarter, and proposed capital expenditures for 2004 and 2005. Pursuant to section 0.459 of the Commission's rules, Sprint has requested that its lists of new and upgraded cell sites, with accompanying cost data, be treated as confidential and withheld from public inspection. *Id.* at 1-2. We recognize that Sprint's 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. Because Sprint has supplemented its petitions to include detailed construction plans, we need not consider whether its previous more general commitments were sufficient to establish that it would offer the supported services. *See* CWA Comments at 9-10 (objecting to sufficiency of Sprint's submissions).

Sprint should be required to offer unlimited local calling to mirror the services offered by wireline carriers.²⁹ No such requirement is necessary because the Commission has not established a minimum local usage requirement and Sprint has pledged compliance with any and all minimum local usage requirements under applicable law.³⁰ We note that Sprint includes local usage in all of its calling plans.³¹ Second, the National Association of State Utility Consumer Advocates (NASUCA) argues that Sprint does not provide equal access to interexchange services.³² Section 54.101(a)(7) of the Commission's rules states that one of the supported services is access to interexchange services, not equal access to those services.³³ Accordingly, we find sufficient Sprint's showing that it will offer access to interexchange services.

12. Third, we disagree that ETC designation would be improper in this case due to the mobile nature of Sprint's services. Specifically, certain commenters contend that the service area in which a customer resides may bear no relationship to the location where universal service support will actually be used by Sprint, and therefore that providing support would undermine the purpose of the universal service fund.³⁴ Similarly, some commenters argue that Sprint's service is not a substitute for wireline service, constitutes only an adjunct service and is already available to the public.³⁵ 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.³⁶ We also note that the Commission recently sought comment on this and related issues.³⁷ Fourth, we reject the argument that Sprint does not currently offer certain supported services because its service is of poor quality.³⁸ We find that the alleged shortcomings in Sprint's service quality, read in the light least favorable to Sprint, do not rise to the level of failure to provide service. Furthermore, Sprint has committed in this proceeding to meet service quality standards, including those set forth in the Cellular Telecommunications and Internet Association (CTIA) Code.³⁹ Finally, we reject the New York State Telecommunications Association, Inc.'s contention that, because the state public service commission

²⁹CenturyTel Comments at 5-6; NASUCA November 6 and 10, 2003 Comments at 2.

³⁰See Sprint Supplemental Reply at 3-4.

³¹*Id* at 3-4.

³²NASUCA November 6 and 10, 2003 Comments at 2.

³³47 C.F.R. §54.101(a)(7). We note that in July 2002, four members of the Joint Board recommended adding equal access to interexchange service as a supported service. *See Federal-State Joint Board on Universal Service, Recommended Decision, CC Docket No. 96-45, 17 FCC Rcd 14095, 14124-27, paras. 75-86 (2002)*. In July 2003, the Commission decided to defer consideration of this issue pending resolution of the Commission's proceeding examining the rules relating to high-cost universal service support in competitive areas. *See Federal-State Joint Board on Universal Service, Order and Order on Reconsideration, CC Docket No. 96-45, 18 FCC Rcd 15090, 15104, para. 33 (2003)*. *See also infra* para. 17 and n.57.

³⁴CenturyTel Comments at 6.

³⁵*Id.* at 5-6; GTA Comments at 2; NASUCA November 6 and 10, 2003 Comments at 1; NYSTA, Inc. November 6, 2003 Comments at 3-4; NYSTA, Inc. May 28, 2004 Comments at 2.

³⁶See *Highland Cellular Order*, 19 FCC Rcd at 6432-33, para. 23.

³⁷*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)*.

³⁸CWA Comments at 6-9 (poor quality of service, based upon numerous unresolved complaints, indicates inability to provide service). *See also* NASUCA November 6 and 10, 2003 Comments at 2 (Sprint should be required to comply with state consumer protection rules).

³⁹Sprint May 14, 2004 Supplement at 7; *see* n.56, *infra*.

lacks jurisdiction, and thus cannot enforce compliance, Sprint may not provide the supported services.⁴⁰ We note that if Sprint fails to fulfill the requirements of the Act, 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.⁴¹ The Commission also may assess forfeitures for violations of Commission rules and orders.⁴²

13. Offering the Supported Services Using a Carrier's Own Facilities. Sprint 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.⁴³ Sprint states that it intends to provide the supported services using its existing network infrastructure.⁴⁴

14. Advertising Supported Services. Sprint 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.⁴⁵ In addition to its current advertising,⁴⁶ Sprint has committed to specific methods to publicize the availability of Lifeline and Link-up service and improved service in unserved or underserved areas.⁴⁷

C. Public Interest Analysis

15. We conclude that it is "consistent with the public interest, convenience, and necessity" to designate Sprint as an ETC throughout its licensed non-rural service areas in the states of Alabama, Florida, Georgia, New York, North Carolina, Tennessee and Virginia.⁴⁸ In determining whether the public interest is served, the Commission places the burden of proof upon the ETC applicant.⁴⁹ We note that the WCB 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.⁵⁰ In the *Virginia Cellular Order* and the *Highland Cellular Order*, however, the Commission determined that designation

⁴⁰NYSTA, Inc. November 6, 2003 Comments at 4; NYSTA, Inc. May 28, 2004 Comments at 3. *See also* CenturyTel Comments at 5 (no state safeguards to curb abuse).

⁴¹*See* 47 U.S.C. § 254(e).

⁴²*See* 47 U.S.C. § 503(b).

⁴³47 U.S.C. § 214(e)(1)(A).

⁴⁴*See* Alabama Petition at 9 and Attachment A at 2-3; Florida Petition at 8-9 and Attachment A at 2-3; Georgia Petition at 8-9 and Attachment A at 2-3; New York Petition at 8-9 and Attachment A at 2-3; North Carolina Petition at 9 and Attachment A at 2-3; Tennessee Petition at 8 and Attachment A at 2-3; Virginia Petition at 8-9 and Attachment A at 2-3.

⁴⁵47 C.F.R. § 214(e)(1)(B).

⁴⁶Alabama Petition at 9 and Attachment A at 3; Florida Petition at 9 and Attachment A at 3; Georgia Petition at 9 and Attachment A at 3; New York Petition at 9 and Attachment A at 3; North Carolina Petition at 9 and Attachment A at 3; Tennessee Petition at 9 and Attachment A at 3; Virginia Petition at 9 and Attachment A at 3.

⁴⁷*See* Sprint Supplement, May 14, 2004 at 11-13.

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

⁴⁹*See Virginia Cellular Order*, 19 FCC Rcd at 1574-75, para. 26; *Highland Cellular Order*, 19 FCC Rcd 6431, para. 20.

⁵⁰*See, 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 (WCB 2000).

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.⁵¹

16. We conclude that Sprint has satisfied the burden of proof in establishing that its universal service offering in these seven states will provide benefits to non-rural consumers. While some commenters argue that Sprint has failed to demonstrate that its designation as an ETC would serve the public interest,⁵² we reject these comments because Sprint has met the public interest standards for rural areas as outlined in the *Virginia Cellular Order*. Sprint's public interest showing here is sufficient based on the detailed commitments Sprint 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, Sprint 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 publicize locally the construction of new facilities so that consumers are informed of provide improved service.⁵³ In addition, Sprint has made service quality commitments comparable to those made in the *Virginia Cellular Order* and the *Highland Cellular Order*, including commitments to comply with the CTIA Code for Wireless Service and to provide the Commission with consumer complaint data.⁵⁴ Because the Commission has previously found similar commitments sufficient to meet the public interest test in areas served by rural carriers, it would be hard to find that Sprint's application in the present case fell short of meeting the applicable standard in areas served by non-rural centers. We therefore find that Sprint 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).⁵⁵

17. The Commission has sought comment on the *Recommended Decision* of the Federal-State 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.⁵⁶ Several commenters argue 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, or that any

⁵¹See *Virginia Cellular Order*, 19 FCC Rcd at 1575, para. 27; *Highland Cellular Order*, 19 FCC Rcd at 6431-32, para. 21.

⁵²CenturyTel Comments at 2-3 (seeks cost-benefit analysis); CWA Comments at 2-5; GTA Comments at 1; NYSTA, Inc. November 6, 2003 Comments at 4-5; NYSTA, Inc. May 28, 2004 Comments at 3-4.

⁵³*Virginia Cellular Order*, 19 FCC Rcd at 1575-1580, paras. 28-35; *Highland Cellular Order*, 19 FCC Rcd at 6432-38, paras. 22-33; Sprint Supplement, May 14, 2004 at 11-13.

⁵⁴Sprint Supplement, May 14, 2004 at 7. 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.

⁵⁵See 47 U.S.C. § 214(e)(6).

⁵⁶*ETC High-Cost NPRM*, supra n. 37; *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.

changes resulting from that rulemaking should be applied to already granted ETC petitions.⁵⁷ Although these commenters raise 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 Sprint captures each and every customer located in the affected study areas, the overall size of the high-cost support mechanisms would not significantly increase.⁵⁸ Nevertheless, we continue to be mindful of 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 Sprint and other competitive ETCs receive in the future.

18. We further disagree with the argument by Verizon and other commenters that we should not designate any additional competitive ETCs because doing so could have a significant impact on the access charge plan established by the Commission's *CALLS Order*.⁵⁹ 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.⁶⁰ 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 target was contemplated.⁶¹ 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 2005.⁶² 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.⁶³

D. Designated Service Areas

19. We designate Sprint as an ETC in the requested service areas in Alabama, Florida, Georgia, New York, North Carolina, Tennessee and Virginia served by non-rural telephone companies, as

⁵⁷See Verizon November 6 and 10, 2003, February 17, 2004 and March 11, 2004 Oppositions at 1 and attached Verizon Opposition to Alltel Designation status at 8-10; NASUCA November 6 and 10, 2003 Comments at 2; GTA Comments at 3; NYSTA, Inc. November 6, 2003 Comments at 2, 5; NYSTA, Inc. May 28, 2004 Comments at 4.

⁵⁸For example, out of the seven states in which Sprint seeks designation, the incumbent carriers in Alabama receive the most high-cost support. The total amount of high-cost support received by such carriers is approximately 1.42% of the total high cost support available to all ETCs.

⁵⁹See generally Verizon November 6 and 10, 2003, February 17, 2004 and March 11, 2004 Oppositions at 1 and attached Verizon Opposition to Alltel Designation status at 8-10; Verizon May 28, 2004 Supplemental Comments at 2-7; CenturyTel Comments at 4-5; CWA Comments at 2-5. 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*).

⁶⁰See 47 C.F.R. § 54.307(a).

⁶¹See 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*).

⁶²See *CALLS Order*, 15 FCC Rcd at 12977, 13046, paras. 35-36, 201.

⁶³See *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.”).

listed in Appendix B.⁶⁴ This designation is effective immediately.

E. Regulatory Oversight

20. Sprint 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.⁶⁵ Sprint 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 Sprint is designated as an ETC.⁶⁶ Sprint has further requested that the Commission find that Sprint has met the appropriate certification filing deadline in order for it to begin receiving support as of its ETC designation date.⁶⁷ Accordingly, we treat Sprint’s certification as timely so that it can begin receiving universal service support as of the date of its ETC designation.⁶⁸

21. Separate and in addition to its annual certification filing under rule section 54.313, Sprint 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) how many requests for service from potential customers were unfulfilled for the past year.⁶⁹ We require Sprint to submit these additional data to the Commission and USAC on October 1 of each year beginning October 1, 2005.⁷⁰ We find that reliance on Sprint’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*.⁷¹ We conclude that fulfillment of these additional reporting requirements will further the Commission’s goal of ensuring that Sprint 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.⁷² Sprint will be required to provide such records and documentation to

⁶⁴See Appendix B.

⁶⁵47 C.F.R. § 54.313.

⁶⁶Sprint September 29, 2004 Letter.

⁶⁷Sprint November 4, 2004 Letter at 2-3.

⁶⁸Section 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 Sprint’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 Sprint stating that universal service support is being used for its intended purposes. *See* 47 C.F.R. § 54.313.

⁶⁹See Sprint Supplement, May 14, 2004 at 7-10.

⁷⁰Sprint’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.

⁷¹*Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 417-18 (5th Cir. 1999).

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

the Commission and USAC upon request. We further emphasize that if Sprint fails to fulfill the requirements of the Act, 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.⁷³ The Commission also may assess forfeitures for violations of Commission rules and orders.⁷⁴

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 any party to its application, is subject to a denial of federal benefits, including Commission benefits.⁷⁵ This certification must also include the names of individuals specified by section 1.2002(b) of the Commission's rules.⁷⁶ Sprint has provided certifications consistent with the requirements of the Anti-Drug Abuse Act of 1988.⁷⁷ We find that Sprint 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.⁷⁸

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 0.131 and 0.331 of the Commission's rules, 47 C.F.R. §§ 0.131 and 0.331, Sprint Communications, Inc. IS DESIGNATED AN ELIGIBLE TELECOMMUNICATIONS CARRIER throughout its licensed non-rural service area in the states of Alabama, Florida, Georgia, New York, North Carolina, Tennessee 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 Wireless Telecommunications Bureau to the Alabama Public Service Commission, the Florida Public Service Commission, the Georgia Public Service Commission, the New York Public Service Commission, the North Carolina Utilities Commission, the Tennessee Regulatory Authority, the Virginia State Corporation Commission, and the Universal Service Administrative Company.

FEDERAL COMMUNICATIONS COMMISSION

John B. Muleta
Chief
Wireless Telecommunications Bureau

⁷³See *Declaratory Ruling*, 15 FCC Rcd at 15174, para. 15. See also 47 U.S.C. § 254(e).

⁷⁴See 47 U.S.C. § 503(b).

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

⁷⁶See *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).

⁷⁷See Alabama Petition at 12 and Exhibit A at 3; Florida Petition at 12 and Exhibit A at 3; Georgia Petition at 12 and Exhibit A at 3; New York Petition at 12 and Exhibit A at 3; North Carolina Petition at 12 and Exhibit A at 3; Tennessee Petition at 12 and Exhibit A at 3; Virginia Petition at 12 and Exhibit A at 3.

⁷⁸47 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

Cellular Telecommunications and Internet Association (CTIA) (11/6/03)

National Association of State Utility Consumer Advocates (NASUCA) (11/6/03)

Opposition

Verizon Communications, Inc. (Verizon) (11/6/03)

Reply Comments

Sprint Corporation (Sprint) (11/20/03)

Supplement

Sprint (5/14/04)

Supplemental Comments

CenturyTel of Alabama, LLC, CenturyTel of Eagle, Inc., and CenturyTel, Inc. (CenturyTel) (5/28/04)

Communications Workers of America (CWA) (5/28/04)

Verizon (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

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

CTIA (2/17/04)

Opposition

Verizon (2/17/04)

Reply Comments

Sprint (3/1/04)

Supplement

Sprint (5/14/04)

Supplemental Comments

Verizon (5/28/04)

CWA (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

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

Comments

CTIA (11/6/03)

Georgia Telephone Association (GTA) (11/6/03)

NASUCA (11/6/03)

Opposition

Verizon (11/6/03)

Reply Comments

Sprint (11/20/03)

Supplement

Sprint (5/14/04)

Supplemental Comments

CWA (5/28/04)

Verizon (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

**Petition for Designation as an
Eligible Telecommunications Carrier
in the State of New York**

Comments

CTIA (11/06/03)

NASUCA (11/6/03)

New York State Telecommunications Association, Inc. (NYSTA, Inc.) (11/6/03)

Opposition

Verizon (11/6/03)

Reply Comments

Sprint (11/20/03)

Supplement

Sprint (5/14/04)

Supplemental Comments

CWA (5/28/04)

NYSTA, Inc. (5/28/04)

Verizon (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

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

CTIA (3/11/04)

Opposition

Verizon (3/11/04)

Reply Comments

Sprint (3/25/04)

Supplement

Sprint (5/14/04)

Supplemental Comments

CWA (5/28/04)

Verizon (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

**Petition for Designation as an
Eligible Telecommunications Carrier
in the State of Tennessee**Comments

CTIA (11/24/03)

NASUCA (11/10/03)

Opposition

Verizon (11/10/03)

Reply Comments

Sprint (11/20/03)

Supplement

Sprint (5/14/04)

Supplemental Comments

CWA (5/28/04)

Verizon (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

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

Comments

CTIA (11/6/03)

NASUCA (11/6/03)

Opposition

Verizon (11/6/03)

Reply Comments

Sprint (11/20/04)

Supplement

Sprint (5/14/04)

Supplemental Comments

CWA (5/28/04)

Verizon (5/28/04)

Supplemental Reply Comments

Sprint (6/9/04)

Alabama

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

**BELLSOUTH TELECOMM INC
DBA SOUTH CENTRAL BELL TEL**

ALBSALMA
ALCYALMT
ALVLALMA
ANTNALLE
ANTNALMT
ANTNALOX
ATHNALER
ATHNALMA
ATTLALNM
AUBNALMA
BLFNALMA
BOAZALMA
BRHMALCH
BRHMALCP
BRHMALEL
BRHMALEN
BRHMALEW
BRHMALFO
BRHMALFS
BRHMALHW
BRHMALMT
BRHMALOM
BRHMALOX
BRHMALRC
BRHMALTA
BRHMALVA
BRHMALWE
BRHMALWL
BRPTALMA
BRTOALMA
BSMRALBP
BSMRALBU
BSMRALHT
BSMRALMA
BWDNGAMA
BYMNALMA
CALRALMA
CHBGALMA
CHLSALMA
CLANALMA
CLMBALMA
CLMNALFA
CLMNALJC
CLMNALMA
CNTMFLLE
CRDVALMA
CRLDALMA
DCTRALMT
DDVLALMA
DMPLALMA
DORAALMA
EUTWALBO
EUTWALMA
EVRGALMA
FLRNALMA
FMTNALMT
FRHPALMA
FTDPALMA
FTPYALMA

GDSDALHS
GDSDALMT
GDSDALRD
GDWRALMA
GNBOALMA
GRDLALNM
GRLYALMA
GTVLALNM
GYVLALNM
HLVIALMA
HNVIALW
HNVIALMT
HNVIALPW
HNVIALRA
HNVIALRW
HNVIALUN
HNVIALBR
HNVIALNM
HRTSALNM
HRTSALPE
HZGRALMA
JCVLALMA
JSPRALMT
KLLNALMA
LFYTALRS
LGTNALMA
LNDNALMA
LVTNALLA
LXTNALMA
MARNALNM
MDSNALNM
MNFDALMA
MNTVALNM
MOBLALAP
MOBLALAZ
MOBLALBF
MOBLALOS
MOBLALPR
MOBLALSA
MOBLALSE
MOBLALSF
MOBLALSH
MOBLALSK
MOBLALTH
MOLTALNM
MTGMALDA
MTGMALMB
MTGMALMT
MTGMALNO
MTVRALMA
OHTCALMA
OPLKALMT
PDMTALMA
PHCYALFM
PHCYALMA
PNSNALMA
PRSHALNM
PRVLALMA
RLVLALMA

RRVLALMA
SELMALMT
SHFDALMT
SYLCALMT
TLDGALMA
TLDGALRF
TLLPGAES
TROYALMA
TSCALDH
TSCALMT
TSCALNO
TSKGALMA
TWCKALMA
UNTWALNM
VNCNALMA
WBTNALNM
WRRRALNM
WTMPALMA
YORKALMA

LECTALXA
LNCLALXA
MENTALXA
MSSYALXA
NTSLALXA
ODRGALXA
ORVLALXA
PANLALXA
PHBLALXA
PLCYALXA
RCFRALXA
RFRMALXA
THRSALXA
TLLSALXA
TSVLALXA
VYHDALXA

**CENTURYTEL TEL OF ALABAMA, LLC
(SOUTHERN)**

ARITALXA
BNKSALXA
BRNDALXA
DLVLALXA
DTHNALXA
ECHOALXA
ENTRALXA
FRHMALXA
GNVLALXA
GRGNALXA
HDLDALXA
MCKNALXA
MLCYALXA
NWBCALXA
NWTNALXA
NWWIALXA
OZRKALXA
SLCMALXA
WCBGALXA

**CENTURY TEL OF ALABAMA, LLC
(NORTHERN)**

ACVLALXA
ALBRALXA
BLBTALXA
CHLFALXA
CRTNALXA
DPILALXA
DELTALXA
ETVLALXA
FLVLALXA
FWRVALXA
GDBAALXA
GORDALXA
HFLNALXA
IRSEALXA
JMSNALXA

Florida

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

VERIZON FLORIDA INC.

ABDFLXA
ALTRFLXA
BARTFLXA
BRBAFLXA
BRTNFLXX
PLSLFLXA
ANMRFLXA
STGRFLXA
CLWRFLXA
CNSDFLXA
DNDNFLXA
INRKFLXX
PNLSFLXA
ENWDFLXA
FRSTFLXA
DUNDFLXA
HNCYFLXA
HNCYFLXN
POINFLXA
HDSNFLXA
MNLKFLXA
INLKFLXA
BBPKFLXA
LKWFLXA
LKWFLXE
LKLDFLXA
LKLDFLXE
LKLDFLXN
HGLDFLXA
LRGOFLXA
BRJTFLXA
MLBYFLXA
MYCYFLXA
NRPTFLXA
NPRCFLXA
SNSPFLXA
PLMTFLXA
PRSHFLXA
PTCYFLXA
PNCRFLXA
PKCYFLXA
NRSDFLXA
SPRGFLXA
SRSTFLXA
SSDSFLXA
SARKFLXA
SEKYFLXA
LGBKFLXA
BAYUFLXA
FHSDFLXA
GNDYFLXA
LLMNFLXA
NGBHFLXA
PSDNFLXA
SKWYFLXA
SPBGFLXA
SPBGFLXS
SGBEFLXA
THNTFLXA

BRNDFLXA
KYSTFLXA
OLDSFLXA
CRWDFLXA
SLSPFLXA
TMTRFLXA
UNVRFLXA
ALFAFLXA
BHPKFLXA
HYPKFLXA
SMNLFLXA
SWTHFLXA
TAMPFLXE
TAMPFLXX
WLCRFLXA
WSSDFLXA
YBCTFLXA
LNLKFLXA
LUTZFLXA
WLCHFLXA
RSKNFLXA
WIMMFLXA
TRSPFLXA
VENCFLXA
VENCFLXS
OSPRFLXA
LKALFLXA
WNHNFLXC
CYGRFLXA
ZPHYFLXA

**BELLSOUTH TELECOMM INC
DBA SOUTHERN BELL TEL & TEL**

ARCHFLMA
BLDWFLMA
BLGLFLMA
BCRTFLBT
BCRTFLMA
BCRTFLSA
BYBHFLMA
BRSNFLMA
BKVLFLJF
BNNLFLMA
CNTMFLLE
CDKYFLMA
CFLDFLMA
CHPLFLJA
COCOFLMA
CCBHFLAF
CCBHFLMA
PMBHFLCS
CSCYFLBA
DYBHFLFN
DYBHFLMA
DYBHFLFB
DYBHFLPO
DYBHFLS
DBRYFLMA
DRBHFLMA

DELDFLMA
DLSPFMLA
DLBHFLKP
DLBHFLMA
DBRYFLDL
DNLNFLWM
EORNFLMA
EGLLFLBG
EGLLFLIH
FRBHFLFP
FLBHFLMA
FTGRFLMA
FTPRFLMA
FTLDFLCR
FTLDFLCY
FTLDFLJA
FTLDFLMR
FTLDFLOA
FTLDFLPL
FTLDFLSG
FTLDFLSU
FTLDFLWN
GSVFLFLMA
GSVFLFLNW
GENVFLMA
GLBRFLMC
HAVNFLMA
HWTHFLMA
HBSDFLMA
HLNVFLMA
HLWDFLHA
HLWDFLMA
HLWDFLPE
HLWDFLWH
HMSTFLEA
HMSTFLHM
HMSTFLNA
JCBHFLMA
JCBHFLAB
JCBHFLSP
JCVLFLAR
JCVLFLBW
JCVLFLCL
JCVLFLFC
JCVLFLIA
JCVLFLJT
JCVLFLLF
JCVLFLNO
JCVLFLOW
JCVLFLRV
JCVLFLSJ
JCVLFLSM
JCVLFLWC
MNDRFLAV
MNDRFLLO
MNDRFLW
JPTRFLMA
KYLRFLLS
NKLRFLMA

BGPIFLMA
KYLRFLMA
KYWSFLMA
MRTHFLVE
SGKYFLMA
ISLMFLMA
KYHGFLMA
LKCFLMA
LKMRFMLA
LYHNFLFH
MXVFLFLMA
MLBRFLMA
COCOFLME
MIAMFLAE
MIAMFLAL
MIAMFLAP
MIAMFLBA
MIAMFLBC
MIAMFLBR
MIAMFLCA
MIAMFLFL
MIAMFLHL
MIAMFLNM
MIAMFLNS
MIAMFLLOL
MIAMFLPB
MIAMFLPL
MIAMFLRR
MIAMFLSH
MIAMFLSO
MIAMFLWD
MIAMFLWM
MIAMFLGR
MIAMFLIC
MIAMFLKE
MIAMFLME
MIAMFLDB
MCNPFLMA
MICCFLBB
MDBGFLPM
MLTNFLRA
MNSNFLMA
NWBYFLMA
NDADFLAC
NDADFLBR
NDADFLGG
NDADFLLOL
NSBHFLMA
OKHLFLMA
OLTWFLLN
ORPKFLMA
ORPKFLRW
ORLDFLAP
ORLDFLCL
ORLDFLMA
ORLDFLPC
ORLDFLPH
ORLDFLSA
OVIDFLCA

PACEFLPV
PAHKFLMA
PLTKFLMA
PLCSFLMA
PNCYFLCA
PNCYFLMA
GCSPFLCN
PNSCFLBL
PNSCFLFP
PNSCFLHC
PNSCFLPB
PNSCFLWA
PRRNFLMA
PRSNFLFD
PCBHFLNT
PNVDFLMA
PMPKFLMA
PMBHFLFE
PMBHFLTA
PMBHFLNP
HTISFLMA
PTSLFLMA
PTSLFLSO
SNFRFLMA
SBSTFLFE
SBSTFLMA
STAGFLWG
STAGFLBS
STAGFLMA
STAGFLSH
STRTFLMA
SYHSFLCC
TTVFLFLMA
TRENFLMA
VERNFLMA
VRBHFLBE
VRBHFLMA
WWSPLFI
WWSPLFSH
WELKFLMA
WPBHFLAN
WPBHFLGA
WPBHFLGR
WPBHFLHH
WPBHFLLE
WPBHFLRB
WPBHFLRP
YNTWFLMA
YNFNFLMA
YULEFLMA

Georgia

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

**BELLSOUTH TELECOMM INC
DBA SOUTHERN BELL TEL & TEL**

AIVLGAMA	BNBRGAMA	RPVLGAMA
ALBYGAMA	BRVIGAMA	RYTNGAMA
APNGGAES	BLCSGAES	RTLGGAMA
ATHNGAMA	BGRTGAMA	SVNHGABS
ATLNGAAD	BWDNGAMA	SVNHGADE
ATLNGABH	BRMNGAES	SVNHGAGC
ATLNGABU	BRWKGAMA	SVNHGASI
ATLNGACD	BCHNGAES	SVNHGAWB
ATLNGACS	BUFRGABH	SVNHGAWI
ATLNGAEL	CLHNGAES	SENOGAMA
ATLNGAEP	CRTNGAMA	SMVLGAMA
ATLNGAFP	CRVLGAMA	SCCRGAMA
ATLNGAGR	CVSPGAMA	SPRKGAMA
ATLNGAHR	CDTWGAMA	SPRTGAMA
ATLNGAIC	CHTGTNBR	SSISGAES
ATLNGALA	CHTGTNRO	SYLVGAES
ATLNGAPP	CHTGTNSE	TLLPGAES
ATLNGASS	CXTNGAMA	TMPLGAMA
ATLNGATH	CLMTGAMA	THVLGAMA
ATLNGAWD	CCHRGAMA	THSNGAMA
ATLNGAWE	CLMBGABV	TFTNGAMA
CHMBGAMA	CLMBGAMT	TBISGAMA
LGVLGACS	CLMBGAMW	VLDSGAMA
LLBNGAMA	CNYRGAMA	VDALGAMA
LTHNGAJS	CORDGAMA	VLRCGAES
PANLGAMA	CVTNGAMT	WRRBGAMA
SNLVGAMA	CMNGGAMA	WRTNGAMA
SNMTGALR	CSSTGAMA	WTVLGAES
TUKRGAMA	DBLNGAMA	WYCRGAMA
ALPRGAMA	FLBRGAMA	WYBOGAES
DLTHGAHS	FRSYGAMA	WRNSGAMA
DNWDGAMA	FTVYGAMA	
LRVLGAOS	GSVLGAMA	
NRCRGAMA	GTVLGAMA	
RSWLGAMA	GNBOGAES	
ASTLGAMA	GRFNGAMA	
DGVLGAMA	HMTNGAMA	
DLLSGAES	HRLMGAMA	
PWSPGAAS	HPHZGAES	
SMYRGAMA	HGVLGAMA	
ACWOGAMA	JCSNGAMA	
MRTTGAEA	JKISGAMA	
MRTTGAMA	KGTNGAMA	
SMYRGAPF	LGRNGAMA	
WDSTGACR	LKPKGAMA	
FRBNGAEB	LSBGGAMA	
FYVLGASG	LULAGAMA	
HMPNGAJW	LMKNGAMA	
JNBOGAMA	LTVLGACS	
MCDNGAGS	MACNGAGP	
MRRWGAMA	MACNGAMT	
PLMTGAMA	MACNGAVN	
PTCYGAMA	MDSNGAMA	
RVDLGAMA	MNTIGAMA	
STBRGANH	NWNNGAMA	
AGSTGAAU	PNMTGAMA	
AGSTGAFL	POLRGAMA	
AGSTGAMT	RCLDGAMA	
AGSTGATH	ROMEGATL	

New York

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

FRONTIER TELEPHONE OF ROCHESTER

ATLNNYXA
AVONNYXA
BCPTNYXA
BITNNYXA
BRGNNYXA
CANDNYXA
CCVLNYXA
CHCNNYXA
CLDNNYXA
DNSVNYXA
ERCHNYXA
FAPTNYXB
FRTNNYXA
GENSNYXA
HMLCNYXA
HMLNNYXA
HNRTNYXA
HOFNNYXA
LCSRNYXA
LIVNNYXA
LROYNYXA
MTMRNYXA
NPLSNYXA
PNFDNYXA
PVLNNYXA
ROCHNYXB
ROCHNYXC
ROCHNYXD
ROCHNYXE
ROCHNYXF
ROCHNYXG
ROCHNYXH
ROCHNYXJ
ROCHNYXK
SCVLNYXA
SPWRNYXA
VCTRNYXA
WBSTNYXA
WBSTNYXB
WYLDNYXA

VERIZON NEW YORK, INC.

AKRNNYAK
ALBNNYAI
ALBYNYGD
ALBYNYSS
ALBYNYWA
ALDNNYAD
ALMTNYAL
AMBRNYAB
AMHRNYMP
AMSTNYPE
ANGENYAG
ANGLNYAO
ARPTNYAR
ARVGNAYV
ATTCTNYAT
ATWPNYAW
AUBNNYAU
AVOCNYAC

AVPKNYAV
AXBANYAX
BALSNYBA
BATHNYBH
BATVNYBT
BAVLNYBV
BBYLNYBN
BDVGNVYBV
BECNNYBE
BERNNYBR
BFLONYBA
BFLONYEL
BFLONYFR
BFLONYHE
BFLONYMA
BFLONYSP
BGFLNYBF
BLFSNYBZ
BLLNNYBG
BLMTNYBM
BLRVNYBC
BNGHNYHY
BNGHNYRO
BRKRNYBK
BRPTNYBP
BRWDNYBW
BRWSNYBW
BSTNNYBN
BYRNNYBY
BYSHNYBY
CAIRNYCA
CBLSNYBZ
CHCKNYCE
CHKTNYFR
CHPQNYCP
CICRNYCJ
CLAYNYOS
CLCNNYCN
CLCRNYCC
CLCTNYCC
CLEVNYCE
CLNCNYBA
CLPKNYCP
CLTNNYZI
CLVLNYCK
CLVRNYCV
CLYDNYCY
CMDNNYZM
CMLSNYID
CMLSNYON
CMMKNYCM
CMPBNYCP
CNBRNYCD
CNDLNYCL
CNGRNYCN
CNSRNYCX
CNSTNYZA
CNTNYPZO
CNTTNYCI
CPNHNYZP

CPTWNYZW
CRHDNYCH
CRLDNYCR
CRMLNYCL
CRNGNYCG
CRNWNVCW
CRTHNYZG
CSPPNYCS
CSTNNYCS
CTBRNYCB
CTCHNYCU
CTNGNYCH
CTONNYZN
CTRGNYSO
CTSKNYCT
CUBANYEM
CYTNNYZY
DBFYNYDF
DLGVNYDG
DLMRNYDA
DLSNNYDL
DNKRNYDK
DNMRNYDN
DRBYNYDB
DRPKNYDP
DVPLNYDP
DVPTNYDT
EAURNYEA
EDENNYED
EGLVNYGL
EGNBNYEG
EHTNNYEH
ELBANYEB
ELCVNYEV
ELDPNYEU
ELVLNYEL
EMIRNYEM
ENDCNYEN
ENPTNYEN
ESPRNYER
EVMLNYEI
FLBGNYFB
FLPKNYFP
FRDLNYFM
FRPTNYFP
FRSHNYFS
FSHKNYLD
FSVLNYFL
FTANNYFA
FYTTNYFY
FYVLNYFV
GDISNYGI
GENVNYGN
GLCVNYGC
GLFLNYGF
GLWYNYGW
GNBGNYFV
GPTSNYGP
GRCTNYGC
GRCYNYGC

GRLKNYGL
GRNKNYGN
GRSNNYGA
GRTNNYGT
GRVGNVYGV
GRVINYGE
GSPNNYGP
GWNDNYGD
HCVLNYHV
HDFLNYMS
HDSNNYHD
HGLDNYHG
HHFLNYHF
HIFLNYHF
HLLDNYHO
HLLYNYHE
HMBGNYHB
HMBYNYHB
HMPSNYHS
HNDLNYHI
HNSTNYHU
HNTRNYHN
HOMRNYHM
HRFRNYHR
HRKMNYHC
HRNLNYHL
HRSNNYHN
HRWKNYHW
HSFLNYHS
HSHDNYHH
HVTNNYHX
HYPKNYHK
ILINNYIL
ITHCNYIH
ITHCNYPG
JAVANYJA
JFVLNYJF
JHCYNYJC
JNVLNYJV
JRDNNYJD
KENDNYKD
KGTNNYKG
KNVYNYKV
KRHNKYKR
KTBANYKB
KTNHNYKA
LBRTNYLB
LCPTNYLK
LFRVNYLE
LFYTNYLF
LHSTNYLH
LKGRNYLR
LKKTNYLK
LKPCNYLA
LMSTNYLM
LNBHNYLB
LNCSNYLC
LNNGNYLG
LRMTNYLA
LSTNNYLW

LTFLLNYLS
LTHMNYTS
LTVYNYLI
LVMNNYLV
LVTWNYLT
LXTNNYLX
LYBRNYLB
LYNSNYLY
LYVLNYLL
MACDNYMC
MAINNYME
MARNNYMR
MARVNYMV
MCDGNYMD
MCGRNYMG
MCHVNYMC
MCLNNYMZ
MDPTNYMP
MDRDNYMK
MEDNNYPA
MEXCNYMX
MHPCNYMP
MINLNYMI
MINONYMI
MLBKNYML
MLFRNYMU
MLTNNYMN
MMRNNYMA
MNHSNYMH
MNTINYMT
MNTKNYMT
MORVNYMO
MRBONYMB
MSPQNYMP
MSTCNYMC
MTKSNYMK
MTVRNYMV
NCHLNYNL
NCLNNYNO
NCLVNYNC
NGFLNY76
NGFLNYPO
NGFLNYWO
NGRNNYNG
NRFLNYNO
NROSNYNR
NRWDNYND
NSYRNYNS
NWBRNYNW
NWBRNYWT
NWCYNYNC
NWFNNYNF
NWFNNYMA
NWBRLNYNP
NWRCONYR
NWRKNYK
NWWNNYNN
NYACNYNK
NYCKNY14
NYCKNY71

New York (Cont'd)

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

VERIZON NEW YORK, INC.

NYCKNY77	NYCXNYMH	SCHRYNYQH	WPFLNYWF
NYCKNYAI	NYCXNYTB	SCHVNYQN	WRBGNYWU
NYCKNYAL	NYCXNYTR	SDTNNYPI	WRCSNYUC
NYCKNYAR	OCBHNYOB	SFRNNYSU	WSNCNYUN
NYCKNYAU	OKFDNYOK	SGHRNYSG	WSVLNYNC
NYCKNYAY	OLENNYHA	SGRTNYSG	WTGLNYWG
NYCKNYBR	ONEDNYOD	SHHMNYSH	WTPTNYWR
NYCKNYBU	ONNTNYOA	SKNTNYSE	WTRLNYWT
NYCKNYCL	ONTRNYON	SLCKNYSI	WTTWNYUN
NYCKNYFA	ORBGNYO	SLDNNYSE	WVRLNYWV
NYCKNYFT	ORPKNYST	SLMNNYWW	WWVLNYWW
NYCKNYKP	OSNGNYOS	SLTSNYSL	YNKRNYYN
NYCKNYLA	OSWGNYOS	SMTWNYSM	YNTWNYTT
NYCKNYRA	OTEGNYOT	SNFLNYSL	YPHNNYAA
NYCKNYTY	OWEGNYOW	SODSNYSD	YRTWNYTT
NYCKNYWM	OWSCNYOO	SPVLNYWM	
NYCMNY13	OYBANYOY	SPVYNYSV	
NYCMNY18	PASNNYPN	SRLKNYQL	
NYCMNY30	PCHGNYPH	SRNCNYQC	
NYCMNY36	PERUNYPE	SRSPNYSR	
NYCMNY37	PGHKNYSH	SSCHNYSO	
NYCMNY42	PGHKNYSP	SSLMNYSS	
NYCMNY50	PHLANYPF	STKTNYSK	
NYCMNY56	PHMTNYPM	SYBHNYQY	
NYCMNY73	PJSTNYPJ PT	SYOSNYSY	
NYCMNY79	PKSKNYPS	SYRCNYDD	
NYCMNY97	PLBGNYPB	SYRCNYEP	
NYCMNYBS	PLMYNYPY	SYRCNYGS	
NYCMNYCA	PLVLNYPL	SYRCNYJS	
NYCMNYMN	PLVWNYPV	SYRCNYSA	
NYCMNYTH	PNYNNYPN	SYRCNYSU	
NYCMNYVS	POMNNYPO	SYVLNYSA	
NYCMNYWA	PPRGNYPP	THRSNYTH	
NYCMNYWS	PRDYNYPD	TKHONYTU	
NYCMNYZO	PRISNYPA	TLLYNYTY	
NYCQNYAS	PRRVNYNP	TNVLNYTN	
NYCQNYBA	PRTVNYPV	TNWNNYTW	
NYCQNYBH	PSVLNYPV	TROYNY03	
NYCQNYCO	PTCHNYPC	TROYNY04	
NYCQNYFH	PTNMNYPX	TRTWNYTT	
NYCQNYFL	PTSDNYPS	TUXDNYTX	
NYCQNYFR	PTTWNYPI	UTICNYUT	
NYCQNYHS	PTVYNYPY	VLFLNYVF	
NYCQNYIA	PTWANYPW	VRHVNYVR	
NYCQNYJA	PVYDNYPD	WBYNNYWE	
NYCQNYLI	PWNGNYSS	WDMRNYFR	
NYCQNYLN	RCVLNYRH	WDPTNYWT	
NYCQNYNJ	RDCKNYRC	WERLNYWL	
NYCQNYNW	RNKNYRNR	WHBHNYWB	
NYCQNYOP	RNLKNYRL	WHBONYWP	
NYCQNYRH	RODLNYRD	WHPLNYWP	
NYCRNYND	ROMENYRM	WHTHNYUH	
NYCRNYNS	RSLNNYRO	WHVRNYWH	
NYCRNYSS	RSVLNYRV	WLBONYUB	
NYCRNYWS	RVHDNYRV	WLCTNYWC	
NYCXNYCI	RYE NYRY	WLSNNYME	
NYCXNYCR	SATNNYSN	WLVLNYNM	
NYCXNYGC	SAVNNYSN	WMSNNYWN	
NYCXNYHO	SBTHNYSB	WNDLNYWD	
NYCXNYJE	SCDLNYSR	WNKHNYWK	
NYCXNYKB	SCHNNYSC	WNTGNYWT	

North Carolina

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

**BELLSOUTH TELECOMM INC
DBA SOUTHERN BELL TEL & TEL
(SAC 235193)**

ARSNNCMA
APEXNCCE
BLMTNCCE
BSCYNCMA
BURLNCDA
BURLNCEL
BURLNCHA
CRBHNCCE
CARYNCCE
CARYNCWS
CLMTNCMA
CPHLNCRO
CHRLNCBO
CHRLNCCA
CHRLNCCE
CHRLNCCR
CHRLNCDE
CHRLNCER
CHRLNCMI
CHRLNCRE
CHRLNCSE
CHRLNCTH
CHRLNCUN
CHRLNCOD
CHRLNCLP
CHVLNCCE
CLEVNCMA
DVSNNCPO
DNVRNCMA
ELBONCMA
FAMTNCMA
GSTANCDA
GSTANCSE
GTWDNCMA
GBSNNCMA
GLBONCMA
GNHMNCMA
GNBONCAP
GNBONCAS
GNBONCEU
GNBONCHO
GNBONCLA
GNBONCMC
GNBONCPG
GRVRNCMA
HMLTNCMA
HVLNCCE
JULNNCMA
KGMTNCMA
KNDLNCCE
LTMRCNCE
LRBGNCMA
LNTNNCMA
LNTNNCVA
LCSTNCMA
LWLLNCMA
LMTNNCMA
MADNNCCE
MLTNNCMA

MNTINCMA
MTHLNCMA
MTOLNCCE
PMBRNCCE
RLGHNCDU
RLGHNCGA
RLGHNCGL
RLGHNCHO
RLGHNCJO
RLGHNCMO
RLGHNCSE
RLGHNCSE
RDVLNCMA
RDVLNCSE
RCHMNCMA
RWLDNCMA
RFFNNCMA
SLBRNCMA
SXPNCMA
SELMNCMA
SHLBNCMA
STNLNCCE
SSVLNCMA
SSVLNCSE
STPNNCMA
SRFDNCCE
TRMNCMA
WNDLNCPI
WNSLNCAR
WNSLNCCL
WNSLNCFI
WNSLNCGL
WNSLNCLE
WNSLNCVI
WNSLNCWA
WNSLNCWH
WGVLCMA
ZBLNNCCE

**VERIZON SOUTH INC.-NC
(SAC 230479)**

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

**NORTH STATE TELEPHONE CO.
DBA NORTH STATE COMM
(SAC 230491)**

HGPNNCXA
HGPNNCXD
HGPNNCXC
HGPNNCXE
HGPNNCXF
RNMNNCXA
THVLNCXA

Tennessee

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

**BELLSOUTH TELECOMM INC
DBA SOUTH CENTRAL BELL TEL**

ACHLTNMT	JCSNTNNS	NSVLTNWC
ARTNTNMT	JFCYTNMA	NSVLTNWM
ASCYTNMA	JSPRTNMT	NWBRTNMA
ATHNTNMA	KGTNTNMT	NWPTTNMT
BLGPNTMA	KNVLTNBE	OKRGTNMT
BLLSTNMA	KNVLTNFC	OLHCTNMA
BLNCTNMT	KNVLTNMA	OLSPTNMA
BNTNTNMT	KNVLTNWH	PLSKTNMA
BWVLTNMA	KNVLTNYH	PSVWTNMT
CHRLTNMT	LBNNTNMA	PTLDTNMA
CHTGTNBR	LFLTNTMA	RDGLTNMA
CHTGTNDT	LKCYTNMA	RKWDTNMA
CHTGTNHT	LNCYTNMA	RPLYTNMA
CHTGTNMV	LODNTNMA	RRVLTNMA
CHTGTNNS	LWBGTNMA	SANGTNMT
CHTGTNRB	LXTNTNMA	SDDSTNMA
CHTGTNR0	LYBGTNMT	SEWNTNMW
CHTGTNSE	LYLSTNMA	SHVLTNMA
CHTGTNSM	LYVLTNMA	SMYRTNMA
CHTNTNMT	MAVLTNMA	SNTFTNMA
CLEVTNMA	MCWNTNMT	SOVLTNMT
CLMATNMA	MDVITNMT	SPBGTNMA
CLTNTNMA	MEDNTNMA	SPFDTNMA
CLVLTNMA	MILNTNMA	SPHLTNMT
CMDNTNMA	MMPHTNBA	SRVLTNMA
CNVLTNMA	MMPHTNCK	SVVLTNMT
CRPLTNMA	MMPHTNCT	SWTWTNMT
CRHTTNMA	MMPHTNEL	TPVLTNMA
CRVLTNMA	MMPHTNFR	TLLHTNMA
CULKTNMA	MMPHTNGT	TRINTNMA
CVTNTNMT	MMPHTNHP	TROYTNMT
DKSNTNMT	MMPHTNMA	TRTNTNMA
DNRGTNMA	MMPHTNMT	UNCYTNMA
DYBGTNMA	MMPHTNOA	WHBLTNMT
DYTNTNMA	MMPHTNSL	WHHSTNMA
EAVLTNMA	MMPHTNST	WHPITNMA
FIVLTNMA	MMPHTNWW	WHVLTNMT
FKLNTNCC	MNCHTNMA	WHWLTNMA
FKLNTNMA	MNPLTNMA	WNCHTNMA
FRDNTNMA	MRBOTNMA	WRTRTNMT
FRVWTNMT	MRTWTNMA	WTTWTNMA
GALLTNMA	MSCTTNMT	WVRLTNMT
GBSNTNMT	MSCWTNMA	
GDVLTNMA	MYVLTNMA	
GNBRTNMA	NRRSTNMA	
GRNBTNMA	NSVLTNAP	
GTBGTNMT	NSVLTNBH	
GTWSTNSW	NSVLTNBV	
HDVLTNMA	NSVLTNBW	
HIMNTNMA	NSVLTNCD	
HLLSTNMT	NSVLTNCH	
HMBLTNMA	NSVLTNDO	
HNNGTNMA	NSVLTNHH	
HNSNTNMT	NSVLTNIN	
HNTGTNMA	NSVLTNMC	
HRFRTNMA	NSVLTNMT	
HTVLTNMA	NSVLTNST	
JCSNTNMA	NSVLTNUN	

Virginia

Appendix B

**NonRural ILEC Wire Centers Served by Sprint Wireless Division
For Which ETC Status is Requested**

VERIZON SOUTH INC.-VA (CONTEL)

ALBRVAXA
AMHRVAXA
APMTVAXA
ARCLVAXA
BRWRVAXA
BRWYVAXA
BWLGVAXA
BYKNVAXA
BYTNVAXA
CHKTVAXA
CHNCVAXA
CHNCVAXB
CLBHVAXA
CLMTVAXA
CPRNVAXA
CRLDVAXA
CRTDVAXA
DAWNVAXA
DHLGVAXA
DLCYVAXA
DLLSVAXA
DNDRVAXA
DSPAVAXA
DSWLVAXA
DTVLVAXA
DYTNVAXA
EDOMVAXA
EKTNVAXA
EMPRVAXA
EPFKVAXA
FKLNVAXB
FRNHVAXA
GLCSVAXA
GRBRVAXA
GRBRVAXB
GRTSVAXA
HAYSVAXA
HCKRVAXA
HITNVAXA
HLLDVAXA
HNVRVAXA
HRBGVAXA
HYMRVAXA
INHLVAXA
IVORVAXA
IVTNVAXA
JRRTVAXA
KGGRVAXA
KGQNVAXA
KGWLVAXA
KMKNVAXA
KZTWVAXA
LDYSVAXA
LRTNVAXA
LRVLVAXA
LVLYVAXA
MGVLVAXA
MNSSVAXA
MTHWVAXA
NKVLVAXA
OCQNVAXA
OLCHVAXA

PRANVAXA
PRANVAXB
PTRYVAXA
PUNGVAXA
QNTCVAXA
RPHNVAXA
SALDVAXA
SBWKVAXA
SMFDVAXA
SRRYVAXA
STCKVAXA
STFRVAXA
TPHNVAXA
TRNGVAXA
WKFDVAXA
WNDSVAXA
WRSWVAXA
WYCVVAXA

VERIZON VIRGINIA, INC.

ALXNVAAD
ALXNVAAX
ALXNVABA
ALXNVABR
ALXNVACN
ALXNVAFR
ALXNVAMV
ARTNVAAR
ARTNVACK
ARTNVACY
ARTNV AFC
ASBNVAAS
ASLDVAAS
BCHNVABH
BCKNVABC
BDFRVABD
BEVLVABV
BKBGVABB
BLBGVABB
BLMTVABM
BOYCVABY
BTHIVABT
CALVVACA
CGVLVACL
CHCYVACC
CHESVACR
CHHMVACH
CHSKVACD
CHSKVADC
CHSKVAGU
CLHGVACO
CLPPVACU
CLPPVAGR
CLPPVALI
CLPPVARV
CMLDVACU
CNCRVACN
CNVIVACT
CRBGVACB
CRVLVACV
DAVLVADA
DAVLVAFP

DAVLVAVE
DBLNVADU
DNWDVADW
DRVRVADR
FIFEVAFI
FLCHVAMF
FRBGVAFB
FRBGVALH
FRFXVABF
FRFXVAFF
GCLDVAGO
GNBOVAGA
GNWDVAGW
GOVLVAGV
GRFLVAGF
GVTNVAGR
HLBOVAHB
HMPNVAAB
HMPNVADC
HMPNVAQN
HMPNVAWD
HPWLVAHW
HRNDVADU
HRNDVAHE
HRNDVAST
HRWDVAHW
LOUSVALU
LRTNVAGU
LSBGVALB
LVTNVALN
LVVLVALV
LYBGVACH
LYBGVACV
LYBGVAMH
LYBGVANL
LYBGVAOF
LYBGVATM
LYBGVAYB
MCHVVAMV
MCKYVAMK
MCLNVALV
MDBGVAMI
MDLTVAMD
MDSNVAMA
MNKNVAMN
MNRLVAML
MRSHVAMA
NLFRVANF
NRFLVABL
NRFLVABS
NRFLVAGS
NRFLVAOV
NRFLVASP
NRFLVAWC
NWNWVAHU
NWNWVAHV
NWNWVAJF
NWNWVAND
NWNWVAYK
ORNGVAOR
PCVLVAPV
PLSKVAPU

PNRVVAPR
PRFRVAPF
PTBGVACD
PTBGVAPB
PTMOVAFH
PTMOVAFS
PWHTVAPW
QNTNVAQN
RCMDVACG
RCMDVAGK
RCMDVAGR
RCMDVAGY
RCMDVAHL
RCMDVAHR
RCMDVAHT
RCMDVAIT
RCMDVALS
RCMDVAPE
RCMDVAPS
RCMDVARA
RCMDVASN
RCMDVASR
RCMDVATC
RDFRVARA
RKVLVARK
RMTNVARE
RONKVABK
RONKVABS
RONKVACS
RONKVACV
RONKVAGC
RONKVALK
RSTNVAFM
SALMVAFI
SALMVAMC
SALMVASA
SFFLVASK
SHVLVASW
SNMTVASM
SNTNVASS
SPFDVASP
SPTSVASP
STCYVASC
STDRVASD
STTNVAST
STTNVAVE
SWVLVASV
THPLVATP
TOANVATO
UNVLVAUV
UPVLVAUP
VARNVAVR
VINNVAVN
VRBHVACC
VRBHVACT
VRBHVAGN
VRBHVAIL
VRBHVAIR
VRBHVAPT
VRBHVARC
VRBHVASR
VRBHVAVB

WHOKVAWO
WHVLVAWH
WLBGVAWM
WNCHVANM
WNCHVAWC
WNTRVAWG
WRTNVAWR
WSPNVAWP
WTFRVAWT
WVRLVAWV