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October 22, 2003

**Via e-mail and FedEx**

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: UT-031558; Sprint's Petition for Designation as an ETC

Dear Ms. Washburn:

On September 26, 2003, Sprint filed its Petition for Designation as an Eligible Telecommunications Carrier. The Commission has not yet acted on the Petition. Pursuant to the request of the Staff of the Washington Utilities and Transportation Commission, Sprint amends its Petition. Specifically, Sprint amends the Petition with a revision to Exhibit A, Affidavit of Brian K. Staihr. Sprint also revises Exhibit C, which as filed set forth the wire centers in which Sprint seeks ETC status. The revised Exhibit C sets forth the exchanges, rather than the wire centers, in which Sprint seeks ETC designation.

If you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

William E. Hendricks

Enclosures  
cc. Bob Shirley, Commission Staff

## Exhibit A

### Affidavit of Dr. Brian K. Staihr

Brian K. Staihr, being first duly sworn upon oath, deposes and states as follows:

1. My name is Brian K. Staihr, and I serve as Regulatory Economist for Sprint Corporation. My business address is 6450 Sprint Parkway, Overland Park, KS 66251. I am an authorized representative of Sprint Corporation's Wireless Division, which consists of Sprint Spectrum, L.P., WirelessCo, L.P., SprintCom, Inc., Sprint PCS License, L.L.C., APC PCS, LLC, PhillieCo, L.P., and other wholly-owned and controlled affiliates (collectively, "Sprint"), with regard to Sprint's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Washington ("Application"). I have read the foregoing Application and all information therein is true and correct to the best of my knowledge, information and belief.

2. Sprint is authorized to provide broadband personal communications service ("PCS") in Washington pursuant to Part 24 of the FCC's rules. Sprint is a common carrier, consistent with the definition in 47 U.S.C. § 153(10) and the requirements of 47 U.S.C. § 214(e), and is a commercial mobile radio service provider as set forth in 47 U.S.C. § 332(c)(1).

3. Sprint intends to obtain universal service support funding in certain of the high-cost areas served by non-rural incumbent local exchange carriers ("ILECs") in Washington, specifically Qwest Corporation ("Qwest") and Verizon Northwest, Inc. ("Verizon"). As required, this funding will be used only to support the provision, upgrading, and maintenance of Sprint's all-digital wireless network in Washington. As a result, Sprint will be able to increase the geographic coverage of its network in the areas in which it seeks ETC designation. In addition, designation of Sprint as an ETC will speed the deployment of advanced wireless network facilities that support provision of both basic wireless services and higher-bandwidth and enhanced services to consumers in Washington. As an ETC, Sprint will also offer a reduced-rate universal service package to subscribers who are eligible for Lifeline support. Sprint's service offerings are competitive with those of Qwest and Verizon.

4. Sprint provides all the services and functionalities supported by the federal universal service program, as set forth in Section 214(e) of the Act and Section 54.101(a) of the FCC's rules, throughout the service area for which it seeks ETC designation in Washington.

5. Voice-grade access to the public switched network. The FCC has concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth and frequency range. Sprint meets this requirement by providing voice-grade

access to the public switched telephone network. Through its interconnection arrangements with Qwest, Verizon, and other local exchange carriers, all customers of Sprint are able to make and receive calls on the public switched telephone network within the specified bandwidth.

6. Local usage. ETCs must include local usage beyond providing simple access to the public switched network as part of a universal service offering. Sprint includes specified quantities of usage in each of its rate plans, at the option of the customer, and thereby complies with the requirement that all ETCs offer local usage.

7. Dual-tone multi-frequency ("DTMF") signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Sprint provides signaling that is functionally equivalent to DTMF, such as out-of-band digital signaling, which satisfies this requirement.

8. Single-party service or its functional equivalent. Sprint meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

9. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Sprint currently provides its subscribers with access to 911 emergency services in accord with this requirement, and consistent with FCC regulations throughout the service area for which designation is sought. Sprint also provides Enhanced 911 services, including Phase I and Phase II E-911 services, where requested by local public safety authorities ready to receive the information and where such services are supported by the local exchange carrier.

10. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. Sprint meets this requirement by providing all of its customers with access to operator services, including customer service and call completion.

11. Access to interexchange service. Sprint meets the requirement of access to interexchange service by providing all of its customers with the ability to make and receive interexchange calls. Most Sprint rate plans include nationwide interexchange calling at the same rate as local calls. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

12. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. Sprint meets this requirement by providing all of its customers with access to directory assistance by dialing "411."

13. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no additional charge. 47 C.F.R. § 54.101(a)(9). Once designated as an ETC, Sprint will participate in Lifeline as required, and will provide toll control and/or toll blocking capability

in satisfaction of the FCC's requirement. Sprint currently has the technology to provide toll limitation and will utilize this technology to provide such functionality at no additional charge to Lifeline customers.

14. A carrier requesting designation must certify that it offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services." Sprint provides the supported services using its existing network infrastructure, which includes the antennas, cell-sites, towers, trunking, mobile switching, and interconnection facilities owned or leased by the Company, used to serve PCS customers.

15. Sprint advertises the availability of the supported services and the corresponding charges in a manner that informs the general public within the designated service area of both the services available and the corresponding charges. Sprint advertises its wireless services through several different media of general distribution throughout the service areas for which designation is requested.

16. Telecommunications carriers in Washington are required to offer the same Lifeline and Link Up discounts offered by Qwest and Verizon. Accordingly, Sprint will offer Lifeline and Link Up discounts in accordance with 47 C.F.R. §§ 54.400 through 54.415, RCW 80.36.410 through 80.36.475, and Chapter 480-122 WAC.

17. Sprint requests ETC designation for the service area in Washington depicted on the map attached as Exhibit B. Specifically, Sprint proposes a service area consisting of each of the Qwest and Verizon exchanges in Washington in which PCS service is available over the Sprint PCS network. To the extent Sprint serves only a portion of the exchange, Sprint requests ETC designation only in that portion of the wire center where it provides service. A map of the proposed service area is attached in Exhibit B, and a list of the full and partial exchanges included in the proposed service area is provided in Exhibit C.

18. A grant of Sprint's application will serve the public interest by promoting additional deployment of wireless facilities and services to the high-cost areas served by Qwest and Verizon in Washington, and bringing consumers in those areas the benefits of additional competitive universal service offerings.

19. Granting Sprint's Application is consistent with RCW 80.36.300, which provides it is the policy of the state to: (1) Preserve affordable universal telecommunications service; (2) maintain and advance the efficiency and availability of telecommunications service; (3) ensure that customers pay only reasonable charges for telecommunications service; (4) ensure that rates for noncompetitive telecommunications services do not subsidize the competitive ventures of regulated telecommunications companies; (5) promote diversity in the supply of telecommunications services and products in telecommunications markets throughout the state; and (6) permit flexible regulation of competitive telecommunications companies and services.

20. High-Cost Certification. Sprint certifies that all high-cost universal service support received in Washington will be used only for the provision, maintenance, and upgrading of services and facilities for which the support is intended.

21. Anti-Drug Abuse Certification. To the best of my knowledge, the applicant referred to in the foregoing Application, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) of the applicant as specified by Section 1.2002(b) of the FCC's rules, are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

22. This concludes my affidavit.

I certify (or declare) under penalty of perjury under the law of the State of Washington that the foregoing is true and correct:

10/20/03 Overland Park, KS  
Date and Place

[Signature]  
Signature

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me on this \_\_\_ day of October, 2003.

[Signature]  
NOTARY PUBLIC

My Commission Expires: 2/18/05  
(name) Susan Skahan



**NonRural ILEC Exchange Served by Sprint PCS  
For Which ETC Status is Requested**

**QWEST CORPORATION**

Aberdeen-Hoquiam	Liberty Lake
Auburn	Longview-Kelso
Bainbridge Island	Maple Valley
Battle Ground	Moses Lake
Belfair	Newman Lake
Bellevue	Olympia
Bellingham	Pasco
Bellingham	Port Angeles
Black Diamond	Port Ludlow
Bremerton	Port Orchard
Buckley	Port Townsend
Castle Rock	Puyallup
Centralia	Renton
Chehalis	Ridgefield
Cle Elum	Rochester
Colfax	Roy
Copalis	Seattle
Deer Park	Sequim
Des Moines	Shelton
Easton	Silverdale
Elk	Spokane
Enumclaw	Sumner
Ephrata	Tacoma
Graham	Tacoma (Waverly)
Green Bluff	Vancouver
Hoodport	Walla Walla
Issaquah	Warden
Kent	Yakima

Per Qwest Local Tariff 5.1.1

**VERIZON NORTHWEST INC.**

Acme	Everson
Alger	Ferndale
Big Lake	Grayland
Blaine	LaConner
Burlington	Laurel
Conway	Lynden
Custer	Sedro Woolley
Deming	Westport
Edison	

**VERIZON NORTHWEST INC.-WA**

Anacortes	Monroe
Arlington	Mount Vernon
Benton City	Oak Harbor
Bothell	Pullman
Burlington	Quincy
Camas-Washougal	Richland
Cashmere	Richmond Beach
Coupeville	Rosalia
Everett	Sedro Woolley
George	Silver Lake
Granite Falls	Snohomish
Halls Lake	Soap Lake
Kennewick	Stanwood
Kirkland	Sultan
Leavenworth	Wenatchee
Marysville	Woodland

Per Verizon Northwest Tariff 4.D.1