

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	DOCKET UT-190744
SAGE TELECOM COMMUNICATIONS, LLC, d/b/a TRUCONNECT,	ORDER 01
Petitioner,	GRANTING ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION WITH CONDITIONS AND EXEMPTION FROM RULE
Seeking Designation as an Eligible Telecommunications Carrier in the state of Washington pursuant to 47 U.S.C. § 214(e)(2) (<i>Low Income Only</i>)	

BACKGROUND

- ¹ On July 25, 2019, Sage Telecom Communications, LLC, d/b/a TruConnect, (Sage or Company) filed a petition (Petition) with the Washington Utilities and Transportation Commission (Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) in the state of Washington under the Communications Act of 1934,¹ applicable FCC rules, and Chapter 480-123 Washington Administrative Code (WAC). Sage proposes to provide qualified Washington consumers with Lifeline services, which are federal Universal Service Fund (USF) supported services.² ETC designation would allow the Company to receive federal low-income universal service support for prepaid wireless service applicable to Lifeline services. In support of its Petition, Sage filed its FCC-approved compliance plan with the Commission and a proposed coverage area.
- ² On December 23, 2019, Sage supplemented its filing to reflect updated proposed Lifeline rate plans in compliance with changes in the FCC's minimum service standards. On April 13, 2020, the Company again supplemented its filing, listing the actual Washington exchanges for which the company requests ETC designation.³

¹ 47 U.S.C. § 214 (e)(2).

² The USF subsidizes monthly and, in certain circumstances, initial connection charges for qualified low-income households.

³ See Sage April 13, 2020 Letter, Exhibit A.

3 Sage asserts that designating the Company as an ETC would advance the public interest. Sage further contends that one of the principal goals of the Telecommunications Act of 1996 was “to secure lower prices and higher quality services” to all citizens, regardless of location or income.⁴ Sage states that the public interest benefits of its Lifeline offering include:

- (1) larger local calling areas as compared to traditional wireline carriers;
- (2) the convenience, portability, and security afforded by mobile telephone service;
- (3) the opportunity for customers to control costs by receiving a preset amount of monthly airtime at no charge;
- (4) the opportunity for customers to receive both the minimum service standards for voice and broadband usage within the same rate plan;
- (5) the ability of users to use the supported service to send and receive “SMS” or text messages;
- (6) the ability for customers to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted (and the courtesy of free low-balance alerts);
- (7) the option to purchase international calling at affordable rates;
- (8) the opportunity for customers to receive service without going through a credit check or deposit requirement, or committing to a long-term service contract; and
- (9) access to 911 and E911 service where available.⁵

Sage observes that many customers, “including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity.” The Company submits that granting it ETC status would increase

⁴ Petition at 20-21 (citing Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56).

⁵ Petition at 21.

consumer choice and competition in the market.⁶ In its supplemental letter, Sage states that, due to the COVID-19 pandemic, it is especially important to provide affordable telecommunication services. Lifeline allows customers “to contact healthcare providers and access safe telemedicine services, obtain essential services, or survive in an online-only work and school environment.”⁷

4 Sage proposes to resell wireless service from Verizon, Sprint, and T-Mobile to provide services. Therefore, the Petition also seeks an exemption from the following provisions of WAC 480-123-030(1):

- WAC 480-123-030(1)(d) requires high-cost program participants to file a substantive plan of the investments to be made with initial federal support for the first two years of their programs. Sage indicates that it does not seek ETC designation for the purpose of participating in the USF high-cost program, making the substantive investment plan inapplicable to its Petition.⁸
- WAC 480-123-030(1)(f) requires submission of cell site maps of geographic service areas. Sage states that it does not own, control, or plan to develop cell sites, but instead will rely on those owned and operated by Verizon and Sprint in Washington. Therefore, Sage requests a waiver of this requirement to provide coverage maps.⁹
- WAC 480-123-030(1)(g) requires ETCs to demonstrate the ability to remain functional in emergency situations. As noted above, Sage resells facilities owned by Verizon, Sprint, and T-Mobile. It therefore relies on those carriers’ facilities for backup battery power at each cell site, backup generators at each microwave hub, and backup battery and generators at each switch located in Washington. Again, Sage seeks a waiver of this filing requirement.¹⁰

5 Commission staff (Staff) agrees with Sage that the Company meets all applicable regulatory requirements to be designated as an ETC. However, Staff presented, and the Company agreed to comply with, a list of conditions the Commission previously imposed

⁶ Petition at 22.

⁷ Sage April 13, 2020 Letter.

⁸ Petition at 19-20.

¹⁰ *Id.* ¹⁰ *Id.* at 20.

on other similarly situated Lifeline ETCs seeking to operate in Washington. These include compliance filings, customer communications, and quarterly reports to be filed with the Commission. A complete list of these conditions is set forth in Appendix A to this order.

6 Staff also agrees with and recommends granting Sage’s request for exemptions from the filing requirements of WAC 480-123-030(1)(d), (f), and (g), due to the limited nature of the designation as a Lifeline Only (LLO) ETC.

7 Staff notes that the FCC’s National Lifeline Accountability Database and the National Lifeline Eligibility Database (aka the National Verifier or “NV”) are now fully functional. Because these systems are now functional, Staff does not recommend requiring Sage to verify customer eligibility by working with the Department of Social and Health Services (DSHS).

DISCUSSION

8 Common carriers receiving designation as ETCs under 47 U.S.C. § 214 are eligible to receive funds from the federal USF for Lifeline services. State utility commissions are responsible for designating common carriers as ETCs for the purpose of receiving such funds, and may impose conditions on a common carrier so designated.¹¹ The Commission will approve petitions from carriers requesting ETC designation if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.¹²

9 State commissions may designate more than one carrier as an ETC in an area if such designation is consistent with the public interest, convenience, and necessity, and if the carrier seeking ETC designation meets these two requirements of 47 U.S.C. § 214(e)(1):

(A) Offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a

¹¹ *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d),(f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund*, Order 03 (June 24, 2010), UT-093012, ¶ 78.

¹² WAC 480-123-040.

combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

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

10 We agree with Staff that Sage is capable of providing services supported by federal universal service mechanisms, as defined in 47 C.F.R. § 54.101(a), by reselling wireless service from Verizon, Sprint, and T-Mobile, its underlying network carriers. If the FCC approves a carrier's compliance plan, the FCC does not apply the Act's "own facilities" requirement to carriers that seek limited ETC designation solely to participate in the Lifeline program. The compliance plan must demonstrate that the ETC applicant commits to fight waste, fraud, and abuse in the Lifeline program and will adhere to federal Lifeline rules. Here, Sage seeks ETC designation for the limited purpose of participating in the Lifeline program, and the FCC approved Sage's compliance plan on December 26, 2012.¹³ Further, Sage commits to advertise its Lifeline services.¹⁴

11 Staff is correct that certain additional conditions should be imposed on Sage as we have done when designating other similarly situated ETCs in Washington. Appendix A to this Order provides the Company specific guidance on our expectations for regulatory compliance, customer service, consumer protection, and various reporting requirements that will ensure Staff can monitor Sage's operations for strict adherence to all ETC requirements.

12 We also agree that Sage has demonstrated that the requirements of WAC 480-123-030(1)(d) should not apply to the Company because the rule only applies to high-cost program participants and Sage is not a high-cost program participant. WAC 480-123-030(1)(f) and (g) also do not apply to Sage's proposed operations as an ETC because the Company will not use its own facilities to provide service; rather, Sage will rely on an underlying carrier's facilities and backup services. The Company's request for exemption from these portions of WAC 480-123-030 is thus granted.

¹³ *Wireline Competition Bureau Approves the Compliance Plans of AirVoice Wireless, Amerimex Communication, Blue Jay Wireless, Millenium 2000, Nexus Communications, Platinumtel Communications, Sage Telecom, Telrite, and Telscape Communications*, FCC Public Notice, WC Docket Nos. 09-197 and 11-42, DA 12-2063 (rel. Dec. 26, 2012).

¹⁴ Petition at 14.

FINDINGS AND CONCLUSIONS

- 13 (1) The Commission has jurisdiction over the subject matter of this order and is authorized to designate Eligible Telecommunications Carriers in Washington under 47 U.S.C. § 214(e)(2), 47 C.F.R. §54.201(b)-(c), and WAC 480-123.
- 14 (2) Sage is a telecommunications company seeking to do business in the state of Washington. Sage meets the requirements for designation as an ETC because the FCC has approved Sage's compliance plan and Sage has committed to advertise the availability of its services and the charges therefor using media of general distribution. Sage's designation as an ETC will advance the purpose of universal service because Sage will offer voice telephony services, which facilitate universal service. Sage has also demonstrated that its designation as an ETC is in the public interest.
- 15 (3) The Commission may grant an exemption from any of its rules if doing so is consistent with the public interest, the purposes underlying regulation, and applicable statutes. Sage has demonstrated that the requirements of WAC 480-123-030(1)(d), (f), and (g) should not apply to the Company and that granting the requested exemption is in the public interest and consistent with applicable laws, rules, and orders.
- 16 (4) This matter came before the Commission at its regularly scheduled meeting on May 7, 2020.

ORDER

THE COMMISSION ORDERS:

- 17 (1) Sage Telecom Communications, LLC's request for designation as an ETC is hereby GRANTED, subject to the conditions set out in Appendix A and limited to the list of Washington exchanges set forth in Appendix B to this order.
- 18 (2) Sage Telecom Communications, LLC's request for exemption from WAC 480-123-030(1)(d), (f), and (g) is hereby GRANTED.

- 19 (3) The Commission retains jurisdiction over this matter for purposes of effectuating this order.

DATED at Lacey, Washington, and effective May 7, 2020.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chair

ANN E. RENDAHL, Commissioner

JAY M. BALASBAS, Commissioner

APPENDIX A

Washington State Conditions on Designation of Sage Telecom Communications, LLC, d/b/a TruConnect, as an Eligible Telecommunications Carrier

1. Within 30 days of approval of its ETC designation in Washington and prior to offering Lifeline services, Sage must make a compliance filing for approval by the Commission containing the following:
 - a. Sage's Lifeline rate plans, terms and conditions. The rates, terms and conditions shall include all provisions that apply to the Lifeline services offered by Sage in Washington State and detailed procedures explaining how customers can participate in a particular Lifeline plan.
 - b. Sage's proposed language to be used in all advertising of Lifeline services and on its websites. The language shall include information directing customers to the Washington State Office of the Attorney General for complaints regarding any Lifeline service issues.
 - c. Sage's Lifeline Customer Application Form.

Commission staff shall review Sage's compliance filing and recommend to the Commission whether it should be approved or rejected within 10 business days. Sage shall not offer Lifeline services until the Commission has approved its compliance filing.

2. Sage shall file with the Commission any future changes to its rates, terms, or conditions at least one day prior to the effective date of the change.
3. The information on Sage's rates, key terms, and conditions (*e.g.*, return policy, usage definition, refill methods, annual certification requirement, and customer service contact) shall be provided in a package sent or given to Lifeline customers after enrollment in Sage's Lifeline program, as well as at Sage's official Lifeline website.
4. Sage shall provide Lifeline customers with the choice of all other rate plans available to its regular customers.
5. For the rate plan free of charge to customers, Sage must meet the FCC's minimum service standards.
6. Sage shall follow the FCC's deactivation standards.

7. On a quarterly basis beginning with the quarter ending on September 30, 2020, Sage shall provide the number of Lifeline customers that it enrolls each month. Sage shall also report the number of deactivated Lifeline customers each month by service plan and the reasons for deactivation (*e.g.*, no usage for 60 consecutive days, annual verification unsuccessful, or voluntary exit). Quarterly reports shall be filed with the Commission no later than 30 days after the end of each quarter.
8. Sage shall respond within 30 days to Commission Staff's information requests on Sage's Lifeline operations, including but not limited to Lifeline customers' usage patterns and Lifeline customer records.
9. Sage shall cooperate with the Commission and the Universal Service Administrative Company (USAC), including full participation in the new National Verifier system.
10. Sage must not deduct airtime minutes for calls to customer care made from the customer's handset by dialing 611. Sage shall explicitly state the policy of free 611 calls in its Lifeline service agreements. Sage may require the customer to call the toll-free customer care number from another phone if necessary to resolve technical issues related to the handset or its programming.
11. Sage shall file with the Commission, by March 31 of each year, a report on the number of complaints, categorized by the different nature of complaints that it received from Washington Lifeline customers during the prior calendar year (*e.g.*, billing disputes and service quality complaints). This report shall include complaints filed with Sage, the Commission's Consumer Protection and Communications Section, the Washington State Office of the Attorney General, and the Federal Communications Commission (FCC). This report shall not include calls from customers to Sage with regard to general inquiries such as account balance, additional purchases, service availability or technical support. The Commission reserves the rights to revoke Sage's ETC designation if Sage fails to provide reasonable quality of service.
12. Sage shall cooperate with the Washington State Enhanced 911 Program (E911) and all Public Safety Answering Points on E911 issues and shall, upon request, designate a representative to serve as a member or alternate member of the Washington State E911 Advisory Committee or its Communications Sub-committee.
13. Sage shall comply with rules on cessation of business as specified in WAC 480-120-083.
 - a. Prior to cessation of business, Sage shall make arrangements with its underlying carriers to provide minutes already sold to customers under the

same terms and conditions it has with the customers, or provide refunds to the existing customers.

- b. Sage shall provide written notice to the following persons at least 30 days in advance of cessation of service:
 - i. The Commission;
 - ii. The state 911 program;
 - iii. Each of its customers;
 - iv. The national number administrator.
 - c. The notice to the Commission and the state 911 program must include the same information required by WAC 480-120-083(3).
 - d. The notice to the customers must include the same information required by WAC 480-120-083(4).
 - e. The notice to the national number administrator must include the same information required by WAC 480-120-083(7).
 - f. Sage shall file with the Commission at least 30 days in advance of its cessation of business and request the relinquishment of its ETC designation in Washington.
14. Sage shall collect and maintain necessary records and documentation to ensure its compliance with the applicable FCC and Commission requirements, including existing requirements and any future modifications. The records and documentation shall be provided to Commission Staff upon request.
 15. Sage shall cooperate with Commission Staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
 16. Sage shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.

APPENDIX B

Sage Telecom Communications, LLC d/b/a TruConnect Areas for Eligible Telecommunications Carrier Designation

LEC	EXCHANGE	CLLI
ASOTIN TELEPHONE CO.	ASOTIN	ASOTWAXA
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	COWICHE	CWCHWAXX
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	TIETON	TITNWAXX
CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN	BLKIWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ALMIRA	ALMRWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	AMES LAKE	ASLKWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ASHFORD	ASFDWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	BASIN CITY	BSCTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CARNATION	CRNTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CATHLAMET	CTHLWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHENEY	CHNYWAXC
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHEWELAH	CHWLWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL	BSCTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	COULEECITY	CLCYWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CRESTON	CETNWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CURTIS	CRTSWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EDWALLTYLR	EDWLWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ELMA	ELMAWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ELTOPIA	ELTPWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EUREKA	EURKWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FALL CITY	FLCYWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS	CLBYWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FOX ISLAND	ARLTWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	GIG HARBOR	GGHRWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	HARRINGTON	HRTNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KINGSTON	KGTNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LIND	LINDWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MATHEWSCOR	ELTPWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MEDICAL LK	MDLKWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MONTESANO	MNTSWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MORTON	MRTNWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	NORTH BEND	NBNDWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ODESSA	ODSSWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ORTING	ORNGWAXA

ILEC	EXCHANGE	CLLI
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	REARDAN	RRDNWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	RITZVILLE	RTVLWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SO PRAIRIE	SPRRWAXX
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SOUTH BEND	RYMNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPANGLE	SPNGWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPRAGUE	SPRGWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	TWISP	TWISWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VADER	VADRWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VASHON	VSHNWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WILSON CRK	WSCKWAXA
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	YACOLT	YCLTWAXA
ELLENSBURG TELEPHONE CO.	ELLENSBURG	ELBGWAXA
ELLENSBURG TELEPHONE CO.	KITTITAS	ELBGWAXA
ELLENSBURG TELEPHONE CO.	SELAH	ELBGWAXA
ELLENSBURG TELEPHONE CO.	THORP	ELBGWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BENTONCITY	BNCYWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BOTHELL	BOTHWAXB
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BRIDGEPORT	BRPTWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS	CAMSWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	DOUGLASCO	MNFDWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT	EVRTWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	FARMINGTON	FRTNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GARFIELD	GRFDWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GEORGE	GERGWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	HALLS LAKE	HLLKWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK	KNWCWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND	BOTHWAXB
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE	ARTNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON	ALGRWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NACHES	NCHSWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NEWPORT	NWPTWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAK HARBOR	CPVLWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAKESDALE	OKDLWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PALOUSE	PALSWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PULLMAN	PLMNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND	RCLDWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD	FRFDWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA	MLDNWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SKYKOMISH	SKYKWAXX

ILEC	EXCHANGE	CLLI
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH	CLVWWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SOAP LAKE	SOLKWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	TEKOA	TEKOWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE	CHLNWAXX
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY	ACMEWAXA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WOODLAND	WDLDWAXA
HOOD CANAL TELEPHONE CO.	UNION	UNINWAXB
INLAND TELEPHONE CO.	DEWATTO	DWTOWAXA
INLAND TELEPHONE CO.	ROSLYN	RSLNWAXX
INLAND TELEPHONE CO.	UNIONTOWN	UNTWAXA
KALAMA TELEPHONE COMPANY	KALAMA	KALMWAXB
LEWIS RIVER TELEPHONE COMPANY, INC.	AMBOY	AMBYWAXA
LEWIS RIVER TELEPHONE COMPANY, INC.	COUGAR	COGRWAXX
LEWIS RIVER TELEPHONE COMPANY, INC.	LA CENTER	LACTWAXA
MASHELL TELECOM, INC.	EATONVILLE	ETVLWAXC
MCDANIEL TELEPHONE CO.	MOSSYROCK	MSRKWAXX
MCDANIEL TELEPHONE CO.	SALKUM	ONLSWAXA
QWEST CORPORATION	ABERDEEN	ABRDWA01
QWEST CORPORATION	AUBURN	AUBNWA01
QWEST CORPORATION	BAINBDG IS	BNISWA01
QWEST CORPORATION	BATTLEGRND	BTLGWA01
QWEST CORPORATION	BELFAIR	BLFRWA01
QWEST CORPORATION	BELLEVUE	BLLVWAGL
QWEST CORPORATION	BLACKDIMND	BDMDWA01
QWEST CORPORATION	BREMERTON	BMTNWA01
QWEST CORPORATION	BUCKLEY	BCKLWA01
QWEST CORPORATION	CASTLEROCK	CSRKWA01
QWEST CORPORATION	CENTRALIA	CENLWA01
QWEST CORPORATION	CHEHALIS	CHHLWA01
QWEST CORPORATION	CLARKSTON	LSTNIDSH
QWEST CORPORATION	CLE ELUM	CLELWA01
QWEST CORPORATION	COLFAX	CLFXWA01
QWEST CORPORATION	CRYSTAL MT	CRMTWA01
QWEST CORPORATION	DAYTON	DYTNWA01
QWEST CORPORATION	DEER PARK	DRPKWA01
QWEST CORPORATION	DES MOINES	DESMWA01
QWEST CORPORATION	ELK-GRNBLF	ELK WA01
QWEST CORPORATION	ENUMCLAW	ENMCWA01
QWEST CORPORATION	EPHRATA	EPHRWA01

ILEC	EXCHANGE	CLLI
QWEST CORPORATION	GRAHAM	GRHMWAGR
QWEST CORPORATION	HOODSPORT	HDPTWA01
QWEST CORPORATION	ISSAQUAH	ISQHWAEX
QWEST CORPORATION	KENT	KENTWA01
QWEST CORPORATION	LIBERTY LK	LBLKWA01
QWEST CORPORATION	LONGVIEW	LGVWWA02
QWEST CORPORATION	LOON LAKE	LNLKWA01
QWEST CORPORATION	MAPLE VLY	MPVYWAMV
QWEST CORPORATION	MOSES LAKE	MSLKWA01
QWEST CORPORATION	NEWMANLAKE	NWLKWA01
QWEST CORPORATION	OLYMPIA	LACYWA01
QWEST CORPORATION	OTHELLO	OTHEWA01
QWEST CORPORATION	PASCO	PASCWA01
QWEST CORPORATION	PATEROS	PTRSWA01
QWEST CORPORATION	POMEROY	PMRYWA01
QWEST CORPORATION	PORT ORCH	COLBWA01
QWEST CORPORATION	PORTLUDLOW	PTLWWA01
QWEST CORPORATION	PTTOWNSEND	PTTWWA01
QWEST CORPORATION	PUYALLUP	PYLPWA01
QWEST CORPORATION	RENTON	KENTWAOB
QWEST CORPORATION	RIDGEFIELD	RDFDWA01
QWEST CORPORATION	ROCHESTER	ROCHWA01
QWEST CORPORATION	ROY	ROY WA01
QWEST CORPORATION	SEATTLE	KENTWAOB
QWEST CORPORATION	SHELTON	SHTNWA01
QWEST CORPORATION	SILVERDALE	SLDLWASI
QWEST CORPORATION	SPOKANE	SPKNWA01
QWEST CORPORATION	SPRINGDALE	SPDLWA01
QWEST CORPORATION	SUMNER	BYLKWA01
QWEST CORPORATION	TACOMA	TACMWAFWA
QWEST CORPORATION	TACOMAWVLY	TACMWAWA
QWEST CORPORATION	TOUCHET	WLWLWA01
QWEST CORPORATION	VANCOUVER	ORCHWA01
QWEST CORPORATION	WAITSBURG	WTBGWA01
QWEST CORPORATION	WALLAWALLA	WLWLWA01
QWEST CORPORATION	WARDEN	WRDNWA01
QWEST CORPORATION	WINLOCK	WNLCWA01
QWEST CORPORATION	YAKIMA	YAKMWA02
ST JOHN TELEPHONE CO.	ST JOHN	STJHWAXA

ILEC	EXCHANGE	CLLI
TENINO TELEPHONE CO.	BUCODA	TENNWAXA
TENINO TELEPHONE CO.	TENINO	TENNWAXA
TOLEDO TELEPHONE CO., INC.	TOLEDO	TOLDWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	CHIMACMCTR	CNTRWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	COLUMBIA	CLMAWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GLENWOOD	GLWDWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GRANGER	GRNGWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HARRAH	HRRHWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HOOD CANAL	BRNNWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MABTON	BCTNWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MATTAWA	MTWAWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	POULSBO	PLSBWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PROSSER	PRSRWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PT ANGELES	GRNRWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	STEVENSON	STSNWAXA
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	SUNNYSIDE	SNSDWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TOPPENISH	TPNSWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WAPATO	WPATWAXX
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WHITE SWAN	WHSWAXX
WESTERN WAHIAKUM COUNTY TELEPHONE CO.	GRAYS RIVER	GRRVWAXA
WHIDBEY TELEPHONE CO.	SO WHIDBEY	SWHDWAXX
YCOM NETWORKS, INC.	RAINIER	YELMWAXA
YCOM NETWORKS, INC.	YELM	YELMWAXA