

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

GLOBAL CONNECTION INC. OF
AMERICA d/b/a STANDUP
WIRELESS,

Seeking Designation as an Eligible
Telecommunications Carrier on a
Wireless Basis (*Low Income Only*)

DOCKET UT-220524

ORDER 01

GRANTING ELIGIBLE
TELECOMMUNICATIONS
CARRIER DESIGNATION WITH
CONDITIONS AND EXEMPTION
FROM RULE

BACKGROUND

- 1 On July 7, 2022, Global Connection Inc. of America d/b/a StandUP Wireless (StandUP or Company) filed a petition (Petition) with the Washington Utilities and Transportation Commission (Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) in select exchanges in the state of Washington under the Communications Act of 1934,¹ applicable Federal Communications Commission (FCC) rules, and Chapter 480-123 Washington Administrative Code (WAC). StandUP 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, StandUP filed its FCC-approved compliance plan with the Commission and a proposed coverage area.
- 2 On January 31 and February 3, 2023, StandUP supplemented its filing to include (a) the actual Washington exchanges and zip codes for which the Company requests ETC designation, and (b) the Tribal Lifeline Price category.
- 3 StandUP's Lifeline rate plans comply with the FCC's minimum service standards because they include:
- Free data-capable device or SIM card,
 - Free calls to Company Customer Service,

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.

- Free calls to 911 emergency services,
- Free access to Voicemail, Caller-ID, and Call Waiting features,
- Voice minutes may be used for Domestic Long Distance at no extra cost, and
- Data on LTE or 5G Network.

4 The details of StandUP’s proposed rate plans are as follows:

Plan Type	Monthly Minutes	Monthly Text Messages	Monthly Data	Net Cost to Qualifying Customers
Basic Lifeline	1,000	Unlimited	4.5 GB	\$0.00
Tribal Lifeline	Unlimited	Unlimited	10.0 GB	\$0.00

5 StandUP provides Lifeline service in 31 states and in the territory of Puerto Rico through commercial mobile radio service by utilizing (reselling) the network of T-Mobile. The Company currently has an application pending at the FCC for ETC designation in six other states and the District of Columbia, as well.

6 StandUP is a reseller of facility based wireless service providers, and, therefore, the Petition also seeks an exemption from the following provisions of WAC 480-123-030(1):

- WAC 480-123-030(1)(d) requires an ETC petitioner to provide a “substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers.” StandUP requests an exemption from the requirement because the Company seeks only Lifeline support, not federal High-Cost support. It does not have an obligation to use federal USF for infrastructure investment.
- WAC 480-123-030(1)(f) requires a wireless ETC petitioner to provide “a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals.” StandUP requests an exemption because it does not have access to its underlying carriers’ maps.
- WAC 480-123-030(1)(g) requires a wireless ETC to have “at least four hours of back up battery power at each cell site, backup generators at each microwave hub, and at least five hours back up battery power and backup

generators at each switch.” StandUP requests an exemption because it does not have control over its underlying carriers’ emergency power back up facilities.

7 Commission staff (Staff) agrees with StandUP 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 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.

8 Staff also agrees with and recommends granting StandUP’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.

DISCUSSION

9 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.³ 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 the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.⁴

10 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) Offers the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services

³ *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*, Docket UT-093012, Order 03 at ¶ 78 (June 24, 2010).

⁴ WAC 480-123-040.

(including the services offered by another eligible telecommunications carrier); and

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

11 We agree with Staff that StandUP 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 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, StandUP seeks ETC designation for the limited purpose of participating in the Lifeline program, and the FCC approved StandUP's revised compliance plan on August 15, 2018. Further, StandUP commits to advertise its Lifeline services.

12 Staff is correct that certain additional conditions should be imposed on StandUP 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 StandUP's operations for strict adherence to all ETC requirements.

13 We also agree that StandUP 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 StandUP is not a high-cost program participant. WAC 480-123-030(1)(f) and (g) also do not apply to StandUP's proposed operations as an ETC because the Company will not use its own facilities to provide service; rather, StandUP 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.

FINDINGS AND CONCLUSIONS

14 (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.

15 (2) StandUP is a telecommunications company seeking to do business in the state of Washington. StandUP meets the requirements for designation as an ETC because

the FCC has approved StandUP's compliance plan and StandUP has committed to advertise the availability of its services and the charges therefor using media of general distribution. StandUP's designation as an ETC will advance the purpose of universal service because the Company will offer voice telephony services, which facilitate universal service. StandUP has also demonstrated that its designation as an ETC is in the public interest.

16 (3) This matter came before the Commission at its regularly scheduled meeting on February 23, 2023.

17 (4) 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. StandUP 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.

ORDER

THE COMMISSION ORDERS THAT:

18 (1) Global Connection Inc. of America d/b/a StandUP Wireless'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.

19 (2) Global Connection Inc. of America, d/b/a StandUP Wireless's request for exemption from WAC 480-123-030(1)(d), (f), and (g) is hereby GRANTED.

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

DATED at Lacey, Washington, and effective February 23, 2023.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chair

ANN E. RENDAHL, Commissioner

MILTON H. DOUMIT, Commissioner

Appendix A

Washington State Conditions on Designation of Global Connection Inc. of America d/b/a StandUP Wireless as an Eligible Telecommunications Carrier

1. Within 30 days of approval of its ETC designation in Washington and prior to offering Lifeline services, Global Connection must make a compliance filing for approval by the Commission containing the following:
 - a. Global Connection's Lifeline rate plans, terms, and conditions. The rates, terms and conditions shall include all provisions that apply to the Lifeline services offered by Global Connection Inc. in Washington State and detailed procedures explaining how customers can participate in a particular Lifeline plan.
 - b. Global Connection'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. Global Connection's Lifeline Customer Application Form.

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

2. Global Connection 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 Global Connection'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 Global Connection's Lifeline program, as well as at Global Connection's official Lifeline website.
4. Global Connection 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, Global Connection must meet the FCC's minimum service standards.
6. Global Connection shall follow the FCC's deactivation standards.

7. On a quarterly basis beginning with the quarter ending on December 31, 2022, Global Connection shall provide the number of Lifeline customers that it enrolls each month. Global Connection 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. Global Connection shall respond within 30 days to Commission staff's information requests on Global Connection's Lifeline operations, including, but not limited to, Lifeline customers' usage patterns and Lifeline customer records.
9. Global Connection shall cooperate with the Commission and the Universal Service Administrative Company (USAC), including full participation in the new National Verifier system.
10. Global Connection must not deduct airtime minutes for calls to the suicide and crisis prevention lifeline by dialing 988 or calls to customer care made from the customer's handset by dialing 611. 988 has been recently designated as the new three-digit dialing code that will route callers to the National Suicide Prevention Lifeline. Global Connection shall explicitly state the policy of free 988 and 611 calls in its Lifeline service agreements. Global Connection 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. Global Connection 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 Global Connection, 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 Global Connection with regard to general inquiries such as account balance, additional purchases, service availability or technical support. The Commission reserves the rights to revoke Global Connection's ETC designation if Global Connection fails to provide reasonable quality of service.
12. Global Connection 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. Global Connection shall comply with rules on cessation of business as specified in WAC480-120-083.

- a. Prior to cessation of business, Global Connection 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. Global Connection 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. Global Connection 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. Global Connection 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. Global Connection shall cooperate with Commission staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
 16. Global Connection shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.

Appendix B

**Global Connection Inc. of America, d/b/a StandUP Wireless
Areas for Eligible Telecommunications Carrier Designation**

ILEC NAME	EXCHANGE
ASOTIN TELEPHONE CO.	ANATONE
ASOTIN TELEPHONE CO.	ASOTIN
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	COWICHE
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	RIMROCK
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	TIETON
CENTURYTEL OF INTER-ISLAND, INC. DBA	SAN JUAN
CENTURYTEL OF WASHINGTON, INC. DBA	ALMIRA
CENTURYTEL OF WASHINGTON, INC. DBA	AMES LAKE
CENTURYTEL OF WASHINGTON, INC. DBA	ASHFORD
CENTURYTEL OF WASHINGTON, INC. DBA	CARNATION
CENTURYTEL OF WASHINGTON, INC. DBA	CATHLAMET
CENTURYTEL OF WASHINGTON, INC. DBA	CHENEY
CENTURYTEL OF WASHINGTON, INC. DBA	CHEWELAH
CENTURYTEL OF WASHINGTON, INC. DBA	CONNELL
CENTURYTEL OF WASHINGTON, INC. DBA	COULEECITY
CENTURYTEL OF WASHINGTON, INC. DBA	CRESTON
CENTURYTEL OF WASHINGTON, INC. DBA	CURTIS
CENTURYTEL OF WASHINGTON, INC. DBA	DAVENPORT
CENTURYTEL OF WASHINGTON, INC. DBA	EDWALLTYL
CENTURYTEL OF WASHINGTON, INC. DBA	ELMA
CENTURYTEL OF WASHINGTON, INC. DBA	EUREKA
CENTURYTEL OF WASHINGTON, INC. DBA	FALL CITY
CENTURYTEL OF WASHINGTON, INC. DBA	FORKS
CENTURYTEL OF WASHINGTON, INC. DBA	GIG HARBOR
CENTURYTEL OF WASHINGTON, INC. DBA	HARRINGTON
CENTURYTEL OF WASHINGTON, INC. DBA	HUNTERS
CENTURYTEL OF WASHINGTON, INC. DBA	KINGSTON
CENTURYTEL OF WASHINGTON, INC. DBA	LIND
CENTURYTEL OF WASHINGTON, INC. DBA	LKQUINAULT
CENTURYTEL OF WASHINGTON, INC. DBA	LONG BEACH
CENTURYTEL OF WASHINGTON, INC. DBA	MATHEWSCO
CENTURYTEL OF WASHINGTON, INC. DBA	MEDICAL LK
CENTURYTEL OF WASHINGTON, INC. DBA	MESA
CENTURYTEL OF WASHINGTON, INC. DBA	MONTESANO
CENTURYTEL OF WASHINGTON, INC. DBA	MORTON
CENTURYTEL OF WASHINGTON, INC. DBA	NORTH BEND
CENTURYTEL OF WASHINGTON, INC. DBA	OCOSTA
CENTURYTEL OF WASHINGTON, INC. DBA	ODESSA

ILEC NAME	EXCHANGE
CENTURYTEL OF WASHINGTON, INC. DBA	ORTING
CENTURYTEL OF WASHINGTON, INC. DBA	OTHELLO
CENTURYTEL OF WASHINGTON, INC. DBA	PACIFICBCH
CENTURYTEL OF WASHINGTON, INC. DBA	REARDAN
CENTURYTEL OF WASHINGTON, INC. DBA	RITZVILLE
CENTURYTEL OF WASHINGTON, INC. DBA	SO PRAIRIE
CENTURYTEL OF WASHINGTON, INC. DBA	SOUTH BEND
CENTURYTEL OF WASHINGTON, INC. DBA	SPANGLE
CENTURYTEL OF WASHINGTON, INC. DBA	SPRAGUE
CENTURYTEL OF WASHINGTON, INC. DBA	TWISP
CENTURYTEL OF WASHINGTON, INC. DBA	VADER
CENTURYTEL OF WASHINGTON, INC. DBA	VASHON
CENTURYTEL OF WASHINGTON, INC. DBA	WASHTUCNA
CENTURYTEL OF WASHINGTON, INC. DBA	WILSON CRK
CENTURYTEL OF WASHINGTON, INC. DBA	YACOLT
ELLENSBURG TELEPHONE CO.	ELLENSBURG
ELLENSBURG TELEPHONE CO.	KITTITAS
ELLENSBURG TELEPHONE CO.	SELAH
ELLENSBURG TELEPHONE CO.	THORP
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BELLEVUE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BENTONCITY
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BOTHELL
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BRIDGEPORT
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	FARMINGTON
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GARFIELD
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GEORGE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GRAYLAND
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	HALLS LAKE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MANSFIELD
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NACHES
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NEWPORT
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NILE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAK HARBOR
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAKESDALE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PALOUSE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PULLMAN

ILEC NAME	EXCHANGE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	QUINCY
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHMND BC
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SEATTLE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SILVERLAKE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SKYKOMISH
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SOAP LAKE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	STEVESPASS
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	TEKOA
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WATERVILLE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCT
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WOODLAND
HAT ISLAND TELEPHONE CO.	HAT ISLAND
HOOD CANAL TELEPHONE CO.	UNION
INLAND TELEPHONE CO.	CLE ELUM
INLAND TELEPHONE CO.	DEWATTO
INLAND TELEPHONE CO.	PRESCOTT
INLAND TELEPHONE CO.	ROSLYN
INLAND TELEPHONE CO.	UNIONTOWN
KALAMA TELEPHONE COMPANY	KALAMA
LEWIS RIVER TELEPHONE COMPANY, INC.	AMBOY
LEWIS RIVER TELEPHONE COMPANY, INC.	LA CENTER
MASHELL TELECOM, INC.	EATONVILLE
MCDANIEL TELEPHONE CO.	MOSSYROCK
MCDANIEL TELEPHONE CO.	SALKUM
PEND OREILLE TELEPHONE COMPANY	CUSICK
PEND OREILLE TELEPHONE COMPANY	IONE
PEND OREILLE TELEPHONE COMPANY	METALINFLS
PIONEER TELEPHONE CO.	ENDICOTT
PIONEER TELEPHONE CO.	LACROSSE
QWEST CORPORATION	ABERDEEN
QWEST CORPORATION	AUBURN
QWEST CORPORATION	BAINBDG IS
QWEST CORPORATION	BATTLEGRND
QWEST CORPORATION	BELFAIR
QWEST CORPORATION	BELLEVUE
QWEST CORPORATION	BLACKDIMN
QWEST CORPORATION	BREMERTON

ILEC NAME	EXCHANGE
QWEST CORPORATION	BUCKLEY
QWEST CORPORATION	CASTLEROCK
QWEST CORPORATION	CENTRALIA
QWEST CORPORATION	CHEHALIS
QWEST CORPORATION	CLARKSTON
QWEST CORPORATION	CLE ELUM
QWEST CORPORATION	COLFAX
QWEST CORPORATION	COLVILLE
QWEST CORPORATION	COPALIS
QWEST CORPORATION	CRYSTAL MT
QWEST CORPORATION	DAYTON
QWEST CORPORATION	DEER PARK
QWEST CORPORATION	DES MOINES
QWEST CORPORATION	ELK-GRNBLF
QWEST CORPORATION	ENUMCLAW
QWEST CORPORATION	EPHRATA
QWEST CORPORATION	GRAHAM
QWEST CORPORATION	HOODSPORT
QWEST CORPORATION	ISSAQUAH
QWEST CORPORATION	KENT
QWEST CORPORATION	LIBERTY LK
QWEST CORPORATION	LONGVIEW
QWEST CORPORATION	LOON LAKE
QWEST CORPORATION	MAPLE VLY
QWEST CORPORATION	MOSES LAKE
QWEST CORPORATION	NEWMANLAK
QWEST CORPORATION	OLYMPIA
QWEST CORPORATION	OTHELLO
QWEST CORPORATION	PASCO
QWEST CORPORATION	PATEROS
QWEST CORPORATION	POMEROY
QWEST CORPORATION	PORT ORCH
QWEST CORPORATION	PORTLUDLO
QWEST CORPORATION	PT ANGELES
QWEST CORPORATION	PTTOWNSEN
QWEST CORPORATION	PUYALLUP
QWEST CORPORATION	RENTON
QWEST CORPORATION	RIDGEFIELD
QWEST CORPORATION	ROCHESTER
QWEST CORPORATION	ROY
QWEST CORPORATION	SEATTLE
QWEST CORPORATION	SHELTON

ILEC NAME	EXCHANGE
QWEST CORPORATION	SILVERDALE
QWEST CORPORATION	SPOKANE
QWEST CORPORATION	SPRINGDALE
QWEST CORPORATION	SUMNER
QWEST CORPORATION	TACOMA
QWEST CORPORATION	TACOMAWVL
QWEST CORPORATION	TOUCHET
QWEST CORPORATION	VANCOUVER
QWEST CORPORATION	WAITSBURG
QWEST CORPORATION	WALLAWALL
QWEST CORPORATION	WARDEN
QWEST CORPORATION	WHATCOMCT
QWEST CORPORATION	WINLOCK
QWEST CORPORATION	YAKIMA
ST JOHN TELEPHONE CO.	ST JOHN
TENINO TELEPHONE CO.	TENINO
TOLEDO TELEPHONE CO., INC.	TOLEDO
UNITED TELEPHONE-NORTHWEST-WA DBA	CHIMACMCT
UNITED TELEPHONE-NORTHWEST-WA DBA	COLUMBIA
UNITED TELEPHONE-NORTHWEST-WA DBA	DALLESPORT
UNITED TELEPHONE-NORTHWEST-WA DBA	GLENWOOD
UNITED TELEPHONE-NORTHWEST-WA DBA	GOLDENDAL
UNITED TELEPHONE-NORTHWEST-WA DBA	GRANDVIEW
UNITED TELEPHONE-NORTHWEST-WA DBA	GRANGER
UNITED TELEPHONE-NORTHWEST-WA DBA	HARRAH
UNITED TELEPHONE-NORTHWEST-WA DBA	HOOD CANAL
UNITED TELEPHONE-NORTHWEST-WA DBA	KLICKITAT
UNITED TELEPHONE-NORTHWEST-WA DBA	LYLE
UNITED TELEPHONE-NORTHWEST-WA DBA	MABTON
UNITED TELEPHONE-NORTHWEST-WA DBA	MATTAWA
UNITED TELEPHONE-NORTHWEST-WA DBA	POULSBO
UNITED TELEPHONE-NORTHWEST-WA DBA	PROSSER
UNITED TELEPHONE-NORTHWEST-WA DBA	PT ANGELES
UNITED TELEPHONE-NORTHWEST-WA DBA	ROOSEVELT
UNITED TELEPHONE-NORTHWEST-WA DBA	STEVENSON
UNITED TELEPHONE-NORTHWEST-WA DBA	SUNNYSIDE
UNITED TELEPHONE-NORTHWEST-WA DBA	TOPPENISH
UNITED TELEPHONE-NORTHWEST-WA DBA	TROUT LAKE
UNITED TELEPHONE-NORTHWEST-WA DBA	WAPATO
UNITED TELEPHONE-NORTHWEST-WA DBA	WH SALMON
UNITED TELEPHONE-NORTHWEST-WA DBA	WHITE SWAN
UNITED TELEPHONE-NORTHWEST-WA DBA	WHITSTRAN

ILEC NAME	EXCHANGE
UNITED TELEPHONE-NORTHWEST-WA DBA	WILLARD
WESTERN WAHKIAKUM COUNTY TELEPHONE CO.	GRAYS RIVER
WESTERN WAHKIAKUM COUNTY TELEPHONE CO.	NASELLE
WHIDBEY TELEPHONE CO.	SO WHIDBEY
YCOM NETWORKS, INC.	RAINIER
YCOM NETWORKS, INC.	YELM