

ORIGINAL

Before the
Washington Utilities and Transportation Commission

In the Matter of the Petition of)	
)	Docket No. UT - <u>023033</u>
RCC Minnesota, Inc.)	
)	PETITION OF RCC MINNESOTA, INC.
For Designation as an Eligible)	FOR DESIGNATION AS AN ELIGIBLE
Telecommunications Carrier)	TELECOMMUNICATIONS CARRIER
Under 47 U.S.C. § 214(e)(2))	

RCC Minnesota, Inc. ("RCC"), by its counsel, submits this Petition for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Telecommunications Act of 1934, as amended ("Act"), 47 U.S.C. § 214(e)(2), and Section 54.201 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 54.201. RCC requests that it be designated as eligible to receive all available support from the federal Universal Service Fund ("USF") including, but not limited to, support for rural, insular and high-cost areas and low-income customers. In support of this Petition, the following is respectfully shown:

I. Name and Address of Petitioner

1. The name and address of Petitioner are RCC Minnesota, Inc., 3905 Dakota St. SW, Alexandria, MN 56308.

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II. Applicable Statutes and Rules

2. The statutes and rules implicated by the instant Petition are as follows: 47 U.S.C. §§ 153(27), 153(44), 214(e), 253(b) and 254(d); 47 C.F.R. §§ 51.5, 54.5, 54.101, 54.201, 54.207, 54.307, 54.313, and 54.314.

III. Authorization and Service Area

3. RCC is a telecommunications carrier as defined in 47 U.S.C. § 153(44) and 47 C.F.R. § 51.5, and for the purposes of Part 54 of the FCC's rules.¹ RCC is therefore considered a common carrier under the Act.

4. RCC is authorized by the FCC as the "A Band" cellular carrier in the Washington 2, Washington 3, and Washington 8 Rural Service Areas ("RSAs").² A map of RCC's proposed service area is attached hereto as Exhibit A. RCC is a commercial mobile radio service ("CMRS") provider pursuant to the definition of "mobile service" provided in 47 U.S.C. § 153(27). RCC provides interstate telecommunications services as defined in 47 U.S.C. § 254(d) and 47 C.F.R. § 54.5.

5. A telecommunications carrier may be designated as an ETC and receive universal service support throughout its designated service area if it agrees to: (i) offer services that are supported by federal universal service support mechanisms, and (ii) advertise the availability of such services.³ In its *First Report and Order* implementing Sections 214(e) and 254, the FCC set

¹ 47 U.S.C. § 54.1 *et seq.*

² The operating entity for RCC in Washington is RCC Holdings, Inc. d/b/a Cellular One.

³ See 47 U.S.C. § 214(e)(1).

forth the services a carrier must provide to be designated as an ETC in order to receive federal universal service support.⁴

6. Section 214(e)(2) of the Act provides that ETC designations shall be made for a “service area” designated by the state commission. In areas served by a non-rural company, the state commission may establish an ETC service area for a competitor without federal concurrence.⁵ Accordingly, RCC requests designation for its service area in the non-rural wire centers listed in Exhibit B, attached hereto. Where RCC serves only a portion of a wire center listed, it requests that it be designated as an ETC in that portion of the wire center where it is authorized to serve.⁶

7. In areas served by a rural telephone company, “service area” means the local exchange carrier (“LEC”) study area unless and until the FCC and the states, taking into account recommendations of a Federal-State Joint Board on Universal Service, establish a different definition of service area for such company.⁷ On August 17, 1998, the Washington Utilities and Transportation Commission (“WUTC”, “Commission”) and 20 rural LECs filed a petition requesting the FCC’s agreement with the WUTC’s designation of the individual exchanges of 15 rural LECs as their “service areas” for universal service purposes. The petition also requested a waiver of Section 54.307 of the FCC’s rules, 47 C.F.R. § 54.307, to permit the disaggregation of

⁴ *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, 8809-25 (1997) (“*First Report and Order*”).

⁵ See 47 U.S.C. § 214(e)(5).

⁶ Those wire centers that RCC partially serves are indicated on Exhibit B with the word “partial.”

⁷ See 47 C.F.R. §54.207(b).

high-cost support to Washington's rural carriers. In a *Memorandum Opinion and Order* released September 9, 1999,⁸ the FCC agreed with the WUTC's proposed service area designation, stating that redefinition along exchange-area boundaries was "warranted in order to promote competition."⁹

8. The FCC also granted the proposed waiver of Section 54.307, permitting the disaggregation of high-cost support on an interim basis pending the development of a new mechanism for the calculation and distribution of support.¹⁰ Recently, pursuant to the *Fourteenth Report and Order* released in May 2001, several LECs in Washington submitted filings to the WUTC to select among the three enumerated paths defining the manner in which support is to be calculated and distributed on a going-forward basis.¹¹ The computation and distribution of high-cost support resulting from those filings will supersede the portions of the *Designation Order* that pertain to disaggregation.¹²

9. RCC notes that the service area redefinition effectuated by the *Designation Order* is wholly distinct from the disaggregation issue. Indeed, the geographic composition of a service

⁸ See *Petition for Agreement with Designation of Rural Company Eligible Telecommunications Carrier Service Areas and for Approval of the Use of Disaggregation of Study Areas for the Purpose of Distributing Portable Federal Universal Service Support, Memorandum Opinion and Order*, 15 FCC Rcd 9921, 9927 (1999) ("*Designation Order*").

⁹ *Id.*

¹⁰ *Id.*

¹¹ See 47 C.F.R. § 54.315; *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order, Twenty Second Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 16 FCC Rcd 11294, 11299-309 (2001).

¹² See *Designation Order*, 15 FCC Rcd at 9927.

area for designation of a competitive ETC has no impact on the way in which LECs compute and receive high-cost support. The rural LECs covered by RCC's service territory — CenturyTel of Washington, Inc., Pend Oreille Telephone Company, St. John Telephone Company, Pioneer Telephone Company, Inland Telephone Company, and Asotin Telephone Company — are among those who successfully petitioned for the redefinition of service areas along exchange-area boundaries. Accordingly, with respect to the rural LEC wire centers¹³ within RCC's service territory, the WUTC may designate RCC as an ETC without the need to redefine the LEC service areas. The LEC wire centers that are covered by RCC's service area are listed in Exhibit C, attached hereto.

10. There are several rural LEC wire centers that RCC does not cover entirely, solely because RCC is not licensed by the FCC strictly along LEC boundaries.¹⁴ In order to accommodate CMRS carriers who have authorized service areas that do not match LEC wire centers, the FCC permits the state to designate the competitive ETC's service area along boundaries that are not identical with LEC wire center boundaries. To do otherwise would effectively exclude wireless carriers as a class from receiving universal service support and, as discussed in Section VI, *infra*, would be contrary to the pro-competition policies articulated by the FCC and the WUTC. Accordingly, for the LEC wire centers that are only partially covered by

¹³ With the exception of certain non-rural areas, wire centers are generally synonymous with exchanges. See "Promoting Competition and Reforming Universal Service: A Report to the Washington State Legislature" at p. 51 n.94 (WUTC., Nov. 1998). Accordingly, RCC's request for ETC designation at the wire-center level is consistent with WUTC's use of LEC exchanges for both ETC designation and disaggregation of high-cost support.

¹⁴ These wire centers are identified in Exhibit C by the word "partial."

RCC's authorized service area, RCC requests that the WUTC designate the portion of the wire center where RCC is authorized to provide service.

IV. RCC Offers the Supported Services to Qualify for Federal USF Support

11. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that carriers designated as ETCs shall, throughout their service area, (1) offer the services that are supported by federal universal service support mechanisms either using their own facilities or a combination of their own facilities and resale of another carrier's services, and (2) advertise the availability of such services and the charges therefore using media of general distribution. 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d). The services which are supported by the federal USF are:

- 1) voice grade access to the public switched network;
- 2) local usage;
- 3) dual tone multi-frequency signaling or its functional equivalent;
- 4) single-party service or its functional equivalent;
- 5) access to emergency services;
- 6) access to operator services;
- 7) access to interexchange service;
- 8) access to directory assistance; and
- 9) toll limitation for qualifying low-income consumers.

47 C.F.R. § 54.101(a).

12. RCC is a full-service wireless carrier which now offers all of these services, as described in detail below, throughout its service area. RCC therefore satisfies the requirements of Section 214(e)(1) of the Act.

13. Voice Grade Access. RCC provides voice grade access to the public switched network through interconnection arrangements with local telephone companies. RCC offers its

subscribers this service at bandwidth between 300 and 3,000 hertz as required by 47 C.F.R. 54.101(a)(1), thereby providing voice grade access.

14. Local Usage. RCC has a variety of rate plans which provide local usage consistent with 47 C.F.R. § 54.101(a)(2). To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue.¹⁵ As it relates to local usage, the *October 1998 NPRM* sought comment on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comment on how much, if any, local usage should be required to be provided to customers as part of a universal service offering.¹⁶ In the *First Report and Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide.¹⁷ Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs, and RCC will comply with any and all minimum local usage requirements adopted by the FCC.

15. DTMF Signaling. RCC provides dual tone multi-frequency (“DTMF”) signaling to facilitate the transportation of signaling throughout its network. RCC currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling.

¹⁵ See *Guam Cellular and Paging, Inc.*, CC Docket No. 96-45, DA 02-174 at para. 11 (C.C.B. rel. Jan. 25, 2002) (“*Guamcell*”); *Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) (“*October 1998 NPRM*”).

¹⁶ See *October 1998 NPRM*, 13 FCC Rcd at 21277-21281.

¹⁷ See *First Report and Order*, 12 FCC Rcd at 8813.

16. Single Party Service. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.¹⁸ RCC provides single party service, as that term is defined in Section 54.101 of the FCC’s rules. *See* 47 C.F.R. § 54.101.

17. Access to Emergency Services. RCC currently provides 911 access to emergency services throughout its service area.

18. Access to Operator Services. RCC provides customer access to operator services. Customers can reach operator services in the traditional manner by dialing “0”.

19. Access to Interexchange Services. RCC has signed interconnection agreements with interexchange carriers. These arrangements enable RCC to provide its customers access to interexchange services. Customers may also “dial around” to reach their interexchange carrier of choice.

20. Access to Directory Assistnace. Subscribers to RCC’s services are able to dial “411” or “555-1212” to reach directory assistance from their mobile phones.

21. Toll Limitation. RCC has toll blocking capabilities which will enable RCC to provide toll blocking service for Lifeline customers once RCC is designated an ETC.

22. Pursuant to Section 54.201 of the FCC’s rules, 47 C.F.R. § 54.201, RCC will advertise the availability of each of the supported services detailed above, throughout its licensed service area, by media of general distribution. The methods of advertising utilized may include newspaper, magazine, direct mailings, public exhibits and displays, bill inserts, and telephone directory advertising.

¹⁸ *See id.* at 8810.

V. Statement of Need

23. Many residents of Washington live in rural areas where it is cost-prohibitive for a competitive wireline telecommunications company to offer service. As a result, consumers generally have only one service provider from which to choose. RCC seeks to offer citizens of Washington in its service area an alternative to traditional wireline service. In order for RCC's network to expand into underserved areas, federal high-cost loop funding must be provided so that needed infrastructure can be fully deployed and competitive service can be delivered.

24. By granting ETC status to RCC, this Commission will expedite the provision of competitive telephone service to the people living in remote areas and provide a meaningful choice for many subscribers who have access to only one service provider.

VI. Grant of RCC's Application Would Serve the Public Interest

25. In areas served by non-rural LECs, the Commission can designate RCC as an ETC upon finding that the company meets the nine-point checklist and that it agrees to advertise the supported services.¹⁹ In areas served by a rural telephone company, the Commission must also determine whether granting ETC status to a competitor would serve the public interest.²⁰ In numerous cases decided by the FCC and state commissions, the answer has been in the affirmative.²¹

¹⁹ See *Cellular South Licenses, Inc.*, Docket No. 01-UA-0451 (Dec. 18, 2001) (Mississippi).

²⁰ See 47 U.S.C. § 214(e)(2).

²¹ See, e.g., *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 48, 55 (2000) ("*Western Wireless*"), *aff'd*, 24 CR 1216 (Oct. 19, 2001) ("*Western Wireless Recon. Order*"); *Smith Bagley, Inc., Final Order*, Utility Case No. 3026 (Feb. 19, 2002) (New Mexico).

26. Designation of RCC will promote competition and facilitate the provision of advanced communications services to the residents of rural Washington. Residents in many rural areas have long trailed urban areas in receiving competitive local exchange service and advanced telecommunications services. In many rural areas, no meaningful choice of local exchange carrier exists.

27. To date, a number of wireless carriers have been designated as ETCs in multiple states, including Washington.²² Recognizing the advantages wireless carriers can bring to the universal service program, the FCC has found that “imposing additional burdens on wireless entrants would be particularly harmful to competition in rural areas, where wireless carriers could potentially offer service at much lower costs than traditional wireline service.”²³ One of the principal goals of the Telecommunications Act of 1996 was to “promote competition and reduce regulation in order to secure lower prices and high-quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies.”²⁴ Competition in rural areas increases facilities and spurs development of advanced communications as carriers vie for a consumer’s business.

²² See, e.g., *Yelm Telephone Company et al., Order Designating Eligible Telecommunications Carriers*, Docket Nos. UT-970333 et al. (Dec. 23, 1997) (Washington); *Guamcell, supra*; *Cellular South Licenses, Inc., supra*; *N.E. Colorado Cellular, Inc.*, Docket No. 00A-315T (Dec. 21, 2001) (Colorado); *Minnesota Cellular Corporation’s Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. P5695/M-98-1285 (Oct. 27, 1999) (Minnesota).

²³ *First Report and Order*, 12 FCC Rcd at 8881-82.

²⁴ Telecommunications Act of 1996, Public Law, 104-104, 100 Stat. 56 (1996).

28. The WUTC has emphasized the public interest benefits that flow from competitive entry by wireless carriers in rural areas. For example, in its order granting the amended petition for ETC designation by United States Cellular (“USC”), the Commission stated:

The Commission believes it is in the public interest to grant USC’s petition because rural customers will benefit from the increased availability of wireless service. These benefits include increased mobility and increased level of service.²⁵

29. The FCC recognized this fact in its initial decision designating Western Wireless as an ETC in the State of Wyoming, observing: “Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²⁶ Similarly, in designating the cellular carrier Smith Bagley, Inc. as an ETC in Arizona, the state commission found competitive entry to provide additional consumer choice and a potential solution to “health and safety risks associated with geographic isolation.”²⁷ By designating a wireless carrier as an ETC, the WUTC will foster competition and provide a meaningful choice of services and service providers to the residents of Washington.

30. The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural telephone companies emphasizes competition and consumer benefit,

²⁵ *United States Cellular Corporation et al., Third Supplemental Order Granting Petition for Designation as Eligible Telecommunications Carrier*, Docket No. UT-970345, (Jan. 26, 2000) (“*Third Supplemental Order*”).

²⁶ *Western Wireless Corporation; supra*, 16 FCC Rcd at 55.

²⁷ *Smith Bagley, Inc., Order*, Decision No. 63269, Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000) (Arizona).

not incumbent protection. In considering the impact that Western Wireless' ETC designation in Wyoming would have on rural telephone companies, the FCC said:

We do not believe that it is self-evident that rural telephone companies cannot survive competition from wireless providers. Specifically, we find no merit to the contention that designation of an additional ETC in areas served by rural telephone companies will necessarily create incentives to reduce investment in infrastructure, raise rates, or reduce service quality to consumers in rural areas. To the contrary, we believe that competition may provide incentives to the incumbent to implement new operating efficiencies, lower prices, and offer better service to its customers.²⁸

Further, Congress has mandated that universal service provisions be “competitively neutral” and “necessary to preserve and advance universal service.” *See* 47 U.S.C. §253(b). RCC will provide consumers with wider local calling areas, mobile communications, a variety of service offerings, high-quality service, and competitive rates. By offering customers new choices, the incumbent LECs will have an incentive to introduce new, innovative, or advanced service offerings.

31. In most rural areas, wireless telephone service is today a convenience, but it will not emerge as a potential alternative to wireline service unless high-cost loop support is made available to drive infrastructure investment. Indeed, without the high-cost program it is doubtful that many rural areas would have wireline telephone service even today. Provision of high-cost support to RCC will begin to level the playing field with the incumbent LECs and make available for the first time a potential competitor for primary telephone service in remote areas of

²⁸ *Western Wireless, supra*, 16 FCC Rcd at 57.

Washington.²⁹

32. The consumer benefits of designating a competitive ETC are already becoming evident. In South Dakota, shortly after WWC License, LLC entered the market as a competitive carrier, the incumbent LEC lowered its prices and upgraded its switch. Competitive carriers in Arizona and Mississippi have earmarked high-cost support funds for additional channel capacity, new cell sites, and expedited upgrading of facilities from analog to digital.

33. With high-cost support, RCC will have an opportunity to create a network that is capable of convincing customers to rely on wireless service as their primary phone.

VII. High-Cost Certification

34. Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify with the FCC and the Universal Service Administrative Corporation (“USAC”) their compliance with Section 254(e) of the Federal Telecommunications Act of 1996. 47 C.F.R. §§ 54.313, 54.314. RCC attaches its high-cost certification letter as Exhibit D hereto. RCC respectfully requests that the WUTC issue a finding that RCC has met the high-cost certification requirement and that RCC is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that

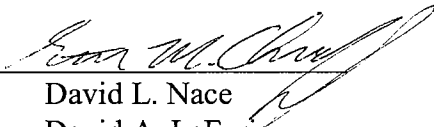
²⁹ See *Third Supplemental Order, supra* at ¶ 43 (“The fact that its competitors receive universal service support puts USC at a disadvantage in its ability to make cellular technology more widely available at competitive prices. Allowing USC to receive universal service support increases the likelihood that cellular technology will become available to more rural consumers at an affordable price.”)

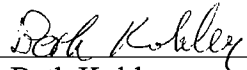
funding will not be delayed.³⁰

WHEREFORE, pursuant to Section 214(e)(2) of the Act, RCC respectfully requests that the Commission, (1) enter an Order designating RCC as an ETC for its requested ETC service area as shown on Exhibit A hereto, and (2) certify to the FCC that RCC will use the support for its intended purpose.

Respectfully submitted,

RCC Minnesota, Inc.

By: 
David L. Nace
David A. LaFuria
Steven Chernoff
Lukas, Nace, Gutierrez & Sachs, Chartered
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By: 
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Colchester, Vermont 05446

May 31, 2002

³⁰ See, e.g. *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, CC Docket 96-45 (filed Feb. 6, 2002).

Exhibit A

MAP OF PROPOSED SERVICE AREA

Exhibit B

NON-RURAL LEC WIRE CENTERS

LEC: Verizon Northwest, Inc. - WA

Wire Center : Loomis
Molson
Tonasket
Curlew
Republic
Newport
Brewster
Bridgeport
Manson
Chelan
Mansfield
Waterville
Cashmere
Wenatchee
Lake Wenatchee
Stevens
Leavenworth
Entiat
East Wenatchee (partial)
Rosalia (partial)
Tekoah
Thornton
Oakesdale
Farmington
Garfield
Palouse
Pullman

LEC: Qwest Corp. - WA

Wire Centers: Oroville
Northport (partial)
Colville
Omak
Coulee Dam (partial)
Pateros
Loon Lake
Elk (partial)

Springdale (partial)
Deer park (partial)
Colfax
Pomeroy
Clarkston (partial)
Dayton
Waitsburg
Walla Walla
Pasco (partial)

Exhibit C

RURAL LEC WIRE CENTERS

LEC: CenturyTel of Washington, Inc.

Wire Centers: Kettle Falls
 Valley
 Winthrop
 Nespelem
 Chewelah
 Twisp
 Inchelium
 Coulee City (partial)
 Starbuck (partial)
 Davenport (partial)
 Eureka (partial)

LEC: Pend Oreille Tel. Co.

Wire Centers: Cusick
 Metaline Falls
 Ione (partial)

LEC: St. John Tel. Co.

Wire Center(s): Saint John (partial)

LEC: Pioneer Tel. Co.

Wire Center(s): Lacrosse
 Endicott

LEC: Inland Tel. Co.

Wire Centers: Uniontown
 Prescott (partial)

LEC: Asotin Tel. Co.

Wire Centers: Asotin
 Anatone

Exhibit D

HIGH-COST CERTIFICATION LETTER

May 20, 2002

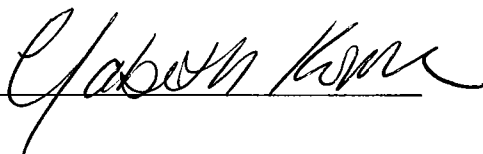
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Drive SW
Olympia, Washington 98504-7250

**Re: RCC Minnesota, Inc.
High-Cost Certification**

To the Commission:

RCC Minnesota, Inc. ("RCC") has submitted a Petition for ETC designation in the State of Washington. As required by Sections 54.313(b) and 54.314(b) of the Federal Communications Commission's rules, 47 C.F.R. §§ 54.313(b), 54.313(b), RCC hereby submits the certification below in order to begin receiving high-cost support in its designated ETC area.

Accordingly, as Legal Services Director of RCC, I hereby certify on behalf of the company and under penalty of perjury that all high-cost support provided to the Company will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996, 47 U.S.C. § 254(e). I also certify that I am authorized to make this certification on the company's behalf.



5-20-02

Date

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this 20 day of May, 2002.



NOTARY PUBLIC

My Commission Expires: 2/10/03

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

CERTIFICATE OF SERVICE

I, Janelle Wood, hereby certify that I have, on this 31st day of May, 2002, placed in the United States mail, first-class postage pre-paid, a copy of the foregoing PETITION FOR RCC MINNESOTA, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER filed today to the following:

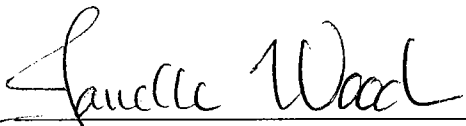
Asotin Telephone Company
TDS Telecom
Gail Long, Regulatory Contact
Post Office Box 1566
Oregon City, Oregon 97045

St. John, Co-operative Telephone and
Telegraph Company
Larry Dickerson, Manager
Post Office Box 268
St. John, Washington 99171

CenturyTel of Washington, Inc.
Don Dennis, Manager State Gov. Relations
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Gig Harbor, Washington 98332

Verizon Northwest, Inc.
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Policy and External Affairs
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Inland Telephone Company
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Janelle Wood

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