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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

July 20, 2007

Mr. Bob Shirley  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr., SW  
Olympia, WA 98504-7250

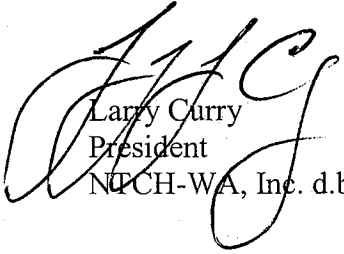
RE: Petition of NTCH-WA, Inc. d.b.a. CLEAR TALK for designation as an Eligible  
Telecommunications Carrier pursuant to Chapter 480-123-WAC

Dear Mr. Shirley,

Please accept for filing the enclosed petition of NTCH-WA, Inc. d.b.a. CLEAR TALK for  
designation as an eligible telecommunications carrier.

Please contact me with any questions regarding this filing.

Sincerely,



Larry Curry  
President  
NTCH-WA, Inc. d.b.a. CLEAR TALK

P 208.223.6246  
F 208.233.6244  
233 North Main St.  
Pocatello, ID 83204

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STATE OF WASHINGTON  
COMMUNICATIONS

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

In the Matter of the Petition of	)
	) Docket No.
NTCH-WA, Inc. d.b.a. CLEAR TALK	)
	) Petition of NTCH-WA, Inc
For Designation as an Eligible	) d.b.a. CLEAR TALK for
	) Designation as an Eligible
Telecommunications Carrier Under 47 U.S.C. §	) Telecommunications
	) Carrier
214(e)(2)	)
	)

1. NTCH-WA, Inc. d.b.a. CLEAR TALK (“NTCH-WA, Inc. d.b.a. CLEAR TALK” or “Petitioner”) hereby submits to the Commission this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Chapter 480-123 Washington Administrative Code, Section 214(e)(2) of the Telecommunications Act of 1934, as amended (“A c t”), 47 U.S.C. § 214(e)(2), and Section 54.201 of the rules of the Federal Communications Commission (“FCC”), 47 C.F.R. § 54.201.

CLEAR TALK 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 customers in high-cost locations and low-income consumers.

## I. INTRODUCTION

### A. Name and Address of Petitioner

2. The name of the Petitioner is NTCH-WA, Inc. d.b.a. CLEAR TALK. The address of the Petitioner is 319 W. Yakima Ave., Yakima, Washington 98902. All correspondence regarding this petition should be directed to Larry Curry in this matter:

Larry Curry, President  
319 W. Yakima Ave.  
Yakima, WA 98902  
larry@cleartalk.net  
208-221-3912

### B. Relevant Statutes and Rules

3. The statutes and rules implicated by this Petition include Chapter 480-123 Washington Administrative Code, RCW 80.36.600, 47 U.S.C. §§ 153(10), 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.

### C. Authorization

4. CLEAR TALK has been registered by the Washington Utilities and Transportation Commission as a telecommunications company, with tentative launch date of 4th quarter of 2007 or 1st quarter of 2008. In addition to competitive telecommunications services, CLEAR TALK will offer enhanced services to customers throughout south-central Washington.

5. CLEARTALK is a common carrier, engaged in the business of “owning, operating or managing local facilities used to provide telecommunications for sale, or resale to the general public” within this state and south central Washington.

Telecommunications is defined for this purpose as “the transmission of information by wire, radio, optical cable, electromagnetic, or other similar means.” RCW 80.04.010.

6. CLEARTALK is in negotiations regarding the interconnection and resale agreements pursuant to federal law with Qwest, Verizon and Sprint.

**II. CLEARTALK WILL MEET ALL OF THE FEDERAL AND STATE  
REQUIREMENTS FOR DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER IN THE AREAS REQUESTED**

7. WAC 480-123-040 provides that the Commission will approve a petition for designation as an ETC 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. As demonstrated in this petition, CLEARTALK will meet all of these requirements. The company will provide and advertise all supported services and will do so using its own facilities. ETC designation will, by making universal service funding available to CLEARTALK, directly advance the purposes of federal universal service policy by giving more customers in south-central Washington access to a greater variety of basic and advanced services.

8. CLEAR TALK 's network uses advanced technology that makes it distinct from either the copper/fiber networks of the traditional local exchange companies or the cell tower systems of commercial mobile radio service operators that have already been designated as ETCs in Washington. CLEAR TALK 's network is in many ways the best of both networks, in that it uses fixed wireless facilities to establish wireless loops to individual customer premises.<sup>1</sup> These loops connect homes and businesses to the public switched telephone network via radio towers that can be erected quickly and at lower cost than the typical cell tower. Moreover, the wireless loops provided by CLEAR TALK 's network provide substantially more bandwidth than the typical south central Washington farm receives today over either the legacy wireline telephone network or the commercial mobile radio service (cellular) systems.

9. With designation as an ETC, CLEAR TALK will offer consumers and businesses in rural areas of south-central Washington a choice – and not simply another wireline choice or another wireless choice. CLEAR TALK provides the basic services supported by the federal universal service program using a network that offers more than just basic services.

10. Exhibit A to this Petition provides the detailed information required by WAC 480-120-030.

<sup>1</sup> CLEAR TALK may use other transport or loop technologies where circumstances favor these alternatives. For example, fiber optic circuits owned by public utilities are available in some areas and can be leased by CLEAR TALK to provide the necessary transmission capacity.

### III. DESIGNATION OF CLEAR TALK WILL ADVANCE THE PURPOSES OF UNIVERSAL SERVICE

11. Sec. 254 identifies three purposes or principles that are to be advanced through the federal and state implementation of the universal service program:<sup>2</sup>

- (1) **Quality and rates** – Quality services should be available at just, reasonable, and affordable rates.
- (2) **Access to advanced services** – Access to advanced telecommunications and information services should be provided in south-central Washington.
- (3) **Access in rural and high cost areas** – Consumers, including low income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

12. Designation of CLEAR TALK as an ETC will advance these purposes by increasing the availability of services – both basic and advanced – to consumers and

<sup>2</sup>Sec. 254 identifies other principles to govern the universal service program, but these are not directly relevant to this petition. These principles address administration of mechanisms to collect and disburse funds for the universal service program and the provision of services to schools, health care, and libraries.

businesses in south central Washington. CLEAR TALK's wireless loop network will allow it to reach customers in remotes areas of south central Washington at costs that are substantially below what would be incurred by replicating the incumbent wireline network. CLEAR TALK's basic service will be available at rates that are no higher than the incumbents' rates, thereby promoting the affordability of service, and in many instances the broadband wireless access (BWA) offered by CLEAR TALK will otherwise be unavailable from existing providers.

13. The Commission need not be concerned that CLEAR TALK's entry into this market will harm universal service through "cream skimming" of universal service support. The cream skimming concern, which has been addressed both by the Commission and by its federal counterparts, arises when support amounts do not match variations in cost of serving customers. Typically, these concerns arise when per line support levels are uniform across a geographic area and a competitor is able to limit its service to the portions of the area where costs are lowest. The Commission has already addressed the potential for cream skimming by disaggregating the support received by incumbent local exchange companies and targeting the support to the highest cost exchanges. For example, CenturyTel's high -cost line support varies by a factor of 20 across its south-central Washington exchanges. In the past, incumbents have construed the meaning of "cream skimming". The FCC's intent with this ruling requires that any carrier, wireless or wireline, to serve all applicants within the FCC designated area where they are licensed to serve.

CLEARTALK intends to serve all applicants within the BTA's they are awarded (228 and 842.)

#### **IV. DESIGNATION OF NTCH-WA IS IN THE PUBLIC INTEREST**

14. Congress required that state commissions consider the “public interest” in reviewing ETC petitions, but it did not elaborate on what constitutes this public interest. The Commission has, however, through its prior ETC designations explained how it applies the public interest standard:

“Public interest” is a broad concept encompassing the welfare of present and future consumers, stakeholders, and the general public. The “public interest” is broader than the goal of fostering competition alone, and broader than the goal of advancing universal service alone; and we believe the decision today advances these two goals. Designating CLEAR TALK as an ETC furthers the public interest because rural consumers, like urban consumers, will benefit from increased competition in the form of a greater variety of services and more comparability of services. Rural customers also benefit because they, rather than the government, will choose which services and technologies meet their telecommunications needs.<sup>4</sup>

<sup>4</sup> *In the Matter of the Petition of SPRINT CORPORATION, d/b/a SPRINT PCS, SPRINTCOM, INC., SPRINT SPECTRUM, L.P., and WIRELESSCO, L.P. for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-043120, Order 01 (Corrected), January 27, 2005, para. 36 (internal citation omitted).



15. CLEARTALK's application for ETC designation meets this standard for the public interest. CLEARTALK is a local carrier, hiring local people, benefiting local communities and creating competition. Indeed, the public interest is arguably even more present in CLEARTALK's application than in the mobile wireless applications in which the Commission has previously considered this question. The greater public interest arises from a characteristic of CLEARTALK's service. It provides a closer substitute to the basic service of the wireline incumbents. Mobile wireless service provides many important benefits to consumers, but it is at best an imperfect substitute for residential or business wireline service. Mobile wireless service typically is more expensive than basic wireline service and does not provide unlimited local calling for a flat rate. Some mobile operators offer limited data capabilities, but high-speed access is generally not available in rural areas and is quite expensive where it is deployed.<sup>5</sup> In short, CLEARTALK will do more to bring choice for basic service and to bring access to advanced services than any other wireless ETCs already designated by this Commission.

16. CLEARTALK also requests that the Commission, as part of its public interest analysis, consider the competitive harms that would result if the Commission were not to designate CLEARTALK while its competitors continue to receive federal support. As noted earlier, CLEARTALK's fixed wireless service offering will directly compete with the basic and (to the extent offered) advanced services of local wireline

<sup>5</sup> For example, Sprint's mobile broadband service is offered at \$60 per month for unlimited service, and coverage maps indicate that the service is not available outside of Spokane and the Yakima Valley in eastern Washington. Verizon Wireless offers broadband at \$80 per month; coverage maps indicate service is not available in many parts of eastern Washington.

exchange companies. It will also compete, albeit less directly, with the voice and data offerings of mobile wireless operators. Every incumbent wireline carrier operating in south-central Washington has already been designated as an ETC and is receiving federal universal support, and many of the mobile wireless operators are likewise designated and funded. CLEAR TALK submits that the principles of competitive and technological neutrality will be undermined if these carriers are allowed to operate with significant government support and CLEAR TALK is not afforded similar support. CLEAR TALK believes that in a hypothetical subsidy-free market structure it would compete on very favorable terms against these incumbents, but it will be at a substantial disadvantage if it is deprived of support comparable to its competitors.


17. Finally, CLEAR TALK suggests that the Commission recognize in its public interest analysis that CLEAR TALK is locally operated, hiring local people and serving local communities. Indeed, CLEAR TALK will be one of the few carriers providing service today in south-central Washington , with headquarters also in south central Washington. Many of the rural incumbents LECs, Broadbands, wireless providers are now owned by out-of-state corporations. CLEAR TALK will be located locally to better serve the local customers.

18. CLEAR TALK certifies that it will use all federal high-cost universal service support it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to 47 U.S.C. 254(3).

## VI. CONCLUSION

19. CLEAR TALK respectfully requests that the Commission grant this Petition to designate CLEAR TALK as an ETC in each of the BTA's within the 509 area code (228 and 842), including exchanges served by both non-rural ILECs and rural ILECs.

Respectfully submitted, this 20th day of July, 2007



Larry Curry  
President

NTCH-WA, Inc., d.b.a. CLEAR TALK

**Exhibit A**

**Statement in Compliance With 480-123-030**

20. In support of its Petition and consistent with the requirements of WAC 480-123-030, CLEAR TALK provides the following:

**(a) A description of the area or areas for which designation is sought.**

21. CLEAR TALK requests designation as an ETC in each of the BTA's within the 509 area code (482 and 228). The UTC has previously designated a mix of incumbent and competitive carriers in these exchanges. The incumbent carriers include Qwest, Verizon, and Sprint, which are non-rural carriers for the purposes of Sec. 214(e), and numerous rural carriers. The specific exchanges are listed in Exhibits B and C.

**(b) A statement that the carrier will offer the services supported by federal universal service support mechanisms throughout the area for which it seeks designation, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another ETC).**

22. CLEAR TALK will provide the federally designated supported services throughout the areas for which it seeks designation as an ETC. It will do so using its own facilities.

23. CLEARTALK, like all other carriers, does not have facilities in place to serve every customer immediately. The company expects to build its network out in response to customer demand and the availability of investment funds. Both this Commission and the Federal Communications Commission have determined that the requirement to offer services does not imply that an ETC must be capable of serving every customer immediately. To do so would likely result in wasteful construction of networks where no demand develops and would impose a virtually insurmountable barrier to entry for competitors.

24. The Commission has required in WAC 480-120-071 that local exchange companies filing tariffs complete service extension requests within 18 months, if the customer is reasonably entitled to service and unless it finds that there is good cause to take longer. While this rule does not apply to CLEARTALK, it provides a standard for availability of service that CLEARTALK will commit to meet as an ETC.

**(c) A description of how it will provide each supported service.**

25. CLEARTALK will own and operate a fixed wireless network in south-central Washington. This network will be built largely on CDMA technology. Data is delivered to the network via fiber optic lines from Verizon and Qwest tandems.

26. The CLEARTALK network is much more reliable than standard wireless networks. The network can be any combination of the following: star networking,

chain networking and hybrid networking. The advantage of multiple topologies allows CLEAR TALK to design a system that will insure the reliability of transmission. The last mile connectivity is engineered and monitored to ensure consistency.

27. To deliver voice services, CLEAR TALK will be implementing CDMA. This system is also engineered to provide voice services. Unlike many other CLECs, CLEAR TALK uses many facility-based interconnections, thereby eliminating issues with virtual NXX arrangements.

28. The individual supported services are discussed below:

1. ***Voice-grade access to the public switched network.***

“Voice-grade access” is defined as a function that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. Bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.

29. As illustrated in Exhibit D to this petition, the voice service offered by CLEAR TALK provides voice-grade access to the public switched network.

2. ***Local usage.*** “Local usage” means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end-users.

30. CLEAR TALK will offer unlimited local usage as a part of its voice service. The local calling area for CLEAR TALK customers will equal or exceed the local calling area of the incumbent local exchange company in each exchange.

**3. *Dual tone multi-frequency signaling or its functional equivalent.***

“CLEARTALK has the option to use multiple signaling functions including DTMF, MF, SS7 .

31. Customers using CLEARTALK voice service enter telephone numbers using DTMF signaling. These signals are used by CLEARTALK’s equipment to initiate a telephone call over the public switched telephone network.

4. ***Single-party service or its functional equivalent.*** “Single-party service” is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user’s particular transmission.

32. All voice service offered by CLEARTALK is single-party service.

5. ***Access to emergency services.*** “Access to emergency services” includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. “911” is defined as a service that permits a telecommunications user, by dialing the three-digit code 911, to call emergency services through a Public Service Access Point (PSAP) operated by the local government. “Enhanced 911” is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. “Access to emergency services” includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911 systems.

33. CLEARTALK will route all 911 calls to the PSAP that serves the specific customer. CLEARTALK expects to provide enhanced 911 service using Intrado’s V911

system. This is a comprehensive system for supplying all elements necessary to provide numbering and location information (ANI and ALI) and to provide redundant and highly reliable routing of emergency calls through appropriate selective routers to the correct public service answering point (PSAP).

6. ***Access to operator services.*** “Access to operator services” is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call.

34. CLEAR TALK will provide customer service to its voice customers.

Customers dial “611” to reach CLEAR TALK’s customer service center, where live customer care representatives are available to assist customers.

7. ***Access to interexchange service.*** “Access to interexchange service” is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier’s network.

35. CLEAR TALK provides its voice customers with access to interexchange service. Customers can use CLEAR TALK’s service to make calls to any number on the public switched telephone network. Customers who wish to use another interexchange carrier may do so by using 1-800 access to that carrier’s prepaid or postpaid services.

8. ***Access to directory assistance.*** “Access to directory assistance” is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings.



36. CLEARTALK will provide directory assistance service to its voice customers. Customers dial “411” where live operators are available to assist customers in finding a telephone number.

9. *Toll limitation for qualifying low-income consumers.* “Toll limitation” denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For ETCs that are capable of providing both services, “toll limitation” denotes both toll blocking and toll control.

37. CLEARTALK will provide toll blocking to customers that request the service. The service prevents completion of calls that would result in toll calls to the customer. To the extent it is capable of doing so, CLEARTALK will also provide toll control to qualifying low-income consumers.

**(d) 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.**

38. CLEARTALK will use all funds received as a result of its ETC designation for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Because CLEARTALK is a facilities-based carrier and would receive support only after it has begun serving individual customers; the funds received would in many instances directly compensate CLEARTALK for the investments made and expenses incurred to connect the supported customer to the network. Our general investment as of

now is \$1.1 million dollars, including the purchase of our own building and all the improvements to the building, construction of radio towers used in the hybrid design of the fixed wireless network, purchase and installation of wireless networking equipment, purchase and maintenance of central office space and equipment, and payment of charges for interoffice circuits and services used to connect customers to the public switched telephone network and the enhanced 911 network. CLEAR TALK must incur these costs before it ever receives payments from either customers or the universal service program, and universal service funds will allow CLEAR TALK to expand its network more quickly and more widely than would otherwise be possible.

39. These investments provide direct and substantial benefits to customers in the exchanges served by CLEAR TALK. By expanding the reach of its network, CLEAR TALK will bring competitive telecommunications choices to customers who today have little or no option other than their incumbent local exchange company. CLEAR TALK's network could also provide affordable broadband service to customers who in many cases are unable to obtain any access to the Internet other than dial-up access.

- (e) A statement that the carrier will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers not receiving discounts;**

40. CLEARTALK will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is designed to reach low-income consumers not receiving discounts.

**(f) For wireless petitioners, 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;**

41. This requirement does apply to CLEARTALK.

**(g) Information that demonstrates its ability to remain functional in emergency situations including a description of how it complies with WAC 480-120-411 or, for a wireless carrier, information that demonstrates it has at least four hours of back up battery power at each cell site, back up generators at each microwave hub, and at least five hours back up battery power and back up generators at each switch;**

42. CLEARTALK's central offices are located in Yakima and Pasco in it's own facilities, will have both battery and automatic-start generator power available in the event of a power outage; available battery power exceeds the four-hour requirement in WAC 480-120-411.

**Information that demonstrates that it will comply with the applicable consumer protection and service quality standards of chapter 480-120 WAC or, for a wireless carrier, a commitment to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service. Information regarding the version of the CTIA code adopted and where to obtain it is set forth in WAC 480-123-999.**

43. The Commission's service quality rules include network performance standards (WAC 480-120-401), network maintenance (WAC 480-120-411), trouble reports (WAC 480-120-438), installation of customer lines (WAC 480-120-105), and repair (WAC 480-120-440). CLEAR TALK will comply with these standards, to the extent they apply to the company, as demonstrated below. The Commission has generally not held regulated companies to a level of absolute compliance with all standards in all circumstances and has at times granted exemptions to companies based on specific circumstances. CLEAR TALK likewise does not, by demonstrating its general ability to comply with the standards, intend to waive its right to request either mitigation of any enforcement action or exemption from any standard.

44. *Network performance standards (WAC 480-120-401)*. This rule provides standards for the reliability of switching service, intercept service, interoffice facilities, customer loops, and interexchange carrier trunking. CLEAR TALK's network design is different in many respects to the incumbent local exchange network architecture assumed in this rule, but the CLEAR TALK network will provide service at these standards. CLEAR TALK wireless local loop technology is a digital service that is designed with redundant capabilities. CLEAR TALK's interconnection trunking requirements are governed by interconnection agreements that require the company to maintain adequate network capacity. The softswitch technology used by CLEAR TALK

allows it to monitor network conditions, and as necessary, CLEAR TALK is able to adjust network parameters (including the codec used to convert analog voice communication into a digital signal) to ensure reliable voice service over a wide range of operating conditions and network loads.

45. ***Network maintenance (WAC 480-120-411)***. Compliance with this standard is addressed separately under paragraph (g) above.

46. ***Trouble reports (WAC 480-120-438)***. This rule limits the number of trouble reports per hundred lines in service. CLEAR TALK will closely track all trouble reported by its customers and will identify and correct these problems. In addition, because CLEAR TALK uses digital loop facilities for all customers, it is able to monitor network performance without waiting for customers to report trouble conditions.

47. ***Installation of customer lines (WAC 480-120-105)***. This rule does apply to CLEAR TALK. However, the company will promptly complete orders for new service.

48. ***Repair of service interruptions and impairments (WAC 480-120-440)***. This rule requires that, with some exceptions, service interruptions be restored within 48 hours and service impairments be restored within 72 hours. The Commission has observed that this standard “demand[s] near perfection in a way that is extremely difficult to achieve” and “may create incentives for inefficient service quality achievement.”<sup>6</sup> CLEAR TALK will maintain a staff of trained technicians and a sufficient supply of

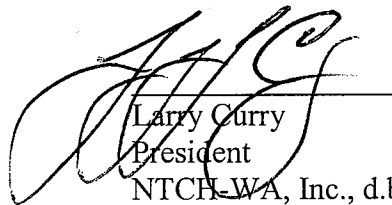
<sup>6</sup> *Sixteenth Supplemental Order, Order Denying Termination of Service Quality Program; Granting Modification*, Docket UT-991358, June 30, 2004, para. 76.

replacement equipment so that it will in almost all instances be able to restore service within the intervals required by this rule.

49. In addition to meeting the standards discussed above, CLEAR TALK will cooperate with UTC consumer affairs staff in resolving any customer complaints that may arise.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED July 20, 2007

A handwritten signature in black ink, appearing to read 'L. Curry', is written over a horizontal line. The signature is stylized and cursive.

Larry Curry  
President  
NTCH-WA, Inc., d.b.a. CLEAR TALK

### Exhibit B - Rural Telephone Company Exchanges

<u>Company</u>	<u>Exchange</u>	<u>CLLI</u>
Asotin Telephone Company	Anatone	ANATWAXX
	Asotin	ASOTWAXA
CenturyTel of Cowiche	Cowiche	CWCHWAXX
	Rimrock	RMRKWAXA
	Tieton	TITNWAXX
CenturyTel of Washington	Almira	ALMRWAXA
	Basin City	BSCTWAXX
	Benge	RTVLWAXA
	Cheney	CHNYWAXC
	Chewelah	CHWLWAXX
		VLLYWAXX
	Connell	CNNLWAXA
	Coulee City	CLCYWAXA
	Creston	CETNWAXX
	Davenport	DVPTWAXX
	Edwall-Tyler	EDWLWAXA
	Etopia	ELTPWAXX
	Eureka	EURKWAXA
	Harrington	HRTNWAXA
	Hunters	ICHLWAXA
	Kahlotus	KHLTWAXA
	Kettle Falls	KTFLWAXA
	Lind	LINDWAXA
	Mathews Corner	MTCOWAXX
	Medical Lake	MDLKWAXX
	Mesa	MESAWAXX
	Nespelem	NSPLWAXA
	Odessa	ODSSWAXA
	Reardan	RRDNWAXX
	Ritzville	RTVLWAXA
	Royal City	RYCYWAXA
	Spangle	SPNGWAXA
	Sprague	SPRGWAXA
	Starbuck	STRBWAXA
	Twisp	TWISWAXA
	Washtucna	WSHTWAXA
	Wilbur	WLBRWAXA
	Wilson Creek	WSCKWAXA
Winthrop	WNTHWAXA	

Ellensburg Telephone Company	Ellensburg	ELBGWAXA
	Kittitas	ELBGWAXA KTTSWAXX
	Lauderdale	ELBGWAXA
	Selah	ELBGWAXA SELHWAXX
	Thorp	ELBGWAXA THRPWAXA
	Vantage	ELBGWAXA VNTGWAXX
	Inland Telephone Company	Prescott
Roslyn		RSLNWAXX
Uniontown		UNTWWAXA
M&L Enterprises, Inc	Mt Hull	ORVLWA02
Pend Oreille Telephone Company	Cusick	CUSKWAXX
	Ione	IONEWAXX
	Metaline Falls	MTFLWAXX
Pioneer Telephone Company	Endicott	ENDCWAXA
	La Crosse	LCRSWAXA
St John Co-Op Telephone & Telegraph Company	St John	STJHWAXA



**Company Exchange CLLI**

Qwest Corporation Clarkston LSTNIDSH  
Cle Elum CLELWA01  
Colfax CLFXWA01  
Colville CLVLWA01  
Coulee Dam CLDMWA01  
Dayton DYTNAWA01  
Deer Park DRPKWA01  
Easton ESTNWA01  
Elk ELK WA01  
Ephrata EPHRWA01  
Green Bluff GRBLWA01  
Liberty Lake LBLKWA01  
Loon Lake LNLKWA01  
Moses Lake MSLKWA01  
MSLKWAAB  
Newman Lake NWLKWA01  
Northport NPRTWA01  
Omak OMAKWA01  
Orient-Laurier  
Oroville ORVLWA01  
Othello OTHEWA01  
Pasco PASCWA01  
Pateros PTRSWA01  
Pomeroy PMRYWA01  
Spokane SPKNWA01  
SPKNWA01  
SPKNWA01  
SPKNWACH  
SPKNWAFWA01  
SPKNWAHD  
SPKNWAKY  
SPKNWAMO  
SPKNWAWA  
SPKNWAWH  
Springdale SPDLWA01  
Touchet WLWLWA01  
Waitsburg WTBGWA01  
Walla Walla WLWLWA01  
Warden WRDNWA01  
Yakima YAKMWA02  
YAKMWAVE  
United Telephone Company of The Northwest Columbia CLMAWAXA  
Dallesport DLPTWAXA  
WSHRWAXA  
Glenwood GLWDWAXA  
Goldendale GLDLWAXA  
Grandview GDVWWAXA  
Granger GRNGWAXA  
Harrah HRRHWAXA

**Exhibit C - Non-rural Telephone Company Exchanges****Company Exchange CLLI****Exhibit C - Non-rural Telephone Company Exchanges**

Klickitat KLCTWAXX  
Lyle LYLEWAXA

Mabton BCTNWAXX  
MBTNWAXX  
Mattawa MTWAWAXA  
Paterson PASNWAXA  
Prosser PRSRWAXA  
Roosevelt RSVTWAXA  
Stevenson STSNWAXA  
Sunnyside SNSDWAXX  
Toppenish TPNSWAXX  
ZLLHWAXA  
Trout Lake TRLKWAXX  
Wapato WPATWAXX  
White Salmon WHSLWAXX  
White Swan WHSWWAXX  
Whitstran WHTSWAXA  
Willard WLRDWAXX  
Verizon Northwest Benton City BNCYWAXX  
Brewster BRWSWAXA  
Bridgeport BRPTWAXX  
Cashmere CSHRWAXX  
Chelan CHLNWAXX  
Curlew CRLWAXA  
Entiat ENTTWAXX  
Fairfield FRFDWAXA  
Farmington FRTNWAXX  
Garfield GRFDWAXX  
George GERGWAXX  
Kennewick KNWCWAXA  
KNWCWAXA  
KNWCWAXB  
KNWCWAXC  
KNWCWAXC  
Latah LATHWAXA  
Leavenworth LVWOWAXX  
Loomis LOMSWAXA  
Mansfield MNFDWAXX  
Molson MLSNWAXA  
Naches NCHSWAXX  
Newport NWPTWAXX  
Nile NILEWAXX  
Oakesdale OKDLWAXX  
Palouse PALSWAXX  
Pullman PLMNWAXX  
Quincy QNCYWAXX  
Republic RPBLWAXA  
Richland RCLDWAXA  
RCLDWAXB

Petition of NTCH-WA, Inc. d.b.a. CLEAR TALK For Designation as an Eligible Telecommunications Carrier.

**Company Exchange CLLI**

**Exhibit C - Non-rural Telephone Company Exchanges**

RCLDWAXB  
WRLDWAXA  
Rockford RCFRWAXB  
Rosalia MLDNWAXA

ROSLWAXA  
THTNWAXA  
Soap Lake SOLKWAXX  
Tekoa TEKOWAXX  
Tonasket TNSKWAXA  
Waterville WTVLWAXA  
Wenatchee WNTCWAXX  
LKWNWAXA  
MNSNWAXA

Petition of NTCH-WA, Inc. d.b.a. CLEAR TALK For Designation as an Eligible Telecommunications Carrier.

Fax  
Phone Residence  
ATA / Switch  
Computer  
Soft Switch  
Co-Location Facility  
Internet

Media Gateway

Media Gateway

LEC

Lec

SS7 Network

H.248

H.248

TDM

TDM

SIGTRAN

Packet Media

Router

Packet Media

Subscriber Network

Call Control (SIP)

TCP/IP

TDM

Copper DS0

SCTP

OSPF

OSPF

Pasco

Seattle

OSPF

OSPF

OSPF

OSPF

OSPF

OSPF

OSPF

OSPF

OSPF  
OSPF  
OSPF  
Spokane  
BGP  
BGP  
BGP  
Fiber  
Licensed Microwave  
Microwave  
Internet  
BGP  
Tandem  
Tandem  
TDM  
TDM  
TDM / DS3

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