

Kristin L. Jacobson, Counsel
201 Mission Street, Suite 1500
San Francisco, CA 94105
Tel: 707-816-7583 Fax: 415-684-7339
Email: kristin.l.jacobson@sprint.com



July 21, 2011

David S. Danner
Secretary and Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
P.O. Box 47250
Olympia, WA 98504-7250

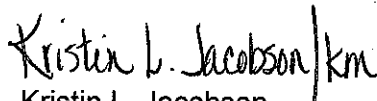
RE: Sprint Nextel's Application for Relinquishment of Eligible Telecommunications Carrier (ETC) Designation

Dear Mr. Danner:

On behalf of Sprint Nextel enclosed are an original and twelve (12) copies of an Application for Relinquishment of Eligible Telecommunications Carrier (ETC) Designation. Please date-stamp the extra copy of this filing and return it in the self-addressed, postage-prepaid envelope provided.

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

Very truly yours,


Kristin L. Jacobson

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION

OF THE STATE OF WASHINGTON

In the Matter of the Application of)
Sprint Nextel Corporation) Docket No. _____
For Relinquishment of Eligible)
Telecommunications Carrier (ETC))
Designation)

**SPRINT NEXTEL CORPORATION
APPLICATION FOR RELINQUISHMENT OF ELIGIBLE TELECOMMUNICATIONS
CARRIER (ETC) DESIGNATION**

Kristin L. Jacobson
Counsel, Sprint Nextel
Regulatory Affairs West Region
201 Mission Street, Suite 1500
San Francisco, CA 94105-1855
Office: (707) 816-7583
Fax: (415) 684-7339

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of the Application of)
Sprint Nextel Corporation) Docket No. _____
For Relinquishment of Eligible)
Telecommunications Carrier (ETC))
Designation)

**SPRINT NEXTEL CORPORATION
APPLICATION FOR RELINQUISHMENT OF ELIGIBLE TELECOMMUNICATIONS
CARRIER (ETC) DESIGNATION**

Sprint Nextel Corporation ("Sprint Nextel") hereby submit this Application for Relinquishment of its Eligible Telecommunications Carrier ("ETC") Designation in the State of Washington, effective as of December 31, 2011. This application is made pursuant to 47 USC § 214(e)(4) and 47 CFR § 54.205.

I. COMMUNICATIONS REGARDING THIS APPLICATION

All pleading, correspondence and communications regarding this Application should be addressed as follows:

Kristin L. Jacobson
Counsel, Sprint Nextel
Regulatory Affairs West Region
201 Mission Street, Suite 1500
San Francisco, CA 94105-1855
Office: (707) 816-7583
Fax: (415) 684-7339

II. BACKGROUND

Sprint Nextel was designated as an eligible telecommunications carrier (“ETC”) in certain areas served by Qwest Corporation and Verizon Northwest Inc., by the Commission in Docket No. UT-031558 on October 29, 2003 (“Non-Rural Order”). In Docket No. UT-043120, in an order dated January 13, 2005 (“Rural Order”), the Commission also designated Sprint Nextel in areas served by certain rural telephone companies. In Docket No. UT-073023, in an order dated October 23, 2007 (“Expansion Order”), the Commission then expanded the scope of Sprint Nextel’s designation. This order expanded the areas in which Sprint Nextel was previously designated to include Sprint Nextel’s operating entities that provide service using iDEN technology. The collective areas in which Sprint Nextel is currently designated are referred to as its “Designated Areas.”

III. REQUEST FOR RELINQUISHMENT

In WT Docket No. 08-94 before the FCC, Sprint Nextel Corporation agreed to reduce its federal high-cost universal service fund (“USF”) support in five equal increments beginning in January 2009.¹ On September 3, 2010, the FCC released an order providing instructions for implementing this commitment.² Among other things, the *Implementation Order* specified that Sprint Nextel could meet its high-cost USF phase-out obligation through “line loss,

¹ *Sprint Nextel Corp. and Clearwire Corporation, Applications For Consent to Transfer Control of Licenses, Leases, and Authorizations*, WT Docket No. 08-94, 23 FCC Rcd 17570 (2008).

² *In the Matter of High-Cost Universal Service Support*, WC Docket No. 05-337, *Federal-State Joint Board on Universal Service, Request for Review of Decision of Universal Service Administrator by Corr Wireless Communications. LLC*, CC Docket No. 96-45, *Order* released Sept. 3, 2010 (FCC 10-155) (“*Implementation Order*”).

relinquishment of ETC status, or other circumstances....”³ Sprint Nextel’s actual high-cost USF support for 2009 and 2010 were below the allowable cap for those years; thus, no further action is required for those years. In order to meet the phase-out requirement for 2012, however, Sprint Nextel will be required to take additional steps to reduce its high-cost receipts.

In compliance with the FCC’s *Implementation Order*, Sprint Nextel has decided to relinquish its ETC designation in Washington, effective December 31, 2011. Although Sprint Nextel will no longer receive federal high cost USF support in Washington after its relinquishment, it intends to continue to provide wireless service in all of its designated areas in Washington as a non-ETC, consistent with internal business plans. Existing subscribers will be able to continue receiving wireless service from Sprint Nextel on a non-ETC basis, or alternatively, they may select from the two or more remaining ETC providers in each service area.

47 USC § 214(e)(4) states in relevant part:

A State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue

³ *Id.* n. 39.

to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier.⁴

Sprint Nextel is designated as an ETC in certain exchanges in Washington (see Exhibit A for list of Wire Centers). To the best of Sprint Nextel's knowledge, the remaining ETC providers (see Exhibit B) (referred to as "ILECs" and "remaining ETC providers") will continue to serve customers in the Designated Area. There will be at least one ETC remaining in each of the Wire Centers identified in Exhibit A (in addition to any wireline or wireless competitive ETCs that may also provide service in each listed exchange). Therefore, there is no barrier to prevent Sprint Nextel from relinquishing its ETC designation in Washington. Further, to the best of Sprint Nextel's knowledge, no remaining ETC provider will be required to purchase or construct additional facilities to continue providing service within the Designated Area. Because ILECs currently serve the entire study area in which Sprint Nextel is designated as an ETC in Washington, the Commission need not provide notice to the ILECs to permit them to purchase or construct facilities to ensure that Sprint Nextel's customers will continue to receive service. This "advance notice to the commission" therefore completes all requirements of the federal rule, and the Commission should accept Sprint Nextel's Washington ETC relinquishment.

Upon acceptance and approval of its Washington ETC relinquishment application, Sprint Nextel will provide written notice by U.S. Mail to each of its then-current Lifeline customers in Washington advising that Sprint Nextel will no longer provide service discounts as an ETC.⁵ The notice will inform these customers that the monthly Lifeline credit will be discontinued 60 days following the issuance of the notice. Sprint Nextel will offer each of its Washington

⁴ See also 47 CFR § 54.205(a) and (b)(emphasis added).

⁵ As of April 30, 2011, Sprint Nextel had 68 Washington Lifeline customers.

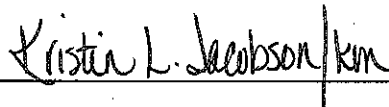
Lifeline customers the option of continuing to receive the same service from Sprint Nextel, or selecting an alternative calling plan. If a Lifeline customer decides to leave Sprint Nextel, no early termination fee will be applied. The notice will further inform each customer that Lifeline discounted service may be obtained from the remaining ETC providers in the area, as appropriate. A list of the remaining ETC providers will be included in the customer notification, if so requested from the Commission. After December 31, 2011, Sprint Nextel will not activate any new Lifeline subscribers in Washington.

Sprint Nextel will no longer be seeking certification as an ETC and will not be seeking high cost or other support for additional periods beyond December, 31, 2011, including the 2012 funding year. Accordingly, and pending approval of this application, Sprint Nextel's annual ETC certification and report filings with the Commission for 2011 and 2012, pursuant to WAC 480-123-060 through 070, will be adjusted to reflect the termination date of Sprint Nextel's ETC status as of December 31, 2011.

IV. Conclusion

Wherefore, Sprint Nextel, having provided notice in compliance with law and having fulfilled the requirements of law, respectfully requests that the Commission accept the relinquishment of its ETC designation in Washington effective December 31, 2011 and issue an Order confirming such.

DATED: This 21st day of July 2011 in San Francisco, California.

A handwritten signature in black ink that reads "Kristin L. Jacobson/km". The signature is written in a cursive style and is positioned above a horizontal line.

Kristin L. Jacobson
Counsel, Sprint Nextel
Regulatory Affairs West Region
201 Mission Street, Suite 1400
San Francisco, CA 94105-1855
Office: (415) 278-5314
Fax: (415) 278-5303

EXHIBIT A

Sprint Nextel ETC Designated Exchanges

ABRDWA01	EVSNWAXX	BLLVWASH	RCLDWAXB	MSLKWAAB	OLYMWA02	SULTWAXX
ACMEWAXA	FLCYWAXX	BMTNWA01	RDFDWA01	NPVNWA01	ONLSWAXA	TENNWAXA
ANCRWAXX	GDVWWAXA	BRBAWAXA	ROSLWAXA	OCSHWA01	PASNWAXA	TITNWAXX
ARLTWAXX	GERGWAXX	CAMSWAXX	SLKMWAXB	OKHRWAXX	PTORWAFE	TOLDWAXA
ARTNWAXX	GRNGWAXA	CHHLWA01	SPKNWA01	OLYMWAEV	PTRSWA01	VANCWANO
ASFDWAXA	HRRHWAXA	CLMAWAXA	SPKNWAWA	ORCHWA01	PTTWWA01	WHSWWAXX
ASLKWAXA	JOYCWA01	CLVWWAXA	STTLWA03	ORNGWAXA	PYLPWA01	WNTCWAXX
ASOTWAXA	KGTNWAXA	CRNTWAXX	STTLWACH	PTLWWA01	RDMDWAXA	WSCKWAXA
AUBNWA01	KNWCWAXA	DMNGWAXA	STTLWAEL	ROCHWA01	RMRKWAXA	RYCYWAXA
BCTNWAXX	LACYWA01	EDWLWAXA	STTLWASU	RSVTWAXA	RRDNWAXX	SNPSWAXA
BLANWAXB	LBLKWA01	ELK WA01	TACMWAJU	SEQMWA01	SLLKWAXA	SPKNWAWH
BLFRWA01	LYLEWAXA	ELMAWAXA	TACMWAWA	SLDLWASI	SOLKWAXX	TACMWAWV
BLHMWALU	MCCLWAXA	ELTPWAXX	VADRWAXA	SPKNWAHD	SPKNWAKY	WTVLWAXA
BLLVWAGL	MONRWAXX	ENTTWAXX	WHSLWAXX	SPKNWAMO	SPNGWAXA	YAKMWAVE
BNCYWAXX	NWLKWA01	ESTNWA01	WLWLWA01	SPRGWAXA	STJHWAXA	YELMWAXA
BNISWA01	PEELWAXA	EVRTWAXC	WPATWAXX	STSNWAXA	STTLWADU	YAKMWA02
BOTHWAXB	RCBHWAXX	FDWYWA01	ZLLHWAXA	STTLWA04	STTLWALA	
BRNNWAXX	RCLDWAXA	GGHRWAXA	BLHMWA01	STTLWA06	STWDWAXX	
BSCTWAXX	RNTNWA01	GLDLWAXA	BYLKWA01	STTLWACA	SWLYWAXX	
BTLGWA01	ROY WA01	GRFLWAXX	CNWWYWAXX	SUMSWAXX	TACMWAFL	
BURLWAXX	RTVLWAXA	GRHMWAGR	COLBWA01	SWHDWAXX	TACMWALO	
CENLWA01	SPKNWAFI	GRLDWAXX	CSTRWAXA	TACMWAGF	VANCWA01	
CHLNWAXX	SPRRWAXX	GRNRWAXX	DVLLWAXX	TACMWASY	WDLWAXA	
CHNYWAXC	STTLWA05	HDPTWA01	ELBGWAXA	THTNWAXA	WRLDWAXA	
CLELWA01	STTLWAVE	HLLKWAXX	FRHRWAXA	TPNSWAXX	WSRVWAXA	
CLFXWA01	SWLYWAXA	HMPLWAXA	GRBLWA01	UNINWAXB	KENTWAME	
CLTNWAXA	TACMWAFI	JUNTWAXA	ISQHWAEI	WHTSWAXA	LYNDWAXX	
CMISWAXA	TACMWALE	KALMWAXB	KENTWA01	WSHRWAXA	NBNDWAXA	
CNNLWAXA	UNTWAXA	KNWCWAXB	KNWCWAXC	EDSNWAXX	OTHEWA01	
CNTRWAXX	VSHNWAXA	LACNWAXX	KRLDWAXX	ENMCWA01	PASCWA01	
CPVLWAXX	WLRDWAXX	LARLWAXX	LACTWAXA	EWNCWAXA	PRSRWAXA	
CSHRWAXX	WNLCWA01	LINDWAXA	LGVWWA02	FNDLWAXA	QLCNWAXA	
CSRKWA01	WRDNWA01	LKGWWAXA	LKBYWAXA	KENTWAOB	QNCYWAXX	
CWCHWAXX	WSHGWAXA	LNLWAXA	LKSTWAXA	LVWOWAXX	RSLNWAXX	
DESMWA01	WSPTWAXA	MBTNWAXX	MDLKWAXX	MPVYWAMV	SHTNWA01	
DRPKWA01	ALGRWAXX	MSLKWA01	MESAWAXX	MTCOWAXX	SMNRWA01	
EPHRWA01	BCKLWA01	NCHSWAXX	MNSNWAXA	MTWAWAXA	SMSHWAXA	
ESNDWAXA	BDMDWA01	PLMNWAXX	MNTSWAXA	MYVIWAXX	SNHSWAXX	
EURKWAXA	BGLKWAXX	PLSBWAXX	MRISWA01	NWPTWAXX	SPKNWACH	
EVRTWAXA	BLKIWAXX	PTANWA01	MRWYWAXA	OCSTWAXA	STTLWAPA	

EXHIBIT B

Remaining ETC Providers in Washington

AT&T Mobility
Century Link (formerly Embarq)
Century Link (formerly CenturyTel)
Frontier
Hat Island Telephone Company
Inland Cellular
Inland Telephone Company
Kalama Telephone Company
Mashell Telecom, Inc
Pend Orielle Telephone Company
Pioneer Telephone Company
Quest
T-Mobile
TDS Telecom
Tenino Telephone Company
Timberline Telephone Company
Toledo Telephone Co, Inc
U.S. Cellular
Verizon
Virgin Mobile USA, L.P.
Wahkiakum West Telephone
Whidbey Telecom

VERIFICATION OF JOHN CHAPMAN

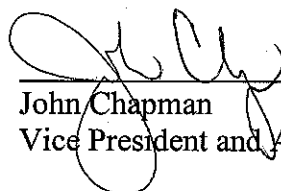
STATE OF KANSAS)
)
COUNTY OF JOHNSON) SS.

John Chapman, being first duly sworn, deposes and says:

1. That he is an officer of Sprint Nextel Corporation ("Sprint"), and duly appointed representative of Sprint;
2. That he has read the forgoing Application and exhibits, and knows the contents thereof; and
3. That he is authorized by Sprint to verify, and he does verify, that the contents of the foregoing Application and exhibits are true to the best of his knowledge, information, and belief.

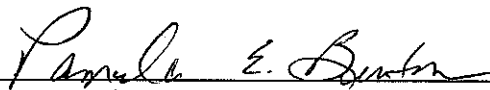
FURTHER AFFIANT SAYETH NAUGHT.

DATED: Overland Park, Kansas, JULY 20, 2011.

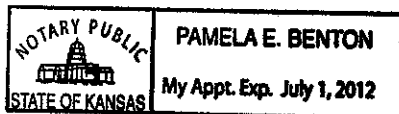


John Chapman
Vice President and Assistant Secretary

Subscribed and sworn to before me
this 20th day of July, 2011



Notary Public, State of Kansas
My commission expires:



CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of July, 2011, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

David S. Danner	<input type="checkbox"/>	Hand Delivered
Secretary and Executive Director	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities & Transportation Commission	<input checked="" type="checkbox"/>	Overnight Mail (FedEx)
1300 S. Evergreen Park Drive, SW	<input type="checkbox"/>	Facsimile (360-586-8203)
P.O. Box 47250	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)
Olympia, WA 98504-7250		

I hereby certify that I have this ___ day of July, 2011, served a true and correct copy of the foregoing document upon the party listed below as follows:

Simon J. ffitc	<input type="checkbox"/>	Hand Delivered
Attorney General of Washington	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Public Counsel Section	<input type="checkbox"/>	Overnight Mail (FedEx)
800 Fifth Avenue, Suite 200	<input type="checkbox"/>	Facsimile (360-586-8203)
Seattle, WA 98104-3188	<input checked="" type="checkbox"/>	Email (simonf@atg.wa.gov)

I declare under penalty of perjury under the law of the State of Washington that the foregoing is true and correct.

Dated this 21st day of July, 2010, at San Francisco, California.

Katherine M. McMahon