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January 6, 2004

**Via e-mail and U.S. Mail**

Ms. Carole Washburn, Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive S.W.  
Box 47250  
Olympia, WA 98504-7250

Re: Docket No. 043120; Sprint's Response to WITA's December 21, 2004 Letter

Dear Ms. Washburn:

Sprint Corporation, on behalf of its Wireless Division ("Sprint"), hereby responds to the letter submitted on December 21, 2004 by the Washington Independent Telephone Association ("WITA"), commenting on Sprint's Petition to Amend its Certification as an Eligible Telecommunications Carrier ("ETC"). Sprint respectfully submits that WITA mischaracterizes and appears to misunderstand the geographic area for which Sprint seeks ETC designation. In addition, Sprint submits that WITA is wrong in its public interest arguments.

1. Sprint Seeks ETC Designation Throughout the Rural Service Areas Listed in Its Petition. Sprint proposes to be designated as an ETC in the entirety of each of the rural incumbent local exchange carrier ("ILEC") exchanges listed in Exhibit C of the petition. Contrary to WITA's mischaracterization, Sprint does not seek to engage in cream-skimming. To the contrary, Sprint is committed to satisfying all of the ETC obligations throughout the entire territory of the listed exchanges, each of which has been defined as a separate "service area" for

ETC designation purposes by the Commission, with the concurrence of the FCC. Moreover, Sprint does not seek designation for portions of rural ILEC wire centers. Nor does Sprint request service area definitions that differ from those already established by the Commission and agreed to by the FCC.

WITA's confusion about the scope of Sprint's proposal can easily be clarified. Sprint holds licenses to provide wireless personal communications service ("PCS") service throughout the entire state of Washington, including all of the exchanges for which ETC status is requested. Moreover, Sprint actually provides wireless service *today* throughout the entirety of the specified exchanges. In portions of these exchanges, Sprint provides wireless service using its own PCS network (shown on the maps provided in Exhibit B of Sprint's petition with cross-hatched shading). In the portions of these exchanges where Sprint does not yet have coverage using its own PCS network facilities, Sprint ensures that its customers' service needs are met through a form of resale of other wireless carriers' service known as "roaming." <sup>1/</sup>

Thus, consistent with Section 214(e)(1)(A) of the federal Communications Act and Section 54.201(d)(1) of the FCC's rules, Sprint provides service throughout these exchanges "either using its own facilities or a combination of its own facilities and resale of another carrier's services": using its own facilities in the area currently covered by Sprint's PCS network, and using resale/roaming elsewhere.

Thus, contrary to WITA's mischaracterization, Sprint does not propose to engage in any form of "cream skimming," because Sprint will discharge its ETC obligations throughout each of the ILEC exchanges for which it seeks designation. Moreover, WITA is wrong when it

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<sup>1/</sup> Because Sprint is using resale in these roaming areas, Sprint will not ask for or receive support dollars for customers that reside in these roaming areas.

contends that Sprint proposes to be designated, or to be subject to ETC obligations, only with respect to areas that it currently provides service using its own network facilities.

2. Contrary to WITA's Argument, Designating Sprint as an ETC Will Advance the Public Interest. The Commission should once again reject WITA's argument that the public interest does not support designating multiple ETCs to serve rural areas, just as it has rejected WITA's identical arguments in the past. *See, e.g., Petition of AT&T Wireless PCS, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011, Order No. 1 (April 13, 2004), ¶¶ 40-49.* Designating Sprint as an ETC in the rural ILEC service areas will expand the range of service choices available to rural consumers, create stronger incentives for competitive pricing, advance the Commission's established policies of competitive and technological neutrality, and promote diversity in the supply of telecommunications services throughout the state. *Id.*

Sincerely,

William E. Hendricks  
Attorney for Sprint