

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

AIR VOICE WIRELESS, LLC, d/b/a
AIRTALK WIRELESS,

Seeking Designation as an Eligible
Telecommunications Carrier in the state
of Washington pursuant to 47 U.S.C. §
214(e)(2) (*Low Income Only*)

DOCKET UT-220276

ORDER 01

GRANTING ELIGIBLE
TELECOMMUNICATIONS
CARRIER DESIGNATION WITH
CONDITIONS AND EXEMPTION
FROM RULE

BACKGROUND

1 On April 19, 2022, Air Voice Wireless, LLC, d/b/a Airtalk Wireless (Air Voice 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). Air Voice 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, Air Voice filed its FCC-approved compliance plan with the Commission and a proposed coverage area.

2 On August 12, 2022, Air Voice supplemented its filing to include an updated officer certification and a list of the actual Washington exchanges for which the Company requests ETC designation. On September 6, 2022, Air Voice filed an additional supplement clarifying that it is seeking designation on an exchange basis, and filed a final, updated study area list on September 20, 2022.

3 Air Voice's Lifeline rate plans comply with the FCC's minimum service standards because they include:

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 data-capable device or SIM card,
- Free calls to Company Customer Service,
- 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,
- Data on LTE or 5G Network.

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

Plan Type	Monthly Minutes	Monthly Text Messages	Monthly Data³	Net Cost to Qualifying Customers
Basic Lifeline	1,000	Unlimited	4.5 GB	\$0.00
Tribal Lifeline	Unlimited	Unlimited	4.5 GB	\$0.00

5 Air Voice provides Lifeline service in 10 states through commercial mobile radio service by utilizing the networks of AT&T Mobility and T-Mobile. It has recently been granted ETC designation in Puerto Rico and 16 states and has applications pending before an additional 14 states, excluding Washington.⁴

³ Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, WC Docket Nos. 11-42, 09-197, and 1090, Order, FCC DA-22-706 (rel. July 1, 2022). The FCC extends the waiver and pauses the mobile broadband data capacity increase through December 1, 2023.

⁴ ETC Designated in: California, Kentucky, Michigan, Mississippi, New York, Ohio, Oklahoma, Pennsylvania, South Carolina, and Wisconsin.

Air Voice has recently been designated as an ETC in: Colorado, Georgia, Idaho, Louisiana, Missouri, Maryland, Montana, Nevada, New Jersey, North Dakota, Puerto Rico, Rhode Island, Tennessee, Utah, Vermont, West Virginia, and Wyoming.

Pending ETC designation in: Alaska, Arizona, Arkansas, Illinois, Indiana, Iowa, Kansas, Massachusetts, Minnesota, Montana, Nebraska, New Mexico, Oregon, South Dakota, and Virginia.

6 Air Voice 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.” Air Voice 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.” Air Voice 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.” Air Voice requests an exemption because it does not have control over its underlying carriers’ emergency power back up facilities.

7 Commission staff (Staff) agrees with Air Voice 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 Air Voice’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.⁵ 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.⁶

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 (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 Air Voice 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, Air Voice seeks ETC designation for the limited purpose of participating in the Lifeline program, and the FCC

⁵ *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).

⁶ WAC 480-123-040.

approved Air Voice's compliance plan on December 23, 2021.⁷ Further, Air Voice commits to advertise its Lifeline services.

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

13 We also agree that Air Voice 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 Air Voice is not a high-cost program participant. WAC 480-123-030(1)(f) and (g) also do not apply to Air Voice's proposed operations as an ETC because the Company will not use its own facilities to provide service; rather, Air Voice 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) Air Voice is a telecommunications company seeking to do business in the state of Washington. Air Voice meets the requirements for designation as an ETC because the FCC has approved Air Voice's compliance plan and Air Voice has committed to advertise the availability of its services and the charges therefor using media of general distribution. Air Voice's designation as an ETC will advance the purpose of universal service because Air Voice will offer voice telephony services, which facilitate universal service. Air Voice has also demonstrated that its designation as an ETC is in the public interest.

16 (3) 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. Air Voice has demonstrated that the requirements of WAC

⁷ *Wireline Competition Bureau Approves the Revised Compliance Plan of Air Voice Wireless, LLC*; FCC Public Notice, WC Docket Nos. 09-197 and 11-42, DA 21-1641 (rel. December 23, 2021).

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.

- 17 (4) This matter came before the Commission at its regularly scheduled meeting on September 29, 2022.

ORDER

THE COMMISSION ORDERS THAT:

- 18 (1) Air Voice Wireless, LLC, d/b/a Airtalk 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) Air Voice Wireless, LLC, d/b/a Airtalk 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 September 29, 2022.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chair

ANN E. RENDAHL, Commissioner

Appendix A

Washington State Conditions on Designation of Air Voice Wireless, LLC dba AirTalk Wireless as an Eligible Telecommunications Carrier

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

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

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

7. On a quarterly basis beginning with the quarter ending on December 31, 2022, Air Voice shall provide the number of Lifeline customers that it enrolls each month. Air Voice 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. Air Voice shall respond within 30 days to Commission staff's information requests on Air Voice's Lifeline operations, including, but not limited to, Lifeline customers' usage patterns and Lifeline customer records.
9. Air Voice shall cooperate with the Commission and the Universal Service Administrative Company (USAC), including full participation in the new National Verifier system.
10. Air Voice must not deduct airtime minutes for calls to the suicide and crisis line by dialing 988 or calls to customer care made from the customer's handset by dialing 611. Air Voice shall explicitly state the policy of free 988 and 611 calls in its Lifeline service agreements. Air Voice 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. Air Voice 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 Air Voice, 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 Air Voice with regard to general inquiries such as account balance, additional purchases, service availability or technical support. The Commission reserves the rights to revoke Air Voice's ETC designation if Air Voice fails to provide reasonable quality of service.
12. Air Voice 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. Air Voice shall comply with rules on cessation of business as specified in WAC 480-120-083.
 - a. Prior to cessation of business, Air Voice 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. Air Voice 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. Air Voice 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. Air Voice 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. Air Voice shall cooperate with Commission staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
16. Air Voice shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.
17. Air Voice commits to targeted advertising campaigns in each of the tribal areas within its study area, and commits to partnering with nonprofit assistance organizations to inform potential customers about lifeline and help promote digital equity.

Appendix B

**Air Voice Wireless, LLC, d/b/a AirTalk Wireless
Areas for Eligible Telecommunications Carrier Designation**

EXCHANGE	ILEC NAME
Spokane	Qwest Corporation
Bainbridge Island	Qwest Corporation
Battleground	Qwest Corporation
Belfair	Qwest Corporation
Bellevue	Qwest Corporation
Bellingham	Qwest Corporation
Black Diamond	Qwest Corporation
Bremerton	Qwest Corporation
Buckley	Qwest Corporation
Castle Rock	Qwest Corporation
Centralia	Qwest Corporation
Chehalis	Qwest Corporation
Clarkston	Qwest Corporation
Cle Elum	Qwest Corporation
Colfax	Qwest Corporation
Copalis	Qwest Corporation
Coulee Dam	Qwest Corporation
Dayton	Qwest Corporation
Deer Park	Qwest Corporation
Des Moines	Qwest Corporation
Easton	Qwest Corporation
Elk	Qwest Corporation
Enumclaw	Qwest Corporation
Ephrata	Qwest Corporation
Graham	Qwest Corporation
Green Bluff	Qwest Corporation
Hoodspport	Qwest Corporation
Issaquah	Qwest Corporation
Liberty Lake	Qwest Corporation
Longview Kelso	Qwest Corporation
Loon Lake	Qwest Corporation
Maple Valley	Qwest Corporation
Moses Lake	Qwest Corporation
Newman Lake	Qwest Corporation
Northport	Qwest Corporation

Olympia	Qwest Corporation
Omak	Qwest Corporation
Oroville	Qwest Corporation
Othello	Qwest Corporation
Pasco	Qwest Corporation
Pomeroy	Qwest Corporation
Port Angeles	Qwest Corporation
Port Angeles	Qwest Corporation
Port Ludlow	Qwest Corporation
Port Orchard	Qwest Corporation
Port Townsend	Qwest Corporation
Prescott	Inland Telephone Company
Puyallup	Qwest Corporation
Renton	Qwest Corporation
Ridgefield	Qwest Corporation
Rochester	Qwest Corporation
Roslyn	Inland Telephone Company
Roy	Qwest Corporation
Seattle	Qwest Corporation
Sequim	Qwest Corporation
Silverdale	Qwest Corporation
Touchet	Qwest Corporation
Waitsburg	Qwest Corporation
Walla Walla	Qwest Corporation
Warden	Qwest Corporation
Winlock	Qwest Corporation
Yakima	Qwest Corporation
South Prairie	CenturyTel of Washington
Orting	CenturyTel of Washington
Morton	CenturyTel of Washington
Glenoma	CenturyTel of Washington
Mineral	CenturyTel of Washington
Packwood	CenturyTel of Washington
Randle	CenturyTel of Washington
Washtucna	CenturyTel of Washington
McCleary	CenturyTel of Washington
Montesano	CenturyTel of Washington
Elma	CenturyTel of Washington
Vashon	CenturyTel of Washington
Cheney	CenturyTel of Washington
Spangle	CenturyTel of Washington

Reardan	CenturyTel of Washington
Medical Lake	CenturyTel of Washington
Davenport	CenturyTel of Washington
Kettle Falls	CenturyTel of Washington
Fall City	CenturyTel of Washington
Carnation	CenturyTel of Washington
North Bend	CenturyTel of Washington
Snoqualmie Pass	CenturyTel of Washington
Ames Lake	CenturyTel of Washington
ClearWater	CenturyTel of Washington
Almira	CenturyTel of Washington
Cathlamet/Puget Island	CenturyTel of Washington
Coulee City	CenturyTel of Washington
Curtis	CenturyTel of Washington
Edwall-Tyler	CenturyTel of Washington
Eureka	CenturyTel of Washington
Harrington	CenturyTel of Washington
Lebam	CenturyTel of Washington
Lind	CenturyTel of Washington
Nespelem	CenturyTel of Washington
Ocosta	CenturyTel of Washington
Odessa	CenturyTel of Washington
Pacific Beach	CenturyTel of Washington
Pe Ell	CenturyTel of Washington
Raymond	CenturyTel of Washington
South Bend	CenturyTel of Washington
Sprague	CenturyTel of Washington
Starbuck	CenturyTel of Washington
Vader	CenturyTel of Washington
Wilbur	CenturyTel of Washington
Wilson Creek	CenturyTel of Washington
Yacolt	CenturyTel of Washington
Arlington	Frontier Communications Northwest, Inc.
Benton City	Frontier Communications Northwest, Inc.
Brewster	Frontier Communications Northwest, Inc.
Bridgeport	Frontier Communications Northwest, Inc.
Burlington	Frontier Communications Northwest, Inc.
Cashmere	Frontier Communications Northwest, Inc.
Chelan	Frontier Communications Northwest, Inc.
Coupeville	Frontier Communications Northwest, Inc.

Darrington	Frontier Communications Northwest, Inc.
Entiat	Frontier Communications Northwest, Inc.
Fairfield	Frontier Communications Northwest, Inc.
Farmington	Frontier Communications Northwest, Inc.
Garfield	Frontier Communications Northwest, Inc.
George	Frontier Communications Northwest, Inc.
Granite Falls	Frontier Communications Northwest, Inc.
Halls Lake	Frontier Communications Northwest, Inc.
Kennewick	Frontier Communications Northwest, Inc.
Latah	Frontier Communications Northwest, Inc.
Leavenworth	Frontier Communications Northwest, Inc.
Mansfield	Frontier Communications Northwest, Inc.
Monroe	Frontier Communications Northwest, Inc.
Moscow	Frontier Communications Northwest, Inc.
Mt Vernon	Frontier Communications Northwest, Inc.
Newport	Frontier Communications Northwest, Inc.
Oak Harbor	Frontier Communications Northwest, Inc.
Oakesdale	Frontier Communications Northwest, Inc.
Palouse	Frontier Communications Northwest, Inc.
Priest River	Frontier Communications Northwest, Inc.
Pullman	Frontier Communications Northwest, Inc.
Quincy	Frontier Communications Northwest, Inc.
Richland	Frontier Communications Northwest, Inc.
Richmond Beach	Frontier Communications Northwest, Inc.
Rockford	Frontier Communications Northwest, Inc.
Rosalia	Frontier Communications Northwest, Inc.
Silver Lake	Frontier Communications Northwest, Inc.
Skykomish	Frontier Communications Northwest, Inc.
Soap Lake	Frontier Communications Northwest, Inc.
Stanwood	Frontier Communications Northwest, Inc.
Stevens Pass	Frontier Communications Northwest, Inc.
Sultan	Frontier Communications Northwest, Inc.
Tekoa	Frontier Communications Northwest, Inc.
Tonasket	Frontier Communications Northwest, Inc.
Waterville	Frontier Communications Northwest, Inc.
Wenatchee	Frontier Communications Northwest, Inc.
Hood Canal	United Telephone Company of The Northwest
Chimacum	United Telephone Company of The Northwest
Columbia	United Telephone Company of The Northwest
Port Angeles	United Telephone Company of The Northwest
Port Angeles	United Telephone Company of The Northwest

Mabton	United Telephone Company of The Northwest
Glenwood	United Telephone Company of The Northwest
Goldendale	United Telephone Company of The Northwest
Grandview	United Telephone Company of The Northwest
Granger	United Telephone Company of The Northwest
Harrah	United Telephone Company of The Northwest
Klickitat	United Telephone Company of The Northwest
Lyle	United Telephone Company of The Northwest
Mattawa	United Telephone Company of The Northwest
Paterson	United Telephone Company of The Northwest
Poulsbo	United Telephone Company of The Northwest
Prosser	United Telephone Company of The Northwest
Roosevelt	United Telephone Company of The Northwest
Sunnyside	United Telephone Company of The Northwest
Toppenish	United Telephone Company of The Northwest
Trout Lake	United Telephone Company of The Northwest
Wapato	United Telephone Company of The Northwest
White Salmon	United Telephone Company of The Northwest
White Swan	United Telephone Company of The Northwest
Whitstran	United Telephone Company of The Northwest
Willard	United Telephone Company of The Northwest
Dallesport	United Telephone Company of The Northwest
Acme	Frontier Communications Northwest, Inc.
Alger	Frontier Communications Northwest, Inc.
Big Lake	Frontier Communications Northwest, Inc.
Concrete	Frontier Communications Northwest, Inc.
Conway	Frontier Communications Northwest, Inc.
Curlew	Frontier Communications Northwest, Inc.
Custer	Frontier Communications Northwest, Inc.
Deming	Frontier Communications Northwest, Inc.
Edison	Frontier Communications Northwest, Inc.
Everson	Frontier Communications Northwest, Inc.
Ferndale	Frontier Communications Northwest, Inc.
Grayland	Frontier Communications Northwest, Inc.
La Conner	Frontier Communications Northwest, Inc.
Laurel	Frontier Communications Northwest, Inc.
Loomis	Frontier Communications Northwest, Inc.
Lyman-Hamilton	Frontier Communications Northwest, Inc.
Lynden	Frontier Communications Northwest, Inc.
Maple Falls	Frontier Communications Northwest, Inc.
Marblemount	Frontier Communications Northwest, Inc.

Molson	Frontier Communications Northwest, Inc.
Naches	Frontier Communications Northwest, Inc.
Nile	Frontier Communications Northwest, Inc.
Republic	Frontier Communications Northwest, Inc.
Sedro Woolley	Frontier Communications Northwest, Inc.
Sumas	Frontier Communications Northwest, Inc.
Westport	Frontier Communications Northwest, Inc.
La Center	Lewis River Telephone Company, Inc.
Amboy	Lewis River Telephone Company, Inc.
Yale	Lewis River Telephone Company, Inc.
Cougar	Lewis River Telephone Company, Inc.
Swift	Lewis River Telephone Company, Inc.
South Whidbey	Whidbey Telephone Company
Point Roberts	Whidbey Telephone Company
Kapowsin	Mashell Telecom Inc.
Mt Hull	Skyline Telecom, Inc.
La Crosse	Pioneer Telephone Company
Endicott	Pioneer Telephone Company
Cusick	Pend Oreille Telephone Company
Ione	Pend Oreille Telephone Company
Metaline Falls	Pend Oreille Telephone Company
Salkum	McDaniel Telephone Company
Mossyrock	McDaniel Telephone Company
Onalaska	McDaniel Telephone Company
Kalama	Kalama Telephone Company
Uniontown	Inland Telephone Company
Union	Hood Canal Telephone Co., Inc.
Bucoda	Tenino Telephone Company
Tenino	Tenino Telephone Company
Hat Island	Hat Island Telephone Company
Cowiche	CenturyTel of Cowiche, Inc.
Tieton	CenturyTel of Cowiche, Inc.
Rimrock	CenturyTel of Cowiche, Inc.
Asotin	Asotin Telephone Company
Anatone	Asotin Telephone Company
Selah	Consolidated Communications of WA Co., LLC
Grays River	Western Wahkiakum County Telephone Company
Naselle	Western Wahkiakum County Telephone Company

St John	St John Co-Op Telephone & Telegraph Company
Aberdeen-Hoquiam	Qwest Corporation
Springdale	Qwest Corporation
Creston	CenturyTel of Washington
Stevenson	United Telephone Company of The Northwest
Sumner	Qwest Corporation
Crystal Mountain	Qwest Corporation
Blaine	Frontier Communications Northwest, Inc.
Dewatto	Inland Telephone Company
Bothell	Frontier Communications Northwest, Inc.
Kirkland	Frontier Communications Northwest, Inc.
Woodland	Frontier Communications Northwest, Inc.
Kent	Qwest Corporation
Auburn	Qwest Corporation
Royal City	CenturyTel of Washington
Silverton	Skyline Telecom, Inc.
Tacoma	Qwest Corporation
Tacoma	Qwest Corporation
Tacoma	Qwest Corporation
Tacoma	Qwest Corporation
Marysville	Frontier Communications Northwest, Inc.
Snohomish	Frontier Communications Northwest, Inc.
Everett	Frontier Communications Northwest, Inc.
Vancouver	Qwest Corporation
Long Beach	CenturyTel of Washington
Chewelah	CenturyTel of Washington
Mathews Corner	CenturyTel of Washington
Connell	CenturyTel of Washington
San Juan	CenturyTel of Inter Island, Inc.
Kingston	CenturyTel of Washington
Ritzville	CenturyTel of Washington
Forks	CenturyTel of Washington
Lake Quinalt	CenturyTel of Washington
Anacortes	Frontier Communications Northwest, Inc.
Twisp	CenturyTel of Washington
Gig Harbor	CenturyTel of Washington
Toledo	The Toledo Telephone Company
Colville/Orient Laurier	Qwest Corporation
Shelton	Qwest Corporation

Pateros	Qwest Corporation
Ashford	CenturyTel of Washington
Eatonville	Mashell Telecom Inc.
Yelm	Consolidated Communications of WA Co., LLC
Ellensburg	Consolidated Communications of WA Co., LLC
Camas-Washougal	Frontier Communications Northwest, Inc.
Camas-Washougal	Frontier Communications Northwest, Inc.
Camas-Washougal	Frontier Communications Northwest, Inc.