BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of State Certification of Support as Required by 47 C.F.R. § 54.314	Docket No. UT-073015 SUPPLEMENT TO RECERTIFICATION FILING OF RURAL CELLULAR CORPORATION FOR 2007

1 RCC was designated as an eligible telecommunications carrier ("ETC") by the Washington Utilities and Transportation Commission in Docket No. UT-023033 on August 14, 2002.

2 **Tab A** Declaration Certifying Use of Universal Service Funds. Funds received by RCC from the federal high-cost universal service support fund will be used only for the provision, maintenance and upgrading of the facilities and services for which the support was intended.

3 **Tab B** 2006 Service Improvement Plan re Use of Funds is intended to satisfy the requirements of WAC 480-123-070(1)(a) – (b) "Report on Use of federal funds and benefits to customers." – ***Confidential*** [Revised 9/11/07].

4 **Tab C** Local Service Outage Report is intended to satisfy the requirements of WAC 480-123-070(2)(a) – (f) "Local service outage report." - ***Confidential***

5 **Tab D** Unfulfilled Request for Service is intended to satisfy the requirements of WAC 480-123-070(3) "Report on failure to provide service." – ***Confidential***

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6 **Tab E** Complaints per 1,000 handsets is intended to satisfy the requirements of WAC 480-123-070(4) "Report on complaints per one thousand handsets or lines." - ***Confidential*** [Revised 9/11/07].

7 **Tab F** RCC is in compliance with the CTIA Consumer Code for Wireless Carriers. This statement and the following supplemental statement are made in response to WAC 480-123-070(5) "Certification of compliance with applicable service quality standards." RCC complies with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Services ("Code"). Most recently, RCC received confirmation from CTIA that it was compliant with all requirements in the Code for the time period September 9, 2006 through September 9, 2007. RCC conducted internal audits of its operations in Washington to confirm its compliance with the Code. These audits were conducted in May 2006 and again in October 2006 and form the basis for RCC's certification of compliance

8 **Tab G** and the following supplemental statement are made in response to WAC 480-123-070(6) "Certification of ability to function in emergency situations":

> RCC provides the following information demonstrating its ability to remain functional in emergency situations consistent with the Commission's standards based on FCC Rule 54.202(a)(2). RCC has reasonable amounts of back-up power to provide functionality without an external power source, and has implemented industry practices to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations.
>
> Each cell site in the RCC network is equipped with a reasonable amount of battery back-up. Cell sites are engineered for a minimum of four (4) hours of battery standby power in the event of a commercial power failure. Each cell site has the necessary equipment to allow a portable generator to be quickly and safely connected for standby power. RCC has a total of 23 permanent generators installed at critical cell site locations, as well as 5 portable generators available for transport to an area affected by a commercial power outage. By using a combination of generator and battery back-up power, each cell site has reasonable amounts of back-up power to provide functionality without an external power source.

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The mobile switching center ("MSC") locations are also equipped with battery back-up systems and dedicated automatic start-up generators. The MSC locations are engineered for a minimum of eight (8) hours of battery standby time. RCC regularly monitors its network through a combination of a manned switching center and an automated alarm system that is connected to all network nodes. During non-business hours, the automated alarm system monitors all network elements and pages the responsible on-call technician in the event of an outage. RCC's network switching technicians are located within a reasonable driving distance of the MSC locations. RCC's network field technicians are similarly located in cell site areas. All network technicians are required to be available 24 x 7 in the event a network element fails that may need their assistance to repair in a timely manner.

RCC is capable of rerouting traffic around damaged facilities. Many cell sites in the RCC network provide overlapping coverage for neighboring areas that can be used in the event of damage to a particular facility. In the event of a major failure of a cell site, neighboring sites could be adjusted to provide coverage to a wider service area. In the event of a major outage, RCC is capable of deploying a temporary coverage solution by delivering base station equipment to a location and installing temporary antennae systems to provide a level of service while damaged facilities are being repaired. RCC also has tower crews under contract so that repairs can be quickly initiated in the event a cell site location is damaged.

In order to provide quality service, RCC has deployed a major microwave transport network that provides cell site/MSC connectivity to over 75% of its cell sites in Washington. This microwave background is engineered and constructed to employ path diversity where possible. RCC also has the ability to change call routing translations in the event of an extended outage due to a damaged facility. Call delivery circuit translations include overflow routes so that if a particular route is not available to deliver a call, a secondary route may be used. Finally, RCC does not forbid in-market roaming so that customers are able to access a like-technology network that overlaps RCC's network in the event of damaged facilities.

RCC has implemented industry practices to manage traffic spikes resulting from emergency situations. The RCC network is designed to minimize call blocking. In order for a traffic spike to result in call blocking, the number of simultaneous calls must exceed the total number of voice paths available at the one or more serving cell sites at a given location. Each cell site is measured for capacity based on a standard of not more than two percent (2%) blocked calls on any sector during its busiest hour using a 14-day average. When a sector approaches this level of utilization, RCC takes steps to increase call capacity. Similar to rerouting of traffic around damaged facilities, RCC also has the ability to manage

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traffic spikes through the deployment of base station equipment and temporary antennae systems, as well as changing call routing translations.

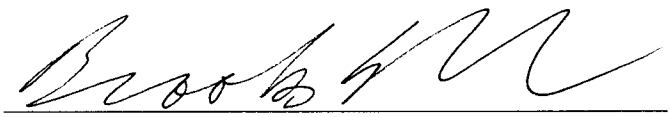
9 **Tab H a**s certified during the calendar year 2006, RCC advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e), and the Commission Orders in Docket No. UT-023033. [Revised 9/11/07]. As listed in Tab H, outreach activities included newspaper advertising, including newspapers of alternative languages and free to the public, bill messages to existing customers, posters at all retail locations, information posted on Unicel's and USAC's website, outreach mailings, including posters for display, to social service agencies and reservations.

10 **Tab I** Service Improvement Plan, October 2007 through September 2008 and the following supplemental statement are intended to satisfy the requirements of WAC 480-123-080 – ***Confidential.*** RCC included a full year of operating costs for cell sites to be constructed in a year rather than pro-rate because a great deal of the operating costs are fully incurred even before a cell site is completed, such as tower or ground leases, electricity, fixed facility costs, site planning costs, etc.

11 **Tab J** .jpg version of coverage map previously filed – ***Confidential.*** Note that an electronic version only of RCC's coverage map has also been filed in a .shp format. [.shp map revised 9/11/07] – ***Confidential.***

Respectfully submitted this 11th day of September, 2007.

Miller Nash LLP



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