

Support Received - 2006 (thous. \$)

\$

Uses of Support Funds (thous. \$) - 2006
Project

Investment \$

Expense \$

Status

Investment Benefit

Population Benefitted

New Cell Sites Constructed:

REDACTED

REDACTED

	<u># Washington Customers</u>	<u>Total # sites providing coverage to ETC Designated Areas:</u>	<u>Total Annual Estimated Network Operating Cost for ETC Designated Areas:</u>	<u>Annual Network Operating Costs per site:</u>	<u>2006 USF Support to be used for Network Operating Cost</u>	<u>Percentage of Total Network costs:</u>
	<u>12/31/06</u>					

Network Operating Costs:

- Fixed network costs for leased facilities
- Variable network costs for usage
- Network Features - Directory Assistance
- Rent/Lease obligations for cell sites
- Real Estate/Property taxes for cell sites
- Utilities for cell sites
- Field/Switch Technicians/Engineering

REDACTED

REDACTED

Washington Attorney General (AG) Complaints

# Complaints per 1,000	Complaint Type	Carrier Resolution
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FCC Complaints

# Complaints per 1,000	Complaint Type	Carrier Resolution
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Tab H - Lifeline Advertising - Revised 9/11/07

ETC Name: RCC Minnesota, Inc.

ETC Contact and Phone Number: Steve Otto (320) 808-2479

Lifeline Advertising January 1, 2006-December 31, 2006

REDACTED

CONFIDENTIAL
Per WAC 480-07-160

SEADOC5:291722.1

Firm

Address 1

Address 2

City

State Zip

REDACTED

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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*

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
RECORDS MANAGEMENT UNIT
07 SEP 12 AM 9:28

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

4 7 **Tab F** RCC is in compliance with the CTIA Consumer Code for Wireless
5 Carriers. This statement and the following supplemental statement are made in response
6 to WAC 480-123-070(5) "Certification of compliance with applicable service quality
7 standards." RCC complies with the Cellular Telecommunications and Internet
8 Association's ("CTIA") Consumer Code for Wireless Services ("Code"). Most recently,
9 RCC received confirmation from CTIA that it was compliant with all requirements in the
10 Code for the time period September 9, 2006 through September 9, 2007. RCC
11 conducted internal audits of its operations in Washington to confirm its compliance with
12 the Code. These audits were conducted in May 2006 and again in October 2006 and
13 form the basis for RCC's certification of compliance

14 8 **Tab G** and the following supplemental statement are made in response to WAC
15 480-123-070(6) "Certification of ability to function in emergency situations":

16 RCC provides the following information demonstrating its ability
17 to remain functional in emergency situations consistent with the
18 Commission's standards based on FCC Rule 54.202(a)(2). RCC
19 has reasonable amounts of back-up power to provide functionality
20 without an external power source, and has implemented industry
21 practices to reroute traffic around damaged facilities and manage
22 traffic spikes resulting from emergency situations.

23 Each cell site in the RCC network is equipped with a reasonable
24 amount of battery back-up. Cell sites are engineered for a
25 minimum of four (4) hours of battery standby power in the event of
26 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.

1 The mobile switching center ("MSC") locations are also equipped
2 with battery back-up systems and dedicated automatic start-up
3 generators. The MSC locations are engineered for a minimum of
4 eight (8) hours of battery standby time. RCC regularly monitors its
5 network through a combination of a manned switching center and
6 an automated alarm system that is connected to all network nodes.
7 During non-business hours, the automated alarm system monitors
8 all network elements and pages the responsible on-call technician
9 in the event of an outage. RCC's network switching technicians
10 are located within a reasonable driving distance of the MSC
11 locations. RCC's network field technicians are similarly located in
12 cell site areas. All network technicians are required to be available
13 24 x 7 in the event a network element fails that may need their
14 assistance to repair in a timely manner.

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

26 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

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

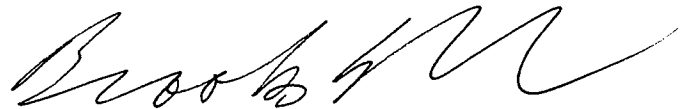
3 9 **Tab H** as certified during the calendar year 2006, RCC advertised the availability
4 of supported services and the charges for them as required by 47 U.S.C. § 214(e), and the
5 Commission Orders in Docket No. UT-023033. [Revised 9/11/07]. As listed in Tab H,
6 outreach activities included newspaper advertising, including newspapers of alternative
7 languages and free to the public, bill messages to existing customers, posters at all retail
8 locations, information posted on Unicef's and USAC's website, outreach mailings,
9 including posters for display, to social service agencies and reservations.

10 10 **Tab I** Service Improvement Plan, October 2007 through September 2008 and
11 the following supplemental statement are intended to satisfy the requirements of WAC
12 480-123-080 – *Confidential*. RCC included a full year of operating costs for cell sites to
13 be constructed in a year rather than pro-rate because a great deal of the operating costs
14 are fully incurred even before a cell site is completed, such as tower or ground leases,
15 electricity, fixed facility costs, site planning costs, etc.

16 11 **Tab J** .jpg version of coverage map previously filed – *Confidential*. Note that an
17 electronic version only of RCC's coverage map has also been filed in a .shp format. [.shp
18 map revised 9/11/07] – *Confidential*.

19 Respectfully submitted this 11th day of September, 2007.

20 Miller Nash LLP

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23 Brooks E. Harlow, P.C.
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24 Attorneys for Rural Cellular Corporation