

STATE OF WASHINGTON
BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

Application of North American Local, LLC
For Designation as a Non-Rural
Wireless Eligible Telecommunications Carrier

Docket No. _____

**APPLICATION OF NORTH AMERICAN LOCAL, LLC FOR DESIGNATION AS A
NON-RURAL WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIER**

North American Local, LLC (“North American Local” or the “Company”), by undersigned counsel, and pursuant to §214(e)(2) of the Communications Act of 1934, as amended (the “Act”), §54.101 through §54.207 of the rules of the Federal Communications Commission (“FCC”), and by Washington Administrative Code, WAC 480-123-030, hereby requests the Washington Utilities and Transportation Commission (“Commission”) designation as a non-rural wireless Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving support from the federal Universal Service Fund (“USF”) to provide wireless service under its Low-Income section for Lifeline Assistance (“Lifeline”) services. North American Local also requests a waiver of the requirements set forth in WAC 480-123-030(d)(f) and (g). As demonstrated in this Application, North American Local meets all the statutory and regulatory requirements for designation as an ETC in the State of Washington. North American Local respectfully requests that the Commission grant this Application expeditiously so that North American Local may begin providing wireless Lifeline service to qualified low-income households at the earliest practicable time.

I. INTRODUCTION

North American Local is a facilities based wireless telecommunications carrier serving the basic telephone needs of consumers. North American Local is a Nevada Limited Liability

Company authorized to do business in Washington, and throughout the requested Designated Service Area. North American Local provides Commercial Mobile Radio Services ("CMRS") to qualifying low income consumers in Alabama and Wisconsin, and proposes to provide these services in Washington (see Exhibit A – Washington Good Standing) All correspondence, communications, pleadings, notices, orders, and decisions relating to this Petition should be addressed to:

RTC Associates LLC
3075 Breckinridge Blvd Suite 425
Duluth GA 30096

II. LEGAL COMPLIANCE

A. The Commission has the Authority to Perform ETC Designations

The Commission has the requisite authority to perform the limited ETC designation requested herein. Section 214(e)(2) of the Communications Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.¹ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier ETC if the carrier satisfies the requirements of Section 214(e)(1). By offering all of the services supported by the federal USF and advertising the availability of such services, North American Local currently meets all of the applicable requirements of Section 214 of the Act, warranting its designation as an ETC by the Commission.

B. ETC Legal Requirements

¹ 47 U.S.C. § 254(e).

Section 254(e) of the Communications Act of 1934 (the “Act”) provides that “only an eligible telecommunications carrier designated under section 214(e) of this title shall be eligible to receive specific Federal Universal Service support.” Section 214(e)(1) and (2) of the Act require state commissions to designate as an ETC, throughout the service area for which ETC status is sought, any common carrier that (i) offers services that are supported by federal universal service support mechanisms, either using its own facilities or a combination of its own facilities and resale of another carrier’s facilities, and (ii) advertises the availability of such services and the charges using media of general distribution.

1. Eligibility and Identification of the Service Area

North American Local is a common carrier as that term is defined in the Act and, as such, is eligible for designation as an ETC.

Section 214(e)(2) of the Act provides that ETC designation shall be made of a “service area” designated by the state commission. Section (214)(e)(5) of the Act provides that the “service area” shall be a “geographic area established by the State commission.” North American Local is seeking ETC authority for its wireless services, consisting of Sprint Wireless coverage areas.

2. Supported Services

Section 214(e)(1)(A) of the Act requires that an ETC offer the services that are supported by the federal universal service support mechanisms (“Supported Services”) either using its own facilities as a combination of its own facilities and resale of another carrier’s services. North American Local will provide each of

these required services identified in 47 C.F.R § 54.101 throughout its designated service area utilizing a combination of its own facilities and the wireless infrastructure of its underlying carriers.

1. Voice-grade access to the public switched telephone network – North American Local will provide its customers with the ability to make and receive calls on the public switched telephone network.
2. Local Usage – “Local usage” means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users.”² The FCC has interpreted its rule as requiring carriers to offer customer’s rate plans with varying amounts of local usage.³ North American Local intends to initially offer qualifying customers a plan with 250 free minutes of local usage. This plan satisfies the “local usage” requirement. Tribal customers will receive 1,000 minutes of service free of charge.
3. Access to emergency services – “Access to emergency services” includes access to services, such as 911 and enhanced 911 (“E911”), provided by local governments or other public safety organizations. All of the phones that North American Local distributes are capable of delivering automatic numbering information (“ANI”) and automatic location information (“ALI”), and otherwise satisfy applicable state and federal E911 requirements.

3. Advertising Support Services

Section 214(e)(1)(B) of the Act requires that an ETC advertise the availability of Supported Services and the related charges using media of general distribution.

ETC’s are also required to publicize the availability of Lifeline services in a manner

² 47 C.F.R. § 54.101(a)(2).

³ See Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 48, 52 II 10 (200).

reasonably designated to reach those likely to qualify for such services.⁴ North American Local will advertise the availability of the Supported Services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. North American Local will use a variety of media resources including but not limited to customer direct mail, customer brochures, television, and print media. North American Local does not use agents to enroll customers for Lifeline. All customers enrollments are done by North American Local employees. In addition, North American Local agrees to comply with all form and content requirements, if any, promulgated by the FCC and this Commission in future and required of all designated ETCs.

4. Provision of Supported Services Throughout the Use of Own Facilities and Resale of Another Carrier's Services

North American Local will provide wireless service through a combination of its own facilities and those of its underlying carrier. In its Lifeline Reform Order, the FCC decided to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC's compliance with certain 911 requirements and the ETC's filing with and approval by the FCC of a compliance plan describing the ETC's adherence to certain protections prescribed by the FCC ("Blanket Forbearance").

⁴ 47 C.F.R. § 54.405(b) and § 54.411(d).

North American Local is not seeking forbearance under the compliance plan rules as it will be utilizing its own network infrastructure to provide service to its customers.

C. Additional Eligibility Criteria

The FCC, in its March 17, 2005 Report and Order establishing additional criteria that all ETC applicants must satisfy in order to be designated as an ETC, which include: (1) a commitment and ability to provide the Supported Services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) commitment to satisfy consumer protection and service quality standards; (4) offering local usage comparable to that offered by the incumbent LEC; and (5) an acknowledgement that it may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designation pursuant to Section 214(e)(4) of the Act.⁵

1. Commitment and Ability to Provide the Supported Services

The requires an ETC to demonstrate its commitment to provide the Supported Services throughout the designated service area by: (A) committing to provide service throughout it designated service area to customers who make a reasonable request for service; and (B) submitting a five-year plan demonstrating how high cost universal service support will be used to improve its coverage, service quality and capacity.

⁵ See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 20 FCC RCD 6371 (2005) ("ETC Order"), at 6386-87.

a. Commitment to Serve all Customers Making a Reasonable Request for Service

If designated as a wireless ETC, North American Local will provide service using its own facilities in combination with its underlying carrier. As North American Local and its underlying wireless carriers are already operational, North American Local will be able to commence offering its Lifeline service programs to all qualified consumers soon after it receives approval from the Commission and upon implementation of procedures and internal systems necessary, such as the distribution of sales materials to authorized agent locations. As a result, North American Local will be able to meet the requirements of 47 C.F.R § 54.202(a)(1).

b. Five Year Service Improvement Plan

The FCC required the filing of a Five Year Service Improvement Plan in 47 C.F.R. § 202. However, the requirement appears to be intended to demonstrate the use of high-cost funds and as such is not applicable to North American Local's request for low-income support from the FUSF.

2. Ability to Remain Functional in Emergency Situations

47 C.F.R § 54.202(a)(2) requires that an ETC provide “a demonstration of the carrier’s ability to remain functional in emergency situations...” Because North American Local’s services will be provided through a combination of its own facilities as those of its underlying carrier, they will be as reliable and provide all of the back-ups and contingency plans of its underlying wireless carriers, which include backup battery power at cell sites to ensure functionality in

emergency situations. North American's facilities include backup power in case of a power outage and generator capacity.

3. Consumer Protection and Commitment to Provide Quality Service

If designated as a wireless ETC, North American Local will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(2), as well as all applicable state specific consumer protection and service quality standards and will commit that all universal service fund support received by North American Local will be directly reflected in the price that the eligible customer pays. In addition, North American Local will certify compliance with the protection of Customer Proprietary Network Information ("CPNI") as required by federal law and with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service as required by 47 C.F.R § 54.202(a)(3). Through a combination of its own network and the network of its wireless partners, North American Local will be able to provide the same quality and reliable service that is currently provided by any other wireless provider. Although no carrier can guarantee that its customers will never experience service disruptions, North American Local's contractual arrangements are designed to minimize any failures, provide alternate call routing, and expedite recovery in the event a failure occurs. North American Local affirms its commitment to continue to satisfy applicable consumer protection and service quality standards if certified as an ETC.

4. Local Usage

An ETC is required to “demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.”⁶ The FCC has explained that the local usage plans of an ETC applicant should be reviewed on a case-by-case basis⁷ in order to ensure that each ETC applicant is providing local usage component as a part of its universal service offering that meets the FCC requirements. With respect to wireless service, to date, the FCC has not quantified an amount of local usage required to be included by an ETC in its universal service offering.⁸ Though North American Local may offer additional plans in the future, its initial Lifeline service offerings will include a free plan providing 250 minutes of local and domestic toll usage. Tribal customer will be given 1000 minutes free of charge.

Lifeline customers can purchase additional bundles of minutes, referred to in North American Local’s general terms and conditions as Replenishment Plans. This local usage plan satisfies the “comparable local usage” requirement.

D. Public Interest

Designation of North American Local as an ETC on a wireless basis is in the public interest of the State of Washington and its low-income telecommunications end-users. Under the 1996 Act, “upon request and consistent with the public interest, convenience and necessity”

⁶ See *Lifeline Reform Order*, ¶ 49

⁷ See ETC Order at 6385, 41133

⁸ See ETC Order at 6385, II 32

the Commission shall “designate more than one common carrier as an eligible telecommunications carrier for a service area designated” by the Commission. In doing so, the Commission shall find that the designation is in the public interest.” The FCC Rules require that an ETC application demonstrate that designation would be consistent with the public interest, convenience and necessity and that prior to designating an ETC pursuant to section 214(e)(6), the Commission shall consider the benefits of increased consumer choice, and the unique advantages...of the applicant’s service offering”.⁹ Pursuant to this requirement, North American Local provides the following information which clearly demonstrates that North American Local’s designation as an ETC on a wireless basis is consistent with the public interest, convenience and necessity providing consumers with increased competitive choice through the offering of a unique service.

The FCC has also identified factors that are to be considered in determining whether designation of additional ETCs will serve the public interest such as whether the benefits of an additional ETC would outweigh potential harms. These factors include: 1) the benefits of increased competitive choice; and 2) the unique advantages and disadvantages of the company’s service offerings. North American Local affirms that its ETC designation meets these criteria as described below.

E. Increased Competitive Choice.

The FCC has determined that while designation of competitive ETCs promotes and benefits consumers by increasing customer choice, designation must include “an affirmative determination that such designation is in the public interest regardless of

⁹ ETC Order at 7 40

whether the applicant seeks designation in an area served by a rural or non-rural carrier.”¹⁰

North American Local is seeking ETC designation on a wireless basis which will provide an additional valuable alternative to the existing more traditional telecommunications services currently available in these areas and will promote competition and facilitate the provision of advanced communications services to low-income residents of Washington.¹¹

The public interest benefits of inclusion of the Company’s wireless service include a nationwide calling area (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage in the event that included usage has been exhausted, 9-1-1 service and, where available, E 9-1-1 service in accordance with current FCC requirements.

The inclusion of toll calling as a part of North American Local’s wireless offering, along with the fact that service is provided on a prepaid basis, will allow consumers to avoid the risk of becoming burdened with large and unexpected charges for toll calling and unexpected overage charges.

Designation of the Company as an ETC on a wireless basis will also provide other carriers serving the same area an incentive to improve their existing networks and service offerings in order to remain competitive, which will result in improved consumer services and will also benefit consumers by allowing North American Local to offer the services designated for support at rates that are “just, reasonable, and affordable.”¹²

¹⁰ See Federal-State Joint Board on Universal Service, 20 FCC Rcd 6371, ¶ 42 (2005)

¹¹ ETC Order at ¶ 4L

¹² See 47 U.S.C. § 254(b)(1)

As provided by the 1996 Act, the availability of basic telecommunications services to low-income consumers is critical to the provision of public health, safety, and other services. In addition, the FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of telecommunications services they provide.¹³ This is of particular interest in cases where wireless providers, such as North American Local, seek to provide services as alternatives to those of the traditional ILEC. In the Highland Cellular case,¹⁴ the FCC recognized and affirmed that some households may not have access to the public switched network as provided by the incumbent local exchange carrier. The availability of a wireless competitor benefits consumers who routinely drive long distances to attend work or school or to accomplish everyday tasks such as shopping or attending community and social events. The wireless service offered by North American Local will provide these consumers with a convenient and affordable alternative to traditional telecommunications service that can be used while at home and away from home.

The Lifeline service offered by North American Local also provides important benefits that are especially needed by low-income Washington residents in this time of economic downturn. The availability of a mobile telephone will be critical to the efforts of the unemployed as they search for other employment opportunities. Without a regular paycheck, wireless telephone service would become a luxury beyond the means of many of those persons.

¹³ See e.g., *Specialized Common Carrier Services*, 29 FCC 2d 870 (1971).

¹⁴ Federal-State Joint Bd. on Universal Serv., Highland Cellular, Inc., *Memorandum Opinion and Order*, 19 F.C.C.R. 6422 (2004).

North American Local's Lifeline programs will enable thousands of residents to obtain wireless service which would otherwise be unavailable to them. The economic circumstances indicate that low-income individuals, now more than ever, can greatly benefit from the advantages offered by North American Local's Lifeline service thus allowing those adversely impacted by the failing economy or job loss to have access to a free wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

It is also a commonly accepted fact that in today's market, qualified Lifeline customers view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location.

Added together, North American Local expects these additional competitive advantages to create an atmosphere that will cause many qualified consumers, at their option, to select the Company's low income wireless Lifeline service in lieu of the more traditional wireline or wireless services.

F. The Unique Advantages of North American Local's Service Offerings.

North American Local will offer a unique, easy to use, competitive and highly affordable wireless telecommunications service, which it will make available to qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional services.

North American Local will announce and advertise telecommunications services as an ETC where it provides service in its Service Area and will publicize the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Washington residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to North American Local's Lifeline supported service.

North American Local will provide universal service as an ETC in all of its Service Area. North American Local is willing to accept carrier of last resort obligations throughout the universal service areas in which North American Local is designated as an ETC by the Commission.

North American Local offers a local usage plan comparable to the one offered by the ILEC in the service areas for which it seeks designation.

G. North American Local's Lifeline Plan.

Lifeline is a component of one of four separate federal universal service fund mechanisms¹⁵ known as the "low-income support mechanism"¹⁶ and is defined in 47 C.F.R. § 54.401 as "a retail local service offering" "available only to qualified low-income consumers" "for which qualifying low-income consumers pay reduced charges as a result of application of the Lifeline support amount" "that includes the services or functionalities enumerated in § 54.401(a)(1) through (a)(3)", which the Company will use to "make available Lifeline

¹⁵ 47 C.F.R. § 54.8(a)(1); See "Definitions" at second sentence

¹⁶ 47 C.F.R. § 54.8(a)(1); See "Definitions" at first sentence

service...to qualifying low-income consumers”.¹⁷ Under the Company’s Basic Lifeline Plan (the “Plan”), North American Local will provide qualified Lifeline customers who reside in the State of Washington with a preset number of free anytime local and long distance minutes each month and will use all low-income universal service support to allow the Company to provide the service with no monthly recurring charge, thus ensuring that the consumer receives 100% of all universal service support funding for which the Company will seek reimbursement. Under the Plan, qualified Lifeline customers will be provided with 250 minutes that do not rollover, which can be used for local and long distance calling. Tribal customers will receive 1000 minutes. In addition, the Plan includes a free 911/E911compliant handset. The ability to text is available with the plan and is charged as 1 text equals 1 minute of usage. In the event that all airtime has been used, Lifeline customers will have the capability of purchasing additional minutes to replenish airtime.

In addition to the Plan, North American affords qualified Lifeline customers the option of applying their Lifeline discount to any of North American Local’s service offerings, to include its Wireless Landline Replacement product or pre-paid minute plans that include data services. When applying the Lifeline discount to these expanded service offerings, the purchase of additional equipment may be required, such as the Wireless Terminal Device or a data capable handset. In the alternative, if the customer already owns equipment that is compatible with North American Local’s network, such equipment can be utilized with these enhanced services offerings provided it meets North American Local’s minimum specifications with respect to 911/E911 compliancy.

¹⁷ 47 C.F.R. §54.401(a)(1), 54 401 (a)(2), , .

Lifeline customers can purchase additional bundles of minutes, referred to in North American Local's general terms and conditions as Replenishment Plans. North American Local's Replenishment plans are available in 30 day increments, and include text messaging and data service. Customers who do not have data capable handsets, such as those included with the Plan, will not have access to data services purchased as a component of these Replenishment Plans. North American Local's Replenishment Plans may also be purchased as standalone pre-paid service plans.

These service plans, available as standalone pre-paid plans or as Replenishment or "top up" minutes, are available for purchase at North American Local's on its website. All low-income universal service support will be used to allow North American Local to provide the Plan with no monthly recurring charge, or provide a Lifeline discount on available service plan offerings, thus ensuring that Lifeline consumers receive the full benefit of the universal service support funding for which North American Local will seek reimbursement. North American Local will not deduct airtime minutes for calls made by Lifeline customers to North American Local's Customer Service, or for calls made by North American Local to such Lifeline customers to address billing, customer care and customer service issues.

All North American Local wireless plans also include the following customer calling features at no additional charge:

- (1) Caller ID
- (2) Call Waiting
- (3) Call Forwarding
- (4) 3-Way Calling
- (5) Voicemail

Under North American Local's proposed Plan offering, each eligible wireless customer will receive a 911/E911 compliant handset. Wireless handsets will be delivered at no charge to qualifying Lifeline customers, service will be activated, and the requisite number of minutes will be added upon certification of the customer for Lifeline. North American Local will not assess Lifeline subscribers an activation fee to enroll in North American Local's Lifeline supported services.

I. Designation of North American Local on a Wireless Basis Will Impose a Negligible Burden on the USF.

North American Local reiterates that it is applying for ETC designation solely for the purpose of providing Lifeline discounts to qualified low-income consumers and to seek reimbursement for the same and will not seek or accept High Cost support. Under the FCC Rules, an ETC applicant must submit a five-year plan that describes with specificity the proposed improvements or upgrades to the applicant's network on a wire-center-by-wire-center basis throughout its proposed Service Area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because North American Local seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline services to eligible customers, submission of a Five-Year Network Improvement Plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunication services for eligible consumers, is distributed on a per-customer basis, and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low-income users, which is clearly in the public interest. In addition, designation of the

Company as an ETC will not pose any adverse effect in the growth in the high cost portions of the USF, nor will it create or contribute to an erosion of high cost funding from any rural or non-rural telephone company.

The FCC reaffirmed this position when it stated that “the potential growth of the fund associated with high-cost support distributed to competitive ETCs” is not relevant to carriers seeking support associated with the low-income program.¹⁸ Accordingly, total low-income support for 2008 accounted for only 11.5 percent of the total distribution of the USF, with high-cost accounting for over 63 percent of the total.¹⁹

The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the fund when it stated that “any increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible participation in the Lifeline programs, furthering the statutory goal of providing access to low-income consumers.”²⁰

It is also vital to recognize that in the case of Lifeline support, an ETC receives USF support *only* for the customers it obtains. In the scenario where a competitive ETC obtains a Lifeline customer from another ETC, only the “capturing” ETC provides a Lifeline discount and as a result, only the “capturing” ETC receives support reimbursement.

In addition, all providers are required to contribute a portion of the interstate revenues received from their customers to the Universal Service Fund. In accordance with current federal regulations, North American Local will make contributions based on that portion of its revenue

¹⁸ Petition of TracFone Wireless, Inc. for Forbearance from 47 U.C.S § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005) (TracFone Forbearance Order) at ¶ 17

¹⁹ 2010 Wireline Competition Bureau, FCC, *Trends in Telephone Service*, Chart 19.1

²⁰ TracFone Forbearance Order, at ¶ 1

that is determined to be interstate. As such, approving North American Local as an ETC will actually create contributions to the USF that were previously non-existent.

J. Waivers Requested

- a. North American Local requests the Commission exempt it from the ETC petition requirements set forth in WAC 480-123-030(d), which states that an ETC petitioner must provide a substantive plan of the investments to be made with the initial federal support and description of how those expenditures will benefit customers. This requirement applies to carriers that seek high-cost support to fund investments to their networks. North American Local seeks designation as an ETC so it can provide only low income support Lifeline services. The company will pass the Lifeline credits on to Lifeline customers. North American Local has no basis for filing an investment plan, and should be exempt from this requirement.
- b. North American Local also seeks exemption from the requirements set forth in WAC 480-123-030(f), which requires wireless petitioners to provide 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. As discussed above, North American Local will be reselling the wireless services of its underlying carrier and, where necessary for coverage, the services of other Tier 1 wireless carriers. As a reseller, North American Local's coverage area encompasses the aggregate coverage areas of its underlying carriers in Washington. North American Local does not have access to the underlying carriers' lists of geographic service area maps of service areas showing the locations of cell sites. In addition, the underlying carriers' maps are subject to non-disclosure agreements. North American Local does not have the

permission of its underlying carriers to provide coverage maps to the Commission. Given that North American Local does not have access to the maps, the Company requests an exemption from the requirement to provide coverage maps. The coverage map that is enclosed as Exhibit B, is publicly available map from its underlying carrier showing the areas of coverage. This map does not show the details requested in WAC 480-123-030(f).

CONCLUSION

North American Local respectfully requests designation as an ETC for the Designated Service Area for purposes of receiving federal Lifeline universal service support. Dated this 1st day of August, 2015.

Respectfully Submitted,

North American Local LLC

By: Kenny Perkins

EXHIBIT A

EXHIBIT B

UNITED STATES OF AMERICA

The State of



Washington

Secretary of State

I, **KIM WYMAN**, Secretary of State of the State of Washington and custodian of its seal, hereby issue this

CERTIFICATE OF REGISTRATION

to

NORTH AMERICAN LOCAL LLC

a/an NV Limited Liability Company. Charter documents are effective on the date indicated below.

Date: 8/19/2015

UBI Number: 603-534-714

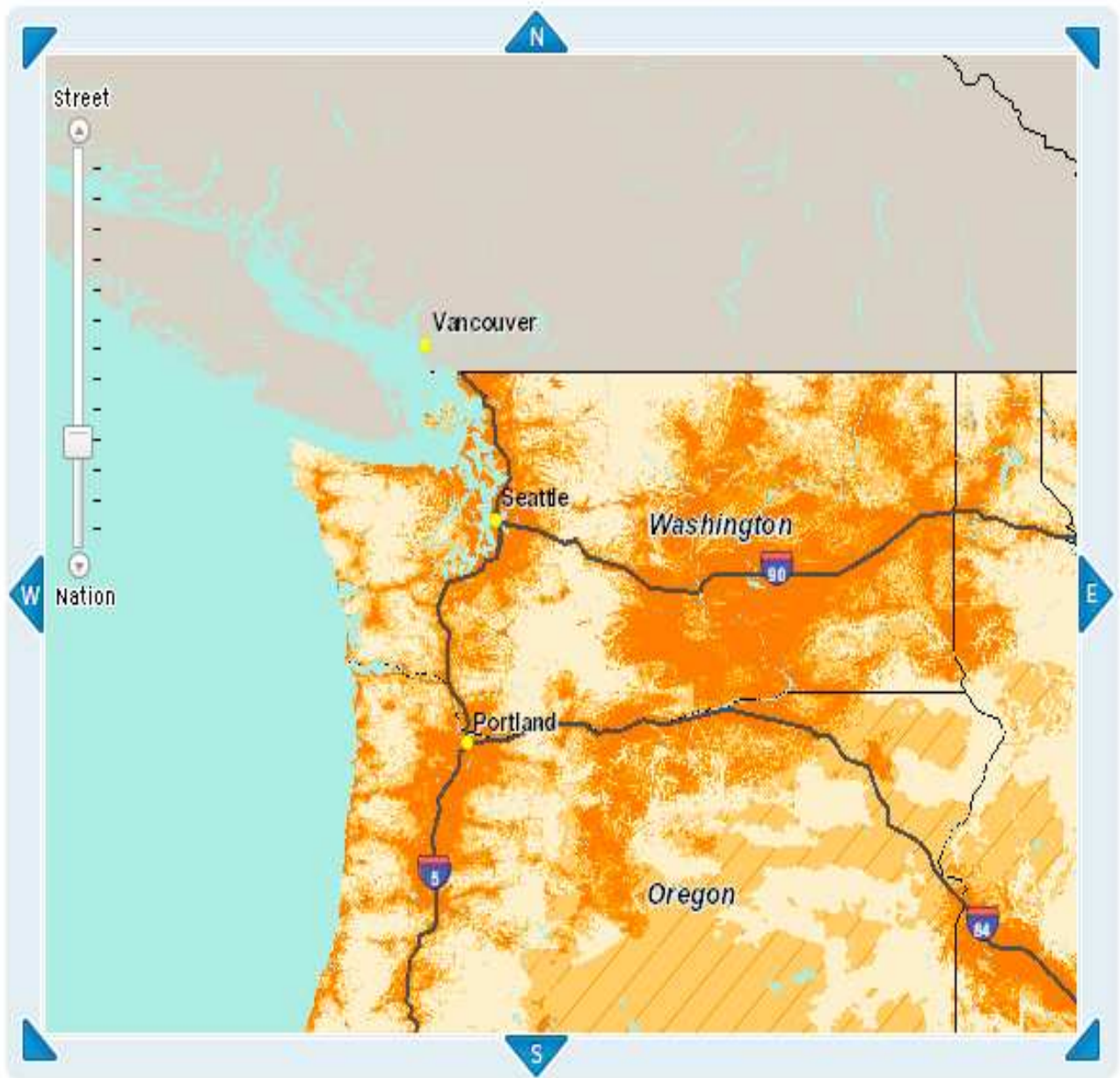


Given under my hand and the Seal of the State of Washington at Olympia, the State Capital

Handwritten signature of Kim Wyman in black ink.

Kim Wyman, Secretary of State

Date Issued: 8/21/2015



Voice Coverage Legend

- Best ☐
- Good ☐
- Moderate ☐
- Requires 3G Capable Handset
- Partner ☐
- No Service Available