

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKET UT-073023
)	
)	ORDER 01
SPRINT NEXTEL CORPORATION)	
)	ORDER DESIGNATING SPRINT
)	NEXTEL CORPORATION AS AN
To Amend Its Designation as an)	ELIGIBLE
Eligible Telecommunications Carrier)	TELECOMMUNICATIONS
and Request for an Exemption from)	CARRIER; DENYING PETITION FOR
WAC 480-123-070(6) and WAC 480-)	PERMANENT EXEMPTION FROM
123-030(1)(g))	WAC 480-123-070(6); GRANTING
)	PARTIAL EXEMPTION FROM
)	WAC 480-123-030(1)(g) AND
)	WAC 480-123-070(6) SUBJECT TO
)	CONDITION
.....)	

BACKGROUND

- 1 Sprint Nextel Corporation (Sprint or Company) is a telecommunications carrier operating in the state of Washington. The Company was formed in August 2005 by the merger of Sprint Corporation and Nextel Communications, Inc. (Nextel).¹
- 2 The Washington Utilities and Transportation Commission (Commission) first designated Sprint Corporation as an eligible telecommunications carrier (ETC) on October 29, 2003, in Docket UT-031558. On January 13, 2005, in Docket UT-043120, the Commission increased the geographic service area for which Sprint Corporation is designated an ETC.
- 3 On May 7, 2007, Sprint filed a petition with the Commission to: (1) consolidate its ETC designation under the name of Sprint Nextel Corporation, (2) expand the Company’s ETC designation to include 18 exchange areas for which it has not been designated previously, (3) expand existing designations for partial exchanges to full

¹ Sprint and its operating subsidiaries and affiliates -- Sprint PCS; SprintCom, Inc.; Sprint Spectrum, L.P.; WirelessCo, L.P.; and Nextel West Corporation -- provide commercial mobile radio services (CMRS) in Washington.

exchanges, and (4) include all eligible Sprint customers, including those served by the pre-merger Nextel Communications, Inc. (Nextel) network and residing within existing ETC service areas, for the purpose of obtaining access to federal universal service funds (FUSF).

4 Sprint also requested a permanent exemption from its obligation under WAC 480-123-030(1)(g), which requires a wireless carrier to maintain four hours of battery power at its cell sites, back-up generators at each microwave hub, and at least five hours of back-up battery power and back-up generators at each switch in its ETC service area in Washington (back-up power requirements).²

5 Under federal law, state regulatory commissions have the responsibility to evaluate and approve petitions filed by telecommunications carriers seeking to be designated as ETCs in order to obtain access to FUSF.³ To be eligible to receive FUSF, petitioning carriers must demonstrate that they will offer services supported by universal service funding using their own facilities or through resale of another carrier's services. Petitioners must also demonstrate that they advertise the availability of their services using media of general distribution.⁴ In Washington, petitioning carriers must also satisfy the requirements of WAC 480-123-010 through WAC 480-123-080 before being designated as an ETC.

6 Sprint's petition was brought before the Commission at its regularly scheduled meetings on July 11 and October 10, 2007.

7 As discussed in more detail below, we find that Sprint's petition to amend its existing ETC designation adequately meets these federal and state requirements.

DISCUSSION

8 The Federal Communications Commission (FCC) oversees virtually all aspects of the FUSF program, including administration of funding and the process used to compensate ETCs. The states evaluate the merits of petitions for ETC designation.

² Sprint received a temporary exemption from WAC 480-123-070(6) in Docket UT-063066, which requires ETCs to certify substantial compliance with service quality standards set forth in WAC 480-123-030(1)(h), which in turn requires that petitions for ETC designation contain information demonstrating an ETC's ability to remain functional in emergency situations.

³ 47 C.F.R. § 214(e)(2).

⁴ 47 C.F.R. § 214(e)(1).

In Washington, the Commission will approve a petition for ETC designation if it determines the filing satisfies the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.

- 9 In this docket, Sprint requests that we modify the scope of its existing ETC designation as a consequence of its merger with Nextel, another wireless carrier.⁵ The Commission has already designated Sprint's predecessor as an ETC for areas served by rural and non-rural incumbent telephone companies. In the instant petition, Sprint asserts that, except for the back-up power requirements of WAC 480-123-030(1)(g), it satisfies each of the requirements for ETC designation for each of the incumbent local exchange carrier (ILEC) wire centers for which it seeks designation.
- 10 The Washington Independent Telephone Association (WITA) opposes Sprint's petition. WITA asserts that a significant portion of the anticipated incremental increase in Sprint's FUSF if the petition is granted will be invested in network facilities in the more urban areas of Washington. This, WITA contends, is contrary to the public interest because the purpose of the FUSF is to promote the delivery of universal service in the more rural areas of the state.
- 11 In support of its position, WITA submitted and discussed briefly two studies released by Criterion Economics, L.L.C., that are highly critical of the provision of FUSF to wireless carriers. We note these studies reflect broad observations regarding the current universal service federal mechanism which allows multiple providers in rural areas to receive FUSF, including wireless carriers. Moreover, the studies do not address the merits of Sprint's petition nor its compliance with existing federal and state law relating to ETC designations.
- 12 Given that the Commission previously determined that designating Sprint as an ETC was in the public interest and advanced the purpose of universal service, we find WITA's arguments unpersuasive as to the merits of Sprint's petition to expand its ETC designation. Expansion of Sprint's current ETC designation to include 18 additional exchange areas and expansion of its existing designations for partial exchanges to full exchanges meets the public interest standard, as did Sprint's original ETC designation. In its petition, Sprint demonstrates that it satisfies each of the

⁵ Sprint's request is not a case of first impression for the Commission. In Docket UT-043011, the Commission approved the petition of Cingular Wireless, LLC, for designation as an ETC as a result of its merger with AT&T Wireless.

prerequisites for designation as an ETC. Sprint is capable of providing, and currently does provide, the nine supported services set forth in 47 C.F.R. § 54.101(a)(1)-(a)(9) in each of the requested exchange areas. Sprint will continue to offer and advertise the availability of the supported services, consistent with our ETC rules.

- 13 We are mindful of the ongoing national debate about the FUSF program, including increasing concerns about the scope and scale of the fund that underlie the dissenting opinion. However, we do not view this docket as the appropriate forum in which to address such concerns. As we have noted elsewhere, the Commission does not have the authority to effect federal universal service fund reform.⁶
- 14 We agree with the dissent that the Commission has an obligation to oversee the ETC designation process and to assure accountability for the appropriate expenditure of FUSF. That was the primary objective in our adoption of WAC 480-123-010 et. seq, which provides the structure for such oversight. While noting broad policy concerns (which we share), the dissent does not discuss how Sprint's petition fails to comply with either our rules or federal rules for ETC designation.
- 15 ETC petitioners are entitled to due process, which includes equitable, consistent application of the rules. The objections the dissent raises can be levied against many existing ETC's. That is why it is difficult to address the dissent's fundamental policy concerns on a case-by-case basis.
- 16 Finally, the broad policy issues are not addressed by denying the petition, but the public interest in our state would be harmed. Denial would make no measurable difference in what Washington ratepayers pay to support the FUSF or in the overall fiscal condition of the FUSF. Denial would mean, however, that funds that would otherwise benefit Washington residents by supporting investment in our state's telecommunication network will go instead to other states.
- 17 Of course, if and when the FCC or Congress reforms the FUSF, the Commission will implement the new regime to the best of our abilities. In the meantime, we must work within the framework as we find it.

⁶ Docket UT-073032, Order 01, Denying Petition of the Washington Independent Telephone Association for a Moratorium on Designation of Competitive Eligible Telecommunications Carriers.

- 18 Sprint further requests a waiver of WAC 480-123-030(1) (g) and WAC 480-123-070(6) for the Integrated Dispatch Enhanced Network (iDEN) portion of its wireless network that was previously associated with Nextel.⁷ Sprint states that its iDEN cell sites are presently equipped with a minimum of two hours of battery standby power, rather than the four hours required by rule. Similarly, Sprint's iDEN main switching center (MSC) locations are equipped with three hours of battery back-up, rather than the five hours required by rule. For its cell sites, Sprint notes that it augments its battery back-up with portable generators and other equipment that are staged at key locations throughout its service area. At MSC locations, Sprint has deployed on-site generators and a seventy-two hour fuel supply. Additionally, Sprint states that it follows the wireless industry practice of using towed generators to supplement circumstances where back-up battery power will not maintain operation of a cell site.
- 19 The primary issue raised by Sprint's request for an exemption from the Commission's back-up power rule is whether we should require the Company to come into compliance with the rule within a reasonable period of time as a condition of allowing Sprint to expand its ETC designation. As noted above, that designation entitles the Company access to FUSF. For Sprint to continue to receive FUSF support, the Commission must certify to the FCC that Sprint "will use federal high-cost universal service fund support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended."⁸ Sprint cannot obtain that certification if it does not comply with WAC 480-123-030(1) (g) and WAC 480-123-070(6) or receive an exemption from the applicable rules.
- 20 WITA contends the Commission should deny Sprint's petition because "[t]here is no good reason to allow Sprint Nextel to receive universal service funds when it cannot meet the minimum emergency backup requirements set out by the Commission."⁹ WITA also points generally to "problems" experienced during the December 2006 windstorm in Washington as well as the FCC's recent order on the recommendations

⁷ iDEN is a mobile telecommunications technology which provides its users the benefits of a "push to talk" trunked radio and a cellular telephone. iDEN places more users in a given spectral space, compared to analog cellular and two-way radio systems, by using speech compression and time division multiple access (TDMA).

⁸ 47 C.F.R. § 54.313, and 47 C.F.R. § 54.314.

⁹ WITA comments, at 5.

of the independent panel that reviewed the impact of Hurricane Katrina on telecommunications infrastructure.¹⁰

- 21 As noted above, Sprint merged with Nextel approximately two years ago. The pre-merger Sprint network is substantially in compliance with our rules concerning back-up power; the only exception is a single microwave hub that does not have the required back-up generator as required by our rules.¹¹ In comparison, approximately 36 percent of the pre-merger Nextel network cell sites are not in compliance with our back-up power rules because they had fewer than four hours of battery back-up power available at the time of Sprint's filing. If we do not grant an exemption request, we would have to deny the Company's petition for expansion of its ETC designation. We would also be required to deny the annual certification to the FCC that Sprint needs to remain eligible to receive FUSF support.
- 22 In its petition, Sprint sought a permanent exemption from Commission rules regarding battery back-up power. At the suggestion of Commission Staff, Sprint indicated that it will accept and comply with a temporary exemption from the back-up power requirements. Specifically, the Company agreed to bring all of its back-up power facilities into compliance with WAC 480-123-070(1)(g) within two years of the effective date of this Order.
- 23 Sprint's situation is analogous to that of Cingular, which requested the very exemption Sprint has requested here, following Cingular's merger of two wireless networks in 2006.¹² There, as here, Cingular was an amalgam of two wireless networks that had been created with differing power standards for cell sites. In response to Cingular's request, we granted a temporary exemption from WAC 480-123-070(1)(g) and required the company to bring its network facilities into full compliance with our ETC designation rules within two years of the effective date of our order. We also noted in Cingular, that the benefit to subscribers from requiring the combined company to comply immediately with the battery power requirements in WAC 480-123-030(1)(g) was outweighed by the cost, which would have limited the federal support available to Cingular for increasing network coverage and capacity. As with Cingular, we must weigh the benefits and costs related to requiring

¹⁰ *In the Matter of Recommendation of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, EB Docket No. 06-119, WC Docket No. 06-63, Order, FCC 07-107 (rel. June 8, 2007).

¹¹ Docket UT-073015, Order 01.

¹² Docket UT-063060, Order 01.

Sprint's immediate compliance with our back-up power requirements. We are persuaded to make a similar determination here.

24 We therefore deny Sprint's request for a permanent exemption from WAC 480-123-070(6), but conclude it is in the public interest to grant the Company a reasonable period of time to increase back-up power to four or more hours at all cell sites. Consistent with our grant of an exemption for Cingular, we also grant Sprint the option of meeting the back-up battery requirements of our rules either through batteries, or with back-up power from fixed generators or fuel cells. We grant the Company a temporary exemption from WAC 480-123-030(1)(g) regarding the requirement for battery back-up power for a period of two years, subject to the condition that the Company must increase to four hours, alternative power (battery, fixed generation, or fuel cells) at all cell sites that now have fewer than four hours of alternative power.

SUMMARY FINDINGS AND CONCLUSIONS

25 From the foregoing, the Commission finds and concludes:

- 26 (1) The Commission has jurisdiction over Sprint and the subject matter of this proceeding. *47 U.S.C. § 214(e); RCW 80.36.610.*
- 27 (2) Designating Sprint as an ETC for 18 additional exchanges, and for the entire area of exchanges for which Sprint was designated previously, is in the public interest.
- 28 (3) Customers in the ETC service areas of the pre-merger Nextel are receiving service from an ETC.
- 29 (4) The Commission's rules in WAC 480-123 governing ETCs require them to maintain four hours of battery back-up power at cell sites in their ETC designated areas in Washington.
- 30 (5) Sprint would incur substantial costs to increase to four hours the amount of battery power at all of its cell sites that do not have four hours of battery power.

- 31 (6) The benefit to subscribers from requiring Sprint to comply at this time with the battery power requirements in WAC 480-123-030(1)(g) is outweighed by the potential impact of reduced infrastructure and services that would result from the reduced federal support available to Sprint for increasing network coverage and capacity.
- 32 (7) Given the balance of costs and benefits of complying with the battery back-up requirements of WAC 480-123, the public interest is better served by deferring for two years the requirement that Sprint bring all cell sites up to the four hour back-up power standard.
- 33 (8) The balance of costs and benefits of complying with the battery back-up requirements of WAC 480-123 coupled with the availability of alternative sources of back-up power support a temporary exemption from the rule to allow Sprint to use batteries, fixed power generators, or fuels cells to meet the back-up power requirements of the rule for both priority and non-priority cell sites.
- 34 (9) A partial exemption from WAC 480-123-070(6) and WAC 480-123-030(1)(g), subject to certain conditions to protect the public, is consistent with the public interest, the purposes underlying regulation, and applicable statutes.

ORDER

THE COMMISSION ORDERS:

- 35 (1) Sprint Nextel Corporation is designated as an eligible telecommunications carrier for the areas that correspond to the exchanges listed in Appendices A and B to this Order.
- 36 (2) Sprint Nextel Corporation's petition for a permanent exemption from WAC 480-123-070(6) is denied.
- 37 (3) Sprint Nextel Corporation is granted a partial exemption from the battery power requirements of WAC 480-123-030(1)(g) and the certification requirements of WAC 480-123-070(6) regarding the requirement for battery back-up power at cell sites for a period of two years from the date of this Order, subject to the following condition:

Within two years of the date of this Order, the Company must provide four hours of back-up at all cell sites using reliable alternative power sources (battery, fixed generation or fuel cells).

DATED at Olympia, Washington, and effective October 23, 2007.

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

MARK H. SIDRAN, Chairman

PATRICK J. OSHIE, Commissioner

PHILIP B. JONES, Commissioner (dissenting):

38 I respectfully disagree with the majority opinion. The primary reason is that I do not believe we should be approving more funding for a federal program that is fundamentally broken and in need of serious repair. We all agree that the federal high-cost fund is dysfunctional. Moreover, the Joint Board on Universal Service is prepared to take action in the near future to either control the rapid growth in expenditures for this program, or set forth fundamental reforms to the structure of this program. Since this is a joint federal-state board that includes federal officials and respected state commission colleagues, it is premature to act on Sprint Nextel's petition until we have a chance to review the Joint Board's recommendations and analysis.¹³

¹³ Since there is no rulemaking or other docket open at the Commission presently focused addressing the general policy of designating ETCs, and none is expected in the near future, this is the appropriate forum in which to debate and discuss these issues. We have no choice but to address these issues in the context of individual ETC applications or the annual re-certification process.

39 The federal universal service fund (FUSF) program is a unique creature that is designed at the federal level but largely implemented at the state level.¹⁴ Each state must take its responsibility seriously and exercise due diligence on both the designation of ETCs and oversight of the carriers' activities. The Joint Board recently set forth some important principles for how to reform the program.¹⁵ The statement recognized the need for federal support of voice, broadband, and mobility, but also emphasized the principles of cost controls and accountability. Does the majority action today meet the standard of rigorous cost controls and accountability? My reluctant answer is no.

40 I am concerned about the lack of vigorous oversight by our Commission and attention to the principles of cost control and accountability set forth by the Joint Board. According to recent USAC data, our state's carriers now receive over \$100 million in FUSF funding, split quite evenly between wireless carriers and incumbent wireline carriers. These are fungible investment dollars that are largely commingled with other company revenues as they fund their capital expenditures and operations to run a telephone network. The wireless carriers' share of the funding has grown rapidly in recent years, and most rural exchanges in our state now have multiple carriers providing service. As with most federal subsidies, once we approve funding for them the recipients tend to regard them as their birthright and begin to depend on them as a certain source of revenue in the future. When the federal program is reformed, I believe the level of support ultimately will be reduced and better targeted to truly unserved or seriously underserved areas. It will be difficult then for our Commission to reduce funding for carriers such as Sprint Nextel. In sum, I prefer to err on the side of caution in approving more federal subsidies from the federal treasure chest, especially when I believe we will soon have to retrieve some of these subsidies and put them back in the chest. In my view, we are making our job to reform this dysfunctional program even more difficult in the future by taking the action in this Order.

¹⁴ If a state commission refuses to implement the ETC designation process, the process devolves to the FCC.

¹⁵ *Federal-State Joint Board on Universal Service Statement on Long Term, Comprehensive High-Cost Universal Service Reform*, WC Docket No. 05-337, CC Docket No. 96-45, FCC 07J-3, Released: September 6, 2007.

41 Therefore, I respectfully dissent.

PHILIP B. JONES, Commissioner

Appendix A
Additional Exchanges for which Sprint is Designated an ETC

ILEC	EXCHANGE
UNITED TELEPHONE - NORTHWEST	BRINNON
CENTURYTEL OF WASHINGTON, INC.	CONNELL
CENTURYTEL OF COWICHE, INC.	COWICHE
VERIZON NORTHWEST INC.-WA	WATERVILLE
UNITED TELEPHONE - NORTHWEST	GOLDENDALE
ELLENSBURG TELEPHONE CO.	LAUDERDALE
VERIZON NORTHWEST INC.	NACHES
VERIZON NORTHWEST INC.-WA	NEWPORT
QWEST CORPORATION	OTHELLO
QWEST CORPORATION	PATEROS
CENTURYTEL OF COWICHE, INC.	RIMROCK
CENTURYTEL OF COWICHE, INC.	TIETON
VERIZON NORTHWEST INC.-WA	CHELAN
VERIZON NORTHWEST INC.-WA	ENTIAT
VERIZON NORTHWEST INC.-WA	MANSON
VERIZON NORTHWEST INC.	SUMAS
UNITED TELEPHONE - NORTHWEST	WILLARD
YCOM NETWORKS, INC.	YELM (Bald Hills)

Appendix B
Exchanges for which Sprint's ETC Designation
is Expanded to Encompass the Entire Exchange

ILEC	EXCHANGE
ASOTIN TELEPHONE CO.	ASOTIN
CENTURYTEL OF INTER-ISLAND INC.	BLAKELY
CENTURYTEL OF INTER-ISLAND INC.	EAST SOUND
CENTURYTEL OF INTER-ISLAND INC.	FRIDAY HARBOR
CENTURYTEL OF WASHINGTON INC.	AMES LAKE
CENTURYTEL OF WASHINGTON INC.	ARLETTA
CENTURYTEL OF WASHINGTON INC.	ASHFORD
CENTURYTEL OF WASHINGTON INC.	BASIN CITY
CENTURYTEL OF WASHINGTON INC.	CARNATION
CENTURYTEL OF WASHINGTON INC.	CHENEY
CENTURYTEL OF WASHINGTON INC.	CURTIS
CENTURYTEL OF WASHINGTON INC.	EDWALL-TYLER
CENTURYTEL OF WASHINGTON INC.	ELMA
CENTURYTEL OF WASHINGTON INC.	ELTOPIA
CENTURYTEL OF WASHINGTON INC.	EUREKA
CENTURYTEL OF WASHINGTON INC.	FALL CITY

ILEC	EXCHANGE
INC.	
CENTURYTEL OF WASHINGTON INC.	GIG HARBOR
CENTURYTEL OF WASHINGTON INC.	KINGSTON
CENTURYTEL OF WASHINGTON INC.	LAKE QUINAULT
CENTURYTEL OF WASHINGTON INC.	LAKEBAY
CENTURYTEL OF WASHINGTON INC.	LIND
CENTURYTEL OF WASHINGTON INC.	MATHEWS CORNER
CENTURYTEL OF WASHINGTON INC.	MCCLEARY
CENTURYTEL OF WASHINGTON INC.	MEDICAL LAKE
CENTURYTEL OF WASHINGTON INC.	MESA
CENTURYTEL OF WASHINGTON INC.	MONTESANO
CENTURYTEL OF WASHINGTON INC.	NORTH BEND
CENTURYTEL OF WASHINGTON INC.	OCOSTA
CENTURYTEL OF WASHINGTON INC.	ORTING
CENTURYTEL OF WASHINGTON INC.	REARDAN
CENTURYTEL OF WASHINGTON INC.	RITZVILLE-BENGE
CENTURYTEL OF WASHINGTON INC.	ROYAL CITY
CENTURYTEL OF WASHINGTON INC.	SNOQUALMIE PASS
CENTURYTEL OF WASHINGTON INC.	SOUTH PRAIRIE

ILEC	EXCHANGE
CENTURYTEL OF WASHINGTON INC.	SPANGLE
CENTURYTEL OF WASHINGTON INC.	SPRAGUE
CENTURYTEL OF WASHINGTON INC.	VADER
CENTURYTEL OF WASHINGTON INC.	VASHON
CENTURYTEL OF WASHINGTON INC.	WILSON CREEK
ELLENSBURG TELEPHONE CO.	ELLENSBURG
ELLENSBURG TELEPHONE CO.	KITITAS
ELLENSBURG TELEPHONE CO.	SELAH
ELLENSBURG TELEPHONE CO.	THORP
ELLENSBURG TELEPHONE CO.	VANTAGE
HAT ISLAND TELEPHONE CO.	HAT ISLAND
HOOD CANAL TELEPHONE CO.	UNION
INLAND TELEPHONE CO.	ROSLYN
INLAND TELEPHONE CO.	UNIONTOWN
KALAMA TELEPHONE CO.	KALAMA
LEWIS RIVER TELEPHONE COMPANY	LACENTER
MASEHLL TELECOM, INC.	EATONVILLE
MCDANIEL TELEPHONE COMPANY	ONALASKA
MCDANIEL TELEPHONE COMPANY	SALKUM
QWEST CORPORATION	ABERDEEN-HOQUIAM
QWEST CORPORATION	AUBURN
QWEST CORPORATION	BAINBRIDGE ISLAND
QWEST CORPORATION	BATTLE GROUND
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

ILEC	EXCHANGE
QWEST CORPORATION	CHEHALIS
QWEST CORPORATION	CLE ELUM
QWEST CORPORATION	COLFAX
QWEST CORPORATION	COPALIS
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	HOODSPORT
QWEST CORPORATION	ISSAQUAH
QWEST CORPORATION	KENT
QWEST CORPORATION	LIBERTY LAKE
QWEST CORPORATION	LONGVIEW
QWEST CORPORATION	MAPLE VALLEY
QWEST CORPORATION	MOSES LAKE
QWEST CORPORATION	NEWMAN LAKE
QWEST CORPORATION	OLYMPIA
QWEST CORPORATION	PASCO
QWEST CORPORATION	PORT ANGELES
QWEST CORPORATION	PORT LUDLOW
QWEST CORPORATION	PORT ORCHARD
QWEST CORPORATION	PORT TOWNSEND
QWEST CORPORATION	PUYALLUP
QWEST CORPORATION	RENTON
QWEST CORPORATION	RIDGEFIELD
QWEST CORPORATION	ROCHESTER
QWEST CORPORATION	ROY
QWEST CORPORATION	SEATTLE
QWEST CORPORATION	SEQUIM
QWEST CORPORATION	SHELTON
QWEST CORPORATION	SILVERDALE
QWEST CORPORATION	SPOKANE
QWEST CORPORATION	SUMNER

ILEC	EXCHANGE
QWEST CORPORATION	SUNNYSLOPE
QWEST CORPORATION	TACOMA
QWEST CORPORATION	VANCOUVER
QWEST CORPORATION	WALLA WALLA
QWEST CORPORATION	WARDEN
QWEST CORPORATION	WINLOCK
QWEST CORPORATION	YAKIMA
ST. JOHN TELEPHONE CO.	ST JOHN
TENINO TELEPHONE CO.	TENINO
TOLEDO TELEPHONE CO. INC.	TOLEDO
UNITED TELEPHONE-NORTHWEST	BICKLETON
UNITED TELEPHONE-NORTHWEST	CHIMACUM
UNITED TELEPHONE-NORTHWEST	COLUMBIA
UNITED TELEPHONE-NORTHWEST	DALLESFORT
UNITED TELEPHONE-NORTHWEST	GARDINER
UNITED TELEPHONE-NORTHWEST	GRANDVIEW
UNITED TELEPHONE-NORTHWEST	GRANGER
UNITED TELEPHONE-NORTHWEST	HARRAH
UNITED TELEPHONE-NORTHWEST	LYLE
UNITED TELEPHONE-NORTHWEST	MABTON
UNITED TELEPHONE-NORTHWEST	MATTAWA
UNITED TELEPHONE-NORTHWEST	PATERSON
UNITED TELEPHONE-NORTHWEST	POULSBO
UNITED TELEPHONE-NORTHWEST	PROSSER
UNITED TELEPHONE-NORTHWEST	QUILCENE
UNITED TELEPHONE-NORTHWEST	ROOSEVELT
UNITED TELEPHONE-NORTHWEST	STEVENSON
UNITED TELEPHONE-NORTHWEST	TOPPENISH
UNITED TELEPHONE-NORTHWEST	WAPATO
UNITED TELEPHONE-NORTHWEST	WHITE SALMON
UNITED TELEPHONE-NORTHWEST	WHITE SWAN
UNITED TELEPHONE-NORTHWEST	WHITSTRAN
UNITED TELEPHONE-NORTHWEST	WISHRAM
UNITED TELEPHONE-NORTHWEST	ZILLAH
VERIZON NORTHWEST INC.	ACME
VERIZON NORTHWEST INC.	ALGER
VERIZON NORTHWEST INC.	BIG LAKE

ILEC	EXCHANGE
VERIZON NORTHWEST INC.	BLAINE
VERIZON NORTHWEST INC.	CONWAY
VERIZON NORTHWEST INC.	CUSTER
VERIZON NORTHWEST INC.	DEMING
VERIZON NORTHWEST INC.	EDISON
VERIZON NORTHWEST INC.	EVERSON
VERIZON NORTHWEST INC.	FRENDALE
VERIZON NORTHWEST INC.	GRAYLAND
VERIZON NORTHWEST INC.	LACONNER
VERIZON NORTHWEST INC.	LAUREL
VERIZON NORTHWEST INC.	LYNDEN
VERIZON NORTHWEST INC.	WESTPORT
VERIZON NORTHWEST INC. -WA	ANACORTES
VERIZON NORTHWEST INC. -WA	ARLINGTON
VERIZON NORTHWEST INC. -WA	BENTON CITY
VERIZON NORTHWEST INC. -WA	BOTHELL
VERIZON NORTHWEST INC. -WA	BURLINGTON
VERIZON NORTHWEST INC. -WA	CAMAS
VERIZON NORTHWEST INC. -WA	CAMAS-WASHOUGAL
VERIZON NORTHWEST INC. -WA	CASHMERE
VERIZON NORTHWEST INC. -WA	COUPEVILLE
VERIZON NORTHWEST INC. -WA	EVERETT
VERIZON NORTHWEST INC. -WA	GEORGE
VERIZON NORTHWEST INC. -WA	GRANITE FALLS
VERIZON NORTHWEST INC. -WA	HALLS LAKE
VERIZON NORTHWEST INC. -WA	KENNEWICK
VERIZON NORTHWEST INC. -WA	KIRKLAND
VERIZON NORTHWEST INC. -WA	LEAVENWORTH
VERIZON NORTHWEST INC. -WA	MARYSVILLE
VERIZON NORTHWEST INC. -WA	MONROE
VERIZON NORTHWEST INC. -WA	MOUNT VERNON
VERIZON NORTHWEST INC. -WA	OAK HARBOR
VERIZON NORTHWEST INC. -WA	PULLMAN
VERIZON NORTHWEST INC. -WA	QUINCY
VERIZON NORTHWEST INC. -WA	RICHLAND
VERIZON NORTHWEST INC. -WA	RICHMOND BEACH
VERIZON NORTHWEST INC. -WA	ROSALIA

ILEC	EXCHANGE
VERIZON NORTHWEST INC. -WA	SEDRO WOOLLEY
VERIZON NORTHWEST INC. -WA	SILVER LAKE
VERIZON NORTHWEST INC. -WA	SNOHOMISH
VERIZON NORTHWEST INC. -WA	SOAP LAKE
VERIZON NORTHWEST INC. -WA	STANWOOD
VERIZON NORTHWEST INC. -WA	SULTAN
VERIZON NORTHWEST INC. -WA	WENATCHEE
VERIZON NORTHWEST INC. -WA	WOODLAND
WHIDBEY TELEPHONE CO.	PORT ROBERTS (LANGLEY)
WHIDBEY TELEPHONE CO.	SOUTH WHIDBEY
YCOM NETWORKS, INC.	RAINIER
YCOM NETWORKS, INC.	YELM