

**Before the
Washington Utilities and Transportation Commission**

In the Matter of Amending the Designation)	Docket No. _____
of AT&T Wireless PCS of Cleveland,)	
LLC; AT&T Wireless Services of)	
Washington, LLC; Spokane Cellular)	
Telephone Company; Yakima Cellular)	
Telephone Company; Bremerton Cellular)	PETITION TO AMEND THE
Telephone Company; Olympia Cellular)	DESIGNATION
Telephone Company, Inc.; Bellingham)	AS AN ELIGIBLE
Cellular Partnership and Hood River)	TELECOMMUNICATIONS
Cellular Telephone Company, Inc.)	CARRIER
)	
For Designation as an Eligible)	
Telecommunications Carrier)	
Under 47 U.S.C. § 214(e)(2))	
)	
)	

Bellingham Cellular Partnership; Bremerton Cellular Telephone Company, Hood River Cellular Telephone Company; New Cingular Wireless PCS, LLC; and, Olympia Cellular Telephone Company, subsidiaries of Cingular Wireless LLC (herein after referred to as “Cingular”) respectfully request that the Washington Utilities and Transportation Commission (“Commission”) amend the Designation previously obtained by AT&T Wireless PCS of Cleveland, LLC; AT&T Wireless Services of Washington, LLC; Spokane Cellular Telephone Company; Yakima Cellular Telephone Company; Bremerton Cellular Telephone Company; Olympia Cellular Telephone Company, Inc.; Bellingham Cellular Partnership and Hood River Cellular Telephone Company, Inc., subsidiary licensees of AT&T Wireless Service, Inc. (herein after referred to as “AWS”), as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (“Act”)

I. Background

1. AT&T Wireless PCS of Cleveland, LLC; AT&T Wireless Services of Washington, LLC; Spokane Cellular Telephone Company; Yakima Cellular Telephone Company; Bremerton Cellular Telephone Company; Olympia Cellular Telephone Company, Inc.; Bellingham Cellular Partnership and Hood River Cellular Telephone Company, Inc., subsidiary licensees of AT&T Wireless Service, Inc. submitted a Petition for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended ("Act"), 47 U.S.C. § 214(e)(2), and Federal Communications Commission Rule 54.201 on February 19, 2004. The Washington Utilities and Transportation Commission approved the designation of these entities as ETCs on April 13, 2004.

2. On October 26, 2004, AT&T Wireless Services, Inc. became a wholly owned subsidiary of Cingular Wireless LLC ("Cingular Wireless") through a merger. Thus, at that time, the eight (8) AWS entities previously designated as ETCs in Washington State became subsidiaries of Cingular Wireless. Immediately after the merger, entities that had the phrase "AT&T Wireless" in their names went through a name change, whereby "New Cingular" was substituted for "AT&T Wireless" in the entities' names. On December 31, 2004, Cingular Wireless further reduced the number of its legal operating entities in the State of Washington. At that time, some of the AWS entities previously designated as ETCs in Washington were consolidated into a single entity. Specifically, AT&T Wireless PCS of Cleveland, LLC; AT&T Wireless Services of Washington, LLC; Spokane Cellular Telephone Company; and Yakima Cellular Telephone Company were merged into New Cingular Wireless PCS, LLC. Bellingham Cellular Partnership, Bremerton Cellular Telephone Company, Hood River Cellular Telephone Company, Inc. and, Olympia Cellular Telephone Company, Inc. remain the same.

3. In this proceeding, therefore, Cingular seeks to amend the ETC designations previously obtained by the former AWS entities to receive available support from the federal Universal Service Fund (“USF”) including, but not limited to, support for rural, insular and high-cost areas and low-income customers, to properly reflect the corporate reorganization that has taken place as well as the names of the five (5) Cingular entities now doing business in Washington State, i.e: New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company, Inc.; and Olympic Cellular Telephone Company, Inc.

4. Cingular also seeks to include in its ETC designation those subscribers that prior to the merger were subscribers of a subsidiary of Cingular Wireless. Cingular does not, however, seek to expand the service area in which AWS was previously granted ETC designation.

II. Amended Name and Address of Petitioner

5. The amended Petitioners are: Bellingham Cellular Partnership, Bremerton Cellular Telephone Company, Hood River Cellular Telephone Company, Inc. New Cingular Wireless PCS, LLC, and Olympic Cellular Telephone Company, Inc. The amended Petitioners are subsidiaries of Cingular Wireless.

I. Applicable Statutes and Rules

6. The statutes and rules implicated by the instant Petition are as follows: 47 U.S.C. §§ 153(27), 153(44), 214(e), 253(b) and 254(d); 47 C.F.R. §§ 51.5, 54.5, 54.101, 54.201, 54.207, 54.307, 54.313, and 54.314.

II. Authorization, Service Area and Company Background

7. Through subsidiaries or affiliates, Cingular Wireless offers wireless services throughout the United States and provides services to more than 48,000,000 subscribers. Cingular Wireless is headquartered in Atlanta, Georgia and its Western Region office is

headquartered in Redmond, Washington. Further, Cingular Wireless has the largest digital voice and data network in the United States. Cingular Wireless has the largest free mobile to mobile calling community. Cingular Wireless's RollOver plan also allows customers to keep unused anytime minutes for later use as necessary. RollOver minutes only expire after the 12th billing period.

8. As Cingular obtained AWS' licenses in the state of Washington, it is authorized by the FCC to provide commercial mobile radio services ("CMRS") throughout AWS' ETC Designated area.

9. Cingular provides wireless voice and data services over two separate, overlapping networks. One network uses time division multiple access ("TDMA") as its signal transmission technology. Cingular also provides voice and enhanced data services over a separate network that uses the signal transmission technology known as global system for mobile communications ("GSM") and general packet radio service ("GPRS").

10. A telecommunications carrier may be designated as an ETC and receive universal service support throughout its designated service area if it agrees to: (i) offer services that are supported by federal universal service support mechanisms, and (ii) advertise the availability of such services.¹ In its *Universal Service Order* implementing Sections 214(e) and 254, the FCC set forth the services a carrier must provide to be designated as an ETC in order to receive federal universal service support.²

¹ See 47 U.S.C. § 214(e)(1).

² *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket 96-45, Report and Order, FCC 97-157 ¶¶ 63- 82 (rel. May 8, 1997) ("*Universal Service Order*").

III. Cingular Will Continue to Offer the Supported Services to Qualify for Federal USF Support

11. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that carriers designated as ETCs shall, throughout their service area, (1) offer the services that are supported by federal universal service support mechanisms either using their own facilities or a combination of their own facilities and resale of another carrier's services, and (2) advertise the availability of such services and the charges therefore using media of general distribution.³ The services which are supported by the federal USF are:

- 1) voice grade access to the public switched network;
- 2) local usage;
- 3) dual tone multi-frequency signaling or its functional equivalent;
- 4) single-party service or its functional equivalent;
- 5) access to emergency services;
- 6) access to operator services;
- 7) access to interexchange service;
- 8) access to directory assistance; and
- 9) toll limitation for qualifying low-income consumers.⁴

Cingular will continue to provide all of the nine supported services in satisfaction of the requirements of Section 214(e)(1) of the Act. Cingular accepts the obligation to offer these services throughout the ETC designated areas upon reasonable request in full compliance with the obligation of an ETC.

12. Pursuant to Section 54.201 of the FCC's rules, Cingular will continue to advertise the availability of each of the supported services detailed above, throughout its licensed service area, by media of general distribution. Cingular currently advertises its services through many different media, including television and radio, newspaper, and other print advertisements, as well as outdoor advertising, retail stores, direct marketing and the Internet. Cingular will

³ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

⁴ 47 C.F.R. § 54.101(a).

continue AWS' commitment to use media of general distribution to advertise its universal service qualifying offerings throughout its designated ETC service areas.

IV. Participation in Low Income Programs

13. All ETCs must participate in the federal Lifeline and Link Up programs. Lifeline is a discount off the monthly charge for a company's lowest-cost offering. 47 C.F.R. § 54.401. Link Up is a discount off of a one-time activation charge. 47 C.F.R. § 54.411.

Cingular will continue to participate and to satisfy its obligations under the FCC's Lifeline and Link Up programs. As required, toll blocking will be provided to those Lifeline customers who request it, and any such customers who choose toll blocking will be relieved of any deposit requirement.

14. Cingular will also continue to participate as required in providing additional discounts through the Washington Telephone Assistance Program as set forth in RCW 80.36.410 through 80.36.475 and WAC 480-122.

V. Statement of Need

15. As was the case when AWS initially applied for ETC status in Washington, many residents of Washington live in rural areas where it is cost-prohibitive for a competitive telecommunications company to offer service. As a result, consumers do not have the choices of service providers available in urban areas. Cingular will continue to use federal high-cost funding to expand in underserved areas, bringing needed infrastructure and economic development to those areas of the state.

16. By granting this amended designation to Cingular, this Commission will continue on its mission to bring economic development, expedite the provision of competitive telephone service to the people living in remote areas, and provide more choice for subscribers in high-cost areas.

VI. Ability to Serve

17. As Cingular acquired the AWS FCC licenses in the state and it is not seeking to expand the service area for which AWS was designated an ETC, Cingular is licensed to serve in every exchange where it seeks to amend the previous AWS designation. Further, Cingular will continue to meet the build out requirements established by the FCC. Cingular accepts the obligation to serve those who request services consistent with the obligations of an ETC.

VII. Granting the Amended Cingular Application Would Serve the Public Interest

18. Cingular through this amended Petition for Designation will continue to serve the public interest as it was determined AWS did when it was previously designated an ETC throughout the service areas. As with AWS, Cingular will continue to provide consumers in those areas with a broader choice of service offerings that can be tailored to fit their individual needs. Among other things, Cingular is able to offer its subscribers a larger local calling area when compared to landline telephone companies, reduced long distance rates, competitive pricing and the benefits of mobility. In addition, Cingular Wireless has the largest digital voice and data network in America. As Cingular Wireless further stated upon consummation of the merger with AWS, Cingular Wireless customers will have the widest choice of handset and devices in the wireless industry.

19. Cingular continues to develop and upgrade its wireless network to allow it to offer consumers in rural and high-cost areas the same advanced features (*e.g.*, voice-mail, caller-ID, call-waiting and call-forwarding) provided in urban areas. Cingular has also worked consistently to expand the availability of such state-of-the-art technical innovations as wireless Internet, e-mail, paging service, text-messaging, digital photography and hand-held computing. Thus, an

expanding number of Cingular's Washington customers will be able to combine basic universal service and functionalities with these advanced services if they so desire.

20. Wireless technology and networks have been rapidly deployed over the past 15 years. This network expansion must continue if Washington consumers are to have full access to this technology in the future. The use of federal universal service support to provide universal services and extend wireless networks in rural and high-cost areas clearly benefits the public interest by ensuring these networks will be available to deliver basic and advanced services to all telecommunications consumers.

21. More importantly, Cingular's ETC designation for Washington will continue to provide the incumbent companies with a competitive incentive to improve their own networks, offer advanced services at competitive prices and improve customer service in order to remain competitive. The WUTC has emphasized the public interest benefits that flow from competitive entry by wireless carriers in rural areas. For example, in its order granting the amended petition for ETC designation by United States Cellular ("USC"), the Commission stated:

The Commission believes it is in the public interest to grant USC's petition because rural customers will benefit from the increased availability of wireless service. These benefits include increased mobility and increased level of service.⁶

22. The Commission previously decided that it was in the public interest to designate AWS as an ETC. This Petition only seeks to amend AWS's designation to reflect the company's merger with Cingular Wireless and the company's post-merger corporate restructurings and name changes and thus does not affect the number of ETCs in any area in Washington State. Further, Cingular does **not** seek to expand the service area previously covered in AWS'

⁶ *United States Cellular Corporation, et al., Third Supplemental Order Granting Petition for Designation as Eligible Telecommunications Carrier*, Docket No. UT-970345, ¶ 41 (Jan. 27, 2000) ("*Third Supplemental Order*").

designation. As with the AWS designation, the Cingular designation will not threaten the provision of universal services by rural telephone companies. Attached as Exhibit A please find the non-rural Telephone Company Exchanges previously included in the AWS designation. Attached as Exhibit B please find the Rural Telephone Company Exchanges previously included in the AWS designation. These will be the same exchanges that will be served by Cingular upon approval of this Petition to Amend.

VIII. High-Cost Certification

23. Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify with the FCC and the Universal Service Administrative Corporation ("USAC") their compliance with Section 254(e) of the Federal Telecommunications Act of 1996.⁸ Cingular certifies that like AWS it will use all support received for the purposes for which it is intended in compliance with law. Cingular will continue to comply with the Commission's certification requirement set forth in WAC 480-120-311(2).

IX. Affidavit in Support of Application

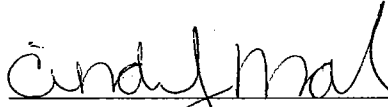
24. Exhibit C hereto is an Affidavit of Daniel Youmans, Regional Director – External Affairs for Cingular Wireless, verifying the accuracy of the facts contained herein.

⁸ 47 C.F.R. §§ 54.313, 54.314.

WHEREFORE, pursuant to Section 214(e)(2) of the Act, Cingular respectfully requests that the Commission enter an Order amending the previous designation of AWS as an ETC for the ETC service area as shown on Exhibits A and B hereto to now be Cingular.

Respectfully submitted,

March 1, 2005

By 
Cindy Manheim, Esq.
Senior Counsel – Regulatory
Cingular Wireless
7277 – 164th Avenue N.E.
Redmond, WA 98052

Attorney for Bellingham Cellular
Partnership, Bremerton Cellular Telephone
Company, Hood River Cellular Telephone
Company, Inc., New Cingular Wireless PCS, LLC,
and Olympia Cellular Telephone Company, Inc.

Exhibit A

NON-RURAL TELEPHONE COMPANY EXCHANGES

<u>SAC</u>	<u>RURAL TELEPHONE COMPANY</u>	<u>WIRE CENTER EXCHANGE</u>
522416	Verizon Northwest Inc. – WA	ANCRWAXX ANACORTES
		ARTNWAXX ARLINGTON
		BNCYWAXX BENTON CITY
		BOTHWAXB BOTHELL
		BURLWAXA BURLINGTON
		CMISWAXA CAMANO ISLAND
		CAMSWAXX CAMAS
		CLVWWAXA CLEARVIEW
		CPVLWAXX COUPEVILLE
		DRTNWAXX DARRINGTON
		DVLLWAXX DUVALL EAST
		EVRTWAXC EVERETT CASINO
		EVRTWAXF EVERETT MAIN
		EVRTWAXA EVERETT PRIMARY CNTR
		FRFDWAXA FAIRFIELD
		FRTNWAXX FARMINGTON
		GRFDWAXX GARFIELD
		MSCWIDXX GARRISON
		GERGWAXX GEORGE
		GRFLWAXX GRANITE FALLS
		HLLKWAXX HALLS LAKE
		JUNTWAXA JUANITA
		KNWCWAXB KENNEWICK MAIN
		KNWCWAXA KENNEWICK-HIGHLANDS
		KNWCWAXC KENNEWICK-MEADOW SPRINGS
		KRLDWAXX KIRKLAND
		LKGWWAXA LAKE GOODWIN
		LKSTWAXA LAKE STEVENS
		MRWYWAXA MANOR WAY
		MYVIWAXX MARYSVILLE
		MONRWAXX MONROE
		MTRWAXX MOUNT VERNON
		RCLDWAXA NORTH RICHLAND
		OKHRWAXX OAK HARBOR
		PALSWAXX PALOUSE
		PLMNWAXX PULLMAN
		QNCYWAXX QUINCY
		RDMDWAXA REDMOND
		RCLDWAXB RICHLAND
		RCBHWAXX RICHMOND BEACH
		RCFRWAXB ROCKFORD
		ROSLWAXA ROSALIA
		SMSHWAXA SAMMAMISH

SWLYWAXA	SEDRO WOOLLEY
SLLKWAXA	SILVER LAKE
SKYKWAXX	SKYKOMISH
SNHSWAXX	SNOHOMISH
SOLKWAXX	SOAP LAKE
STWDWAXX	STANWOOD
SULTWAXX	SULTAN
TEKOWAXX	TEKOA
WSHGWAXA	WASHOUGAL
WSRVWAXA	WASHOUGAL RIVER
WRLDWAXA	WEST RICHLAND
WDLDWAXA	WOODLAND

522449 Verizon Northwest Inc. – WA

ACMEWAXA	ACME
ALGRWAXX	ALGER
BGLKWAXX	BIG LAKE
BRBAWAXA	BIRCH BAY
BLANWAXB	BLAINE
BURLWAXX	BURLINGTON
CNCRWAXX	CONCRETE
CNWWAXX	CONWAY
CSTRWAXA	CUSTER
DMNGWAXA	DEMING
EDSNWAXX	EDISON
EVSNWAXX	EVERSON
FNDLWAXA	FERNDALE
LACNWAXX	LA CONNER
LARLWAXX	LAUREL
HMTNWAXA	LYMAN
LYNDWAXX	LYNDEN
MRBLWAXX	MARBLEMOUNT
MTVRWAXX	MOUNT VERNON-CONTEL
NCHSWAXX	NACHES
NILEWAXX	NILE
SWLYWAXX	SEDRO WOOLLEY
SUMSWAXX	SUMAS

525161 Qwest Corp. – WA

AUBNWA01	AUBURN
BNISWA01	BAINBRIDGE ISLAND
BTLGWA01	BATTLEGROUND
BLFRWA01	BELFAIR
BLLVWAGL	BELLEVUE GLENCOURT
BLLVWASH	BELLEVUE SHERWOOD
BLHMWALU	BELLINGHAM LUMMI
BLHMWA01	BELLINGHAM REGENT
BDMDWA01	BLACK DIAMOND
BYLKWA01	BONNEY LAKE
BMTNWA01	BREMERTON ESSEX
BCKLWA01	BUCKLEY
CSRKWA01	CASTLE ROCK
CENLWA01	CENTRALIA
CHHLWA01	CHEHALIS
LSTNIDSH	CLARKSTON
CLELWA01	CLE ELUM
COLBWA01	COLBY
CRSBWA01	CROSBY
CRMTWA01	CRYSTAL MOUNTAIN
FDWYWA01	DES MOINES FED. WAY
DESMWA01	DES MOINES TAYLOR
ESTNWA01	EASTON
ENMCWA01	ENUMCLAW
EPHRWA01	EPHRATA
GRHMWAGR	GRAHAM
GRBLWA01	GREEN BLUFF
HDPTWA01	HOODSPORT
ISQHWAEX	ISSAQUAH
JOYCWA01	JOYCE
KENTWAME	KENT MERIDIAN
KENTWAOB	KENT O BRIEN
KENTWA01	KENT ULRICK
LACYWA01	LACEY
LBLKWA01	LIBERTY LAKE
LGVWWA02	LONGVIEW
MPVYWAMV	MAPLE VALLEY
MRISWA01	MERCER ISLAND
MSLKWAAB	MOSES LAKE AFB
MSLKWA01	MOSES LAKE ALDER
NPVNWA01	NAPAVINE
NWLKWA01	NEWMAN LAKE
OLYMWA01	OLYMPIA EVERGREEN
OLYMWA02	OLYMPIA WHITEHALL
ORCHWA01	ORCHARDS
OTHEWA01	OTHELLO
PTANWA01	PORT ANGELES
PTLWWA01	PORT LUDLOW
PTORWAFE	PORT ORCHARD

PTTWWA01	PORT TOWNSEND
PYLPWA01	PUYALLUP
RNTNWA01	RENTON
RDFDWA01	RIDGEFIELD
ROCHWA01	ROCHESTER
ROY_WA01	ROY
STTLWA05	SEATTLE ATWATER
STTLWACA	SEATTLE CAMPUS
STTLWACH	SEATTLE CHERRY
STTLWADU	SEATTLE DUMWAMISH
STTLWA03	SEATTLE EAST
STTLWAEI	SEATTLE ELLIOTT
STTLWA04	SEATTLE EMERSON
STTLWALA	SEATTLE LAKEVIEW
STTLWA06	SEATTLE MAIN
STTLWAPA	SEATTLE PARKWAY
STTLWASU	SEATTLE SUNSET
STTLWAVE	SEATTLE WEST
SEQMWA01	SEQUIM
SHTNWA01	SHELTON
SLDLWASI	SILVERDALE
SPKNWACH	SPOKANE CHESTNUT
SPKNWAFI	SPOKANE FAIRFAX
SPKNWAHD	SPOKANE HUDSON
SPKNWAKY	SPOKANE KEYSTONE
SPKNWAMO	SPOKANE MORAN
SPKNWA01	SPOKANE RIVERSIDE
SPKNWAWA	SPOKANE WALNUT
SMNRWA01	SUMNER
SNYSWA01	SUNNYSLOPE
TACMWAFI	TACOMA FAWCETT
TACMWAFI	TACOMA FORT LEWIS
TACMWAGF	TACOMA GREENFIELD
TACMWAJU	TACOMA JUNIPER
TACMWALE	TACOMA LENOX
TACMWALO	TACOMA LOGAN
TACMWASY	TACOMA SKYLINE
TACMWAWA	TACOMA WAVERLY 2
TACMWAWV	TACOMA WAVERLY 7
VANCWA01	VANCOUVER
VANCWANO	VANCOUVER NORTH
WRDNWA01	WARDEN
WNLCWA01	WINLOCK
YAKMWA02	YAKIMA CHESTNUT
YAKMWAVE	YAKIMA WEST

Exhibit B

RURAL TELEPHONE COMPANY EXCHANGES

<u>SAC</u>	<u>RURAL TELEPHONE COMPANY</u>	<u>WIRE CENTER</u>	<u>EXCHANGE</u>
522400	Sprint/United Tel. NW – WA	BCTNWAXX	BICKLETON
		BRNNWAXX	BRINNON
		CNTRWAXX	CHIMACMCTR
		CLMAWAXA	COLUMBIA
		DLPTWAXA	DALLESFORT
		GRNRWAXX	GARDINER
		GLWDWAXA	GLENWOOD
		GLDLWAXA	GOLDENDALE
		GDVWWAXA	GRANDVIEW
		GRNGWAXA	GRANGER
		HRRHWAXA	HARRAH
		LYLEWAXA	LYLE
		MBTNWAXX	MABTON
		MTWAWAXA	MATTAWA
		PASNWAXA	PATERSON
		PLSBWAXX	POULSBO
		PRSRWAXA	PROSSER
		QLCNWAXA	QUILCENE
		RSVTWAXA	ROOSEVELT
		STSNWAXA	STEVENSON
		SNSDWAXX	SUNNYSIDE
		TPNSWAXX	TOPPENISH
		TRLKWAXX	TROUT LAKE
		WPATWAXX	WAPATO
		WHSLWAXX	WH SALMON
		WHSWWAXX	WHITE SWAN
		WHTSWAXA	WHITSTRAN
		WLRDWAXX	WILLARD
		WSHRWAXA	WISHRAM
		ZLLHWAXA	ZILLAH
522404	Asotin Tel. – WA	ANATWAXX	ANATONE
		ASOTWAXA	ASOTIN

522408 Century Tel. of Washington, Inc.

ALMRWAXA	ALMIRA
ASLKWAXA	AMES LAKE
ARLTWAXX	ARLETTA
ASFDWAXA	ASHFORD
BSCTWAXX	BASIN CITY
BLKIWAXX	BLAKELY ISLAND
CRNTWAXX	CARNATION
CTHLWAXA	CATHLAMET
CHNYWAXC	CHENEY
CLWRWAXA	CLEARWATER
CNNLWAXA	CONNELL
CETNWAXX	CRESTON
ESNDWAXA	EAST SOUND
EDWLWAXA	EDWALL-TYLER
ELMAWAXA	ELMA
ELTPWAXX	ELTOPIA
FLCYWAXX	FALL CITY
FRKSWAXA	FORKS
FRHRWAXA	FRIDAY HARBOR
GGHRWAXA	GIG HARBOR
HRTNWAXA	HARRINGTON
KHLTWAXA	KAHLOTUS
KGTNWAXA	KINGSTON
LKBYWAXA	LAKEBAY
LINDWAXA	LIND
LNBHWAXA	LONG BEACH
LOPZWAXX	LOPEZ
	MATHEWS
MTCOWAXX	CORNER
MCCLWAXA	MCCLEARY
MDLKWAXX	MEDICAL LAKE
MESAWAXX	MESA
MRTNWAXX	MORTON
NBNDWAXA	NORTH BEND
VSHNWAXB	NORTH VASHON
OCPKWAXX	OCEAN PARK
ODSSWAXA	ODESSA
ORNGWAXA	ORTING
RYCYWAXA	OTHELLO
PGISWAXX	PUGET ISLAND
RRDNWAXX	REARDAN
RTVLWAXA	RITZVILLE
SNPSWAXA	SNOSQUALNIE
	PASS
SPRRWAXX	SOUTH PRAIRIE
SPNGWAXA	SPANGLE
SPRGWAXA	SPRAGUE
VADRWAXA	VADER
VSHNWAXA	VASHON

		WSHTWAXA WLBRWAXA WSCKWAXA YCLTWAXA	WASHTUCNA WILBUR WILSON CREEK YACOLT
522410	Century Tel. of Cowiche, Inc	CWCHWAXX RMRKWAXA TITNWAXX	COWICHE RIMROCK TIETON
522412	Ellensburg Tel. Co.	ELBGWAXA KTTSWAXX LDDLWAXA SELHWAXX THRPWAXA VNTGWAXX	ELLENSBURG KITTITAS LAUDERDALE SELAH THORPE VANTAGE
522417	Hat Island Tel. Co.	SWHDWAXX	HAT ISLAND
522419	Hood Canal Tel. Col, Inc.	UNINWAXB	UNION
522423	Inland Tel. Co. – WA	RSLNWAXX UNTWAXA	ROSLYN UNIONTOWN
522426	Kalama Tel. Co.	KALMWAXB	KALAMA
522427	Lewis River Telephone Co., d/b/a TDS Telecom	AMBYWAXA LACTWAXA YALEWAXX	AMBOY LA CENTER YALE
522430	McDaniel Tel. Co. dba TDS Telecom	MSRKWAXX ONLSWAXA SLKMWAXB	MOSSY ROCK ONALASKA SALKUM
522431	Mashell Telecome, Inc.	ETVLWAXA	EATONVILLE

522442	St. John Telephone and Telegraph	STJHWAXA	ST JOHN
522446	Tenino Tel. Co.	TENNWAXA	TENINO
522447	Toledo Te. Co. Inc.	TOLDWAXA	TOLEDO
522451	Western Wahkiakum County Tel. Co.	GRRVWAXA NASLWAXX	GRAYS RIVER NASELLE
522452	Whidbey Tel. Co.	PNRBWAXA CLTNWAXA FELDWAXA LNGLWAXA SWHDWAXX	POINT ROBERTS SOUTH WHIDBEY
522453	Yelm Tel. Co.	RANRWAXA YELMWAXA YELMWAXB	RAINIER YELM

Exhibit C

AFFIDAVIT OF DANIEL YOUMANS

Daniel Youmans, being first duly sworn upon oath, deposes and states as follows:

1. My name is Daniel Youmans, and I serve as Regional Director - External Affairs, Cingular Wireless. My business address is 617 Eastlake Avenue East, Seattle, Washington 98109. I am an authorized representative of subsidiary licensees of Cingular Wireless LLC including, Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company; New Cingular Wireless PCS, LLC; and, Olympia Cellular Telephone Company (collectively "Cingular"). I have read the foregoing Petition to Amend the Designation as an Eligible Telecommunications Carrier and all information therein is true and correct to the best of my knowledge, information and belief.

2. Cingular is authorized to provide commercial mobile radio service ("CMRS") in Washington pursuant to the FCC's rules. Cingular is a common carrier consistent with the definition in 47 U.S.C. § 153(10) and the requirements of 47 U.S.C. § 214(e).

3. Cingular seeks amend the AWS ETC designation previously granted by the Washington Utilities and Transportation Commission to obtain universal service support available in certain areas by rural and non-rural incumbent local exchange carriers to reflect the corporate reorganization that has taken place as well as the names of the five (5) Cingular entities now doing business in Washington State. Cingular also seeks to include in its ETC designation those subscribers that prior to the merger were subscribers of a subsidiary of Cingular Wireless LLC. Cingular does not become an ETC in any area of the state that AWS was not previously designated.

4. As required, this funding will be used only to support the provision, upgrading, and maintenance of Cingular's wireless network in Washington. As set forth in the Petition to Amend, this support will assist Cingular in providing basic telecommunications services to low income consumers, and to consumers in high-cost areas, and will allow Cingular to continue to upgrade and expand its state-of-the-art wireless network in Washington.

5. Cingular will continue to offer all the services and functionalities supported by the federal universal service program, as set forth in Section 214(e) of the Act and Section 54.101(a) of the FCC's rules, throughout the service areas for which it seeks ETC designation in Washington.

6. An ETC offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services." Cingular provides the supported services using primarily its own network infrastructure, which includes the antennas, cell-sites, towers, trunking, mobile switching, and interconnection facilities owned or leased by the Company.

7. Cingular will continue to advertise the availability of the supported services and the corresponding charges in a manner that informs the general public within the designated service area of both the services available and the corresponding charges. As an ETC, Cingular will continue to advertise its services through many media of general distribution throughout the service areas for which designation is requested.

8. Telecommunications carriers in Washington are required to participate in Lifeline and Link Up and WTAP Programs. Cingular will continue to participate in the programs in accordance with 47 C.F.R. §§ 54.400 through 54.415, RCW 80.36.410 through 80.36.475, and Chapter 480-122 WAC.

9. Cingular seeks to continue with the same designated service area as that obtained previously by AWS.

10. Amending the AWS designation in the manner described in the Petition will serve the public interest by promoting additional deployment of wireless facilities and services to the high-cost areas in Washington, and bringing consumers in those areas the benefits of additional competitive universal service offerings.

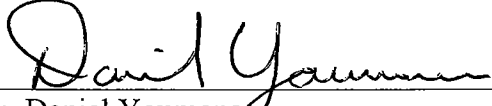
11. Granting Cingular's Petition to amend the designation previously obtained by AWS is consistent with RCW 80.36.300, which provides it is the policy of the state to: (1) Preserve affordable universal telecommunications service; (2) maintain and advance the efficiency and availability of telecommunications service; (3) ensure that customers pay only reasonable charges for telecommunications service; (4) ensure that rates for noncompetitive telecommunications services do not subsidize the competitive ventures of regulated telecommunications companies; (5) promote diversity in the supply of telecommunications services and products in telecommunications markets throughout the state; and (6) permit flexible regulation of competitive telecommunications companies and services.

12. High-Cost Certification. Cingular certifies that all high-cost universal service support received in Washington will be used only for the provision, maintenance and upgrading of services and facilities for which the support is intended.

13. This concludes my affidavit.

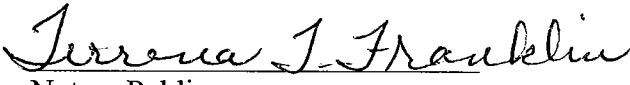
I hereby declare under penalty of perjury under the law of the State of Washington that the foregoing is true and correct.

Executed on 3/1, 2005.


By: Daniel Youmans
Title: Regional Director - External Affairs
Cingular Wireless

Subscribed and sworn to before me
this 1st day of March, 2005.

(Notary Seal)


Notary Public

