

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

In the Matter of the Petition of)	DOCKET UT-101060
)	
T-MOBILE WEST CORPORATION)	ORDER 01
)	
)	ORDER GRANTING DESIGNATION
)	AS AN ELIGIBLE
For Designation as an Eligible)	TELECOMMUNICATIONS
Telecommunications Carrier and a)	CARRIER AND A TEMPORARY
Temporary Partial Exemption from WAC)	EXEMPTION FROM THE
480-123-030(1)(g) and WAC 480-123-)	REQUIREMENT OF FOUR HOURS
070(6))	OF BACK-UP POWER AT EACH
)	CELL SITE
.....)	

INTRODUCTION AND BACKGROUND

- 1 On June 10, 2010, T-Mobile West Corporation (T-Mobile, or the Company) filed a petition with the Washington Utilities and Transportation Commission (Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) pursuant to Section 214(e) of the Communications Act of 1934, as amended (the Act), and Washington Administrative Code (WAC) 480-123-020 through 040. T-Mobile seeks ETC designation in Washington for the purpose of receiving both High Cost support and Low Income support from the federal universal service fund (USF). The exchanges for which T-Mobile seeks ETC designation are listed in the Appendix to this Order. The proposed area for ETC designation includes service areas of the non-rural incumbent local exchange carriers (ILECs) and the rural ILECs.
- 2 On September 16, 2010, T-Mobile filed a letter, urging the Commission to consider and approve its ETC application as soon as possible. In that letter, it also provided additional information about its proposed Lifeline plan.
- 3 On October 6, 2010, T-Mobile filed a second letter to clarify a few issues. The Company revised its proposed ETC service area and its investment plan, both with minor non-stative changes. The letter also described its Lifeline plan for residents of tribal lands and expressed the company’s wish to be able to seek exemption from back-up power requirement for new cell sites under special circumstances.
- 4 T-Mobile is a wholly owned subsidiary of T-Mobile USA, Inc. It is a facility-based provider of Commercial Mobile Radio Service. It has obtained ETC designation in Florida, Kentucky, North Carolina and Puerto Rico.
- 5 The Commission has jurisdiction over ETC petitions. Section 214(e) of the Act authorizes state regulatory commissions to designate a qualified common carrier as an

ETC for the purpose of receiving federal universal service funds.¹ By rule, WAC 480-123-040, the UTC has the authority to approve petitions from carriers requesting ETC designation.

DISCUSSION

A. ETC Designation

6 Staff reviewed T-Mobile's petition and finds it qualifies for ETC designation except for compliance with the cell site back-up power requirement, which will be discussed later in this memo.

7 47 U.S.C. § 214(e)(2) specifies the criteria based on which a state commission determines whether an applicant qualifies for ETC designation. The provisions are summarized as follows:

(1) The applicant must be a common carrier and meet the requirements in 47 U.S.C. §214(e)(1). The carrier must: (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the associated charges using media of general distribution.

(2) The designation of a competitive ETC (CETC) must be consistent with the public interest, convenience, and necessity.

8 T-Mobile meets the definition of a common carrier. It uses its own facilities to provide the supported services throughout the proposed service area for ETC designation in Washington. It also has roaming arrangements with other wireless carriers to provide extended coverage. It commits to take all reasonable measures as prescribed in 47 C.F.R. § 54.202(a)(1) to fulfill customer requests for service throughout the proposed service area.

9 T-Mobile is capable of offering the services supported by federal universal service fund specified in 47 C.F.R. § 54.101(a). The services include (1) voice grade access to the public switched telephone 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. T-Mobile also commits to advertise the availability of

¹47 U.S.C. § 214(e)(2). See also 47 C.F.R. § 54.201(d).

services supported by federal universal service mechanisms and the charges using media of general distribution.

- 10 The Company provided additional detailed information required by WAC 480-123-030 “Contents of petition for eligible telecommunications carriers.” The petition contains a substantive investment plan for the federal support to be received in the first two years and a description of customer benefits. The petition complies with RCW 9A.72.085, as required.
- 11 Based on staff’s analysis, T-Mobile meets the public interest test for ETC designation.² Washington consumers will benefit from the Company’s additional investment as a result of receiving federal high cost support. It will enhance T-Mobile’s ability to bring competitive and innovative services to consumers throughout its service area, especially rural areas. Designating T-Mobile as an ETC is also consistent with the principle of competitive neutrality.
- 12 Presently, T-Mobile is neither collecting nor remitting Enhanced 911 (E-911) exercise tax on the prepaid customer accounts to the Washington State Department of Revenue (DoR). There is a debate whether the state law on E911 tax contribution, RCW 82.14B.030(4) applies to prepaid wireless accounts. The court case between TracFone and DoR on this matter is pending before the Washington State Supreme Court.³ Staff considers contribution to the state E-911 tax revenue an important component of public interest. In the future, if the court rules that the existing Washington law on E-911 contribution applies to prepaid wireless accounts, or if the relevant law is revised to explicitly include contribution from prepaid wireless accounts, T-Mobile should pay 911 exercise tax on the wireless customer accounts to DoR. If T-Mobile fails to do so, then the Commission should reserve the authority to re-examine the Company’s qualification as an ETC. Therefore, staff recommends the Commission imposes a condition on T-Mobile’s ETC designation that T-Mobile shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.
- 13 The approval of T-Mobile’s ETC designation will not impose additional burden on the federal USF. The FCC capped the total annual high cost support for CETCs in each state at the support level of March 2008.⁴ New ETC designations will cause the redistribution of high cost fund disbursement among CETCs in a state, depending on their reported customer counts. When the total high cost support for all CETCs exceeds the cap, a state cap factor will apply. As a result, all CETCs will get less support proportionately.

² 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201(c).

³ *TracFone Wireless, Inc. v. State of Washington Department of Revenue*. Washington State Supreme Court, Docket 82741-9.

⁴ *In the Matter of High-Cost Universal Service Support et al.*, Order, WC Docket No.05-337 and CC Docket No.96-45. FCC 08-122 (Released May 1, 2008).

- 14 By federal rules, all ETCs must make available Lifeline service to qualified low-income consumers and publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.⁵ T-Mobile states in its petition that it will comply with the federal requirements on Lifeline and Link Up services. With access to federal low-income support, T-Mobile will offer a Lifeline plan priced at \$6.50 per month (net of discount) with a monthly allotment of 145 Whenever minutes of use (MOU), plus 500 Night MOU and 500 Weekend MOU.⁶ Additional minutes will be charged at \$0.05 per minute. With federal Link Up support, the Company will also reduce the \$35 activation fee by \$17.50 for Lifeline customers. Staff believes T-Mobile's Lifeline plan will be a beneficial addition to the existing Lifeline plans available in Washington. It will provide a competitive choice in the market segment serving low-income consumers.
- 15 As Lifeline disbursements rapidly increase nationwide, staff has an increasing concern about the potential for fraud, waste and abuse in the federal Lifeline program. But there is a need to reach more eligible low income households and encourage Lifeline enrollment with minimal logistical hurdles. Staff recognizes that the Commission needs to find the balance between accountability and administrative simplicity.
- 16 Staff does not recommend that T-Mobile comply with any additional conditions on the verification of customer eligibility for Lifeline service beyond existing federal requirements.⁷ In a recent docket concerning TracFone's ETC designation, the Commission required additional conditions to ensure proper verification of customer eligibility.⁸ Staff's recommendation to not impose additional requirements on T-Mobile is based on three considerations. First, unlike TracFone's Lifeline services, T-Mobile's Lifeline plan is post-paid and requires a customer to pay a monthly service fee for service to be continued. If the customer doesn't pay the monthly fee, the service is disconnected and T-Mobile will not receive a lifeline subsidy for the disconnected customer. Second, the potential fraud associated with T-Mobile's offering is likely to be small. T-Mobile's Lifeline customers will pay an activation fee of \$17.50 as well as a monthly fee of \$6.50. Given that customers need to provide an initial as well as a monthly payment, the

⁵ 47 C.F.R. § 54.405.

⁶ Eligible Lifeline customers of tribal lands will pay \$1 per month for the same package. The Company will seek \$5.49 Tire Four support for those customers from the federal Lifeline program.

⁷ The federal rule requires a customer to sign a self-certification form to enroll in a Lifeline program. The customer should either indicate the qualifying public assistance program the customer participates in or provide income documentation to prove income-based eligibility. The federal rule also requires ETCs to conduct an annual survey to verify the continued eligibility of a statistically valid random sample of their Lifeline customers and provide the survey results to the Universal Service Administrative Company and the FCC. 47 C.F.R. § 54.409-410.

⁸ *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d),(f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund*, UT-093012, Order No. 03 (June 24, 2010).

likelihood of fraudulent enrollment will be less than that associated with free pre-paid plans. Finally, T-Mobile just started to operate its Lifeline program in several states. It is hard to estimate how many Lifeline customers it will have. A small Lifeline customer base does not justify the cost associated with more sophisticated customer verification procedure.

- 17 While staff does not believe that additional verification requirements be imposed, staff recommends that the Commission require T-Mobile to provide the number of Lifeline customers and its receipt of federal low income support in its annual re-certification report. T-Mobile should also provide a copy of its annual verification survey report on Lifeline customers' continued eligibility to the Commission. Based on the size of the low income support the Company receives in the future and the result of its eligibility verification survey, the Commission should reserve the right to impose more rigorous customer eligibility verification conditions on the Company's ETC designation.

B. Exemption from the Cell Site Back-Up Power Requirements

- 18 WAC 480-123-030(g) requires a wireless ETC applicant to demonstrate that it has at least four hours of back-up battery power at each cell site, back-up generators at each microwave hub, and at least five hours of back-up battery power and back-up generators at each switch. WAC 480-123-070(6) requires each wireless ETC to certify that it meets the above-mentioned back-up power requirement on an annual basis as part of its annual filing requirements.
- 19 T-Mobile states that it meets the back-up power requirement at each microwave hub and each switch. Also, the vast majority of its cell sites have at least four hours of back-up battery power at each cell site. However, 22 cell sites currently do not satisfy the four-hour back-up battery power requirement. The Company requests the Commission grant it a partial exemption from WAC 480-123-030(1)(g) and WAC 480-123-070(6) for four years conditioned upon T-Mobile bringing all 22 cell sites into compliance at the end of the four year period.
- 20 T-Mobile describes that many of the cell sites without sufficient back-up battery power are "micro" cells used to enhance coverage within a building. The coverage provided by such sites is largely duplicative of existing outdoor coverage. These sites are located in constrained spaces that limit the Company's ability to install standard back-up power. Other cell sites without back-up battery power are pole attachments and building rooftop sites. T-Mobile commits that it will take measures to bring these cell sites in compliance with the Commission's four-hour back-up power requirement, however, it estimates the process will take a considerable amount of time.
- 21 The Commission previously has granted other wireless ETCs temporary exemption from the cell site back-up power rule. The Commission granted AT&T Mobility an exemption

for over five years total⁹ and Sprint Nextel Corporation for over four years.¹⁰ The same rationale for exemption applies here.

22 Staff recommends the Commission grant a temporary exemption to T-Mobile in a manner similar to the requests by other wireless ETCs. T-Mobile should have four years to complete the back-up power upgrade for all cell sites; the Company should be allowed to use reliable power sources other than battery, such as fixed generators or fuel cells to meet the four-hour back-up power standard. Staff recommends the following conditions for the temporary exemption:

- The Company must provide four hours of back-up power at all new cell sites constructed in the service area where it is designated as an ETC during this period, subject to its right to seek exemption from the requirement if warranted.
- The Company must include a compliance status report on back-up power upgrades in its annual ETC certification filing with the Commission.
- The Company must file a final compliance report upon completion of the back-up power upgrades or at the expiration of the temporary exemption, whichever occurs first.

FINDINGS AND CONCLUSIONS

- 23 (1) The Commission has jurisdiction over eligible telecommunications carriers in Washington and the subject matter of this Order pursuant to 47 U.S. C. § 214(e)(2), 47 C.F.R. §§ 54.201(b)-(c) and WAC 480-123-040.
- 24 (2) T-Mobile currently provides service in the exchanges listed in the Appendix to this Order. The Company offers all services that are to be supported by the federal universal service support mechanisms set forth in 47 U.S.C. § 254(c) and 47 C.F.R. § 54.101(a).
- 25 (3) T-Mobile meets the requirements for ETC designation under 47 U.S. C. § 214(e)(1), 47 C.F.R. § 54.201(d) and WAC 480-123-030.
- 26 (4) The Commission finds that granting the Company's petition for designation as an Eligible Telecommunications Carrier, subject to certain conditions, will advance the purpose of universal service found in 47 U.S.C. § 254. The designation is in the public interest and should be granted.

⁹ *In the Matter of the Request of Bellingham Cellular Partnership et al. for a Permanent Exemption from the Requirements of WAC 480-123-070(6)*, UT-063060, Order Nos. 01, 02 and 03.

¹⁰ *In the Matter of the Petition of Sprint Nextel Corporation to Amend its Designation as an Eligible Telecommunications Carrier and Request for and Exemption from WAC 480-123-070(6) and WAC 480-123-030(1)(g)*, UT-073023, Order Nos. 01 and 02.

- 27 (5) The Commission finds that granting the Company's petition for a temporary exemption from the cell site back up power requirement in WAC 480-123-030(1)(g) and WAC 480-123-070(6), subject to certain conditions, is consistent with the public interest, the purposes underlying regulation, and applicable statutes.

ORDER

THE COMMISSION ORDERS:

- 28 (1) The Commission grants the petition of T-Mobile West Corporation for designation as an Eligible Telecommunications Carrier for the purpose of receiving the federal universal service fund in the exchanges listed in the Appendix. The designation is subject to the following conditions:
- a. The Company shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.
 - b. The Company shall provide the number of Lifeline customers and its receipt of federal low income support in its annual re-certification report. The Company shall also provide a copy of its annual verification survey report on Lifeline customers' continued eligibility to the Commission. Based on the size of the low income support the Company receives in the future and the result of its eligibility verification survey, the Commission reserves the right to impose more rigorous customer eligibility verification conditions on the Company's ETC designation.
- 29 (2) T-Mobile West Corporation's petition for a temporary exemption from WAC 480-123-030(1)(g) and WAC 480-123-070(6) which require at least four hours of back-up power at each cell site is granted until December 31, 2014. The Company must use reliable power sources (battery, fixed generator or fuel cells) to meet the four-hour back-up power standard. The exemption is subject to the following conditions:
- a. The Company must provide four hours of back-up power at all new cell sites constructed during this period, subject to its right to seek exemption from the requirement if warranted;
 - b. The Company must include a compliance status report on back-up power upgrades in its annual ETC certification filing with the Commission;

- c. The Company must file a final compliance report upon completion of the back-up power upgrades or at the expiration of the temporary exemption, whichever occurs first.
- 30 (3) T-Mobile West Corporation must comply with applicable federal laws and regulations on ETC obligations and requirements.
- 31 (4) T-Mobile West Corporation must comply with Washington state rules on ETC obligations and requirements set forth in WAC 480-123.
- 32 (5) The Commission has authority to modify, suspend, or revoke T-Mobile West Corporation's ETC designation granted in this Order at a future date.

DATED at Olympia, Washington, and effective October 14, 2010.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

JEFFREY D. GOLTZ, Chairman

PATRICK J. OSHIE, Commissioner

Appendix

**T-Mobile West Corporation
Areas for Eligible Telecommunications Carrier Designation**

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
ASOTIN TELEPHONE CO.	ASOTWAXA	ASOTIN	ASOTIN
CENTURYTEL OF COWICHE, INC.	CWCHWAXX	COWICHE	COWICHE
CENTURYTEL OF INTER-ISLAND, INC.	BLKIWAXX	SAN JUAN	BLAKELY ISLAND
	ESNDWAXA	SAN JUAN	EAST SOUND
	FRHRWAXA	SAN JUAN	FRIDAY HARBOR
	LOPZWAXX	SAN JUAN	LOPEZ
CENTURYTEL OF WASHINGTON, INC.	ASLKWAXA	AMES LAKE	AMES LAKE
	BSCTWAXX	BASIN CITY	BASIN CITY
	CHNYWAXC	CHENEY	CHENEY
	CHWLWAXX	CHEWELAH	CHEWELAH
	CNNLWAXA	CONNELL	CONNELL
	CRNTWAXX	CARNATION	CARNATION
	DVPTWAXX	DAVENPORT	DAVENPORT
	EDWLWAXA	EDWALLTYLR	EDWALL-TYLER
	ELMAWAXA	ELMA	ELMA
	ELTPWAXX	ELTOPIA	ELTOPIA
	FLCYWAXX	FALL CITY	FALL CITY
	LINDWAXA	LIND	LIND
	LNBHWAXA	LONG BEACH	CHINOOK
	LNBHWAXA	LONG BEACH	LONG BEACH
	MCCLWAXA	ELMA	MCCLEARY
	MDLKWAXX	MEDICAL LK	MEDICAL LAKE
	MESAWAXX	MESA	MESA
	MNTSWAXA	MONTESANO	MONTESANO
	MTCOWAXX	MATHEWSCOR	MATHEWS CORNER
	NBNDWAXA	NORTH BEND	NORTH BEND
	OCPKWAXX	LONG BEACH	OCEAN PARK
	ORNGWAXA	ORTING	ORTING

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	RRDNWAXX	REARDAN	REARDAN
	RTVLWAXA	BENGE	BENGE
	RTVLWAXA	RITZVILLE	RITZVILLE
	RYMNVWAXA	SOUTH BEND	RAYMOND
	SBNDWAXA	SOUTH BEND	SOUTH BEND
	SPNGWAXA	SPANGLE	SPANGLE
	SPRGWAXA	SPRAGUE	SPRAGUE
	SPRRWAXX	SO PRAIRIE	SOUTH PRAIRIE
	VLLYWAXX	CHEWELAH	CHEWELAH
	VSHNWAXA	VASHON	VASHON
	VSHNWAXB	VASHON	VASHON
	WNTHWAXA	WINTHROP	WINTHROP
	YCLTWAXA	YACOLT	YACOLT
ELLENSBURG TELEPHONE CO.	ELBGWAXA	ELLENSBURG	ELLENSBURG
	ELBGWAXA	KITTITAS	KITTITAS
	ELBGWAXA	LAUDERDALE	LAUDERDALE
	ELBGWAXA	SELAH	SELAH
	ELBGWAXA	THORP	THORP
	ELBGWAXA	VANTAGE	VANTAGE
INLAND TELEPHONE CO.	UNTWAXA	LEON	LEON
	UNTWAXA	UNIONTOWN	UNIONTOWN
KALAMA TELEPHONE CO.	KALMWAXB	KALAMA	KALAMA
LEWIS RIVER TELEPHONE CO., INC.	AMBYWAXA	AMBOY	AMBOY
	COGRWAXX	COUGAR	COUGAR
	LACTWAXA	LA CENTER	LA CENTER
MASHELL TELECOM, INC.	ETVLWAXC	EATONVILLE	EATONVILLE
PIONEER TELEPHONE CO.	ENDCWAXA	ENDICOTT	ENDICOTT
QWEST CORPORATION	ABRDWA01	ABERDEEN	ABERDEEN-HOQUIAM
	AUBNWA01	AUBURN	AUBURN
	BCKLWA01	BUCKLEY	BUCKLEY

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	BDMDWA01	BLACK DIAMOND	BLACK DIAMOND
	BLHMWA01	BELLINGHAM REGENT	BELLINGHAM-GTLD
	BLHMWALU	BELLINGHAM LUMMI	BELLINGHAM-GTLD
	BLLVWAGL	BELLEVUE GLENCOURT	BELLEVUE
	BLLVWASH	BELLEVUE SHERWOOD	BELLEVUE
	BNISWA01	BAINBRIDGE ISLAND	BAINBRIDGE ISLAND
	BTLGWA01	BATTLEGROUND	BATTLE GROUND
	BYLKWA01	BONNEY LAKE	SUMNER
	CENLWA01	CENTRALIA	CENTRALIA
	CHHLWA01	CHEHALIS	CHEHALIS
	CLELWA01	CLE ELUM	CLE ELUM
	CLFXWA01	COLFAX	COLFAX
	CSRKWA01	CASTLE ROCK	CASTLE ROCK
	DESMWA01	DES MOINES-TA- TR	DES MOINES
	DRPKWA01	DEER PARK	DEER PARK
	ENMCWA01	ENUMCLAW	ENUMCLAW
	EPHRWA01	EPHRATA	EPHRATA
	ESTNWA01	EASTON	EASTON
	FDWYWA01	FEDERAL WAY	DES MOINES
	GRBLWA01	GREEN BLUFF	GREEN BLUFF
	GRHMWAGR	GRAHAM	GRAHAM
	ISQHWAEX	ISSAQUAH	ISSAQUAH
	KENTWA01	KENT ULRICK	KENT
	KENTWAME	KENT MERIDIAN	KENT
	KENTWAOB	KENT O BRIEN	KENT
	KENTWAOB	KENT O BRIEN	RENTON
	KENTWAOB	KENT O BRIEN	SEATTLE
	KENTWAOB	KENT O BRIEN	SEATTLE SOUTH
	LACYWA01	LACEY	OLYMPIA
	LBLKWA01	LIBERTY LAKE	LIBERTY LAKE
	LGVWWA02	LONGVIEW	LONGVIEW-KELSO

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	LNLKWA01	LOON LAKE	LOON LAKE
	MPVYWAMV	MAPLE VALLEY	MAPLE VALLEY
	MRISWA01	MERCER ISLAND	SEATTLE
	MRISWA01	MERCER ISLAND	SEATTLE ADAMS
	MSLKWA01	MOSES LAKE ALDER	MOSES LAKE
	MSLKWAAB	MOSES LAKE AFB	MOSES LAKE
	NWLKWA01	NEWMAN LAKE	NEWMAN LAKE
	OCSHWA01	COPALIS-OCEAN SHORES	COPALIS
	OLYMWA02	OLYMPIA WHITEHALL	OLYMPIA
	OLYMWA01	OLYMPIA EVERGREEN	OLYMPIA
	ORCHWA01	ORCHARDS	VANCOUVER
	OTHEWA01	OTHELLO	OTHELLO-OTHELLO
	PASCWA01	PASCO	PASCO
	PMRYWA01	POMEROY	POMEROY
	PTANWA01	PORT ANGELES	PORT ANGELES
	PTLWWA01	PORT LUDLOW	PORT LUDLOW
	PTTWWA01	PORT TOWNSEND	PORT TOWNSEND
	PYLPWA01	PUYALLUP	PUYALLUP
	RDFDWA01	RIDGEFIELD	RIDGEFIELD
	RNTNWA01	RENTON	RENTON
	RNTNWA01	RENTON	SEATTLE
	SEQMWA01	SEQUIM	PORT ANGELES
	SEQMWA01	SEQUIM	SEQUIM
	SHTNWA01	SHELTON	SHELTON
	SMNRWA01	SUMNER	SUMNER
	SPDLWA01	SPRINGDALE	SPRINGDALE
	SPKNWA01	SPOKANE RIVERSIDE	SPOKANE
	SPKNWACH	SPOKANE CHESTNUT	SPOKANE
	SPKNWAFB	SPOKANE FAIRFAX	SPOKANE

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	SPKNWAHD	SPOKANE HUDSON	SPOKANE
	SPKNWAKY	SPOKANE KEYSTONE	SPOKANE
	SPKNWAMO	SPOKANE MORAN	SPOKANE
	SPKNWAWA	SPOKANE WALNUT	SPOKANE
	SPKNWAWH	SPOKANE WHITWORTH	SPOKANE
	STTLWA03	SEATTLE EAST	SEATTLE
	STTLWA04	SEATTLE EMERSON	SEATTLE
	STTLWA04	SEATTLE EMERSON	SEATTLE NORTH
	STTLWA05	SEATTLE ATWATER	SEATTLE
	STTLWA05	SEATTLE ATWATER	SEATTLE SOUTH
	STTLWA06	SEATTLE MAIN	SEATTLE
	STTLWA06	SEATTLE MAIN	SEATTLE ADAMS
	STTLWA06	SEATTLE MAIN	SEATTLE NORTH
	STTLWACA	SEATTLE CAMPUS	SEATTLE
	STTLWACH	SEATTLE CHERRY	SEATTLE
	STTLWACH	SEATTLE CHERRY	SEATTLE SOUTH
	STTLWADU	SEATTLE DUMWAMISH	SEATTLE
	STTLWADU	SEATTLE DUMWAMISH	SEATTLE SOUTH
	STTLWAEL	SEATTLE ELLIOTT	SEATTLE
	STTLWAEL	SEATTLE ELLIOTT	SEATTLE NORTH
	STTLWAEL	SEATTLE ELLIOTT	SEATTLE SOUTH
	STTLWALA	SEATTLE LAKEVIEW	SEATTLE
	STTLWAPA	SEATTLE PARKWAY	SEATTLE
	STTLWASU	SEATTLE SUNSET	SEATTLE
	STTLWAVE	SEATTLE WEST	SEATTLE

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	TACMWafa	TACOMA FAWCETT	TACOMA
	TACMWaFL	TACOMA FT LEWIS	TACOMA
	TACMWAGF	TACOMA GREENFIELD	TACOMA
	TACMWaJU	TACOMA JUNIPER	TACOMA
	TACMWaLE	TACOMA LENOX	TACOMA
	TACMWaLO	TACOMA LOGAN	TACOMA
	TACMWaSY	TACOMA SKYLINE	TACOMA
	TACMWaWA	TACOMA WAVERLY 2	TACOMA WAVERLY
	TACMWaWV	TACOMA WAVERLY 7	DES MOINES
	TACMWaWV	TACOMA WAVERLY 7	TACOMA WAVERLY
	VANCWA01	VANCOUVER OXFORD	VANCOUVER
	VANCWANO	VANCOUVER NORTH	VANCOUVER
	WRDNWA01	WARDEN	WARDEN
	YAKMWA02	YAKIMA CHESTNUT	YAKIMA
	YAKMWaWE	YAKIMA WEST	YAKIMA
ST JOHN TELEPHONE CO.	STJHWaXA	ST JOHN	ST JOHN
TENINO TELEPHONE CO.	TENNWaXA	BUCODA	BUCODA
	TENNWaXA	TENINO	TENINO
UNITED TELEPHONE - NORTHWEST	BCTNWaXX	BICKLETON	MABTON
	CNTRWaXX	CHIMACUM CENTER	CHIMACUM-CENTER
	DLPTWaac	DALLESPORT	DALLESPORT
	GDVWWaXA	GRANDVIEW	GRANDVIEW
	GRNGWaXA	GRANGER	GRANGER
	GRNRWaXX	GARDINER	PORT ANGELES- GARDINER

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	HRRHWAXA	HARRAH	HARRAH
	LYLEWAXA	LYLE	LYLE
	MBTNWAXX	MABTON	MABTON
	PASNWAXA	PATERSON	PATERSON
	PRSRWAXA	PROSSER	PROSSER
	QLCNWAXA	QUILCENE	HOOD CANAL
	RSVTWAXA	ROOSEVELT	ROOSEVELT
	SNSDWAXX	SUNNYSIDE	SUNNYSIDE
	STSNWAXA	STEVENSON	STEVENSON
	TPNSWAXX	TOPPENISH	TOPPENISH
	WHSWAXX	WHITE SALMON	WHITE SALMON
	WHSWAXX	WHITE SWAN	WHITE SWAN
	WHTSWAXA	WHITSTRAN	WHITSTRAN
	WLRDWAXX	WILLARD	WILLARD
	WPATWAXX	WAPATO	WAPATO
	WSHRWAXA	WISHRAM	DALLESFORT
	ZLLHWAXA	ZILLAH	TOPPENISH
VERIZON NORTHWEST INC.-WA	ANCRWAXX	ANACORTES	ANACORTES
	ARTNWAXX	ARLINGTON	ARLINGTON
	BNCYWAXX	BENTON CITY	BENTON CITY
	BOTHWAXB	BOTHELL	BOTHELL1
	BOTHWAXB	BOTHELL	KIRKLAND
	BURLWAXA	BURLINGTON	SEDRO WOOLLEY
	CAMSWAXX	CAMAS	CAMAS-WASHOUGAL
	CAMSWAXX	CAMAS	VANCOUVER
	CHLNWAXX	CHELAN	WENATCHEE
	CLVWWAXA	CLEARVIEW	SNOHOMISH
	CMISWAXA	CAMANO ISLAND	STANWOOD
	CSHRWAXX	CASHMERE	WENATCHEE
	DVLLWAXX	DUVALL EAST	BOTHELL1
	DVLLWAXX	DUVALL EAST	BOTHELL2
	ENTTWAXX	ENTIAT	WENATCHEE
	EVRTWAXA	EVERETT PRIMARY CENTER	EVERETT
	EVRTWAXC	EVERETT CASINO	EVERETT
	EVRTWAXF	EVERETT MAIN	EVERETT

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	EWNCWAXA	EAST WENATCHEE	WENATCHEE
	FRFDWAXA	FAIRFIELD	FAIRFIELD
	GERGWAXX	GEORGE	GEORGE
	GRFLWAXX	GRANITE FALLS	GRANITE FALLS
	HLLKWAXX	HALLS LAKE	HALLS LAKE
	JUNTWAXA	JUANITA	KIRKLAND
	KNWCWAXA	KENNEWICK-HIGHLANDS	KENNEWICK
	KNWCWAXB	KENNEWICK MAIN	KENNEWICK
	KNWCWAXC	KENNEWICK-MEADOW SPRINGS	KENNEWICK
	KRLDWAXX	KIRKLAND	KIRKLAND
	LKGWWAXA	LAKE GOODWIN	LAKE GOODWIN
	LKSTWAXA	LAKE STEVENS	EVERETT
	LVWOWAXX	LEAVENWORTH	WENATCHEE
	MLDNWAXA	MALDEN	ROSALIA
	MNSNWAXA	MANSON	WENATCHEE
	MONRWAXX	MONROE	MONROE
	MRWYWAXA	MANOR WAY	HALLS LAKE
	MYVIWAXX	MARYSVILLE	MARYSVILLE2
	OKDLWAXX	OAKESDALE	OAKESDALE
	PLMNWAXX	PULLMAN	PULLMAN
	QNCYWAXX	QUINCY	QUINCY
	RCBHWAXX	RICHMOND BEACH	RICHMOND BEACH
	RCFRWAXB	ROCKFORD	ROCKFORD
	RCLDWAXA	NORTH RICHLAND	RICHLAND
	RCLDWAXB	RICHLAND	RICHLAND
	RDMDWAXA	REDMOND	BELLEVUE
	RDMDWAXA	REDMOND	KIRKLAND
	RDMDWAXA	REDMOND	SEATTLE
	ROSLWAXA	ROSALIA	ROSALIA
	SKYKWAXX	SKYKOMISH	SKYKOMISH
	SLLKWAXA	SILVER LAKE	SILVER LAKE
	SMSHWAXA	SAMMAMISH	KIRKLAND

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	SNHSWAXX	SNOHOMISH	SNOHOMISH
	SOLKWAXX	SOAP LAKE	SOAP LAKE
	STWDWAXX	STANWOOD	STANWOOD
	SWLYWAXA	SEDRO WOOLLEY	SEDRO WOOLLEY
	THTNWAXA	THORNTON	ROSALIA
	WDLDWAXA	WOODLAND	WOODLAND
	WNTCWAXX	WENATCHEE	WENATCHEE
	WRLDWAXA	WEST RICHLAND	RICHLAND
	WSHGWAXA	WASHOUGAL	CAMAS-WASHOUGAL
	WSRVWAXA	WASHOUGAL RIVER	CAMAS-WASHOUGAL
	WTVLWAXA	WATERVILLE	WATERVILLE
	ACMEWAXA	ACME	ACME-DEMING-WHATCOMCTY
	ALGRWAXX	ALGER	CONTEL-SEDRO WOOLLEY
	BGLKWAXX	BIG LAKE	CONTEL-SEDRO WOOLLEY
	BLANWAXB	BLAINE	BLAINE-BIRCH BAY-GTLD
	BRBAWAXA	BIRCH BAY	BLAINE-BIRCH BAY-GTLD
	BURLWAXX	BURLINGTON	CONTEL-SEDRO WOOLLEY
	CNWWYWAXX	CONWAY	CONTEL-SEDRO WOOLLEY
	CSTRWAXA	CUSTER	CUSTER-GTLD
	DMNGWAXA	DEMING	DEMING-WHATCOMCTY
	EDSNWAXX	EDISON	CONTEL-SEDRO WOOLLEY
	EVSNWAXX	EVERSON	EVERSON-GTLD
	FNDLWAXA	FERNDALE	BELLINGHAM-GTLD
	FNDLWAXA	FERNDALE	FERNDALE-GTLD
	LACNWAXX	LA CONNER	LA CONNER
	LARLWAXX	LAUREL	LAUREL-WHATCOMCTY
	LYNDWAXX	LYNDEN	LYNDEN-MAPLE FALLS-GTLD
	NCHSWAXX	NACHES	NACHES
	SUMSWAXX	SUMAS	SUMAS-GTLD

Incumbent Local Exchange Carrier	CLLI	Wire Center	Exchange
	SWLYWAXX	SEDRO WOOLLEY	CONTEL-SEDRO WOOLLEY
	WSPTWAXA	WESTPORT	WESTPORT
WESTERN WAHAKIAKUM COUNTY TELEPHONE CO.	GRRVWAXA	GRAYS RIVER	GRAYS RIVER
YCOM NETWORKS, INC.	YELMWAXA	RAINIER	RAINIER
	YELMWAXA	YELM	YELM