

**Before the
Washington Utilities and Transportation Commission**

In the Matter of the Petition of)	
)	Docket No. UT-023040
INLAND CELLULAR)	
)	PETITION FOR MODIFICATION
For Designation as Eligible)	
Telecommunications Carriers)	
Under 47 U.S.C. § 214(e)(2))	

Inland Cellular Telephone Company ("ICTC"), as general partner of and on behalf of both Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular) and Eastern Sub-RSA Limited Partnership (d/b/a Inland Cellular), hereby petitions the Commission for modification of its Order designating Inland Cellular¹ eligible telecommunications carrier ("ETC") status for purposes of receiving all 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.

I. Introduction

1. On July 10, 2002, Inland Cellular submitted a petition to the Commission requesting designation as an eligible telecommunications carrier ("ETC") pursuant to Section 214(e)(2) of the Telecommunications Act of 1934, as amended ("Act"), 47 U.S.C. § 214(e)(2), and Section 54.201 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 54.201, for purposes of receiving all available support from the federal Universal Service Fund

¹ See Order Granting Petition for Designation as an Eligible Telecommunications Carrier, Docket No. UT-023040, (August 30, 2002), Page 3, Footnote 10, "Hereinafter the operating company and the limited partnerships, collectively, will be referred to as "Inland Cellular"".

("USF") including, but not limited to, support for rural, insular and high-cost areas and low-income customers. Inland Cellular requested ETC status throughout its FCC licensed service area in Washington, and the Petition set forth the incumbent local exchange carriers ("ILEC's") wire centers in which Inland Cellular provided service. Because Inland Cellular's cellular geographic service area ("CGSA") differed in some cases from the ILEC wire centers, several wire centers were only partially within Inland Cellular's requested ETC service area. Those wire centers were accordingly marked as "partial." The service areas for Inland Cellular that were marked as "partial" included areas where Inland Cellular's CGSA overlapped portions of non-rural telephone company exchanges (service areas) and rural telephone company service areas (exchanges).² The Commission granted Inland Cellular's petition in an order released August 30, 2002, *In the Matter of the Petition of INLAND CELLULAR TELEPHONE COMPANY, d/b/a Inland Cellular, EASTERN SUB-RSA LIMITED PARTNERSHIP, and WASHINGTON RSA No. 8 LIMITED PARTNERSHIP For Designation as an Eligible Telecommunications Carrier*, Docket No. UT-023040 ("*Inland Cellular Order*").

In the designation order, the Commission directed Inland Cellular to petition the FCC for concurrence with its designation for parts of ILEC exchange areas, *Inland Cellular Order* at ¶ 71. This directive was repeated in the ordering clause, *Id.* at ¶ 90.

2. On September 19, 2005, Inland Cellular submitted a petition to the Commission requesting modification of Docket No. UT-023040 ("*Inland Cellular Order*"). In its petition,

² The WUTC has explained that it uses wireline incumbent telephone company exchange names and boundaries to describe wireless and other ETC service areas, but the two designations are independent and the use of exchange names and boundaries is convenience only. See *In the Matter of the Petition of Sprint Corporation, d/b/a Sprint PCS, Sprintcom, Inc., Sprint Spectrum, L.P., and WirelessCo., L.P. for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-043120, Order No. 01, ¶ 7, n.3; ¶ 47, n.19 (Jan. 13, 2005) ("*Sprint PCS Rural Order*").

Inland Cellular requested that the Commission modify its order by eliminating the paragraphs that direct Inland Cellular to make a filing with the FCC. The Commission granted Inland Cellular's petition in an order with a service date of October 12, 2005, *In the Matter of the Petition of INLAND CELLULAR TELEPHONE COMPANY (Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership, For Designation as an Eligible Telecommunications Carrier*, Docket No. UT-023040, Order No. 02, *ORDER GRANTING MODIFICATION*.

3. Inland Cellular requests that the Commission issue an erratum to the original *Inland Cellular Order* in order to correct an error contained in Exhibit C within the July 10, 2002 petition and subsequent August 30, 2002 Order and adopt the attached Exhibit B and Exhibit C to the original *Inland Cellular Order*.

II. Asotin Telephone Company & the Anatone Wire Center

4. In Exhibit C of Inland Cellular's July 10, 2002 petition, Asotin Telephone Company (study area code ("SAC") 522404), Anatone Wire Center was errantly marked as partial. The Anatone Wire Center is clearly within the CGSA of Inland Cellular and Inland Cellular believed that this error would be corrected in Docket No. UT-023040, Order No. 02, *ORDER GRANTING MODIFICATION*.

5. Inland Cellular noticed that USF support³ that it received had not changed and attempted to contact the Universal Service Administration Company ("USAC") through several phone calls (undocumented) and through correspondence dated March 1, 2007, May 24, 2007 and March 7, 2009 (email) (Exhibits D, E and F, respectively), asking why the Commissions'

³ Information from USAC website, www.usac.org, High Cost, USAC FCC Filings, Appendices, HC04-Disaggregated Per Line Support by Zone..

Order had apparently not taken effect. Inland Cellular received a response from USAC on its March 7, 2009 email (answered May 29, 2009) however, Inland Cellular felt that filing a Petition for Redefinition with the FCC was not an option in light of the FCC's decisions referenced in the email. This was primarily because the issue with the Anatone exchange was not addressed and should not have been subject to a Petition for Redefinition.

6. Inland Cellular attempted once again through correspondence dated August 5, 2011 (Exhibit G) to contact USAC. On August 29, 2011, Inland Cellular received a written response from USAC dated August 26, 2011 (Exhibit H). Regarding the Asotin Telephone Company and the Anatone Wire Center, USAC states:

Before USAC recognizes eligibility in the Anatone wire center, the WUTC must confirm that the partial wire center designation was an error and issue an erratum to the original August 2002 Order stating that ICTC [Washington RSA No. 8 Limited Partnership] is an ETC in the entirety of the Anatone exchange. Upon the WUTC's eligibility clarification, USAC will grant ICTC [Washington RSA No. 8 Limited Partnership] eligibility in the Anatone exchange.

III. All Other Wire Centers marked as Partial

7. With the exception of the Asotin Telephone Company and the Anatone Wire Center, Exhibit B and Exhibit C of Inland Cellular's July 10, 2002 petition were marked as "partial" because those wire centers are not completely within the CGSA of Inland Cellular. Inland Cellular believes that, although these wire centers are geographically approximately no less than 75 percent within the CGSA of Inland Cellular and/or the portion that is outside the CGSA of Inland Cellular is covered by Inland Cellular contours or covered by wholesale agreements (roaming agreements) with competing wireless providers, these wire centers were properly marked as "partial".

IV. Conclusion

8. The Commission has determined that the public interest is served by designating Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (both *d/b/a* Inland Cellular) as ETC's throughout Inland Cellular's licensed service areas, which overlaps many ILEC service areas throughout eastern Washington. Although Inland Cellular does not know what effect, if any, this will have on the Universal Service Funds or the funding levels to Inland Cellular, Inland Cellular respectfully requests that the Commission issue the requested modification set forth above.

Respectfully submitted,

Inland Cellular Telephone Company

As General Partner for

Washington RSA No. 8 Limited Partnership (*d/b/a* Inland Cellular) &
Eastern Sub-RSA Limited Partnership (*d/b/a* Inland Cellular)

By: 

James K. Brooks
Treasurer/Controller

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

CERTIFICATE OF SERVICE

I, James K. Brooks, hereby certify that I have, on this 3rd day of October, 2012, placed in the United States mail, first-class postage pre-paid, a copy of the foregoing: In the Matter of the Petition of INLAND CELLULAR For Designation as Eligible Telecommunications Carriers Under 47 U.S.C. § 214(e)(2), Docket No. UT-023040, PETITION FOR MODIFICATION, filed today to the following:

Asotin Telephone Company
TDS Telecom
Gail Long, State Government Affairs
Post Office Box 1566
Oregon City, Oregon 97045

Frontier Communications Northwest, Inc.
Helen Hall, Director-State Gov. Relations
1800 41st Street
WA0105RA
Everett, Washington 98206

CenturyLink
Mark Reynolds
1600 7th Avenue
Room 3206
Seattle, Washington 98191-0001

Washington Independent Telephone Assoc.
Betty Buckley, Exec Vice President
2405 Evergreen Park Drive SW
Suite B-4
Olympia, Washington 98502-6053

CenturyLink
Tim Grigar, VP & GM
8102 Skansie Avenue
Gig Harbor, Washington 98332-8415

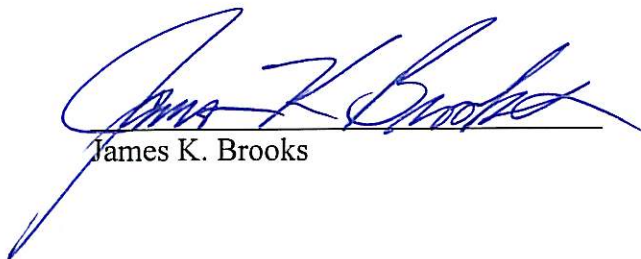

James K. Brooks

Exhibit B

NON-RURAL LEC WIRE CENTERS

LEC: Verizon Northwest, Inc. – WA (currently Frontier)

Wire Center : Farmingdale
Garfield
Garrison
Latah
Palouse
Pullman
Oakesdale
Tekoa
Thornton

Rosalia (Partial)
Soap Lake (Partial)

LEC: Qwest Corp. – WA (currently CenturyLink)

Wire Centers: Colfax
Clarkston
Dayton
Moses Lake
Othello
Pomeroy
Walla Walla
Warden
Waitsburg

Coulee Dam (Partial)
Ephrata (Partial)
Pasco (Partial)

Exhibit C

RURAL LEC WIRE CENTERS

LEC: CenturyTel of Washington, Inc.

Wire Centers: Almira
Creston
Davenport
Edwall
Eureka
Harrington
Lind
Odessa
Ritzville
Sprague
Starbuck
Washtucna
Wilbur
Wilson Creek

Coulee City (Partial)
Eltopia (Partial)
Rearden (Partial)
Royal City (Partial)

LEC: St. John Tel. Co.

Wire Center(s): Saint John

LEC: Pioneer Tel. Co.

Wire Center(s): Lacrosse
Endicott

LEC: Inland Tel. Co.

Wire Centers: Uniontown
Prescott

LEC: Asotin Tel. Co.

Wire Centers: Asotin
Anatone

EXHIBIT "D"

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300



March 1, 2007

Via PDF Email and USPS

Universal Service Administration Company
444 Hoes Lane
Piscataway NJ 08854

Re: Eligible Telecommunications Carrier status-Modified Order

In reviewing the quarterly appendices on the USAC website, USAC FCC Filings, FCC Filings – 2006 and FCC Filings – 2007, Appendix HC04 Disaggregated Per Line Support by Zone for all four quarters in both years, we have noticed that USAC is not recognizing some of the Zones reported. The Zones that are not listed but were reported on FCC Form 525 for 2006 for Washington RSA No. 8 Limited Partnership (SAC 529003) and Eastern Sub-RSA Limited Partnership (SAC 529004) are Asotin Telephone Company, Anatone and Centurytel-Washington, Coulee City, respectively. For 2007, the Zones that are not listed but were reported on FCC Form 525 for Washington RSA No. 8 Limited Partnership is Asotin Telephone Company, Anatone and for Eastern Sub-RSA Limited Partnership are Centurytel-Washington, Coulee City, Eltopia and Reardan.

All of these Zones should have been included per the enclosed copy of Washington Utilities and Transportation Commission Docket No. UT-023040, Order No. 02; Order Granting Modification for Designation as an Eligible Telecommunications Carrier. This order modifies the original order, granting Eligible Telecommunications Carrier (ETC) status to Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular), Inland Cellular Telephone Company general partner, granted on July 26, 2002. The modification eliminates the requirement for Inland Cellular to "petition the FCC for concurrence in designation as an ETC for service areas that overlap parts of rural telephone company service areas and non-rural incumbent service areas (exchanges)." This Order was sent to USAC on December 5, 2005.

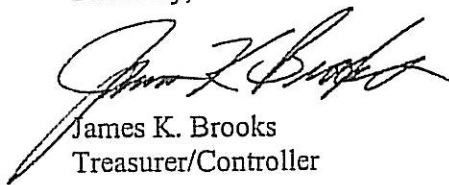
It has also been brought to my attention that Washington RSA No. 8 Limited Partnership (SAC 529003) did not receive Interstate Access Support ("IAS") for 2006. In reviewing the quarterly appendices on the USAC website, USAC FCC Filings, FCC Filings – 2006, Appendix HC12 Interstate Access Support Projected by State by Study

EXHIBIT "D" Page 2

Area, Fourth Quarter 2006, the certification column has an "N". Enclosed are the certifications for receipt of IAS that were sent to both USAC and the FCC on June 9, 2005 and June 23, 2006 for the years 2006 and 2007, respectively. Both certifications contain the relevant certification language, "This is to certify that Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular) will use its Universal Service Interstate Access Support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."

Please let me know if there is any additional information that you require. If you have any questions, I can be contacted at (509) 649-2500.

Sincerely,



James K. Brooks
Treasurer/Controller

Enclosures

Cc: Marlene H. Dortch, Secretary, FCC

EXHIBIT "E"

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300



May 24, 2007

Via Federal Express overnight delivery

Karen Majcher, VP High Cost and Low Income Division
Universal Service Administration Company
2000 L Street NW
Suite 200
Washington DC 20036
(202) 776-0200

Re: Eligible Telecommunications Carrier status-Modified Order

Dear Karen:

In reviewing the quarterly appendices on the USAC website, USAC FCC Filings, FCC Filings – 2006 and FCC Filings – 2007, Appendix HC04 Disaggregated Per Line Support by Zone, for four quarters and three quarters respectively, we have noticed that USAC is not recognizing some of the Zones reported. The Zones that are not listed but were reported on FCC Form 525 for 2006 for Washington RSA No. 8 Limited Partnership (SAC 529003) and Eastern Sub-RSA Limited Partnership (SAC 529004) are Asotin Telephone Company, Anatone and Centurytel-Washington, Coulee City, respectively. For 2007, the Zones that are not listed but were reported on FCC Form 525 for Washington RSA No. 8 Limited Partnership is Asotin Telephone Company, Anatone and for Eastern Sub-RSA Limited Partnership are Centurytel-Washington, Coulee City, Eltopia and Reardan.

These Zones should have been included per the enclosed copy of Washington Utilities and Transportation Commission Docket No. UT-023040, Order No. 02; Order Granting Modification for Designation as an Eligible Telecommunications Carrier; with a service date of October 12, 2005. This order modifies the original order, granting Eligible Telecommunications Carrier (ETC) status to Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular), Inland Cellular Telephone Company general partner, granted on July 26, 2002. The modification eliminates the requirement for Inland Cellular to "petition the FCC for concurrence in designation as an ETC for service areas that overlap parts of rural

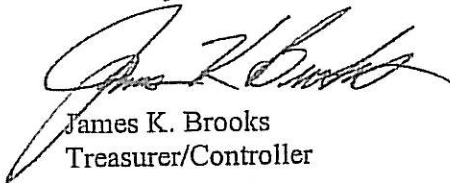
EXHIBIT "E" Page 2

telephone company service areas and non-rural incumbent service areas (exchanges).”
This Order was sent to USAC on December 5, 2005.

It has also been brought to my attention that Washington RSA No. 8 Limited Partnership (SAC 529003) did not receive Interstate Access Support (“IAS”) for 2006. In reviewing the quarterly appendices on the USAC website, USAC FCC Filings, FCC Filings – 2006, Appendix HC12 Interstate Access Support Projected by State by Study Area, Fourth Quarter 2006, the certification column has an “N”. Enclosed are the certifications for receipt of IAS that were sent to both USAC and the FCC on June 9, 2005 and June 23, 2006 for the years 2006 and 2007, respectively. Both certifications contain the relevant certification language, “This is to certify that Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular) will use its Universal Service Interstate Access Support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”

This is our second letter of inquiry regarding this matter and would appreciate a response. Please let me know if there is any additional information that you require. If you should have any questions, I can be contacted at (509) 649-2500.

Sincerely,



James K. Brooks
Treasurer/Controller

Enclosures

Cc: Marlene H. Dortch, Secretary, FCC

EXHIBIT "F"

Subject: RE: UNIVERSAL SERVICE FUNDS
From: "Karen Majcher" <KMajcher@usac.org>
Date: 5/29/2009 10:47 AM
To: "James Brooks" <jbrooks@inlandnet.com>
CC: "Greg Maras" <gmaras@inlandnet.com>

James -

One correction to my email below. The adjustment for the Creston wire center will be included in the June disbursements paid at the end of July.

Karen

-----Original Message-----

From: Karen Majcher
Sent: Friday, May 29, 2009 1:33 PM
To: 'James Brooks'
Cc: Greg Maras
Subject: RE: UNIVERSAL SERVICE FUNDS

James -

I apologize that it has taken us so long to research your inquiry. I hope the information below answers your questions.

SAC 479007 (Idaho)

o No additional support is due in the two ILEC areas in question - Verizon and Qwest.

o Historically, Verizon filed at the study area level. Therefore, Inland is receiving full support for lines filed.

o Qwest receives no support. Therefore, Inland will not receive support in this area.

SACs 529003 and 529004 (Washington):

In Washington, one wire center will be added (Creston in SAC 429004), which will result in an estimated \$15-20K from 1999-2009. This adjustment should occur in May disbursements paid in June.

Inland cannot be granted eligibility in any partially served wire centers until Inland seeks a Petition for Redefinition and it is granted by the FCC. In the original ETC order, the WA PUC required FCC concurrence in these areas. Subsequently, the FCC issued two orders stating that the smallest area in which eligibility should be granted is a fully served wire center. Later, the PUC attempted to modify the original order retroactively. However, the PUC cannot avoid the FCC's decision with a subsequent order.

The timeline of the orders is laid out below:

8/30/2002 ETC Order issued - WA PUC required FCC concurrence for partially served wire centers.
4/12/2004, 3/17/2005 FCC disallowed partial wire center eligibility (see FCC 04-37 and FCC 05-45).
10/12/2005 The WA PUC erroneously attempted to modify the ETC order to allow partial wire center eligibility.

Please let me know if you have any additional questions.

Thanks,
Karen

-----Original Message-----

From: James Brooks [mailto:jbrooks@inlandnet.com]
Sent: Saturday, March 07, 2009 8:19 PM
To: Karen Majcher
Cc: Greg Maras
Subject: UNIVERSAL SERVICE FUNDS

Karen,

Attached are PDF's of the correspondence that I have sent to USAC and yourself. The first one was sent on December 5, 2005, after Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular)(SAC 529003) and Eastern Sub-RSA Limited Partnership (d/b/a Inland Cellular)(SAC 529004), received an Order (UT-023040) from the WUTC Granting Modification. The Order effectively allows Inland Cellular to include all wire centers that were listed in its original petition as partial. Since this Order, I have marked "Y"es in the ETC Designation column. I was reminded of this subject as I was attempting to use the on-line Form 525 submission where I found "N"o for these wire centers. It appears that Inland Cellular has not received all of the support for which it is entitled since the first quarter of 2006.

In case the attachments are too large for you to receive, this email may come in several parts. Please get back to me. I am also curious on why Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular)(SAC 479007) is not receiving IAS for its Idaho operations. Inland Cellular was granted ETC status by the IPUC (Order No. 30212) on December 28, 2006, for non-rural exchanges (i.e. Qwest and Verizon). That Order was conveyed to USAC on June 18, 2007, via email and also hard copy.

Thank you.

--

James K. Brooks
Treasurer/Controller

(509) 649-2500
(509) 649-3300 (fax)

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prohibited. If you have received this message in error, please do not read it. Please reply to sender and delete this e-mail. Thank you.

EXHIBIT "G"

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices



103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300

August 5, 2011

Via Federal Express overnight delivery

Karen Majcher, VP High Cost and Low Income Division
Universal Service Administration Company
2000 L Street NW
Suite 200
Washington DC 20036
(202) 776-0200

Re: Universal Service Support

Dear Ms. Majcher:

As the Treasurer/Controller of Inland Cellular Telephone Company ("ICTC"), the General Partner of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (both *d/b/a* Inland Cellular), I am writing to inquire about the proper procedure in order to correct and receive Universal Service Funds; High Cost Support and Interstate Access Support. To be specific, the Washington Utilities and Transportation Commission Order (partial exchanges) and the Idaho Public Utilities Commission

BRIEF HISTORY

The Washington Utilities and Transportation Commission ("WUTC"), at its meeting held on July 26, 2002, granted the petition of Inland Cellular Telephone Company, the General Partner of and on behalf of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (both *d/b/a* Inland Cellular), to be designated as Eligible Telecommunications Carriers (ETC's) in Docket No. UT-023040 (Order enclosed). Upon receiving an official copy of the Order from the WUTC, on September 30, 2002, the Order was sent to the Universal Service Administration Company ("USAC"). USAC assigned Service Area Code (SAC) 529003 to Washington RSA No. 8 Limited Partnership and SAC 529004 to Eastern Sub-RSA Limited Partnership and lines were and have been reported to USAC.

On October 12, 2005, the WUTC granted the petition of Inland Cellular Telephone Company, the General Partner of and on behalf of Washington RSA

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No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (both *d/b/a* Inland Cellular), to modify the original ETC Order in Docket No. UT-023040, Order No. 02 (Order enclosed). The modification eliminates the requirement for Inland Cellular "to petition the FCC for concurrence in designation as an ETC for service areas that overlap parts of rural telephone company service areas and non-rural incumbent service areas (exchanges)."

On December 5, 2005, the Order Granting Modification was sent to USAC.

On March 1, 2007, a letter was sent to USAC asking why the Order Granting Modification from the WUTC did not affect the universal service funding for certain exchanges that were originally filed as partial. No response was received.

On May 24, 2007, another letter was sent to USAC asking why the Order Granting Modification from the WUTC did not affect the universal service funding for certain exchanges that were originally filed as partial. No response was received.

On December 28, 2006, the Idaho Public Utilities Commission granted the petition of Inland Cellular Telephone Company, the General Partner of and on behalf of Washington RSA No. 8 Limited Partnership (*d/b/a* Inland Cellular) to be designated as an Eligible Telecommunications Carrier (ETC) "as to the non-rural wire centers set forth in Exhibit B therein" in Case No. INC-T-06-02, Order No. 30212 (Order enclosed).

On June 18, 2007, the Order, which includes Exhibit B, was sent to USAC along with a SAC Assignment Request form. USAC assigned Service Area Code (SAC) 479007 to Washington RSA No. 8 Limited Partnership and lines were and have been reported to USAC. No USF funds have been received.

WASHINGTON

In WUTC, Docket No. UT-023040, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, the WUTC included as an exhibit the list of non-rural and rural Local Exchange Carriers ("LEC") exchanges in which Inland Cellular provided over-lapping service, complete and partial (Docket No. UT-023040, Exhibit A). All of the exchanges in Exhibit A that are marked as "partial", with the exception of Asotin Telephone Company, Anatone exchange, were marked as partial because the Cellular Geographic Service Area ("CGSA") for which Washington RSA No. 8 Limited Partnership or Eastern Sub-RSA Limited Partnership are licensed to serve, does not allow service to the entire exchange. As an example, the CenturyTel of Washington, Inc. exchange of Coulee City is split by the Columbia River, which happens to be Eastern Sub-RSA Limited Partnerships CGSA boundary. The Asotin Telephone Company exchange of Anatone was marked "partial" in error; being entirely within the CGSA of Washington RSA No. 8 Limited Partnership. In its Order, the WUTC states (*at 90*):

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"Inland Cellular must petition the FCC for concurrence in designation as an ETC for areas that are parts of ILEC exchanges."

In WUTC, Docket No. UT-023040, Order No. 2, Order Granting Modification, the WUTC reconsidered the condition contained in the first order after ICTC petitioned the WUTC and pointed out Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership service area maps which contained the CGSA's. The Order Granting Modification states (*at 20*):

"Inland Cellular Telephone Company is not required to petition the FCC for concurrence in designation as an ETC for service areas that overlap parts of rural telephone company service areas and non-rural incumbent service areas (exchanges)."

In support of the WUTC's conclusion and Order, Commission Staff Analysis within the Order states (*at 6*):

"Commission [S]taff notes that in previous instances when carriers sought designation for service areas that overlapped parts of wireline exchanges concerns were raised that designation of a wireless company for a service area that overlaps part of an incumbent's exchange might result in cream skimming. Commission Staff contends that many precedents of the Commission support conclusion that cream skimming is not a concern when federal support is disaggregated. Commission Staff asserts that accepting geographic boundaries as they are recognizes the technological differences that exist between carriers, and takes into account the variations in the statutory and regulatory requirements placed on wireline and wireless carriers."

Further, in the Commission discussion and decision, the Commission states (*at 8*):

"We have already determined that it is in the public interest to designate wireless companies as additional ETCs for the locations served by rural telephone companies; that it is in the public interest to make those designations whether the boundaries of the respective rural and wireless carriers' service areas are coincident or overlap; and that disaggregation eliminates concerns about cream skimming."

In conclusion, ICTC is certain that Washington RSA No. 8 Limited Partnership (SAC 529003) should receive USF support from its lines reported for the Asotin Telephone Company exchange of Anatone since it is completely within its CGSA and it was marked as "partial" in error. ICTC also believes that the WUTC was correct in its Order Granting Modification since disaggregation existed in Washington at the time that this Order was issued; cream skimming was reviewed and it was concluded that it was in the public interest.

IDAHO

In the Idaho Public Utilities Commission ("IPUC"), Case No. INC-T-06-02, Order No. 30212, Order states:

EXHIBIT "G" Page 4

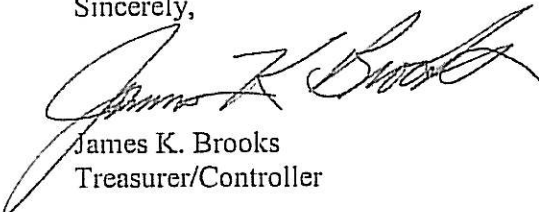
"IT IS HEREBY ORDERED that Inland Cellular Telephone Company's Petition for eligible telecommunications carrier designation as to the non-rural wire centers set forth in Exhibit B therein is granted."

Exhibit B is entitled "NON-RURAL LEC WIRE CENTERS" and contains all of the wire centers of Verizon Northwest, Inc.-ID and Qwest Corp.-ID that are within the CGSA of Washington RSA No. 8 Limited Partnership in Idaho (ID RSA 1 B2 and ID RSA 2 B2).

In conclusion, ICTC is certain that when the IPUC, in referencing Exhibit B, meant the Non-Rural "LEC" Wire Centers since there is no distinction within the petition or in Exhibit B as to rural vs. non-rural wire centers; all exhibits reference Rural or Non-Rural "LEC" Wire Centers. This is re-enforced by the Community Action Partnership Association of Idaho which performs the Lifeline/Link-up verifications in the State of Idaho. After this Order was issued and without provocation by Inland Cellular, the Community Action Partnership Association of Idaho notified Inland Cellular that they would be performing this function and that Inland Cellular would not need to use subscriber certifications; Washington RSA No. 8 Limited Partnership receives Lifeline/Link-up Support from USAC. It could also be concluded that, since Washington RSA No. 8 Limited Partnership has not received any USF Interstate Access Support, none of these exchanges must be in the Verizon Northwest, Inc.-ID (SAC 472416) USF cost filing for Interstate Access Support; ICTC believes that they are and would like to ask for confirmation of the wire centers contained in Exhibit B.

Please let me know if there is any additional information that you require or if you should have any suggestions on how to resolve these issues. If you should have any questions, I can be contacted by email at jbrooks@inlandnet.com or by phone at (509) 649-2500.

Sincerely,



James K. Brooks
Treasurer/Controller

Enclosures

Cc: Marlene H. Dortch, Secretary, FCC
Commissioner Philip Jones, WUTC
Commissioner Patrick Oshie, WUTC
Commissioner Jeffrey Goltz, WUTC
Commissioner Marsha Smith, IPUC
Commissioner Mack Redford, IPUC
Commissioner Paul Kjellander, IPUC