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May 2, 2007

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

**RE: Verified Petition of Sprint Nextel Corporation to Amend Its Designation as an Eligible Telecommunications Carrier and Request for Waiver of WAC 480-123-030(1)(g)**

Dear Ms. Washburn:

Enclosed please find an original and three redacted copies of the "Verified Petition of Sprint Nextel Corporation to Amend Its Designation as an Eligible Telecommunications Carrier and Request for Waiver of WAC 480-123-030(1)(g)", as well as an original and 12 copies of the unredacted version of this filing (per WAC 480-07-160(3)(c)(iii)). Please note that the information included in Exhibit B (Service Area and Network Coverage Map) and Exhibit C (Supplemental Service Improvement Plan for the State of Washington) is considered confidential pursuant to WAC 480-07-160 and RCW 80.04.095. This information is exempt from public disclosure under Exemption 4 of the Freedom of Information Act, 5 U.S.C. §552(b)(4). The aforementioned information is marked as confidential within the filing.

Feel free to contact me with any questions or concerns you may have regarding this filing.

Sincerely,

Kristin L. Jacobson

Enclosures

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07 MAY -7 AM 11:50  
STATE OF WASH.  
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COMMISSION



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

In the Matter of )  
)  
Petition of Sprint Nextel Corporation to )  
Amend Its Designation as an Eligible )  
Telecommunications Carrier and Request )  
for Waiver of WAC 480-123-030(1)(g)

DOCKET NO. UT-\_\_\_\_\_

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STATE OF WASH  
UTIL. AND TRAN  
COMMISSION

**VERIFIED PETITION OF SPRINT NEXTEL CORPORATION TO AMEND ITS  
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER AND  
REQUEST FOR WAIVER OF WAC 480-123-030(1)(g)**

Dated: May 7, 2007

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SPRINT NEXTEL CORPORATION*

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## **I. INTRODUCTION**

1. Sprint Nextel Corporation (“Sprint Nextel”), on behalf of itself and its subsidiaries and affiliates offering commercial mobile radio services (“CMRS”) in the State of Washington, submits this Petition to Amend its Designation as a Competitive Eligible Telecommunications Carrier (“ETC”) and Request for Waiver of WAC 480-123-030(1)(g) pursuant to Section 214(e) of the Telecommunications Act of 1996 (the “Act”), 47 U.S.C. § 151, *et. seq.*, Part 54 of the Federal Communications Commission’s (“FCC”) rules and regulations governing universal service (“FCC Rules”) and the Commission’s universal service rules, WAC 480-123-010, *et seq.*

2. This Petition seeks to amend the ETC designations the Washington Utilities and Transportation Commission (“Commission”) granted to Sprint Nextel on October 29, 2003 in Docket No. UT-031558 and January 13, 2005 in Docket No. UT-043120. Specifically, Sprint Nextel respectfully requests that the Commission amend the foregoing ETC designations as follows:

(a) To consolidate the Company’s ETC designations under the name of the parent company, Sprint Nextel Corporation;

(b) To expand the Company’s designated ETC service area to include the eighteen (18) incumbent local exchange carrier (“ILEC”) wire centers set forth on the attached

**Exhibit A;**

(c) To expand the Company's designated ETC service area to include the entire wire center boundary<sup>1</sup> where the Company was previously designated for only a portion of the wire center in Docket No. UT-031558 (as set forth on **Exhibit E**); and

(d) To include all eligible Sprint Nextel customers, including those that subscribe to the Company's iDEN service offerings.

3. Sprint Nextel also requests a limited waiver of WAC 480-123-030(1)(g) to the extent it would require Sprint Nextel to demonstrate that it maintains four hours of battery back up power at each cell site in its iDEN network serving the Company's designated ETC service areas.

## **II. BACKGROUND**

### **A. Identification of Petitioner**

4. The name of the Petitioner is Sprint Nextel Corporation. Sprint Nextel submits this Petition on behalf of itself and its subsidiaries and affiliates providing CMRS in the State of Washington. Currently, Sprint Nextel's subsidiaries and affiliates providing CMRS service in Washington include Sprint Nextel Corporation, Sprint PCS, SprintCom, Inc., Sprint Spectrum, L.P., WirelessCo, L.P., and Nextel West Corp.

5. Sprint Nextel is a Kansas corporation with its principal place of business located at 6200 Sprint Parkway, Overland Park, Kansas.

6. All correspondence regarding this Application should be directed to the undersigned counsel for Sprint Nextel:

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<sup>1</sup> A "wire center" is defined as "the location of a local switching facility containing one or more central offices . . ." 47 C.F.R. § 54.5. The "wire center boundaries" define the area in which all customers served by a given wire center are located. *Id.*

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**B. Sprint Nextel's ETC Designations**

7. By Order dated October 29, 2003, the Commission designated Sprint Nextel's predecessor, Sprint Corporation, as a competitive ETC in certain areas served by Qwest Corporation and Verizon Northwest, Inc.<sup>2</sup> In certain instances, Sprint Nextel was only designated for the portion of the Qwest or Verizon Northwest wire center where the Company currently provided service.

8. On January 13, 2005, the Commission also designated Sprint Nextel as a competitive ETC for the portions of its licensed service area that coincide or overlap, in whole or in part, with exchange areas served by the following rural telephone companies: United Telephone Northwest; Asotin Telephone Company, CenturyTel of Washington, Inc., CenturyTel of Inter-Island Inc., Ellensburg Telephone Co., Hat Island Telephone Co., Hood Canal Telephone Co., Inland Telephone Co., Kalama Telephone Co., Lewis River Telephone Co., McDaniel Telephone Co., Mashell Telecom, Inc., St. John Telephone Co., Tenino Telephone Co., Toledo Telephone Co., Inc., Whidbey Telephone Co., and YCOM Networks, Inc.<sup>3</sup>

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<sup>2</sup> *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-031558, *Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, Attachment A (October 29, 2003) ("Non-Rural ETC Designation Order").

<sup>3</sup> *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 Granting Petition for Designation as an Eligible Telecommunications Carrier*, Appendix A (Jan. 13, 2005), corrected (Jan. 27, 2005) ("Rural ETC Designation Order").

**C. Sprint Corporation's Merger With Nextel Communications, Inc.**

9. In August 2005, Sprint Corporation merged with Nextel Communications, Inc., to form Sprint Nextel Corporation. Prior to the merger, Sprint Corporation provided wireless telecommunications services utilizing Code Division Multiple Access ("CDMA") technology. Nextel Communications, Inc. provided wireless telecommunications services utilizing integrated Digital Enhanced Network ("iDEN") technology.

10. Sprint Nextel's iDEN technology provides exceptional sound and transmission quality using a state-of-the-art technology capable of delivering all-digital wireless voice communications, Nextel Walkie-Talkie service, mobile messaging, email and Internet access and GPS location assistance.<sup>4</sup> Sprint Nextel's iDEN service offerings also include nationwide calling and enhanced features such as voice-mail, caller-ID, call-waiting and call-forwarding.

**D. Applicable Statutes and Rules**

11. The statutes and rules implicated by the instant Petition are as follows: 47 U.S.C. §§ 214(e) and 254(e); 47 C.F.R. Part 54; and WAC 480-123-020 through 480-123-999.

**E. Description Of Expanded ETC Service Area**

12. In this proceeding, Sprint Nextel seeks to expand its designated ETC service area to include the eighteen (18) ILEC wire centers set forth on **Exhibit A**.<sup>5</sup> Sprint Nextel further seeks to expand its designated ETC service area to include the entire wire center boundary of the non-rural ILEC wire centers where the Company was previously designated in Docket No. UT-031558 as set forth on **Exhibit E**. Pursuant to WAC 480-123-030(1)(f), Sprint Nextel's

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<sup>4</sup> Sprint Nextel's iDEN network is also very reliable and is widely used by first responders (e.g., police and fire departments) for essential communications during emergency situations.

<sup>5</sup> Sprint Nextel has previously been designated as a competitive ETC in each of the identified ILEC's service areas.



proposed ETC service area and network coverage are depicted on the attached **Confidential Exhibit B.**

**III. SPRINT NEXTEL CONTINUES TO SATISFY EACH OF THE PREREQUISITES FOR DESIGNATION AS A COMPETITIVE ELIGIBLE TELECOMMUNICATIONS CARRIER**

13. To qualify for ETC designation under 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201, an applicant must satisfy the following requirements:

- (a) The applicant must be a “common carrier” under federal law;
- (b) The applicant must offer or be capable of offering the services or functionalities set forth in 47 C.F.R. § 54.101(a)(1)-(a)(9) (the “Supported Services”) using its own facilities, or a combination of its own facilities and resale of another carrier’s services;
- (c) The applicant must commit to advertise the availability and charges for the Supported Services using media of general distribution; and
- (d) The applicant must commit to provide the Supported Services throughout its designated ETC service area upon reasonable request.

14. Section 214(c)(2) of the Act provides that ETC designations shall be made for a “service area” designated by the state commission. In an area served by a rural telephone company, “service area” means the rural ILEC’s study area unless and until the state commission and FCC cooperatively establish a different definition of service area for such company.<sup>6</sup> On August 17, 1998, the Commission and twenty ILECs filed a petition with the FCC seeking the FCC’s concurrence with the Commission’s designation of the individual exchanges of fifteen rural LEC’s as their “service areas” for universal service purposes. In its Order released September 9, 1999, the FCC agreed with the Commission’s proposed service area designation,

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<sup>6</sup> 47 C.F.R. § 54.207(b).

stating that redefinition along exchange-area boundaries was “warranted in order to promote competition” in Washington.<sup>7</sup>

15. Consistent with the public interest, convenience, and necessity, a competitive ETC may be designated in any area served by a non-rural ILEC so long as the applicant meets the requirements of 47 U.S.C. § 214(e)(1). In an area served by a rural ILEC, the Commission must determine that the designation of a competitive ETC will serve the public interest. 47 U.S.C. § 214(e)(2).

16. The Commission previously determined that Sprint Nextel satisfies each of the foregoing requirements for designation as a competitive ETC. As demonstrated below, Sprint Nextel satisfies each of these requirements in the additional ILEC wire centers for which it seeks designation in this proceeding and for customers subscribing to the Company’s iDEN service offerings.

**A. Sprint Nextel Is A Common Carrier**

17. The first requirement for ETC designation is that the applicant is a common carrier. 47 U.S.C. § 214(e)(1). A common carrier is defined by the Act as “any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio . . . .” 47 U.S.C. § 153(10). The FCC has determined that wireless telecommunications is a common carrier service. *See* 47 C.F.R. § 20.9(a). Sprint Nextel is therefore deemed a common carrier for purposes of ETC designation.

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<sup>7</sup> *In the Matter of Petition for Agreement with Designation of Rural Company Eligible Telecommunications Carrier Service Areas and for Approval of the Use of Disaggregation of Study Areas for the Purpose of Distributing Portable Federal Universal Service Support*, CC Docket 96-45, *Memorandum Opinion and Order*, DA-99-1844 ¶ 8 (rel. Sept. 9, 1999) (“*Redefinition Order*”); *see also In the Matter of the Petitions of Yelm Telephone Co., et al. for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-97-0333 to 0354, 0356, *Order Designating Eligible Telecommunications Carriers* (Dec. 23, 1997).

**B. Sprint Nextel Provides Each Of The Nine Supported Services**

18. The second requirement for ETC designation is that the applicant be capable of and committed to providing each of the nine Supported Services upon designation. 47 U.S.C. § 214(e)(1)(A). Sprint Nextel is capable of, and currently does provide, the Supported Services as follows:

(a) Voice Grade Access: The FCC has determined that voice grade access to the public switched telephone network means the ability to make and receive calls with a minimum bandwidth of 300 to 3500 Hertz. 47 C.F.R. § 54.101(a)(1). Through its interconnection agreements with various ILECs, all of Sprint Nextel's Washington subscribers are currently able to make and receive calls on the public switched telephone network within the FCC's specified frequency range.

(b) Local Usage: "Local usage" means an amount of minutes of use of exchange service, as prescribed by the FCC, provided free of charge to end users. 47 C.F.R. § 54.101(a)(2). Unlimited local usage is not required of any ETC under federal law.<sup>8</sup> The FCC has determined that a wireless carrier's inclusion of local usage in a variety of service offerings satisfies the obligation to provide local usage.<sup>9</sup> Sprint Nextel currently offers a variety of service offerings which include varying amounts of local usage. In addition, Sprint Nextel expects to comply with any specific local usage requirements adopted by the FCC and required of federal ETCs in the future.

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<sup>8</sup> *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Order and Order on Reconsideration*, FCC 03-170, ¶ 14 (rel. July 14, 2003) ("*July 2003 Order*"); *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, FCC 05-46, ¶ 32 (rel. March 17, 2005) ("*March 2005 Order*").

<sup>9</sup> *In the Matter of Federal-State Joint Board on Universal Service Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion and Order*, ¶ 20 (rel. January 22, 2004) ("*Virginia Cellular*").

(c) Dual Tone Multi-Frequency Signaling or Its Functional Equivalent: “Dual Tone Multi-Frequency” (“DTMF”) is a method of signaling that facilitates the transportation of call set-up and call detail information. 47 C.F.R. § 54.101(a)(3). The FCC has recognized that “wireless carriers use out-of-band signaling mechanisms . . . . [It] is appropriate to support out-of-band signaling mechanisms as an alternative to DTMF signaling.”<sup>10</sup> Sprint Nextel currently uses out-of-band digital signaling and in-band multi-frequency signaling that is the functional equivalent of DTMF signaling, in accordance with the FCC’s requirements.

(d) Single-Party Service or its Functional Equivalent: The FCC has determined that a CMRS provider satisfies the requirement of offering single party service when it offers a dedicated message path for the length of a user’s particular transmission. 47 C.F.R. § 54.101(a)(4). Sprint Nextel provides single-party service by providing a dedicated message path for the length of a user’s wireless transmission in all of its service offerings.

(e) Access to Emergency Service: “Access to emergency service” means the ability to reach a public service answering point (“PSAP”) by dialing “911.” The FCC also requires that a carrier provide access to enhanced 911 (“E911”), which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), when the PSAP is capable of receiving such information and the service is requested from the carrier. 47 C.F.R. § 54.101(a)(5). Sprint Nextel currently provides all of its customers with the ability to access emergency services by dialing “911.” Sprint Nextel is deploying E911 facilities in Washington in response to requests from local PSAPs and will continue to work with local PSAPs within its ETC Service Areas.

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<sup>10</sup> *Universal Service Order*, ¶ 71.

(f) Access to Operator Services: “Access to operator services” means any automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call. 47 C.F.R. § 54.101(a)(6). Sprint Nextel provides all of its customers with access to operator services provided either by Sprint Nextel or third parties.

(g) Access to Interexchange Service: “Access to interexchange service” means the ability to access an interchange carrier’s network. 47 C.F.R. § 54.101(a)(7). The provision of equal access to interexchange service – *i.e.*, the ability of a consumer to access a presubscribed long distance carrier – is not a prerequisite to designation as a competitive ETC.<sup>11</sup> Sprint Nextel provides all of its customers with the ability to make and receive interexchange calls.

(h) Access to Directory Assistance: “Access to directory assistance” means the ability to provide access to a service that makes directory listings available. 47 C.F.R. § 54.101(a)(8). Sprint Nextel provides all of its customers with access to directory assistance by dialing “411” or “555-1212.”

(i) Toll Limitation Services: An ETC must offer “toll limitation” services to qualifying low-income consumers at no charge. 47 C.F.R. § 54.101(a)(9). “Toll limitation” is defined as either “toll blocking” or “toll control” if a carrier is incapable of providing both, but as both “toll blocking” and “toll control” if a carrier can provide both. 47 C.F.R. § 54.400(d). Toll blocking allows consumers to elect not to allow the completion of outgoing toll calls. 47 C.F.R. § 54.400(b). Toll control allows consumers to specify a certain amount of toll usage that may be incurred per month or per billing cycle. 47 C.F.R. § 54.400(c). Sprint Nextel is capable of and does provide toll limitation to Lifeline subscribers.

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<sup>11</sup> *July 2003 Order*, ¶¶ 14-15; *Universal Service Order*, ¶ 78.

**C. Sprint Nextel Will Continue To Offer And Advertise The Availability Of, And Charges For, The Supported Services Throughout Its ETC Service Areas**

19. The third requirement for ETC designation is that an applicant advertise the availability of, and charges for, the Supported Services using media of general distribution. 47 U.S.C. § 214(e)(1)(B).

20. Sprint Nextel currently offers and advertises its wireless telecommunications services in Washington using media of general distribution, including radio, television, billboard, print advertising and the Internet at [www.sprint.com](http://www.sprint.com) and [www.nextel.com](http://www.nextel.com). Sprint Nextel also maintains various retail store locations and sales agents throughout its cellular market areas, which provide an additional source of advertising. Sprint Nextel will continue to advertise the availability of its service offerings and the corresponding rates for those services throughout its ETC Service Areas through media of general distribution.

21. Consistent with the requirements of WAC 480-123-030(e), Sprint Nextel also commits to advertise the availability of Lifeline and Link Up assistance in a manner reasonably calculated to reach low-income consumers not receiving discounts.

**D. Sprint Nextel Will Continue To Provide The Supported Services Throughout Its Designated ETC Service Areas**

22. Pursuant to WAC 480123-030, Sprint Nextel commits to offer the Supported Services throughout its designated ETC service areas using its own facilities or a combination of its own facilities and resale of another carrier's services. Sprint Nextel is a facilities-based provider which owns or leases its own facilities within the Company's existing and requested ETC service areas. The facilities that will be used to provide service in the Company's ETC service areas include the same CMRS radio frequency, cell sites, radio links, trunks and mobile switching centers otherwise used to provide CMRS services in Washington.

23. As a CMRS provider, Sprint Nextel is not subject to WAC 480-120-439. Accordingly, consistent with the requirements of WAC 480-123-070(3), Sprint Nextel will annually report unfulfilled requests for service within its designated service areas and describe in detail how it attempted to provide service to those consumers.

**E. Sprint Nextel Will Continue To Participate In Low-Income Assistance Programs**

24. Sprint Nextel will continue to participate in the FCC's Lifeline and Link Up programs in accordance with 47 C.F.R. §§ 54.400 through 54.415. As required, toll limitation will be provided to those who request it, and customers who choose toll limitation will not be required to pay a service deposit.

**F. Sprint Nextel Will Continue To Utilize Federal High-Cost Universal Service Support To Expand And Improve Service Quality**

25. Under federal law, every ETC is required to use the high-cost universal service support it receives only for the "provision, maintenance, and upgrading of facilities and services for which the support is intended." 47 U.S.C. § 254(e).

26. As set forth in the Company's supplemental service improvement plan attached as **Confidential Exhibit C**, Sprint Nextel will utilize the federal high-cost universal service support it receives to provide the Supported Services and to improve, upgrade, expand and maintain its facilities to provide service in its designated ETC service areas.

27. Consistent with the requirements of WAC 480-123-030(1)(d), Sprint Nextel's service improvement plan (**Confidential Exhibit C**) describes the Company's proposed investments to be made with the assistance of federal high-cost universal service support from

January 1, 2007, through December 31, 2008, and the benefits those investments will bring to the Company's subscribers within its designated ETC service areas.<sup>12</sup>

28. Pursuant to WAC 480-123-070(1), Sprint Nextel will annually provide the Commission with a progress report describing the Company's investments made with support from the federal high-cost universal service fund and the consumer benefits resulting from such investments.

**G. Sprint Nextel Has The Ability To Remain Functional In Emergency Situations**

29. Sprint Nextel maintains adequate back-up power to ensure functionality without an external power source. Except as set forth below, Sprint Nextel certifies that it currently satisfies the standards set forth in WAC 480-123-030(1)(g).

30. Sprint Nextel's network is monitored 24 hours a day, 7 days a week, 365 days a year by its Network Monitoring Centers. In addition, local switching offices staffed by trained technicians and management coordinate with these larger operation centers, to ensure that Sprint Nextel's networks are properly maintained and network performance is at expected levels.

31. Each cell site in Sprint Nextel's CDMA and iDEN networks is equipped with a reasonable amount of battery back-up power. Cell sites equipped with CDMA technology are engineered with a minimum of four hours of battery standby power in the event of a commercial power failure. Cell sites equipped with iDEN technology maintain a minimum of two hours of battery standby power.<sup>13</sup> Sprint Nextel also maintains portable generators that are available for transport to an area affected by a commercial power outage. All Sprint Nextel cell sites have the

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<sup>12</sup> Sprint Nextel's service improvement plan filed herewith as **Confidential Exhibit C** is intended to supplement, rather than supersede or replace, the Company's Annual Plan for USF Expenditures filed with the Commission on July 31, 2006 in Docket UT-063052.

<sup>13</sup> As set forth in Section V below, Sprint Nextel seeks a limited waiver of WAC 480-123-030(1)(g) to the extent the Company's iDEN cell sites are engineered to provide for two, rather than four, hours of battery back up power.



necessary equipment to allow a portable generator to be quickly and safely connected for standby power.

32. Many of Sprint Nextel's cell sites also provide overlapping coverage for neighboring areas that can be used in the event of power failure at a particular facility. In the event of a major failure of a cell site, neighboring sites could be adjusted to provide coverage to a wider service area. In addition, Sprint Nextel maintains several "Cells On Wheels" ("COWs"), which are portable self-contained cell sites, that can provide a temporary coverage solution.

33. Sprint Nextel's CDMA mobile switching center ("MSC") locations are also equipped with at least five hours of battery back up and dedicated automatic start-up generators. Sprint Nextel's iDEN MSC locations are equipped with 3 hours of battery back up and a 72 hour fuel supply to operate on-site generators.<sup>14</sup>

34. Sprint Nextel operates one microwave hub<sup>15</sup> serving its CDMA network in Washington that does not have an on-site generator. This hub is located in North Bend, and is a hub for four microwave satellite sites. On July 31, 2005, Sprint Nextel requested a limited waiver of the requirement contained in WAC 480-123-070(6) (which incorporates WAC 480-123-030(1)(g) by reference) as applied to this microwave hub. The Commission granted Sprint Nextel's request on September 13, 2006.<sup>16</sup> Pursuant to the Commission's September 13 Order in

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<sup>14</sup> As set forth in Section V below, Sprint Nextel seeks a limited waiver of WAC 480-123-030(1)(g) to the extent the Company's iDEN MSC locations maintain three, rather than five, hours of battery back up power.

<sup>15</sup> WAC 480-123-030(1)(g) does not define the term "microwave hub." Sprint Nextel defines a microwave hub as a location responsible for back-haul associated with four or more microwave satellite sites.

<sup>16</sup> *In the Matter of the Request of Cingular Wireless and Sprint Nextel Corporation For a Temporary Exemption from the Requirements in WAC 480-123-070(6)*, Docket UT-063066, *Order Granting Temporary Exemption From the Requirements of WAC 480-123-070(6)* (Sept. 13, 2006).

Docket UT-063066, Sprint Nextel will report to the Commission in its July 31, 2007, annual report regarding this issue.

**H. Sprint Nextel Complies With The CTIA Consumer Code**

35. Consistent with the requirements of WAC 480-123-030(1)(h), Sprint Nextel voluntarily complies with all of the requirements set forth in the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service ("Consumer Code"). Sprint Nextel, through its predecessor companies, became a signatory to the Consumer Code in 2003. Since adopting the Consumer Code, Sprint Nextel has implemented the policy and practices required of signatories throughout its designated ETC service areas.

36. As a signatory to the Consumer Code, Sprint Nextel must also demonstrate its compliance with CTIA on an annual basis, in order to be authorized to display the CTIA seal of Wireless Quality/Consumer Information. CTIA has consistently certified Sprint Nextel's compliance with the Consumer Code since 2003.

**IV. GRANTING SPRINT NEXTEL'S PETITION TO AMEND ITS ETC DESIGNATIONS WILL SERVE THE PUBLIC INTEREST**

37. Pursuant to WAC 480-123-040, the Commission "will approve a petition for designation as an ETC if the petition meets 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." As discussed above, with the exception of the limited waiver of WAC 480-123-030(1)(g) Sprint Nextel requests in this proceeding, the Company satisfies each of the ETC designation requirements set forth in WAC 480-123-030 in the additional ILEC wire centers for which it seeks designation.

38. The Commission has previously determined that designating Sprint Nextel as a competitive ETC will advance the purposes of universal service in Washington by providing a

tangible consumer benefit. Granting Sprint Nextel's Petition to amend its ETC designations in this proceeding will further promote universal service in Washington by extending the Company's designated ETC service area and enabling its iDEN subscribers to benefit from the Company's assumption of universal service obligations and investment of universal service support in the iDEN network. As demonstrated in the Company's supplemental service improvement plan (**Confidential Exhibit C**), Sprint Nextel proposes to make substantial investments in the provision, maintenance and upgrading of its CDMA and iDEN networks. These additional investments will expand and improve service in the ILEC wire centers identified on **Exhibits A and E**. As depicted on **Confidential Exhibit B**, inclusion of Sprint Nextel's iDEN network facilities will also expand the Company's network coverage. Accordingly, the Commission should find that granting Sprint Nextel's Petition will serve the public interest.

**V. REQUEST FOR WAIVER OF WAC 480-123-030(1)(g)**

39. WAC 480-123-030(1)(g) requires an ETC applicant to demonstrate that it has the ability to function in emergency situations. For a wireless carrier, WAC 480-123-030(1)(g) provides that the applicant demonstrate that it maintains 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 back up battery power and back up generators at each switch.

40. As discussed above, Sprint Nextel cell sites equipped with iDEN technology are engineered with a minimum of two, rather than four, hours of battery standby power. Sprint Nextel engineers its iDEN cell sites with a minimum of two hours of battery back-up to enable its technicians sufficient time to respond and deploy portable generators or other equipment to maintain service. To accomplish this, Sprint Nextel stages its portable generators and equipment at key locations throughout its service area. The Company also utilizes an alarm system that

works in stages to alert its on-call technicians. First, the alarm signals the instant a cell site switches to battery back-up power. Following the initial alarm, the system will alert Sprint Nextel technicians when the battery back-up reaches 50% capacity. This system allows Sprint Nextel technicians to evaluate and prioritize their deployment of back-up equipment during emergency situations. Sprint Nextel's established response procedures have proven sufficient to maintain cell site operations due to a loss of commercial power. Sprint Nextel's two hour battery back-up standard, coupled with its timely response and deployment of portable generators or other equipment, adequately ensure that the Company's iDEN-equipped cell sites remain functional during emergency situations.

41. Similarly, Sprint Nextel's iDEN MSC locations are equipped with three, rather than five, hours of battery back up. In addition to battery back up, the Company's MSC locations are also equipped with on-site generators and a seventy-two hour fuel supply. These combined resources enable the Sprint Nextel to operate its MSC locations up to seventy-five hours, with existing supplies, following a loss of commercial power. Under foreseeable circumstances, this seventy-five hour period will provide Sprint Nextel technicians sufficient time to respond and deploy additional equipment or fuel to maintain service.

42. Accordingly, Sprint Nextel respectfully requests a limited waiver of WAC 480-123-030(1)(g) to the extent the Rule would require four hours of battery back up at the Company's iDEN-equipped cell sites and five hours of battery back up at its iDEN MSC locations. Sprint Nextel's engineering standards and response procedures are reasonable and should be deemed sufficient to satisfy the intent of WAC 480-123-030(1)(g).

## **VI. HIGH-COST CERTIFICATION**

43. Under the FCC's universal service rules, state commissions that desire ETCs within their jurisdiction to receive high-cost universal service support must annually file a

certification with the Universal Service Administrative Company (“USAC”) and the FCC stating that all federal high-cost support provided to such carriers will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.<sup>17</sup> On September 27, 2006, the Commission certified Sprint Nextel’s use of federal high-cost universal service support for calendar year 2007.

44. To ensure that the Company’s receipt of federal high-cost universal support is not delayed or disrupted by its request to amend and expand its ETC designations in this proceeding, Sprint Nextel respectfully requests that the Commission re-certify the Company’s use of universal service support for calendar years 2006 and 2007. The FCC’s Rules expressly provide that state commissions may file supplemental certifications. The FCC recently amended 47 C.F.R. §§ 54.313(d) and 54.314(d) and directed states to file such supplemental certifications within 60 days of the date of designation in order to ensure an ETC’s receipt of high-cost universal service support. Accordingly, Sprint Nextel respectfully requests that the Commission re-certify its use of support and transmit a letter to the FCC and USAC in the form attached here as **Exhibit D**.

45. In support of the Company’s request, Sprint Nextel hereby certifies that it will utilize all federal high-cost universal service support it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to 47 U.S.C. § 254(e).

## **VII. CONCLUSION**

46. Based upon the foregoing, Sprint Nextel respectfully requests that the Commission amend Sprint Nextel’s ETC designations to (1) consolidate the Company’s ETC

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<sup>17</sup> 47 C.F.R. §§ 54.313 and 54.314.

designations under the name of the parent company Sprint Nextel Corporation; (2) expand the Company's ETC service area to include the eighteen (18) additional ILEC wire centers identified on **Exhibit A**; (3) expand the Company's ETC service area to include the entire wire center boundary of each non-rural ILEC wire center identified on **Exhibit E**; and (4) include all eligible Sprint Nextel customers, including those that subscribe to the Company's iDEN service offerings. Sprint Nextel further requests that the Commission grant Sprint Nextel's request for a limited waiver of the requirements set forth in WAC 480-123-030(1)(g).

Dated: May 7, 2007



SPRINT NEXTEL CORPORATION

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Regulatory Affairs West Region

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San Francisco, California 94105-1855

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**EXHIBIT A**

**Additional ILEC Wire Centers To Be Included In  
Sprint Nextel's Designated ETC Service Area**

<b>ILEC</b>	<b>SAC</b>	<b>CLLI</b>	<b>EXCHANGE</b>
CENTURYTEL OF COWICHE, INC.	522410	CWCHWAXX	COWICHE
CENTURYTEL OF COWICHE, INC.	522410	RMRKWAXA	RIMROCK
CENTURYTEL OF COWICHE, INC.	522410	TITNWAXX	TIETON
CENTURYTEL OF WASHINGTON, INC.	522408	CNNLWAXA	CONNELL
ELLENSBURG TELEPHONE CO.	522412	LDDLWAXA	LAUDERDALE
QWEST CORPORATION	525161	OTHEWA01	OTHELLO
QWEST CORPORATION	525161	PTRSWA01	PATEROS
UNITED TELEPHONE - NORTHWEST	522400	BRNNWAXX	BRINNON
UNITED TELEPHONE - NORTHWEST	522400	GLDLWAXA	GOLDENDALE
UNITED TELEPHONE - NORTHWEST	522400	WLRDWAXX	WILLARD
VERIZON NORTHWEST INC.	522449	NCHSWAXX	NACHES
VERIZON NORTHWEST INC.	522449	SUMSWAXX	WHATCOMCTY
VERIZON NORTHWEST INC.-WA	522416	CHLNWAXX	WENATCHEE
VERIZON NORTHWEST INC.-WA	522416	ENTTWAXX	WENATCHEE
VERIZON NORTHWEST INC.-WA	522416	MNSNWAXA	WENATCHEE
VERIZON NORTHWEST INC.-WA	522416	NWPTWAXX	NEWPORT
VERIZON NORTHWEST INC.-WA	522416	WTVLWAXA	DOUGLASCO
YCOM NETWORKS, INC.	522453	YELMWAXB	YELM



**CONFIDENTIAL EXHIBIT B**

**Service Area And Network Coverage Map**

**- REDACTED -**

**Confidential per WAC 480-07-160 and RCW 80.04.095**



**CONFIDENTIAL EXHIBIT C**

**Supplemental Service Improvement Plan for the State of Washington**

**- REDACTED -**

**Confidential per WAC 480-07-160 and RCW 80.04.095**



**EXHIBIT D**

**High-Cost Certification Letter**

Karen Majcher  
Vice President, High Cost  
& Low Income Division  
Universal Service Administrative Company  
2000 L Street, NW  
Suite 200  
Washington, DC 20036

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 – 12th Street, S.W.  
Washington, D.C. 20554

Karen Majcher  
Vice President, High Cost  
& Low Income Division  
Universal Service Administrative Company  
444 Hoes Lane  
RRC 4A1060  
Piscataway, NJ 08854

**Re: CC Docket No. 96-45  
Sprint Nextel - 47 C.F.R. §§ 54.313 & 54.314 Certification**

Ms. Dortch and Ms. Flannery:

The Washington State Utilities and Transportation Commission (“WUTC”) has amended Sprint Nextel Corporation’s (“Sprint Nextel”) designation as an eligible telecommunications carrier (“ETC”) in the State of Washington. The WUTC’s Order amending Sprint Nextel’s ETC designation is enclosed as **Exhibit A**.

This letter is WUTC’s certification to the Federal Communications Commission (“FCC”) and Universal Service Administrative Company (“USAC”) that all federal high-cost universal service support provided to Sprint Nextel in Washington will be used only for its intended purposes under Section 254(e) of the Telecommunications Act of 1996 (“Act”).

Sprint Nextel has certified to the WUTC that all federal high-cost universal service support received by the Company in Washington will be used pursuant to Section 254(e) of the Act. Accordingly, WUTC hereby certifies that all federal high-cost universal service support received by Sprint Nextel will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. This letter serves as a supplemental certification to the annual certification filed by PSC, pursuant to 47 C.F.R. §§ 54.313 and 54.314. This supplemental certification is to ensure that Sprint Nextel is eligible to receive high-cost universal service support effective the date of the enclosed Order.

If you have any questions or concerns regarding this certification, please contact me at your convenience.

By the Commission

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Enclosure

cc: Sprint Nextel Corporation



**EXHIBIT E**

**Entire Non-Rural ILEC Wire Centers To Be Included In  
Sprint Nextel's Designated ETC Service Area**

<b>ILEC</b>	<b>CLLI</b>	<b>EXCHANGE</b>
ASOTIN TELEPHONE CO.	ASOTWAXA	ASOTIN
CENTURYTEL OF INTER-ISLAND INC.	BLKIWAXX	BLAKELY
CENTURYTEL OF INTER-ISLAND INC.	ESNDWAXA	EAST SOUND
CENTURYTEL OF INTER-ISLAND INC.	FRHRWAXA	FRIDAY HARBOR
CENTURYTEL OF WASHINGTON INC.	ARLTWAXX	ARLETTA
CENTURYTEL OF WASHINGTON INC.	ASFDWAXA	ASHFORD
CENTURYTEL OF WASHINGTON INC.	ASLKWAXA	AMES LAKE
CENTURYTEL OF WASHINGTON INC.	BSCTWAXX	BASIN CITY
CENTURYTEL OF WASHINGTON INC.	CHNYWAXC	CHENEY
CENTURYTEL OF WASHINGTON INC.	CRNTWAXX	CARNATION
CENTURYTEL OF WASHINGTON INC.	EDWLWAXA	EDWALL-TYLER
CENTURYTEL OF WASHINGTON INC.	ELMAWAXA	ELMA
CENTURYTEL OF WASHINGTON INC.	ELTPWAXX	ELTOPIA
CENTURYTEL OF WASHINGTON INC.	EURKWAXA	EUREKA
CENTURYTEL OF WASHINGTON INC.	FLCYWAXX	FALL CITY
CENTURYTEL OF WASHINGTON INC.	GGHRWAXA	GIG HARBOR
CENTURYTEL OF WASHINGTON INC.	HMPLWAXA	LAKE QUINAULT
CENTURYTEL OF WASHINGTON INC.	KGTNWAXA	KINGSTON
CENTURYTEL OF WASHINGTON INC.	LINDWAXA	LIND
CENTURYTEL OF WASHINGTON INC.	LKBYWAXA	LAKEBAY
CENTURYTEL OF WASHINGTON INC.	MCCLWAXA	MCCLEARY
CENTURYTEL OF WASHINGTON INC.	MDLKWAXX	MEDICAL LAKE
CENTURYTEL OF WASHINGTON INC.	MESAWAXX	MESA
CENTURYTEL OF WASHINGTON INC.	MNTSWAXA	MONTESANO
CENTURYTEL OF WASHINGTON INC.	MTCOWAXX	MATHEWS CORNER
CENTURYTEL OF WASHINGTON INC.	NBNDWAXA	NORTH BEND
CENTURYTEL OF WASHINGTON INC.	OCSTWAXA	OCOSTA
CENTURYTEL OF WASHINGTON INC.	ORNGWAXA	ORTING
CENTURYTEL OF WASHINGTON INC.	PEELWAXA	CURTIS
CENTURYTEL OF WASHINGTON INC.	RRDNWAXX	REARDAN
CENTURYTEL OF WASHINGTON INC.	RTVLWAXA	RITZVILLE-BENGE
CENTURYTEL OF WASHINGTON INC.	RYCYWAXA	ROYAL CITY
CENTURYTEL OF WASHINGTON INC.	SNPSWAXA	SNOQUALMIE PASS
CENTURYTEL OF WASHINGTON INC.	SPNGWAXA	SPANGLE
CENTURYTEL OF WASHINGTON INC.	SPRGWAXA	SPRAGUE
CENTURYTEL OF WASHINGTON INC.	SPRRWAXX	SOUTH PRAIRIE
CENTURYTEL OF WASHINGTON INC.	VADRWAXA	VADER
CENTURYTEL OF WASHINGTON INC.	VSHNWAXA	VASHON

CENTURYTEL OF WASHINGTON INC.	WSCKWAXA	WILSON CREEK
ELLENSBURG TELEPHONE CO.	ELBGWAXA	ELLENSBURG
ELLENSBURG TELEPHONE CO.	KTTSWAXX	KITTITAS
ELLENSBURG TELEPHONE CO.	SELHWAXX	SELAH
ELLENSBURG TELEPHONE CO.	THRPWAXA	THORP
ELLENSBURG TELEPHONE CO.	VNTGWAXX	VANTAGE
HAT ISLAND TELEPHONE CO.	SWHDWAXX	HAT ISLAND
HOOD CANAL TELEPHONE CO.	UNINWAXB	UNION
INLAND TELEPHONE CO.	RSLNWAXX	ROSLYN
INLAND TELEPHONE CO.	UNTWWAXA	UNIONTOWN
KALAMA TELEPHONE CO.	KALMWAXB	KALAMA
LEWIS RIVER TELEPHONE COMPANY	LACTWAXA	LACENTER
MASEHLL TELECOM, INC.	ETVLWAXA	EATONVILLE
MCDANIEL TELEPHONE COMPANY	ONLSWAXA	ONALASKA
MCDANIEL TELEPHONE COMPANY	SLKMWAXB	SALKUM
QWEST CORPORATION	ABRDWA01	ABERDEEN- HOQUIAM
QWEST CORPORATION	AUBNWA01	AUBURN
QWEST CORPORATION	BCKLWA01	BUCKLEY
QWEST CORPORATION	BDMDWA01	BLACK DIAMOND
QWEST CORPORATION	BLFRWA01	BELFAIR
QWEST CORPORATION	BLHMWA01	BELLINGHAM
QWEST CORPORATION	BLHMWALU	BELLINGHAM
QWEST CORPORATION	BLLVWAGL	BELLEVUE
QWEST CORPORATION	BLLVWASH	BELLEVUE
QWEST CORPORATION	BMTNWA01	BREMERTON
QWEST CORPORATION	BNISWA01	BAINBRIDGE ISLAND
QWEST CORPORATION	BTLGWA01	BATTLE GROUND
QWEST CORPORATION	BYLKWA01	SUMNER
QWEST CORPORATION	CENLWA01	CENTRALIA
QWEST CORPORATION	CHHLWA01	CHEHALIS
QWEST CORPORATION	CLELWA01	CLE ELUM
QWEST CORPORATION	CLFXWA01	COLFAX
QWEST CORPORATION	COLBWA01	PORT ORCHARD
QWEST CORPORATION	CSRKWA01	CASTLE ROCK
QWEST CORPORATION	DESMWA01	DES MOINES
QWEST CORPORATION	DRPKWA01	DEER PARK
QWEST CORPORATION	ELK WA01	ELK
QWEST CORPORATION	ENMCWA01	ENUMCLAW
QWEST CORPORATION	EPHRWA01	EPHRATA
QWEST CORPORATION	ESTNWA01	EASTON
QWEST CORPORATION	FDWYWA01	DES MOINES
QWEST CORPORATION	GRBLWA01	GREEN BLUFF

QWEST CORPORATION	GRHMWA01	GRAHAM
QWEST CORPORATION	HDPTWA01	HOODSPORT
QWEST CORPORATION	ISQHWA01	ISSAQUAH
QWEST CORPORATION	JOYCWA01	PORT ANGELES
QWEST CORPORATION	KENTWA01	KENT
QWEST CORPORATION	KENTWAME	KENT
QWEST CORPORATION	KENTWAOB	KENT
QWEST CORPORATION	LACYWA01	OLYMPIA
QWEST CORPORATION	LBLKWA01	LIBERTY LAKE
QWEST CORPORATION	LGVWWA02	LONGVIEW
QWEST CORPORATION	MPVYWAMV	MAPLE VALLEY
QWEST CORPORATION	MRISWA01	SEATTLE
QWEST CORPORATION	MSLKWA01	MOSES LAKE
QWEST CORPORATION	MSLKWAAB	MOSES LAKE
QWEST CORPORATION	NPVNWA01	CHEHALIS
QWEST CORPORATION	NWLKWA01	NEWMAN LAKE
QWEST CORPORATION	OCSHWA01	COPALIS
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	OLYMWA02	OLYMPIA
QWEST CORPORATION	ORCHWA01	VANCOUVER
QWEST CORPORATION	PASCWA01	PASCO
QWEST CORPORATION	PTANWA01	PORT ANGELES
QWEST CORPORATION	PTLWWA01	PORT LUDLOW
QWEST CORPORATION	PTORWAFE	PORT ORCHARD
QWEST CORPORATION	PTTWWA01	PORT TOWNSEND
QWEST CORPORATION	PYLPWA01	PUYALLUP
QWEST CORPORATION	RDFDWA01	RIDGEFIELD
QWEST CORPORATION	RNTNWA01	RENTON
QWEST CORPORATION	ROCHWA01	ROCHESTER
QWEST CORPORATION	ROY WA01	ROY
QWEST CORPORATION	SEQMWA01	SEQUIM
QWEST CORPORATION	SHTNWA01	SHELTON
QWEST CORPORATION	SLDLWASI	SILVERDALE
QWEST CORPORATION	SMNRWA01	SUMNER
QWEST CORPORATION	SNSYWA01	SUNNYSLOPE
QWEST CORPORATION	SPKNWA01	SPOKANE
QWEST CORPORATION	SPKNWACH	SPOKANE
QWEST CORPORATION	SPKNWAFB	SPOKANE
QWEST CORPORATION	SPKNWAFD	SPOKANE
QWEST CORPORATION	SPKNWAFH	SPOKANE
QWEST CORPORATION	SPKNWAFK	SPOKANE
QWEST CORPORATION	SPKNWAFM	SPOKANE
QWEST CORPORATION	SPKNWAFN	SPOKANE
QWEST CORPORATION	SPKNWAFQ	SPOKANE
QWEST CORPORATION	SPKNWAFR	SPOKANE
QWEST CORPORATION	SPKNWAFS	SPOKANE
QWEST CORPORATION	SPKNWAFV	SPOKANE
QWEST CORPORATION	SPKNWAFW	SPOKANE
QWEST CORPORATION	SPKNWAFX	SPOKANE
QWEST CORPORATION	SPKNWAFY	SPOKANE
QWEST CORPORATION	SPKNWAFZ	SPOKANE
QWEST CORPORATION	STTLWA03	SEATTLE

QWEST CORPORATION	STTLWA04	SEATTLE
QWEST CORPORATION	STTLWA05	SEATTLE
QWEST CORPORATION	STTLWA06	SEATTLE
QWEST CORPORATION	STTLWACA	SEATTLE
QWEST CORPORATION	STTLWACH	SEATTLE
QWEST CORPORATION	STTLWADU	SEATTLE
QWEST CORPORATION	STTLWAEI	SEATTLE
QWEST CORPORATION	STTLWALA	SEATTLE
QWEST CORPORATION	STTLWAPA	SEATTLE
QWEST CORPORATION	STTLWASU	SEATTLE
QWEST CORPORATION	STTLWAVE	SEATTLE
QWEST CORPORATION	TACMWAFI	TACOMA
QWEST CORPORATION	TACMWAFL	TACOMA
QWEST CORPORATION	TACMWAGF	TACOMA
QWEST CORPORATION	TACMWAJU	TACOMA
QWEST CORPORATION	TACMWALE	TACOMA
QWEST CORPORATION	TACMWALO	TACOMA
QWEST CORPORATION	TACMWASY	TACOMA
QWEST CORPORATION	TACMWAWA	TACOMA
QWEST CORPORATION	TACMWAWV	TACOMA
QWEST CORPORATION	VANCWA01	VANCOUVER
QWEST CORPORATION	VANCWANO	VANCOUVER
QWEST CORPORATION	WLWLWA01	WALLA WALLA
QWEST CORPORATION	WNLCWA01	WINLOCK
QWEST CORPORATION	WRDNWA01	WARDEN
QWEST CORPORATION	YAKMWA02	YAKIMA
QWEST CORPORATION	YAKMWAVE	YAKIMA
ST. JOHN TELEPHONE CO.	STJHWAXA	ST JOHN
TENINO TELEPHONE CO.	TENNWAXA	TENINO
TOLEDO TELEPHONE CO. INC.	TOLDWAXA	TOLEDO
UNITED TELEPHONE-NORTHWEST	BCTNWAXX	BICKLETON
UNITED TELEPHONE-NORTHWEST	CLMAWAXA	COLUMBIA
UNITED TELEPHONE-NORTHWEST	CNTRWAXX	CHIMACUM
UNITED TELEPHONE-NORTHWEST	DLPTWAXA	DALLESPOUR
UNITED TELEPHONE-NORTHWEST	GDVWWAXA	GRANDVIEW
UNITED TELEPHONE-NORTHWEST	GRNGWAXA	GRANGER
UNITED TELEPHONE-NORTHWEST	GRNRWAXX	GARDINER
UNITED TELEPHONE-NORTHWEST	HRRHWAXA	HARRAH
UNITED TELEPHONE-NORTHWEST	LYLEWAXA	LYLE
UNITED TELEPHONE-NORTHWEST	MBTNWAXX	MABTON
UNITED TELEPHONE-NORTHWEST	MTWAWAXA	MATTAWA
UNITED TELEPHONE-NORTHWEST	PASNWAXA	PATERSON
UNITED TELEPHONE-NORTHWEST	PLSBWAXX	POULSBO
UNITED TELEPHONE-NORTHWEST	PRSRWAXA	PROSSER

UNITED TELEPHONE-NORTHWEST	QLCNWAXA	QUILCENE
UNITED TELEPHONE-NORTHWEST	RSVTWAXA	ROOSEVELT
UNITED TELEPHONE-NORTHWEST	SNSDWAXA	STEVENSON
UNITED TELEPHONE-NORTHWEST	TPNSWAXX	TOPPENISH
UNITED TELEPHONE-NORTHWEST	WHSLWAXX	WHITE SALMON
UNITED TELEPHONE-NORTHWEST	WHSWWAXX	WHITE SWAN
UNITED TELEPHONE-NORTHWEST	WHTSWAXA	WHITSTRAN
UNITED TELEPHONE-NORTHWEST	WPATWAXX	WAPATO
UNITED TELEPHONE-NORTHWEST	WSHRWAXA	WISHRAM
UNITED TELEPHONE-NORTHWEST	ZLLHWAXA	ZILLAH
VERIZON NORTHWEST INC.	ACMEWAXA	ACME
VERIZON NORTHWEST INC.	ALGRWAXX	ALGER
VERIZON NORTHWEST INC.	BGLKWAXX	BIG LAKE
VERIZON NORTHWEST INC.	BLANWAXB	BLAINE
VERIZON NORTHWEST INC.	BRBAWAXA	FRENDALE
VERIZON NORTHWEST INC.	BURLWAXX	BURLINGTON
VERIZON NORTHWEST INC.	CNWWAXX	CONWAY
VERIZON NORTHWEST INC.	CSTRWAXA	CUSTER
VERIZON NORTHWEST INC.	DMNGWAXA	DEMING
VERIZON NORTHWEST INC.	EDSNWAXX	EDISON
VERIZON NORTHWEST INC.	EVSNWAXX	EVERSON
VERIZON NORTHWEST INC.	FNDLWAXA	FERNDALE
VERIZON NORTHWEST INC.	GRLDWAXX	GRAYLAND
VERIZON NORTHWEST INC.	LACNWAXX	LACONNER
VERIZON NORTHWEST INC.	LARLWAXX	LAUREL
VERIZON NORTHWEST INC.	LYNDWAXX	LYNDEN
VERIZON NORTHWEST INC.	SWLYWAXX	SEDRO WOOLLEY
VERIZON NORTHWEST INC.	WSPTWAXA	WESTPORT
VERIZON NORTHWEST INC. -WA	ANCRWAXX	ANACORTES
VERIZON NORTHWEST INC. -WA	ARTNWAXX	ARLINGTON
VERIZON NORTHWEST INC. -WA	BNCYWAXX	BENTON CITY
VERIZON NORTHWEST INC. -WA	BOTHWAXB	BOTHELL
VERIZON NORTHWEST INC. -WA	BRULWAXA	BURLINGTON
VERIZON NORTHWEST INC. -WA	CAMSWAXX	CAMAS
VERIZON NORTHWEST INC. -WA	CLVWWAXA	SNOHOMISH
VERIZON NORTHWEST INC. -WA	CMISWAXA	MARYSVILLE
VERIZON NORTHWEST INC. -WA	CPVLWAXX	COUPEVILLE
VERIZON NORTHWEST INC. -WA	CSHRWAXX	CASHMERE
VERIZON NORTHWEST INC. -WA	DVLLWAXX	BOTHELL
VERIZON NORTHWEST INC. -WA	EVERTWAXA	EVERETT
VERIZON NORTHWEST INC. -WA	EVRTWASXF	EVERETT
VERIZON NORTHWEST INC. -WA	EVRTWAXC	EVERETT CASINO
VERIZON NORTHWEST INC. -WA	EWNCWAXA	WENATCHEE
VERIZON NORTHWEST INC. -WA	GERGWAXX	GEORGE

VERIZON NORTHWEST INC. -WA	GRFLWAXX	GRANITE FALLS
VERIZON NORTHWEST INC. -WA	HLLKWAXX	HALLS LAKE
VERIZON NORTHWEST INC. -WA	JUNTWAXA	KIRKLAND
VERIZON NORTHWEST INC. -WA	KNWCWAXA	KENNEWICK
VERIZON NORTHWEST INC. -WA	KNWCWAXB	KENNEWICK
VERIZON NORTHWEST INC. -WA	KNWCWAXC	KENNEWICK
VERIZON NORTHWEST INC. -WA	KRLDWAXX	KIRKLAND
VERIZON NORTHWEST INC. -WA	LKGWWAXA	MARYSVILLE
VERIZON NORTHWEST INC. -WA	LKSTWAXA	EVERETT
VERIZON NORTHWEST INC. -WA	LVWOWAXX	LEAVENWORTH
VERIZON NORTHWEST INC. -WA	MONRWAXX	MONROE
VERIZON NORTHWEST INC. -WA	MRWYWAXA	HALLS LAKE
VERIZON NORTHWEST INC. -WA	MTVTWAXX	MOUNT VERNON
VERIZON NORTHWEST INC. -WA	MYVIWAXX	MARYSVILLE
VERIZON NORTHWEST INC. -WA	OKHRWAXX	OAK HARBOR
VERIZON NORTHWEST INC. -WA	PLMNWAXX	PULLMAN
VERIZON NORTHWEST INC. -WA	QNCYWAXX	QUINCY
VERIZON NORTHWEST INC. -WA	RCBHWAXX	RICHMOND BEACH
VERIZON NORTHWEST INC. -WA	RCLDWAXA	RICHLAND
VERIZON NORTHWEST INC. -WA	RCLDWAXB	RICHLAND
VERIZON NORTHWEST INC. -WA	RDMDWAXA	KIRKLAND
VERIZON NORTHWEST INC. -WA	ROSLWAXA	ROSALIA
VERIZON NORTHWEST INC. -WA	SLLKWAXA	SILVER LAKE
VERIZON NORTHWEST INC. -WA	SMSHWAXA	KIRKLAND
VERIZON NORTHWEST INC. -WA	SNHSWAXX	SNOHOMISH
VERIZON NORTHWEST INC. -WA	SOLKWAXX	SOAP LAKE
VERIZON NORTHWEST INC. -WA	STWDWAXX	STANWOOD
VERIZON NORTHWEST INC. -WA	SULTWAXX	SULTAN
VERIZON NORTHWEST INC. -WA	SWLYWAXA	SEDRO WOOLLEY
VERIZON NORTHWEST INC. -WA	THTNWAXA	ROSALIA
VERIZON NORTHWEST INC. -WA	WDLDWAXA	WOODLAND
VERIZON NORTHWEST INC. -WA	WNTCWAXX	WENATCHEE
VERIZON NORTHWEST INC. -WA	WRLDWAXA	RICHLAND
VERIZON NORTHWEST INC. -WA	WSHGWAXA	CAMAS- WASHOUGAL
VERIZON NORTHWEST INC. -WA	WSRVWAXA	CAMAS- WASHOUGAL
WHIDBEY TELEPHONE CO.	CLTNWAXA	SOUTH WHIDBEY
WHIDBEY TELEPHONE CO.	LNLWAXA	PORT ROBERTS(LANGLEY)
YCOM NETWORKS, INC.	RANRWAXA	RAINIER
YCOM NETWORKS, INC.	YELMWAXA	YELM

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

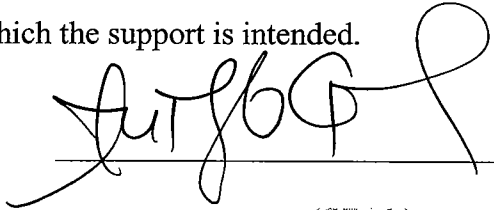
In the Matter of ) DOCKET NO. UT- \_\_\_\_\_  
)  
Petition of Sprint Nextel Corporation to )  
Amend Its Designation as an Eligible )  
Telecommunications Carrier )

**VERIFICATION**

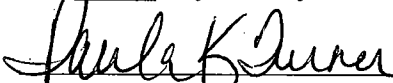
STATE OF KANSAS )  
) ss.  
COUNTY OF JOHNSON )

Anthony G. Krueck, being first duly sworn, hereby certifies as follows:

1. I serve as Vice President Product Development and Management for Sprint Nextel Corporation ("Sprint Nextel").
2. I have reviewed the foregoing Petition of Sprint Nextel Corporation to Amend Its Designation as an Eligible Telecommunications Carrier and Request for Waiver of WAC 480-123-030(1)(g), and I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.
3. I further certify that all federal high-cost universal service support received by Sprint Nextel will be used pursuant to 47 U.S.C. § 254(e) only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

  
\_\_\_\_\_  
(SEAL)

Subscribed and sworn to before me  
this 5<sup>th</sup> day of May, 2007.

  
\_\_\_\_\_  
Notary Public

**PAULA K. TURNER**  
Notary Public State of Kansas  
My Appt. Expires 08/11/2010