

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	
)	Docket No.
ELTOPIA COMMUNICATIONS, LLC)	
)	Petition of Eltopia
For Designation as an Eligible)	Communications, LLC For
)	Designation as an Eligible
Telecommunications Carrier Under 47 U.S.C. §)	Telecommunications
)	Carrier
214(e)(2))	
)	

1. Eltopia Communications, LLC (“Ektopia” or “Petitioner”) hereby submits to the Commission this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Chapter 480-123 Washington Administrative Code, 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 rules of the Federal Communications Commission (“FCC”), 47 C.F.R. § 54.201. Eltopia requests that it be designated as eligible to receive all available support from the federal Universal Service Fund (“USF”) including, but not limited to, support for customers in high-cost locations and low-income consumers.

I. INTRODUCTION

A. Name and Address of Petitioner

2. The name of the Petitioner is Eltopia Communications, LLC. The address of the Petitioner is 2303 Ringold Road, Eltopia, Washington 99330. All correspondence regarding this petition should be directed to Eltopia's consultant in this matter:

Glenn Blackmon, Ph.D.
203 20th Avenue SE
Olympia, WA 98501
mail@glennblackmon.com
360 556-7888

B. Relevant Statutes and Rules

3. The statutes and rules implicated by this Petition include Chapter 480-123 Washington Administrative Code, RCW 80.36.600, 47 U.S.C. §§ 153(10), 153(44), 214(e), 253(b) and 254(d); 47 C.F.R. §§ 51.5, 54.5, 54.101, 54.201, 54.207, 54.307, 54.313, and 54.314.

C. Authorization

4. Eltopia Communications is registered by the Washington Utilities and Transportation Commission as a telecommunications company, effective November 6, 2005 (Docket No. UT-051537). In addition to competitive telecommunications services, Eltopia offers enhanced services including Internet
Petition of Eltopia Communications, LLC For Designation as an Eligible
Telecommunications Carrier – Page 2

access service to customers throughout eastern Washington and in other western states.

5. Eltopia Communications is a common carrier, engaged in the business of “owning, operating or managing any facilities used to provide telecommunications for hire, sale, or resale to the general public” within this state and in interstate commerce. Telecommunications is defined for this purpose as “the transmission of information by wire, radio, optical cable, electromagnetic, or other similar means.” RCW 80.04.010.

6. Eltopia Communications has negotiated interconnection and resale agreements pursuant to federal law with Qwest Corporation; Verizon Northwest, Inc.; CenturyTel (CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., and CenturyTel of Cowiche, Inc.), and United Telephone Company of the Northwest. These fully negotiated agreements were approved by the Commission in Dockets UT-053097, UT-053100, UT-063015, and UT-063020, respectively.

II. ELTOPIA MEETS ALL OF THE FEDERAL AND STATE REQUIREMENTS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE AREAS REQUESTED

7. WAC 480-123-040 provides that 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 demonstrated in this petition, Eltopia meets all of these requirements. The company will provide and advertise all supported services and will do so using its own facilities. ETC designation will, by making universal service funding available to Eltopia, directly advance the purposes of federal universal service policy by giving more customers in eastern Washington access to a greater variety of basic and advanced services.

8. Eltopia's network uses advanced technology that makes it distinct from either the copper/fiber networks of the traditional local exchange companies or the cell tower systems of commercial mobile radio service operators that have already been designated as ETCs in Washington. Eltopia's network is in many ways the best of both networks, in that it uses fixed wireless facilities to establish wireless loops to individual customer premises.¹ These loops connect homes and businesses to the public switched telephone network via radio towers that can be erected quickly and at lower cost than the typical cell tower. Moreover, the wireless loops provided by Eltopia's network provide substantially more bandwidth than the typical eastern Washington farm receives

¹ Eltopia may use other transport or loop technologies where circumstances favor these alternatives. For example, fiber optic circuits owned by electric utilities are available in some areas and can be leased by Eltopia to provide the necessary transmission capacity.

today over either the legacy wireline telephone network or the commercial mobile radio service (cellular) systems.

9. With designation as an ETC, Eltopia Communications will offer consumers and businesses in rural areas of eastern Washington a choice – and not simply another wireline choice or another wireless choice. Eltopia provides the basic services supported by the federal universal service program using a network that also offers broadband services.

10. Exhibit A to this Petition provides the detailed information required by WAC 480-120-030.

III. DESIGNATION OF ELTOPIA WILL ADVANCE THE PURPOSES OF UNIVERSAL SERVICE

11. Sec. 254 identifies three purposes or principles that are to be advanced through the federal and state implementation of the universal service program:²

- (1) **Quality and rates** – Quality services should be available at just, reasonable, and affordable rates.

² Sec. 254 identifies other principles to govern the universal service program, but these are not directly relevant to this petition. These principles address administration of mechanisms to collect and disburse funds for the universal service program and the provision of services to schools, health care, and libraries.

(2) **Access to advanced services** – Access to advanced telecommunications and information services should be provided in all regions of the Nation.

(3) **Access in rural and high cost areas** – Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

12. Designation of Eltopia Communications as an ETC in eastern Washington will advance these purposes by increasing the availability of services – both basic and advanced – to consumers and businesses in eastern Washington. Eltopia’s wireless loop network will allow it to reach customers in remotes areas of eastern Washington at costs that are substantially below what would be incurred by replicating the incumbent wireline network. Eltopia’s basic service will be available at rates that are no higher than the incumbents’ rates, thereby promoting the affordability of service, and in many instances the

broadband services offered by Eltopia will otherwise be unavailable from existing providers.

13. The Commission need not be concerned that Eltopia's entry into this market will harm universal service through "cream skimming" of universal service support. The cream-skimming concern, which has been addressed both by the Commission and by its federal counterparts, arises when support amounts do not match variations in cost of serving customers. Typically, these concerns arise when per-line support levels are uniform across a geographic area and a competitor is able to limit its service to the portions of the area where costs are lowest. The Commission has already addressed the potential for cream-skimming by disaggregating the support received by incumbent local exchange companies and targeting the support to the highest cost exchanges. For example, CenturyTel's high-cost line support varies by a factor of 20 across its eastern Washington exchanges.³

IV. DESIGNATION OF ELTOPIA IS IN THE PUBLIC INTEREST

14. Congress required that state commissions consider the "public interest" in reviewing ETC petitions, but it did not elaborate on what constitutes

³ The Commission has also been presented with another form of the cream-skimming concern when a mobile wireless applicant proposes to serve only a portion of an exchange. That concern is not present with Eltopia's application, since it requests designation for entire exchanges.

this public interest. The Commission has, however, through its prior ETC designations explained how it applies the public interest standard:

“Public interest” is a broad concept encompassing the welfare of present and future consumers, stakeholders, and the general public. The “public interest” is broader than the goal of fostering competition alone, and broader than the goal of advancing universal service alone; and we believe the decision today advances these two goals. Designating [petitioner] as an ETC furthers the public interest because rural consumers, like urban consumers, will benefit from increased competition in the form of a greater variety of services and more comparability of services. Rural customers also benefit because they, rather than the government, will choose which services and technologies meet their telecommunications needs.⁴

15. Eltopia’s application for ETC designation meets this standard for the public interest. Indeed, the public interest is arguably even more present in Eltopia’s application than in the mobile wireless applications in which the Commission has previously considered this question. The greater public interest arises from two characteristics of Eltopia’s service. First, it provides a closer substitute to the basic service of the wireline incumbents. Mobile wireless service provides many important benefits to consumers, but it is at best an imperfect substitute for residential or business wireline service. Mobile wireless service typically is more expensive than basic wireline service and does not provide unlimited local calling for a flat rate. Second, Eltopia’s fixed wireless network

⁴ *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 01 (Corrected), January 27, 2005, para. 36 (internal citation omitted).

provides customers with access to affordable broadband service. Some mobile operators offer limited data capabilities, but high-speed access is generally not available in rural areas and is quite expensive where it is deployed.⁵ In short, Eltopia will do more to bring choice for basic service and to bring access to advanced services than than will any of the competitive ETCs already designated by this Commission.

16. Eltopia also requests that the Commission, as part of its public interest analysis, consider the competitive harms that would result if the Commission were not to designate Eltopia when its competitors continue to receive federal support. As noted earlier, Eltopia's fixed wireless service offering will directly compete with the basic and (to the extent offered) advanced services of wireline local exchange companies. It will also compete, albeit less directly, with the voice and data offerings of mobile wireless operators. Every incumbent wireline carrier operating in eastern Washington has already been designated as an ETC and is receiving federal universal service support, and many of the mobile wireless operators are likewise designated and funded. Eltopia submits that the principles of competitive and technological neutrality will be undermined if these carriers are allowed to operate with significant government

⁵ For example, Sprint's mobile broadband service is offered at \$60 per month for unlimited service, and coverage maps indicate that the service is not available outside of Spokane and the Yakima Valley in eastern Washington. Verizon Wireless offers broadband at \$80 per month; coverage maps indicate service is not available in many parts of eastern Washington.

support and Eltopia is not afforded similar support. Eltopia believes that in a hypothetical subsidy-free market structure it would compete on very favorable terms against these incumbents, but it will be at a substantial disadvantage if it is deprived of support comparable to its competitors.

17. Finally, Eltopia suggests that the Commission recognize in its public interest analysis that Eltopia Communications is a home-grown high-tech enterprise. Indeed, Eltopia is one of the few carriers providing service today in this state that is owned by Washington state residents and headquartered in the state. Even many of the rural incumbent LECs are now owned by out-of-state corporations. Eltopia was started on a farm in Franklin County, the product of a perceived need for advanced services in agricultural areas and a desire to apply advanced technology to meet these needs.

V. HIGH-COST CERTIFICATION

18. Eltopia certifies that it will use 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(3).

VI. CONCLUSION

19. Eltopia respectfully requests that the Commission grant this Petition to designate Eltopia as an ETC in each of the exchanges within the 509 area code, including exchanges served by both non-rural ILECs and rural ILECs.

Respectfully submitted, this 10th day of May 2007.



Will Lee MacHugh
Vice President
Ektopia Communications, LLC

Exhibit A

Statement in Compliance With 480-123-030

20. In support of its Petition and consistent with the requirements of WAC 480-123-030, Eltopia Communications, LLC provides the following:

(a) A description of the area or areas for which designation is sought.

21. Eltopia Communications requests designation as an ETC in each of the exchanges within the 509 area code. The UTC has previously designated a mix of incumbent and competitive carriers in these exchanges. The incumbent carriers include Qwest, Verizon, and Embarq, which are non-rural carriers for the purposes of Sec. 214(e), and numerous rural carriers. The specific exchanges are listed in Exhibits B and C.

(b) A statement that the carrier will offer the services supported by federal universal service support mechanisms throughout the area for which it seeks designation, 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 ETC).

22. Eltopia Communications provides the federally designated supported services throughout the areas for which it seeks designation as an ETC. It will do so using its own facilities and, where its facilities are not yet in place, by reselling another carrier's services.

23. Eltopia, like all other carriers, does not have facilities in place to serve every customer immediately. The company expects to build its network out in response to customer demand and the availability of investment funds. Both this Commission and the Federal Communications Commission have determined that the requirement to offer services does not imply that an ETC must be capable of serving every customer immediately. To do so would likely result in wasteful construction of networks where no demand develops and would impose a virtually insurmountable barrier to entry for competitors.

24. The Commission has required in WAC 480-120-071 that local exchange companies filing tariffs complete service extension requests within 18 months, if the customer is reasonably entitled to service and unless it finds that there is good cause to take longer. While this rule does not apply to Eltopia, it provides a standard for availability of service that it will commit to meet as an ETC.

(c) A description of how it will provide each supported service.

25. Eltopia Communications and its affiliate Eltopia.com own and operate a fixed wireless network in eastern Washington. This network is built largely on Motorola Canopy and Atheros-based radio systems. Data is delivered to the network via fiber optic lines from Seattle to Pasco and Spokane. The network uses border gateway protocol (“BGP”) between its locations and its

peering partners in Seattle to ensure multiple paths to the Internet. Once the bandwidth is delivered to eastern Washington, it is sent wirelessly to customers via microwave packet radio.

26. The microwave network is much more reliable than standard wireless networks. Each tower in the network is connected to a minimum of two other towers in what is known as a mesh topology. Eltopia uses open shortest path first ("OSPF") protocol to manage these connections. The benefit of this is that if there is a problem moving data between any two towers, there is always another connection that can send the data out to the bordering fiber network. The last mile connectivity is engineered and monitored to ensure consistency.

27. To deliver voice services, Eltopia Communications has developed its own softswitch technology. This system currently manages over 800,000 calls per month to provide dial-up Internet service. This system is also engineered to provide voice services. Unlike many other CLECs, Eltopia Communications uses many facilities-based interconnections, thereby eliminating issues with virtual NXX arrangements.

28. The individual supported services are discussed below:

1. *Voice grade access to the public switched network.* "Voice grade access" is defined as a function that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating

there is an incoming call. Bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.

29. As illustrated in Exhibit D to this petition, the voice service offered by Eltopia Communications provides voice-grade access to the public switched network.

2. *Local usage.* "Local usage" means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users.

30. Eltopia will offer unlimited local usage as a part of its voice service. The local calling area for Eltopia customers will equal or exceed the local calling area of the incumbent local exchange company in each exchange.

3. *Dual tone multi-frequency signaling or its functional equivalent.* "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time.

31. Customers using Eltopia voice service enter telephone numbers using DTMF signaling. These signals are used by Eltopia's equipment to initiate a telephone call over the public switched telephone network.

4. *Single-party service or its functional equivalent.* "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission.

32. All voice service offered by Eltopia Communications is single-party service.

5. *Access to emergency services.* "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911," to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.

33. Eltopia Communications will route all 911 calls to the PSAP that serves the specific customer. Eltopia expects to provide enhanced 911 service using Intrado's V9-1-1 system. This is a comprehensive system for supplying all elements necessary to provide numbering and location information (ANI and ALI) and to provide redundant and highly reliable routing of emergency calls through appropriate selective routers to the correct public service answering point (PSAP).

6. *Access to operator services.* "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call.

34. Eltopia Communications will provide operator service to its voice customers. Customers dial "0" to reach Eltopia's customer service center, where live operators are available to assist customers in completing or billing telephone calls.

7. *Access to interexchange service.* "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network.

35. Eltopia Communications provides its voice customers with access to interexchange service. Customers can use Eltopia's service to make calls to any number on the public switched telephone network. Customers who wish to use another interexchange carrier may do so by using 1-800 access to that carrier's prepaid or postpaid services.

8. *Access to directory assistance.* "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings.

36. Eltopia Communications will provide directory assistance service to its voice customers. Customers dial "0" to reach Eltopia's customer service center, where live operators are available to assist customers in finding a telephone number.

9. *Toll limitation for qualifying low-income consumers.* "Toll limitation" denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For ETCs that are capable of providing both services, "toll limitation" denotes both toll blocking and toll control.

37. Eltopia Communications will provide toll blocking to customers that request the service. The service prevents completion of calls that would result in toll calls to the customer. To the extent it is capable of doing so, Eltopia will also provide toll control to qualifying low-income consumers.

(d) A substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers.

38. Eltopia Communications will use all funds received as a result of its ETC designation for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Because Eltopia is a facilities-based carrier and would receive support only after it has begun serving individual customers, the funds received would in many instances directly compensate Eltopia for the investments made and expenses incurred to connect the supported customer to the network. These costs include construction of radio towers used in the mesh design of the fixed wireless network, purchase and installation of wireless networking equipment, purchase and maintenance of central office space, and payment of charges for interoffice circuits and services

used to connect customers to the public switched telephone network and the enhanced 911 network. Eltopia must incur these costs before it ever receives payments from either customers or the universal service program, and universal service funds will allow Eltopia to expand its network more quickly and more widely than would otherwise be possible.

39. These investments provide direct and substantial benefits to customers in the exchanges served by Eltopia. By expanding the reach of its network, Eltopia will bring competitive telecommunications choices to customers who today have little or no option other than their incumbent local exchange company. Eltopia's network will also provide affordable broadband service to customers who in many cases are unable to obtain any access to the Internet other than dial-up access.

(e) A statement that the carrier will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers not receiving discounts;

40. Eltopia Communications will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers not receiving discounts.

(f) For wireless petitioners, a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals;

41. This requirement does not apply to Eltopia Communications.

(g) Information that demonstrates its ability to remain functional in emergency situations including a description of how it complies with WAC 480-120-411 or, for a wireless carrier, information that demonstrates 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 back up battery power and back up generators at each switch;

42. Eltopia's central offices are located in Pasco and Spokane in collocated facilities. These offices have both battery and automatic-start generator power available in the event of a power outage; available battery power exceeds the three-hour requirement in WAC 480-120-411. The Pasco facility is operated by the Franklin County Public Utility District and located in the same building and on the same power supply as the PUD's network operations center.

(h) Information that demonstrates that it will comply with the applicable consumer protection and service quality standards of chapter 480-120 WAC or, for a wireless carrier, a commitment to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service. Information regarding the version of the CTIA code adopted and where to obtain it is set forth in WAC 480-123-999.

43. The Commission's service quality rules include network performance standards (WAC 480-120-401), network maintenance (WAC 480-120-411), trouble reports (WAC 480-120-438), installation of customer lines (WAC 480-120-105), and repair (WAC 480-120-440). Eltopia will comply with these standards, to the extent they apply to the company, as demonstrated below. The Commission has generally not held regulated companies to a level of absolute compliance with all standards in all circumstances and has at times granted exemptions to companies based on specific circumstances. Eltopia likewise does not, by demonstrating its general ability to comply with the standards, intend to waive its right to request either mitigation of any enforcement action or exemption from any standard.

44. *Network performance standards (WAC 480-120-401)*. This rule provides standards for the reliability of switching service, intercept service, interoffice facilities, customer loops, and interexchange carrier trunking. Eltopia's network design is different in many respects to the incumbent local exchange network architecture assumed in this rule, but the Eltopia network will provide service at these standards. Dial tone, for example, is provided by equipment at the customer's premise and is available immediately. Eltopia's wireless loop technology is a digital service that is designed with redundant capabilities. Eltopia's interconnection trunking requirements are governed by interconnection

agreements that require the company to maintain adequate network capacity.

The softswitch technology used by Eltopia allows it to monitor network conditions, and as necessary, Eltopia is able to adjust network parameters (including the codec used to convert analog voice communication into a digital signal) to ensure reliable voice service over a wide range of operating conditions and network loads.

45. *Network maintenance (WAC 480-120-411)*. Compliance with this standard is addressed separately under paragraph (g) above.

46. *Trouble reports (WAC 480-120-438)*. This rule limits the number of trouble reports per hundred lines in service. Eltopia will closely track all trouble reported by its customers and will identify and correct these problems. In addition, because Eltopia uses digital loop facilities for all customers, it is able to monitor network performance without waiting for customers to report trouble conditions.

47. *Installation of customer lines (WAC 480-120-105)*. This rule does not apply to Eltopia Communications. However, the company will promptly complete orders for new service.

48. *Repair of service interruptions and impairments (WAC 480-120-440)*. This rule requires that, with some exceptions, service interruptions be restored within 48 hours and service impairments be restored within 72 hours.

The Commission has observed that this standard “demand[s] near perfection in a way that is extremely difficult to achieve” and “may create incentives for inefficient service quality achievement.”⁶ Eltopia maintains a staff of trained technicians and a sufficient supply of replacement equipment so that it will in almost all instances be able to restore service within the intervals required by this rule.

49. In addition to meeting the standards discussed above, Eltopia Communications will cooperate with UTC consumer affairs staff in resolving any customer complaints that may arise.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED May 10, 2007 at Eltopia, Washington.



Will Lee MacHugh
Vice President
Eltopia Communications, LLC

⁶ *Sixteenth Supplemental Order, Order Denying Termination of Service Quality Program; Granting Modification*, Docket UT-991358, June 30, 2004, para. 76.

Exhibit B - Rural Telephone Company Exchanges

<u>Company</u>	<u>Exchange</u>	<u>CLLI</u>
Asotin Telephone Company	Anatone	ANATWAXX
	Asotin	ASOTWAXA
CenturyTel of Cowiche	Cowiche	CWCHWAXX
	Rimrock	RMRKWAXA
	Tieton	TITNWAXX
CenturyTel of Washington	Almira	ALMRWAXA
	Basin City	BSCTWAXX
	Benge	RTVLWAXA
	Cheney	CHNYWAXC
	Chewelah	CHWLWAXX VLLYWAXX
	Connell	CNNLWAXA
	Coulee City	CLCYWAXA
	Creston	CETNWAXX
	Davenport	DVPTWAXX
	Edwall-Tyler	EDWLWAXA
	Eltopia	ELTPWAXX
	Eureka	EURKWAXA
	Harrington	HRTNWAXA
	Hunters	ICHLWAXA
	Kahlotus	KHLTWAXA
	Kettle Falls	KTFLWAXA
	Lind	LINDWAXA
	Mathews Corner	MTCOWAXX
	Medical Lake	MDLKWAXX
	Mesa	MESAWAXX
	Nespelem	NSPLWAXA
	Odessa	ODSSWAXA
	Reardan	RRDNWAXX
	Ritzville	RTVLWAXA
	Royal City	RYCYWAXA
	Spangle	SPNGWAXA
	Sprague	SPRGWAXA
	Starbuck	STRBWAXA
	Twisp	TWISWAXA
	Washtucna	WSHTWAXA
	Wilbur	WLBRWAXA
	Wilson Creek	WSCKWAXA
	Winthrop	WNTHWAXA
Ellensburg Telephone Company	Ellensburg	ELBGWAXA
	Kittitas	ELBGWAXA KTTSWAXX
	Lauderdale	ELBGWAXA
	Selah	ELBGWAXA SELHWAXX
	Thorp	ELBGWAXA THRPWAXA
	Vantage	ELBGWAXA VNTGWAXX

Exhibit B - Rural Telephone Company Exchanges

<u>Company</u>	<u>Exchange</u>	<u>CLLI</u>
Inland Telephone Company	Prescott	PRSCWAXA
	Roslyn	RSLNWAXX
	Uniontown	UNTWWAXA
M&L Enterprises, Inc	Mt Hull	ORVLWA02
Pend Oreille Telephone Company	Cusick	CUSKWAXX
	Ione	IONEWAXX
	Metaline Falls	MTFLWAXX
Pioneer Telephone Company	Endicott	ENDCWAXA
	La Crosse	LCRSWAXA
St John Co-Op Telephone & Telegraph Company	St John	STJHWAXA

Exhibit C - Non-rural Telephone Company Exchanges

<u>Company</u>	<u>Exchange</u>	<u>CLLI</u>	
Qwest Corporation	Clarkston	LSTNIDSH	
	Cle Elum	CLELWA01	
	Colfax	CLFXWA01	
	Colville	CLVLWA01	
	Coulee Dam	CLDMWA01	
	Dayton	DYTNWA01	
	Deer Park	DRPKWA01	
	Easton	ESTNWA01	
	Elk	ELK WA01	
	Ephrata	EPHRWA01	
	Green Bluff	GRBLWA01	
	Liberty Lake	LBLKWA01	
	Loon Lake	LNLKWA01	
	Moses Lake	MSLKWA01 MSLKWAAB	
	Newman Lake	NWLKWA01	
	Northport	NPRTWA01	
	Omak	OMAKWA01	
	Orient-Laurier		
	Oroville	ORVLWA01	
	Othello	OTHEWA01	
	Pasco	PASCWA01	
	Pateros	PTRSWA01	
	Pomeroy	PMRYWA01	
	Spokane	SPKNWA01 SPKNWA01 SPKNWA01 SPKNWACH SPKNWAF SPKNWAHD SPKNWAKY SPKNWAMO SPKNWAWA SPKNWAWH	
	Springdale	SPDLWA01	
	Touchet	WLWLWA01	
	Waitsburg	WTBGWA01	
	Walla Walla	WLWLWA01	
	Warden	WRDNWA01	
	Yakima	YAKMWA02 YAKMWAVE	
	United Telephone Company of The Northwest	Columbia	CLMAWAXA
		Dallesport	DLPTWAXA WSHRWAXA
		Glenwood	GLWDWAXA
		Goldendale	GLDLWAXA
Grandview		GDVWWAXA	
Granger		GRNGWAXA	
Harrah		HRRHWAXA	

Exhibit C - Non-rural Telephone Company Exchanges

<u>Company</u>	<u>Exchange</u>	<u>CLLI</u>
	Klickitat	KLCTWAXX
	Lyle	LYLEWAXA
	Mabton	BCTNWAXX
		MBTNWAXX
	Mattawa	MTWAWAXA
	Paterson	PASNWAXA
	Prosser	PRSRWAXA
	Roosevelt	RSVTWAXA
	Stevenson	STSNWAXA
	Sunnyside	SNSDWAXX
	Toppenish	TPNSWAXX
		ZLLHWAXA
	Trout Lake	TRLKWAXX
	Wapato	WPATWAXX
	White Salmon	WHSLWAXX
	White Swan	WHSWWAXX
Whitstran	WHTSWAXA	
Willard	WLRDWAXX	
Verizon Northwest	Benton City	BNCYWAXX
	Brewster	BRWSWAXA
	Bridgeport	BRPTWAXX
	Cashmere	CSHRWAXX
	Chelan	CHLNWAXX
	Curlew	CRLWWAXA
	Entiat	ENTTWAXX
	Fairfield	FRFDWAXA
	Farmington	FRTNWAXX
	Garfield	GRFDWAXX
	George	GERGWAXX
	Kennewick	KNWCWAXA
		KNWCWAXA
		KNWCWAXB
		KNWCWAXC
		KNWCWAXC
	Latah	LATHWAXA
	Leavenworth	LVWOWAXX
	Loomis	LOMSWAXA
	Mansfield	MNFDWAXX
	Molson	MLSNWAXA
	Naches	NCHSWAXX
	Newport	NWPTWAXX
	Nile	NILEWAXX
	Oakesdale	OKDLWAXX
	Palouse	PALSWAXX
	Pullman	PLMNWAXX
	Quincy	QNCYWAXX
	Republic	RPBLWAXA
	Richland	RCLDWAXA
		RCLDWAXB

Exhibit C - Non-rural Telephone Company Exchanges

<u>Company</u>	<u>Exchange</u>	<u>CLLI</u>
		RCLDWAXB
		WRLDWAXA
	Rockford	RCFRWAXB
	Rosalia	MLDNWAXA
		ROSLWAXA
		THTNWAXA
	Soap Lake	SOLKWAXX
	Tekoa	TEKOWAXX
	Tonasket	TNSKWAXA
	Waterville	WTVLWAXA
	Wenatchee	WNTCWAXX
		LKWNWAXA
	MNSNWAXA	



