BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET UT-210149
)	
COMMNET WIRELESS, LLC)	
)	
For Designation as an Eligible)	
Telecommunications Carrier in the State of)	
Washington for Purposes of Receiving)	
Support from the Federal Rural Digital)	
Opportunity Fund)	

COMMNET WIRELESS LLC'S NOTICE OF CONDITIONAL RELINQUISHMENT OF ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a), Commnet Wireless, LLC ("Commnet"), submits this Notice of conditional relinquishment of its designation as an eligible telecommunications carrier ("ETC") to the Washington Utilities and Transportation Commission ("Commission"). As explained below, Commnet seeks relinquishment of its ETC status for only those census blocks in Kittitas County, which are identified in Exhibit 1, conditioned on the following:

- (1) the Federal Communication Commission's ("FCC") approval of the joint Application of Commnet and Inland Cellular, LLC ("Inland") for Consent to Assignment of Domestic Section 214 Authorization ("Joint Application") and Inland satisfying the conditions imposed by the FCC for completion of the transfer of funding; and
- (2) the Commission's approval of Inland's Application for Designation as an Eligible Telecommunications Carrier.

In support of this Notice, Commnet states

1. Commnet is a Delaware limited liability company that provides voice and

broadband services in rural and tribal communities in the southwestern United States. Commnet is designated as an ETC in areas where it was awarded Rural Digital Opportunity Funds ("RDOF") in the State of Washington, including but not limited to, the census blocks in Kittitas County identified in **Exhibit 1**.

- 2. Inland Cellular, LLC ("Inland") is a Washington limited liability company based in Roslyn, Washington.
- 3. Following the FCC's announcement that Commnet was a winning bidder in the FCC's Rural Digital Opportunity Fund ("RDOF"), Commnet sought ETC designation before the Commission.
- 4. On May 20, 2021, the Commission issued an Order granting Commnet Petition for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Support from the Rural Digital Opportunity Fund, which included the census blocks identified in Exhibit 1.
- 5. On December 9, 2023, Commnet and Inland entered into an Assignment and Assumption Agreement, under which Commnet agreed to assign its RDOF obligations listed in Exhibit 1 to Inland, and Inland agreed to accept those funds and assume those obligations, subject to any required regulatory approvals. Commnet and Inland have agreed to work together to effectuate the assignment of Commnet's RDOF program obligations to Inland with respect to these census blocks listed in Exhibit 1.
- 6. Commnet and Inland submitted a Joint Application dated April 30, 2024 to the FCC, seeking FCC consent for the assignment of Commnet's domestic Section 214 authorization to Inland, which consists of Commnet's RODF support obligations for its designated census blocks in Kittitas County, which are listed in Exhibit 1. A copy of the Joint Application is

attached at Exhibit 2.

- 7. On June 24, 2024, Inland filed its Application with the Commission seeking approval of its ETC designation in the census blocks in Kittitas County, which are listed in Exhibit 1, where Commnet is currently authorized to receive RDOF support.
- 8. Following all regulatory approvals, and upon assignment, Inland will begin to receive RDOF funds for the transferred areas and assume Commnet's obligations to provide services pursuant to FCC rules.
- 9. Federal law authorizes relinquishment by one ETC where another ETC serves the area. 47 U.S.C. § 214(e)(4) states, in pertinent part:
 - A State commission . . . shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation shall give advance notice the State commission . . . of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission . . . shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission . . . shall establish a time, not to exceed one year after the State commission . . . approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.
- 10. The FCC rules support approval of Commnet's requested ETC relinquishment.

 47 C.F.R. § 54.205 provides that a "state commission shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier." 47 C.F.R. § 54.205(a).
- 11. Once Inland's Application pending before the Commission, and the Joint Application pending before the FCC, are both approved, the necessary criteria for relinquishment will be satisfied.

THEREFORE, based on the foregoing, Commnet respectfully requests the Commission issue an order granting its request for relinquishment, conditioned upon the FCC's approval of the Joint Application and the Commission's approval of Inland's Application seeking ETC designation in the census blocks listed in Exhibit 1.

Respectfully submitted this 21st day of August, 2024.

Commnet Wireless LLC

Warren Thomas

Vice President and General Counsel

Commnet Wireless, LLC

EXHIBIT 1

Count	ApplicantName	FRN	State	County	Census Block	Census Block Group
1	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001061	530379751001
2	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001069	530379751001
3	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001072	530379751001
4	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001084	530379751001
5	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001087	530379751001
6	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001088	530379751001
7	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001090	530379751001
8	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001091	530379751001
9	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001096	530379751001
10	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001097	530379751001
11	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001102	530379751001
12	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001104	530379751001
13	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001107	530379751001
14	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001108	530379751001
15	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001112	530379751001
16	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001116	530379751001
17	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001119	530379751001
18	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001124	530379751001
19	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001128	530379751001
20	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001129	530379751001
21	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001132	530379751001
22	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001138	530379751001
23	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001140	530379751001
24	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001142	530379751001
25	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001143	530379751001
26	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001153	530379751001
27	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001154	530379751001
28	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001168	530379751001
29	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001169	530379751001
30	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001172	530379751001
31	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001175	530379751001
32	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001176	530379751001
33	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001177	530379751001
34	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001178	530379751001
35	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001203	530379751001
36	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001211	530379751001
37	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001212	530379751001
38	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001213	530379751001
39	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001216	530379751001
40	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001236	530379751001

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41	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001237	530379751001
42	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001248	530379751001
43	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001249	530379751001
44	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001254	530379751001
45	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001259	530379751001
46	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001261	530379751001
47	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001270	530379751001
48	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001273	530379751001
49	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001275	530379751001
50	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001276	530379751001
51	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001277	530379751001
52	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001279	530379751001
53	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001280	530379751001
54	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001282	530379751001
55	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001283	530379751001
56	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001284	530379751001
57	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001333	530379751001
58	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001339	530379751001
59	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001348	530379751001
60	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001349	530379751001
61	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001351	530379751001
62	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001355	530379751001
63	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001425	530379751001
64	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001430	530379751001
65	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001443	530379751001
66	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001444	530379751001
67	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001449	530379751001
68	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001450	530379751001
69	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001456	530379751001
70	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001459	530379751001
71	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001461	530379751001
72	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001469	530379751001
73	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001472	530379751001
74	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001473	530379751001
75	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001476	530379751001
76	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001478	530379751001
77	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001479	530379751001
78	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001490	530379751001
79	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001496	530379751001
80	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001497	530379751001
81	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001499	530379751001
82	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001502	530379751001
83	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001504	530379751001
84	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001505	530379751001

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85	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001506	530379751001
86	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001507	530379751001
87	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001511	530379751001
88	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001512	530379751001
89	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001514	530379751001
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91	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001516	530379751001
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93	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001521	530379751001
94	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001524	530379751001
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99	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001534	530379751001
100	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001535	530379751001
101	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001536	530379751001
102	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001537	530379751001
103	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001540	530379751001
104	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001541	530379751001
105	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001542	530379751001
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129	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001637	530379751001
130	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001657	530379751001
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133	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001731	530379751001