

**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 RDOF 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



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Warren Thomas  
Vice President and General Counsel  
Commnet Wireless, LLC

**EXHIBIT 1**

<b>Count</b>	<b>ApplicantName</b>	<b>FRN</b>	<b>State</b>	<b>County</b>	<b>Census Block</b>	<b>Census Block Group</b>
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





129	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001637	530379751001
130	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001657	530379751001
131	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001729	530379751001
132	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001730	530379751001
133	Commnet Wireless, LLC	0007116403	Washington	Kittitas	530379751001731	530379751001