

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of the Application of )  
Sprint Nextel Corporation ) Docket No. UT-111325  
For Relinquishment of Eligible )  
Telecommunications Carrier (ETC) )  
Designation )

---

**SPRINT NEXTEL CORPORATION  
APPLICATION FOR RELINQUISHMENT OF  
ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) DESIGNATION**

Kristin L. Jacobson  
Counsel, Sprint Nextel  
Regulatory Affairs West Region  
201 Mission Street, Suite 1500  
San Francisco, CA 94105-1855  
Office: (707) 816-7583  
Fax: (415) 684-7339

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of the Application of )  
Sprint Nextel Corporation ) Docket No. UT-111325  
Amendment 1 to Application for )  
Relinquishment of Eligible )  
Telecommunications Carrier (ETC) )  
Designation )

---

**SPRINT NEXTEL CORPORATION  
AMENDMENT 1 TO APPLICATION FOR  
RELINQUISHMENT OF ELIGIBLE  
TELECOMMUNICATIONS CARRIER (ETC) DESIGNATION**

Sprint Nextel Corporation (“Sprint Nextel”) hereby submits this First Amendment (“Amendment 1”) to the Application for Relinquishment of its Eligible Telecommunications Carrier (“ETC”) Designation in the State of Washington, Docket No. UT-111325 (“Application”), effective as of December 31, 2011. This Amendment 1 to the Application is made pursuant to 47 USC § 214(e)(4) and 47 CFR § 54.205.

**I. Overview of Amendment 1**

This Amendment 1 seeks to accomplish the following: 1) revise the list of designated exchanges set forth in Exhibit A to Sprint Nextel’s Application; 2) include, as Exhibit C to the Application a Customer Notification Letter that Sprint Nextel intends to send to its Washington Lifeline customers prior to cessation of the Lifeline discount; and

3) provide a brief update regarding Sprint Nextel's battery backup status, including current compliance data set forth in "Confidential" Exhibit B.

## **II. Revised Exhibit A**

Sprint Nextel seeks to delete Exhibit A as filed in the Application, in its entirety, and replace it with the Revised Exhibit A set forth below. This Revised Exhibit A adjusts the description of the exchanges that Sprint Nextel is currently designated as an ETC provider, to ensure consistency with the way the Commission referenced all such exchanges in the earlier issued Sprint Nextel ETC designation orders.

## **III. Exhibit C - Customer Notification Letter**

As discussed in the Application, upon acceptance and approval of its Application, Sprint Nextel will provide written notice by U.S. Mail to each of its then-current Lifeline customers in Washington advising that Sprint Nextel will no longer provide service discounts as an ETC ("Customer Notice").<sup>1</sup> The Customer Notice is attached hereto as Exhibit C to the Application.

The notice will inform these customers that the monthly Lifeline credit will be discontinued 60 days following the issuance of the Customer Notice. Sprint Nextel will offer each of its Washington Lifeline customers the option of continuing to receive the same service from Sprint Nextel, or selecting an alternative calling plan. If a Lifeline customer decides to leave Sprint Nextel, no early termination fee will be applied. The notice will further inform each customer that Lifeline discounted service may be obtained

---

<sup>1</sup> As of April 30, 2011, Sprint Nextel had 68 Washington Lifeline customers.

from the remaining ETC providers in the area, as appropriate. A list of the remaining ETC providers will be included in the Customer Notice, if so requested from the Commission. After December 31, 2011, Sprint Nextel will not activate any new Lifeline subscribers in Washington.

#### **IV. Battery Backup**

Absent Sprint Nextel's application to relinquish its ETC designation, prior to December 31, 2011, it would have sought Commission approval for an extension of the existing temporary exemption from the minimum 4-hour battery backup requirement. The impending ETC designation relinquishment seems to make such a request moot. Sprint Nextel wishes to clarify, however, that although not all of its sites located within the ETC designated territory have 4 hours of battery backup, most of its non-compliant sites have close to the minimum 4 hours of battery coverage. Of the sites that do not meet the minimum 4 hours of battery coverage, most are Class 3 sites (least integral to the operation of Sprint Nextel's wireless communications network). Additionally, many of Sprint Nextel's sites provide a certain amount of overlapping coverage. Thus, in the event of a lengthy and large-scaled commercial power outage, as the backup battery power depletes and certain sites shut down, neighboring sites with overlapping coverage continue to provide wireless coverage to portions of the geographic area predominantly covered by the neighboring sites, for an extended duration of time. Moreover, the cost of adding additional battery strings required to provide an average of an additional hour of battery power in order to meet the minimum 4 hours of battery coverage, is very high (starting at \$20,000 per site for an additional battery string including rectifier upgrade, assuming that structural modifications, increased leased area or other work is not

required, otherwise the cost increases significantly). Many of the remaining non-compliant sites face additional challenges, such as constraints on the size of the leasehold area, resulting in an inability to increase the number of battery strings without lease and structural modifications. Additional entitlements may also be required. In some cases, there is simply no ability to increase the leasehold area because there is no available additional space. Overall, in light of the high cost associated with the purchase and installation of additional backup battery strings which ultimately provide only an average of 1-2 hours of additional backup power for the relatively few Class 2 and Class 3 sites at issue, on a national basis, Sprint Nextel has instead supported investing in an extensive portable backup power generator fleet that are poised to be deployed in the event of a large-scaled commercial power failure. Sprint Nextel has also been actively exploring alternative backup power sources that are more environmentally friendly and provide for longer term backup power alternatives. Although Sprint Nextel is not on target to meet the December 31, 2011 deadline as set forth in the temporary exemption order<sup>2</sup> for battery backup power at the sites identified in its Request for Eligible Telecommunications Carrier Annual Certification in Docket No. UT-111383 filed on July 28, 2011, it has implemented many other network hardening measures, above and beyond the installation of battery strings, to ensure high service quality and network reliability on a network-wide basis in the event of a large scaled commercial power outage.

---

<sup>2</sup> In Docket No. UT-073023, Order 2, dated September 10, 2009, the Commission granted Sprint Nextel a temporary exemption from the four-hour back-up power rule under WAC 480-123-070(6) and WAC 480-123-030(1)(g), until December 31, 2011.

V. Conclusion

Sprint Nextel respectfully requests the Commission's consideration of the information included in this Amendment 1.

DATED: This 30<sup>th</sup> day of November 2011 in San Francisco, California.

Kristin L. Jacobson / km  
Kristin L. Jacobson  
Counsel, Sprint Nextel  
Regulatory Affairs West Region  
201 Mission Street, Suite 1400  
San Francisco, CA 94105-1855  
Office: (707) 816-7583  
Fax: (415) 684-7339

**EXHIBIT A**

**Sprint Nextel ETC Designated Exchanges**

<b>Incumbent Local Exchange Carrier (ILECs)</b>	<b>Exchange</b>
Qwest Corporation	Othello
CenturyTel of Cowiche	Cowiche
CenturyTel of Cowiche	Rimrock
CenturyTel of Cowiche	Tieton
CenturyTel of Washington	Connell
Ellensburg Telephone Company	Lauderdale
Frontier Communications Northwest Inc.	Chelan
Frontier Communications Northwest Inc.	Chelan
Frontier Communications Northwest Inc.	Entiat
Frontier Communications Northwest Inc.	Naches
Frontier Communications Northwest Inc.	Newport
Frontier Communications Northwest Inc.	Sumas
Frontier Communications Northwest Inc.	Waterville
Qwest Corporation	Pateros
United Telephone Company of The Northwest	Goldendale
United Telephone Company of The Northwest	Hood Canal
United Telephone Company of The Northwest	Willard
Qwest Corporation	Bremerton
Qwest Corporation	Winlock
Frontier Communications Northwest Inc.	Custer
Asotin Telephone Company	Asotin
CenturyTel of Washington	Edwall-Tyler
CenturyTel of Washington	Eureka
CenturyTel of Washington	Lind
CenturyTel of Washington	Ritzville - Benge
CenturyTel of Washington	Sprague
CenturyTel of Washington	Wilson Creek
Frontier Communications Northwest Inc.	Pullman
Inland Telephone Company	Uniontown
Qwest Corporation	Colfax
Qwest Corporation	Moses Lake
Qwest Corporation	Moses Lake
Qwest Corporation	Walla Walla- Touchet
Qwest Corporation	Warden

St John Co-Op Telephone & Telegraph Company	St John
CenturyTel of Washington	Eltopia
CenturyTel of Washington	Reardan
CenturyTel of Washington	Royal City
Frontier Communications Northwest Inc.	Rosalia
Frontier Communications Northwest Inc.	Rosalia
Frontier Communications Northwest Inc.	Soap Lake
Qwest Corporation	Ephrata
Qwest Corporation	Pasco
CenturyTel of Washington	Ames Lake
CenturyTel of Washington	Arletta
CenturyTel of Washington	Ashford
CenturyTel of Washington	Basin City
CenturyTel of Washington	Carnation
CenturyTel of Washington	Cheney
CenturyTel of Washington	Curtis
CenturyTel of Washington	Elma
CenturyTel of Washington	Fall City
CenturyTel of Washington	Gig Harbor
CenturyTel of Washington	Kingston
CenturyTel of Washington	Lake Quinalt
CenturyTel of Washington	Lakebay
CenturyTel of Washington	Mathews Corner
CenturyTel of Washington	McCleary
CenturyTel of Washington	Medical Lake
CenturyTel of Washington	Mesa
CenturyTel of Washington	Montesano
CenturyTel of Washington	North Bend
CenturyTel of Washington	North Bend
CenturyTel of Washington	Ocosta
CenturyTel of Washington	Orting
CenturyTel of Washington	South Prairie
CenturyTel of Washington	Spangle
CenturyTel of Washington	Vader
CenturyTel of Washington	Vashon
CenturyTel of Washington (inter-island)	Blakely Island
CenturyTel of Washington (inter-island)	East Sound
CenturyTel of Washington (inter-island)	Friday Harbor
Ellensburg Telephone Company	Ellensburg



Ellensburg Telephone Company	Kittitas
Ellensburg Telephone Company	Selah
Ellensburg Telephone Company	Thorp
Ellensburg Telephone Company	Vantage
Frontier Communications Northwest Inc.	Acme-Deming- Whatcomcty
Frontier Communications Northwest Inc.	Alger*
Frontier Communications Northwest Inc.	Anacortes
Frontier Communications Northwest Inc.	Arlington
Frontier Communications Northwest Inc.	Benton City
Frontier Communications Northwest Inc.	Big Lake
Frontier Communications Northwest Inc.	Blaine-Birch Bay
Frontier Communications Northwest Inc.	Bothell
Frontier Communications Northwest Inc.	Bothell
Frontier Communications Northwest Inc.	Burlington (both)
Frontier Communications Northwest Inc.	Camas-Washougal
Frontier Communications Northwest Inc.	Camas-Washougal
Frontier Communications Northwest Inc.	Camas-Washougal
Frontier Communications Northwest Inc.	Cashmere
Frontier Communications Northwest Inc.	Conway
Frontier Communications Northwest Inc.	Coupeville
Frontier Communications Northwest Inc.	Deming
Frontier Communications Northwest Inc.	Edison
Frontier Communications Northwest Inc.	Everett
Frontier Communications Northwest Inc.	Everett
Frontier Communications Northwest Inc.	Everett
Frontier Communications Northwest Inc.	Everett
Frontier Communications Northwest Inc.	Everson
Frontier Communications Northwest Inc.	Ferndale
Frontier Communications Northwest Inc.	George
Frontier Communications Northwest Inc.	Granite Falls
Frontier Communications Northwest Inc.	Grayland
Frontier Communications Northwest Inc.	Halls Lake
Frontier Communications Northwest Inc.	Halls Lake
Frontier Communications Northwest Inc.	Kennewick
Frontier Communications Northwest Inc.	Kennewick
Frontier Communications Northwest Inc.	Kennewick
Frontier Communications Northwest Inc.	Kirkland
Frontier Communications Northwest Inc.	Kirkland
Frontier Communications Northwest Inc.	Kirkland

Frontier Communications Northwest Inc.	Kirkland
Frontier Communications Northwest Inc.	La Conner
Frontier Communications Northwest Inc.	Laurel
Frontier Communications Northwest Inc.	Leavenworth
Frontier Communications Northwest Inc.	Lynden
Frontier Communications Northwest Inc.	Marysville
Frontier Communications Northwest Inc.	Marysville
Frontier Communications Northwest Inc.	Monroe
Frontier Communications Northwest Inc.	Mount Vernon
Frontier Communications Northwest Inc.	Oak Harbor
Frontier Communications Northwest Inc.	Quincy
Frontier Communications Northwest Inc.	Richland
Frontier Communications Northwest Inc.	Richland
Frontier Communications Northwest Inc.	Richland
Frontier Communications Northwest Inc.	Richmond Beach
Frontier Communications Northwest Inc.	Sedro Woolley
Frontier Communications Northwest Inc.	Sedro Woolley
Frontier Communications Northwest Inc.	Silver Lake
Frontier Communications Northwest Inc.	Snohomish
Frontier Communications Northwest Inc.	Stanwood
Frontier Communications Northwest Inc.	Stanwood
Frontier Communications Northwest Inc.	Sultan
Frontier Communications Northwest Inc.	Wenatchee
Frontier Communications Northwest Inc.	Wenatchee
Frontier Communications Northwest Inc.	Wenatchee
Frontier Communications Northwest Inc.	Westport
Frontier Communications Northwest Inc.	Woodland
Hat Island Telephone Company	Hat Island
Hood Canal Telephone Company	Union
Inland Telephone Company	Roslyn
Kalama Telephone Company	Kalama
Lewis River Telephone Company	La Center
Mashell Telecom	Eatonville
McDaniel Telephone Company	Onalaska
McDaniel Telephone Company	Salkum
Qwest Corporation	Aberdeen-Hoquiam
Qwest Corporation	Auburn
Qwest Corporation	Bainbridge Island
Qwest Corporation	Battle Ground

Qwest Corporation	Belfair
Qwest Corporation	Bellevue
Qwest Corporation	Bellevue
Qwest Corporation	Bellingham
Qwest Corporation	Bellingham
Qwest Corporation	Black Diamond
Qwest Corporation	Bremerton
Qwest Corporation	Bremerton
Qwest Corporation	Buckley
Qwest Corporation	Castle Rock
Qwest Corporation	Centralia
Qwest Corporation	Chehalis
Qwest Corporation	Chehalis
Qwest Corporation	Cle Elum
Qwest Corporation	Copalis- Ocean Shore
Qwest Corporation	Deer Park
Qwest Corporation	Des Moines
Qwest Corporation	Des Moines
Qwest Corporation	Easton
Qwest Corporation	Elk
Qwest Corporation	Enumclaw
Qwest Corporation	Graham
Qwest Corporation	Green Bluff
Qwest Corporation	Hoodspport
Qwest Corporation	Issaquah
Qwest Corporation	Kent
Qwest Corporation	Kent
Qwest Corporation	Kent
Qwest Corporation	Liberty Lake
Qwest Corporation	Longview Kelso
Qwest Corporation	Maple Valley
Qwest Corporation	Newman Lake
Qwest Corporation	Olympia
Qwest Corporation	Olympia
Qwest Corporation	Olympia
Qwest Corporation	Port Angeles
Qwest Corporation	Port Angeles
Qwest Corporation	Port Ludlow
Qwest Corporation	Port Orchard



Qwest Corporation	Tacoma
Qwest Corporation	Tacoma Waverly
Qwest Corporation	Tacoma Waverly
Qwest Corporation	Vancouver
Qwest Corporation	Vancouver
Qwest Corporation	Vancouver
Qwest Corporation	Yakima
Qwest Corporation	Yakima
Tenino Telephone Company	Bucoda
Tenino Telephone Company	Tenino
The Toledo Telephone Company	Toledo
United Telephone Company of The Northwest	Chimacum
United Telephone Company of The Northwest	Columbia
United Telephone Company of The Northwest	Dallesport - Wishram
United Telephone Company of The Northwest	Dallesport - Wishram
United Telephone Company of The Northwest	Grandview
United Telephone Company of The Northwest	Granger
United Telephone Company of The Northwest	Harrah
United Telephone Company of The Northwest	Hood Canal
United Telephone Company of The Northwest	Lyle
United Telephone Company of The Northwest	Mabton-Bickleton
United Telephone Company of The Northwest	Mabton-Bickleton
United Telephone Company of The Northwest	Mattawa
United Telephone Company of The Northwest	Paterson
United Telephone Company of The Northwest	Port Angeles -Gardiner
United Telephone Company of The Northwest	Poulsbo
United Telephone Company of The Northwest	Prosser
United Telephone Company of The Northwest	Roosevelt
United Telephone Company of The Northwest	Stevenson
United Telephone Company of The Northwest	Toppenish - Zillah
United Telephone Company of The Northwest	Toppenish - Zillah
United Telephone Company of The Northwest	Wapato
United Telephone Company of The Northwest	White Salmon
United Telephone Company of The Northwest	White Swan
United Telephone Company of The Northwest	Whitstran
Whidbey Telephone Company	Point Roberts
Whidbey Telephone Company	South Whidbey
Whidbey Telephone Company	South Whidbey
Yelm Telephone Company	Rainier



**CONFIDENTIAL**  
**EXHIBIT B**

**EXHIBIT C**

**Customer Notification Letter**

[Insert Date]

«Customer\_First\_Name» «Customer\_Last\_Name»  
«Address\_Line1»  
«City» «State\_Code» «Postal»

Dear Mr./Ms. «Customer\_First\_Name» «Customer\_Last\_Name»:

Due to Sprint Nextel's ("Sprint") relinquishment of its status as an eligible telecommunications carrier (ETC) in <State>, we will no longer participate in the Lifeline Program.

Effective [60 days from the date of letter], Sprint will no longer offer a Lifeline plan in [State]. If you would like to remain a valued Sprint Customer, there is nothing you need to do, and your Lifeline discount plan will be automatically replaced with the Sprint Basic Plan. This plan has 200 Anytime minutes (same as the Lifeline Plan) with a Monthly Recurring Charge of \$29.99, and unlimited Night & Weekend minutes that may be used before 7:00 am and after 9:00 pm Monday through Friday, and all day Saturday and Sunday. Sprint Basic service also includes Voice Mail, Call Waiting, Caller ID, Numeric Paging, Roaming, and Three-Way Calling at no additional charge. Taxes and other applicable surcharges or fees will be charged in addition to the Monthly Recurring Charge. Other restrictions may apply. If you would like to review other Sprint calling plan options, please contact us directly at 888-408-3306 and our customer service team will be happy to assist you. You can also visit [www.sprint.com](http://www.sprint.com).

If you wish to continue receiving Lifeline assistance, you will need to contact another ETC service provider in your area. A listing of the ETC service providers in your state is enclosed. This information can also be found on the Universal Service Administration Company website at <http://www.universalservice.org/li/low-income/lifelinesupport/browser>, or by calling 888-641-8722. If you choose to obtain Lifeline benefits from another service provider, you will not be subject to an early termination fee for cancelling service with Sprint.

Sincerely,

Sprint Customer Care



**CERTIFICATE OF SERVICE**

I hereby certify that I have this 30<sup>th</sup> day of November, 2011, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

David S. Danner	<input type="checkbox"/>	Hand Delivered
Secretary and Executive Director	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities & Transportation Commission	<input checked="" type="checkbox"/>	Overnight Mail (FedEx)
1300 S. Evergreen Park Drive, SW	<input type="checkbox"/>	Facsimile (360-586-8203)
P.O. Box 47250	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)
Olympia, WA 98504-7250		

I hereby certify that I have this 30<sup>th</sup> day of November, 2011, served a true and correct copy of the foregoing document upon the party listed below as follows:

Simon J. ffitc	<input type="checkbox"/>	Hand Delivered
Attorney General of Washington	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Public Counsel Section	<input type="checkbox"/>	Overnight Mail (FedEx)
800 Fifth Avenue, Suite 200	<input type="checkbox"/>	Facsimile (360-586-8203)
Seattle, WA 98104-3188	<input checked="" type="checkbox"/>	Email (simonf@atg.wa.gov)

I declare under penalty of perjury under the law of the State of Washington that the foregoing is true and correct.

Dated this 30<sup>th</sup> day of November, 2011, at San Francisco, California.



Katherine M. McMahon  
Legal Analyst II