

**Before the
Washington Utilities and Transportation Commission**

In the Matter of the Petition of)	
)	Docket No. UT-023040
INLAND CELLULAR)	
)	AMENDMENT TO PETITION FOR
For Designation as Eligible)	MODIFICATION
Telecommunications Carriers)	
Under 47 U.S.C. § 214(e)(2))	

Inland Cellular LLC (“Inland Cellular”) (d/b/a Inland Cellular), hereby requests to amend its August 7, 2013 petition filed with the Washington Utilities and Transportation Commission (“Commission”) for modification of its Order designating Inland Cellular¹ eligible telecommunications carrier (“ETC”) status for purposes of receiving all available support from the federal Universal Service Fund (“USF”) including, but not limited to, support for rural, insular and high-cost areas and low-income customers.

I. Background

1. On July 10, 2002, Inland Cellular Telephone Company (“ICTC”), as general partner of and on behalf of both Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular) (study area code (“SAC”) 529003) and Eastern Sub-RSA Limited Partnership (d/b/a Inland Cellular) (SAC 529004), petitioned the Commission *For Designation as an Eligible Telecommunications Carrier* and the Commission granted ICTC’s petition in an order (Order 01) released August 30, 2002² (“*Inland Cellular Order*”).

¹ See Docket No. UT-023040, *Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, (August 30, 2002), Page 3, Footnote 10, “Hereinafter the operating company and the limited partnerships, collectively, will be referred to as “Inland Cellular””.

² See Docket No. UT-023040, *Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, (August 30, 2002)

2. On September 19, 2005, ICTC submitted a petition to the Commission requesting modification of Docket No. UT-023040 (“*Inland Cellular Order*”). The Commission granted ICTC’s petition in an order with a service date of October 12, 2005³.

3. On September 7, 2011, and then revised on October 3, 2012, ICTC submitted a petition to the Commission requesting modification of Docket No. UT-023040 (“*Inland Cellular Order*”). In its petition, ICTC requested that the Commission modify Order 01 by changing the designation of the Asotin Telephone Company, Anatone exchange, to *full* from *partial* for ETC funding. In Docket No. UT-023040, Order 03, *ORDER GRANTING MODIFICATION*, the Commission Orders:

1) *The Commission modifies the partial designation of Inland Cellular as an ETC in the Anatone exchange in Order 01 to a full designation.*

2) *The Commission further modifies the list of exchanges in which Inland Cellular is designated as an ETC as reflected in Appendix A to this Order.*

4. In its August 7, 2013 petition, Inland Cellular requested that the Commission modify the *Inland Cellular Order*, on a going forward basis, to add language stating that Inland Cellular is an ETC throughout its licensed cellular service territory and remove the confinement of the list of exchanges reflected in the Appendix to the *Inland Cellular Order* as modified in Order 03.

5. Inland Cellular now requests to amend the August 7, 2013 petition; as opposed to adding language stating that Inland Cellular is an ETC throughout its licensed cellular service territory and removing the confinement of the list of exchanges reflected in the Appendix to the *Inland Cellular Order* as modified in Order 03, the Company now seeks conditional ETC designation for areas currently outside its designated ETC area but within the Company’s

³ See Docket No. UT-023040, Order No. 02, *Order Granting Modification*, (October 12, 2005)

licensed service areas and extended areas for the purpose of filing for the future Mobility Fund Auction⁴.

II. Change of Ownership – No Longer Limited Partnerships

6. All previous filings were performed by ICTC as general partner of and on behalf of Washington RSA No. 8 Limited Partnership (“WA8LP”) (d/b/a Inland Cellular) and Eastern Sub-RSA Limited Partnership (“WA5LP”) (d/b/a Inland Cellular). In late December of 2012, ICTC purchased the remaining limited partnership interests in both WA8LP and WA5LP. ICTC formed a subsidiary called Inland Cellular LLC (d/b/a Inland Cellular) and by petition to the FCC in January of 2013, the cellular licenses for WA8LP and WA5LP were transferred to Inland Cellular LLC; shortly thereafter, all assets, liabilities, revenues and expenses of WA8LP and WA5LP were transferred to Inland Cellular LLC to consolidate recordkeeping; FCC 499 Filer ID 829984.

III. Changes in Universal Service Support

7. Contained in Order 01 and then modified in Order 03, is a list of non-rural telephone company wire centers (exchanges/service areas) and rural telephone company wire centers (exchanges/service areas)⁵. From its implementation until December 31, 2011, Universal Service Support for Competitive Eligible Telecommunications Carriers was based on the incumbent local exchange carriers’ level of support for these areas/exchanges. Referred to as

⁴ See Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, at 28, 493-532.

⁵ The WUTC has explained that it uses wireline incumbent telephone company exchange names and boundaries to describe wireless and other ETC service areas, but the two designations are independent and the use of exchange names and boundaries is convenience only. See *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 No. 01, ¶ 7, n.3; ¶ 47, n.19 (Jan. 13, 2005)(“*Sprint PCS Rural Order*”).

the Identical Support Rule, the FCC eliminated the Identical Support Rule⁶ and froze identical support as of December 31, 2011, and started a five-year phase-out of this support which commenced on July 1, 2012. To replace this support for mobile providers, the FCC intends to implement Mobility Fund Phase II⁷ which will not be dependent on incumbent local exchange carriers' level of support for these areas/exchanges; it will be predicated on eligible geographic areas and whether the area funded is within the mobile carrier's licensed service area. As a reference, included as Exhibit A to this petition, is a list of incumbent local exchange carriers and their respective wire centers segregated by ETC status; current versus conditional.

IV. Conclusion

8. The Commission has determined that the public interest is served by designating Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (both *d/b/a* Inland Cellular) as ETC's. Inland Cellular now requests:

- A) The Commission to grant conditional ETC designation for areas currently outside its designated ETC area but within the Company's licensed service areas and extended areas for the purpose of filing for the future Mobility Fund Auction;
- B) Acknowledge the name change to Inland Cellular LLC (*d/b/a* Inland Cellular) formerly Washington RSA No. 8 Limited Partnership (SAC 529003) and Eastern Sub-RSA Limited Partnership (SAC 529004).

9. Inland Cellular respectfully requests that the Commission issue the requested modification set forth above.

⁶ See Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, at 29, 498, 519-520.

⁷ See Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, at 28, 493-532.

Respectfully submitted,

Inland Cellular LLC

By: 

James K. Brooks
Treasurer/Controller

APPENDIX A

LEC: Asotin Telephone Company

Wire Center:	Anatone	Current
	Asotin	Current

LEC: CenturyLink (f/k/a Qwest Corp.-WA)

Wire Center:	Colfax	Current
	Clarkston	Current
	Coulee Dam	Conditional
	Dayton	Current
	Ephrata	Conditional
	Moses Lake	Current
	Othello	Current
	Pasco	Conditional
	Pomeroy	Current
	Waitsburg	Current
	Walla Walla	Current
	Warden	Current

LEC: CenturyLink (f/k/a CenturyTel of Washington, Inc.)

Wire Center:	Almira	Current
	Coulee City	Conditional
	Creston	Current
	Davenport	Current
	Edwall	Current
	Eltopia	Conditional
	Eureka	Current
	Harrington	Current
	Lind	Current
	Odessa	Current
	Rearden	Conditional
	Ritzville	Current
	Royal City	Conditional
	Sprague	Current
	Starbuck	Current
	Washtucna	Current
	Wilbur	Current
	Wilson Creek	Current

APPENDIX A (cont.)

LEC: Frontier Communications Northwest, Inc. (f/k/a Verizon Northwest, Inc)

Wire Center:	Farmington	Current
	Garfield	Current
	Garrison	Current
	Latah	Current
	Oakesdale	Current
	Palouse	Current
	Pullman	Current
	Rosalia	Conditional
	Soap Lake	Conditional
	Tekoa	Current
	Thornton	Current

LEC: Inland Telephone Company

Wire Center:	Prescott	Current
	Uniontown	Current

LEC: Pioneer Telephone Company

Wire Center:	Endicott	Current
	Lacrosse	Current

LEC: St. John Telephone Company

Wire Center	St. John	Current
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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

CERTIFICATE OF SERVICE


I, James K. Brooks, hereby certify that I have, on this 12th day of December, 2013, placed in the United States mail, first-class postage pre-paid, a copy of the foregoing: In the Matter of the Petition of INLAND CELLULAR For Designation as Eligible Telecommunications Carriers Under 47 U.S.C. § 214(e)(2), Docket No. UT-023040, AMENDMENT TO PETITION FOR MODIFICATION, filed today to the following:

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