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IDAHO PUBLIC
UTILITIES COMMISSION

22 January 2007

EDGE-T-07-01

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
P O Box 83720
Boise ID 83720-0074

Hand Delivered

RE: Edge Wireless, LLC Application for ETC Designation

Dear Ms. Jewell:

I am enclosing an original and seven (7) copies of Edge Wireless, LLC's APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER.

Also enclosed is a copy to be date stamped and returned for our files.

Please note the enclosed Application contains confidential trade secret information that is exempt from public disclosure pursuant to Section 9-340D(1), Idaho Code. Pursuant to Rule 67 of the Rules of Procedure of the Idaho Public Utilities Commission, the enclosed trade secret information has been submitted on yellow paper and has been separated from the non-confidential portion of the Application.

Sincerely,

Molly O'Leary
Richardson & O'Leary, PLLC

Enclosures

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF EDGE WIRELESS, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER)
PURSUANT TO THE)
TELECOMMUNICATIONS ACT OF 1996)
(RURAL AND NON-RURAL AREAS))

Case No. EDG-T-07-01

**APPLICATION OF EDGE WIRELESS, LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER (RURAL AND NON-RURAL AREAS)**

Edge Wireless, LLC ("Edge"), by its attorneys, hereby submits this Application for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Sections 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended ("Act"), 47 U.S.C. §214(e)(1)-(2), and Section 54.201 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 54.201, and this Commission's ETC Designation Requirements ("IPUC ETC Requirements").¹

¹ See *In the Matter of the Application of WWC Holding Co., Inc. dba CellularOne Seeking Designation as an Eligible Telecommunications Carrier That May Receive Federal Universal Service Support*, Order No. 29841, Appendix pp. 1-3 (IPUC Case No. WST-T-05-1, served August 4, 2005)(hereinafter "*IPUC ETC Requirements Order*").

Edge 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 rural, insular and high cost areas and low income customers in the geographic areas specified in this Application and that it be approved to participate in the Lifeline program. In support of this Application, the following is respectfully shown:

I. APPLICANT

Edge is a Commercial Mobile Radio Service (“CMRS”) carrier providing “mobileservice” as defined in 47 U.S.C. § 153(27). Edge provides interstate telecommunications services as defined in 47 U.S.C. § 254(d) and 47 C.F.R. § 54.703(a). Through its cellular authorizations, Edge is licensed to serve the following Basic Trading Areas (“BTAs”) in Idaho: BTA 202 Idaho Falls, BTA 353 Pocatello, BTA 451 Twin Falls, and the portion of BTA 258 Logan (Utah) covering Franklin County, Idaho.² Pursuant to these authorizations, Edge provides service to the following counties in Idaho: Bannock, Bear Lake, Blaine, Bingham, Bonneville, Butte, Camas, Caribou, Cassia, Clark, Custer, Franklin, Fremont, Gooding, Jefferson, Jerome, Lemhi, Lincoln, Madison, Minidoka, Oneida, Power, Teton, and Twin Falls.³ Outside of Idaho, Edge operates in portions of northern California, southeastern Oregon, and northwestern Wyoming. Edge has been operating as an ETC in the State of Oregon since August, 2005.⁴

II. ELIGIBILITY AND IDENTIFICATION OF THE SERVICE AREA.

Under Sections 214(e) and 254 of the Act, the Idaho Public Utilities Commission (“IPUC” or “Commission”) is authorized to designate Edge as an ETC. Section 214(e)(2) of the Act requires state commissions to designate as an ETC, throughout the service area for which

² Edge currently has 60 employees in Idaho. Upon opening its new call center in Idaho Falls in March 2007, Edge will have 74 employees in Idaho. Edge has over 350 total employees and is headquartered in Bend, Oregon.

³ Exhibit A is a map showing the counties encompassed within Edge’s FCC licensed territory in Idaho, superimposed over a map showing incumbent local exchange carrier (“ILEC”) exchanges.

⁴ See *In the Matter of Edge Wireless, LLC Application for Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996*, Order No. 06-965 (OPUC Docket No. UM 1177, August 29, 2005).

ETC status is sought, any common carrier that: (i) offers services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services. In its First Report and Order implementing Sections 214(e) and 254, the FCC designated the specific features a carrier must provide or agree to provide to be designated as an ETC.⁵ The FCC also recognized that wireless telecommunications providers are eligible to be designated as ETCs.⁶

Edge is a telecommunications carrier as defined in 47 U.S.C. § 153(44) and 47 C.F.R. § 51.5(a), and is a telecommunications carrier for the purposes of Part 54 of the FCC's rules. 47 U.S.C. § 54.1 *et seq.* Edge is, therefore, considered a common carrier under the Act.

Section 214(e)(2) of the Act provides that ETC designations shall be made for a "service area" designated by the state commission. Section 214(e)(5) of the Act provides that the "service area" shall be a geographic area established by the state commission. In areas served by a rural telephone company, the FCC's rules generally define a competitive ETC's "service area" to mean the LEC study area.⁷ Attached hereto as Exhibit B is a map depicting Edge's proposed ETC service area in Idaho superimposed over the rural ILEC ("ILEC") exchanges falling within Edge's proposed ETC service area. Attached as Exhibit C is a list of non-rural ILEC and rural ILEC wire centers that fall within Edge's BTAs.⁸ Edge does not seek to split any wire centers in the non-rural ILEC areas. Edge serves all the wire centers in all of the rural ILEC study areas listed in Exhibit C.⁹

⁵ *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8809-25 (1997) ("First Report and Order").

⁶ *Id.*, at 8858-59.

⁷ *See*, 47 C.F.R. §54.207(b).

⁸ Because some ILEC exchanges include more than one ILEC wire center, there is some variation between the list of ILEC wire centers in Exhibit C and the ILEC exchanges shown on Exhibit B.

⁹ There are five rural ILEC wire centers, four in Citizens territory and one CenturyTel – Gem State territory, that fall within Edge's BTA. Upon Commission Staff's recommendation, Edge has excluded these wire centers from its proposed ETC area because including them would require "redefinition" of the Citizens and CenturyTel – Gem State study areas. Had these wire centers been included in the proposed ETC area, Edge planned to invest over a two year period in excess of \$500,000 of universal service support on infrastructure to benefit consumers within

III. The Legal Standard for Granting ETC Status in Non-Rural and Rural Areas.

Edge satisfies each of the statutory and regulatory prerequisites set forth in the Act, the FCC's Rules¹⁰, and the IPUC's ETC Requirements.¹¹ On March 17, 2005, the FCC released its *FCC ETC Requirements Order*¹² establishing additional requirements for carriers seeking ETC designation before the FCC. These additional requirements, however, are not binding on state commissions. This Commission subsequently considered whether to adopt all or some portion of the rules promulgated by the FCC, and issued a set of ETC designation requirements in the *IPUC ETC Requirements Order*.¹³ In this Application, Edge provides all of the information required by the Commission pursuant to the *IPUC ETC Requirements Order*.

Edge may be designated as an ETC in non-rural ILEC areas upon a finding that: (1) Edge offers the supported services; and (2) Edge will advertise the availability of such services using media of general distribution.¹⁴ Edge may be designated as an ETC in rural ILEC areas upon a finding that: (1) Edge offers the supported services; (2) Edge will advertise the availability of such services using media of general distribution; and (3) such designation would serve the public interest.¹⁵

To comply with the additional requirements set forth in the *FCC ETC Requirements Order* and the *IPUC ETC Requirements Order*, Edge includes in this Application the following:

- Demonstration of commitment and ability to provide supported services, including a two-year wire center-specific network improvement plan, attached hereto as Confidential Exhibit D.

the excluded area. Edge will continue to work with Commission Staff to determine the most appropriate time and procedure for obtaining ETC designation for these wire centers.

¹⁰ 47 U.S.C. § 214(e)(1)-(2), and 47 C.F.R. § 54.201.

¹¹ See *IPUC ETC Requirements Order*.

¹² *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) ("*FCC ETC Requirements Order*").

¹³ *IPUC ETC Requirements Order*, Appendix pp. 1-3.

¹⁴ See e.g., *In the Matter of the Petition of IAT Communications, Inc. dba NTCH-Idaho, Inc. or Clear Talk for Designation as an Eligible Telecommunications Carrier*, Order No. 29261 (IPUC Case No. GNR-T-03-8, served June 11, 2003).

¹⁵ See, 47 C.F.R. § 54.207(c).

- Demonstration of Edge’s ability to remain functional in emergency situations.
- Commitment to comply with all applicable service quality standards and consumer protection rules and an agreement to comply with the Cellular Telecommunications and Internet Association’s Consumer Code for Wireless Service (“CTIA Code”).
- Descriptions of Edge’s local rate plans and the local usage plans of the ILECs.

A. SERVICES PROVIDED BY APPLICANT

Edge will offer the federally designated services listed at 47 C.F.R. § 54.101(a). The services which are supported by the federal USF program are: (1) voice grade access to the public switched network, (2) local usage, (3) dual tone multi-frequency signaling or its functional equivalent, (4) single-party service or its functional equivalent, (5) access to emergency services, (6) access to operator services, (7) access to interexchange service, (8) access to directory assistance, (9) toll limitation for qualifying low-income consumers.¹⁶ Edge is a full service wireless carrier that offers all of these services, as described in detail below, throughout its licensed service area utilizing its own facilities – including its own antennas, towers and mobile switching offices.

1. Voice-Grade Access to the Public Switched Telephone Network.

FCC Rule Section 54.101(a)(1) requires voice grade access to the public switched telephone network. The FCC defines this as:

the ability of 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. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.¹⁷

Edge provides voice grade access to the public switched network through interconnection arrangements with local telephone companies. Edge offers its subscribers this service at a

¹⁶ 47 C.F.R. §54.101(a).

¹⁷ 47 C.F.R. 54.101(a)(1).

bandwidth between no less than 300 to 3,000 hertz, thereby providing voice grade access consistent with the FCC's definition.

2. Local Usage.

Edge's rate plans provide local usage consistent with Section 54.101(a)(2) of the FCC's Rules. In the First Report and Order, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide.¹⁸ Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs. Edge meets the local usage requirements by including local usage in its rate plans and Edge will comply with any and all minimum local usage requirements adopted by the FCC.

Consistent with the *IPUC ETC Requirements Order*, Appendix p. 3, Edge submits its LocalEdge rate plan brochures as Exhibit E. The relevant ILEC local usage rate plans are on file with the Commission at: <http://www.puc.state.id.us/tariff/approved/title61/approved.htm>. A copy of this web page is attached as Exhibit F. The Commission has expressly rejected the FCC's requirement that the applicant's usage plan be comparable to that of the ILEC, stating: "we find it is sufficient for the ETC applicant to simply describe its local usage plans and those of the ILEC."¹⁹ The Commission aptly noted that the FCC's comparability analysis could potentially discourage carriers from offering diverse services, and that with competition, consumers should have the option to obtain the type of service offering they would like.²⁰

One of the distinct advantages to the LocalEdge rate plans is that Edge provides significantly wider local calling areas. Whereas the relevant ILEC local calling areas are primarily limited to their local exchange boundaries and extended service area boundaries, Edge's local calling area includes most of Southeastern Idaho and a portion of Northwestern

¹⁸ *Id.* at 8814.

¹⁹ *IPUC ETC Requirements Order*, p. 12; see also, *In the Matter of the Petition of Inland Cellular Telephone Company for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C. §214(e)(2)*, Order No. 30212, p. 11 (IPUC Case No. INC-T-06-02, served Dec. 28, 2006).

²⁰ *Id.*

Wyoming. In addition, Edge's local calling area includes its partner network coverage along the I-84 corridor from the western boundary of Twin Falls to the Oregon border, including Boise and the surrounding area, subject to the requirement that a majority of the subscribers minutes of use be on the Edge Wireless Network.

Second, Edge provides unlimited, toll-free service for 911 emergency calls and for 611 customer care. Edge also provides toll-free 511 road reports to the Idaho Department of Transportation, 711 calls to TRS/TTY operators and 211 calls to social service agencies.

Finally, all of Edge's local calling plans include unlimited nationwide long distance at no additional charge.²¹ The LocalEdge calling plans priced at \$44.99 and higher per month also include unlimited night and weekend calling, and unlimited mobile to mobile calling.²²

3. Dual-Tone, Multi-Frequency Signaling or its Functional Equivalent.

Pursuant to Section 54.101(a)(3) of the FCC's Rules, an ETC must provide dual tone multi-frequency ("DTMF") signaling to facilitate the transportation of signaling throughout its network. Edge currently provides DTMF signaling consistent with the FCC's Rules.

4. Single-Party Service or its Functional Equivalent.

"Single-party service" means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.²³ Edge provides single party service, as required by 47 C.F.R. §54.101(a)(4).

²¹ Local Carryover rate plans, which allow subscribers to carry unused minutes forward to the next billing cycle, do not include unlimited nationwide long distance.

²² See Exhibit E (LocalEdge rate plan brochure).

²³ *First Report and Order* at 8810.

5. Access to Emergency Services and Ability to Remain Functional in Emergency Situations.

The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Edge currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement. Phase I E911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information.²⁴ In addition to Phase 0 E911, Edge Wireless provides Phase I and Phase II wireless E911 to Public Safety Answering Points (“PSAP”) when they request this improved service and are ready to receive the Phase I and Phase II call information. To date, Edge has received requests for E911 Phase I and Phase II deployment in Blaine, Bingham, Bonneville, Caribou, Fremont and Lemhi Counties. All Counties are deployed with the exception of the Fremont County, which is currently in the deployment process (as of December 15, 2006).

Phase I and Phase II wireless E911 service provides valuable location based information to the PSAP which allows emergency personnel to determine the cell site serving the caller and the geographic location of the phone placing the call. Additional cell site coverage in rural areas will greatly improve access to wireless E911 services and greater accuracy of the location based information received by the PSAP. Edge was able to use these enhanced capabilities recently to assist law enforcement rescue efforts in Oregon. When the James Kim family was lost in Oregon, Edge was able to provide information gained from a rural cell site to Search and Rescue personnel regarding the area in which the family’s phone was last active. This information was key to the survival of Mrs. Kim and her two young children. In addition Edge installed a cell on wheels (“COW”) which improved telephone communications for the rescue teams. Exhibit G is a letter from the California Public Utilities Commission praising Edge’s contribution to this rescue.

²⁴ See *Id.*, at 8815-17.

Consistent with the *IPUC ETC Requirements Order* at Appendix p. 3, Edge also has the ability to remain functional in emergency situations. Edge has designed a fault tolerant network that employs the following features:

- Mobile Switching Center
 - Nortel DMS NSS 18- R4 switches with fully redundant fault tolerant processors;
 - 12 hours of back up battery;
 - 300 KW generator with 7days fuel supply;
 - complete complement of spare circuit boards;
 - Self-Healing Alternate Route Protection Service for Fiber Facilities interconnection;
 - Redundant ATM interconnection to remote media gateway switches;
 - Multiple alternate trunk routes for PSTN interconnection trunks;
 - Redundant Microwave radio links; and
 - Automated 7x24 network monitoring.
- Cell sites
 - Overlapping cell site coverage with directed retry for blocked calls;
 - Back haul network engineered with surplus back bone capacity;
 - Field technicians are equipped with growth radio stock;
 - In the event of a capacity spike that can not be absorbed by directed retry, additional radios can be installed quickly;
 - All (4) major hub sites have 8 hours battery back up and standby generators;
 - Standby Generators and 8 hours battery back up at 12 minor hub sites;
 - 85% of sites have minimum of 8 hours back up battery, remaining 15% have 1 hour;
 - Leased Fiber and redundant MW to major network hub locations;
 - All sites have quick connect plugs for portable generator;

- One (1) trailer mounted 20 kw trailer mounted generators stored in Twin Falls and two (2) in Pocatello;
- Compact generator system stored in Pocatello, Idaho for use with Snow Cat only accessible sites; and
- All sites remotely monitored 7x24.
- Monitoring Network and Outage Resolution procedures
 - Edge Wireless has 2 network operating centers (“NOCs”), 1 in Medford, Oregon, and 1 in Pocatello, Idaho;
 - All Switches and cell sites are remotely monitored 7x24, with critical and major alarms escalated to the next level of management every 20 minutes.
- Staffing and Additional Equipment
 - The Idaho Technical Operations team consists of 11 people strategically located within Southeastern Idaho in the following locations: 1 in Rigby, 1 in Idaho Falls, 2 in Shelley, 5 in Pocatello, 1 in Kimberly and 1 in Filer;
 - Staff is very well trained and equipped to respond quickly in the event of outages, alarms or emergencies;
 - Two (2) cells on wheels, complete with temporary microwave systems, stored at Pocatello, Idaho facility which can be used for emergency coverage, capacity and back bone recovery;
 - Complete inventory of alternate access equipment, including:
 - All field staff are equipped with 4 wheel drive pickups, (1) Tucker Terra Snow Cat stored at Pocatello facility, (3) snow mobiles stored at Pocatello facility, (2) Polaris 4 wheelers located in Pocatello;
 - All field staff trained in operation for all alternative site access equipment;
 - Tower crews on standby for emergency tower and antenna repairs; and
 - Technicians equipped with complete complement of spares for Cell site, Microwave and DACs equipment to insure quick recovery.

Edge Wireless has proven its ability to respond quickly during emergency situations:

- Installed cell on wheels, or COWs, to provide phone service for remote fire camps for Tiller and Orleans complex fires;
- Provided timely subscriber location information to help public safety officials locate injured people in rural areas;²⁵
- Increased network capacity on sites serving county fairs annually for the past 5 years, typically adding enough network capacity to handle a 100% increase in busy hour traffic for sites serving the fair grounds; and
- Installed on numerous occasions temporary microwave hops when ILEC-provided circuits have sustained extended outages or due dates for new circuits have not been achieved.

In 2006 alone, Edge Wireless has performed the following network upgrades for improved reliability:

- Installed redundant leased T1 facilities to our Preston, Soda Springs and Montpelier cell sites, thereby providing an alternate route to the Edge microwave system that routes through Sedgwick peak;
- Installed leased DS3 circuits to Idaho Falls, Rexburg and Twin Falls to provide alternate network back haul for Edge's existing microwave network; and
- Installed high capacity Mobile Switching Center.

Through all of these efforts, Edge has ensured that it not only provides customers with needed emergency services, but can also remain fully functional in emergencies. In addition, Edge has planned the following 2007 reliability and technology upgrades:

- Edge Wireless is currently building a regional call center in Idaho Falls with planned opening in March of 2007. The new Idaho call center will provide additional redundancy and improved capability to support Idaho customers with local employees.

²⁵ Attached hereto as Exhibit H is a letter from the Cassia County 911 Coordinator.

- Additional 3G sites to expand coverage area for advanced wireless service.

6. Access to Operator Services.

Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.²⁶ Edge provides customer access to operator services. Customers can reach operator services in the traditional manner by dialing “0”, in compliance with Section 54.101(a)(6) of the Federal Rules.

7. Access to Interexchange Service.

A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.”²⁷ Edge presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements Edge has with several interexchange carriers (“IXCs”).

8. Access to Directory Assistance.

The ability to place a call to directory assistance is a required service offering.²⁸ Subscribers to Edge’s services are able to dial “411” or “555-1212” to reach directory assistance from their mobile phones.

9. Toll Limitation for Qualifying Low Income Consumers.

An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9).²⁹ In particular, all ETCs must provide toll blocking which allows customers to block the completion of outgoing toll calls.³⁰

²⁶ *Id.*, ad 8817-18.

²⁷ *Id.*, at 8819.

²⁸ *Id.*, at 8821.

²⁹ See *Universal Service Fourth Order on Reconsideration in CC Docket No. 96-45, Report and Order in CC Docket Nos. 96-45, 96-262, 94-1, 91-213, 95-72*, 13 FCC Rcd 5318 (1997).

³⁰ *First Report and Order*, at 8821-22.

Edge currently has no Lifeline customers in Idaho because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. §§ 54.400-415. Once designated as an ETC, Edge will participate in Lifeline, as required. Though Edge's switch does not currently support toll blocking *per se*, as noted in Section B above, all of Edge's LocalEdge rate plans include unlimited long distance at no additional charge, which is the functional equivalent of toll blocking. Edge's Lifeline rate plans will have the same feature, as well as the ability to block roaming and international dialing, all of which will allow customers to avoid unexpected charges.³¹

B. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE

Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. Section 54.201, Edge plans to advertise the availability of each of the supported services detailed above, throughout its licensed service area, by media of general distribution. The methods of advertising utilized may include newspaper, magazine, radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory advertising. *See* Confidential Exhibit J which provides data regarding Edge's advertising expenditures in 2006. Edge expects to engage in similar, if not greater, levels of advertising in 2007.

Edge also intends to offer advertising similar to its advertising in Oregon to promote Lifeline service, primarily through print advertising and direct outreach by Edge's direct and indirect sales staff to community health, welfare and employment offices as well as Indian tribes. Edge will not be promoting Linkup service because Edge does not charge for activation of wireless services. Edge will advertise the fact that it does not charge activation fees as a functional equivalent of advertising Linkup. *See* Exhibit K which provides examples of Edge's Lifeline related advertising in Oregon.

³¹ *See* Exhibit I, which is a copy of Edge's Oregon Lifeline brochure.

C. COMMITMENT TO CONSUMER PROTECTION

Consistent with the *IPUC ETC Requirements Order* at Appendix A p. 3, Edge will comply with all applicable service quality standards and consumer protection rules, and will abide by the consumer protection standards established by the CTIA Consumer Code.

D. TRIBAL NOTIFICATION

The *IPUC ETC Requirements Order* at Appendix A p. 2 requires an ETC applicant seeking ETC designation for any part of tribal lands to provide a copy of its application to the affected tribal government or tribal regulatory authority, as applicable, at the time it files its application with Commission. Edge is seeking ETC designation for a portion of the Fort Hall Reservation. Consistent with this requirement, contemporaneous with the filing of the Application with the Commission, Edge has provided a copy of its Application to:

Shoshone-Bannock Tribes of the Fort Hall Reservation of Idaho
Ms. Diana Yupe
Shoshone-Bannock Tribes of Fort Hall
Shoshone-Bannock Heritage Tribal Office
P.O. Box 306
Fort Hall, ID 83203

Edge currently provides service to portions of the Fort Hall Reservation. Upon designation as an ETC, Edge will offer Tribal Lifeline service to qualified residents of the Fort Hall Reservation for as little as one dollar per month.

IV. PUBLIC INTEREST FACTORS

In addition to finding that Edge meets the nine-point checklist, and that it agrees to offer and advertise the supported services throughout the proposed ETC service area, and that it satisfies the Commission's additional criterion, the Commission must also determine whether such designation otherwise serves the public interest.

In determining whether designating Edge as an ETC in the rural ILEC wire centers listed in Exhibit C, the Commission must follow the guidance provided by Congress in adopting the Act, and by the FCC in its enabling orders.³² The overarching principles embodied in the Act are to "promote competition and reduce regulation . . . secure lower prices and higher quality services . . . and encourage the rapid deployment of new technologies."³³ In its implementing orders, the FCC ruled that the pro-competitive and deregulatory directives from Congress required universal service support mechanisms to be competitively neutral and portable among eligible carriers.³⁴ This Commission has adopted the FCC's public interest analysis as set forth in the *FCC ETC Requirements Order*, stating:

Thus, in determining whether ETC designation is in the public interest, this Commission shall consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering.³⁵

³² Pub. L. No. 104-104, 110 Stat. 56 (1996); *See also, First Report and Order, supra; Federal-State Joint Board on Universal Service, Ninth Report and Order and Eighteenth Order on Reconsideration*, 14 FCC Rcd 20432 ("Ninth Report and Order"); *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 16 FCC Rcd 11244 (2001) ("Fourteenth Report and Order"); *See also NAACP v. FCC*, 425 U.S. 662, 669 (1976); *accord, e.g., Office of Communication of the United Church of Christ v. FCC*, 707 F. 2d 1413, 1427 (D.C. Cir. 1983); *Bilingual Bicultural Coalition on Mass Media, Inc. v. FCC*, 595 F. 2d 621, 628 & n. 22 (D.C. Cir. 1978).

³³ *See Act* (preamble).

³⁴ *First Report and Order*, at 8861-62; *Ninth Report and Order*, at 20480.

³⁵ *IPUC ETC Requirements Order*, p. 16.

As shown herein, the public interest objectives set forth in the Act, the FCC's Orders, the *IPUC ETC Requirements Order*, and precedent established across the country, will be furthered by the designation of Edge as an ETC in the rural ILEC wire centers listed in Exhibit C.

A. Increased Consumer Choice and Service Quality.

Designation of Edge as an ETC is in the public interest because such designation will promote competition and thereby facilitate the provision of advanced communications services and higher quality services to the residents of rural Idaho. A central tenet of federal universal service policy is that consumers in rural areas are entitled to the same kind of choices of telecommunications services as those in urban areas.³⁶ In many rural areas, no meaningful choice of local service providers exists. Designation of Edge as an ETC will provide rural consumers with a choice among carriers and service features. Edge will provide wider local calling areas, mobile communications, a variety of service offerings, high-quality service³⁷ and competitive rates. Wireless service provides consumers with numerous benefits not typically available from wireline competitors. For example, mobility provides subscribers the ability to communicate while commuting, working on farms or ranches, or otherwise away from homes and offices. Mobility also makes emergency services more readily accessible in situations where time is of the essence. In addition, wireless handsets offer increased functionality such as contact lists, voice-activated dialing, conference calling capabilities, and access to multi-media and data services. Thus, consumers will be able to choose those service features that best meet their needs.

Upon receipt of ETC designation in Idaho, Edge will use the high-cost support it receives to improve its infrastructure in rural areas. Edge has evaluated the projected levels of support, along with identifying areas where poor coverage and demand for service coincide.³⁸ Edge's two-year network improvement plan shows projects that may not otherwise be constructed

³⁶ See 47 U.S.C. § 254(b)(3).

³⁷ See Confidential Exhibit L, describing service quality metrics to which Edge adheres.

³⁸ See Confidential Exhibit D, Edge's two-year network improvement plan designating proposed infrastructure investment in Edge's BTA should Edge receive ETC status.

without universal service support. This expansion and strengthening of network coverage increases the number of competitive choices available for rural Idaho consumers where Edge service would not otherwise extend without support. The improved service quality, reliability and increased choices to rural Idaho will be significant. In addition, some rural Idaho consumers may be able to obtain wireless service from Edge where landline service from the ILEC is cost prohibitive. Since receiving ETC designation in the State of Oregon³⁹, Edge has been able to invest in infrastructure that brings enhanced wireless services to parts of rural Oregon that would not have otherwise received those services.

As Edge constructs additional cell sites in high-cost areas to improve the quality of its radio frequency (“RF”) signal, consumers will have a greater choice among service providers and will receive more reliable service. Some will have the option to receive Edge’s service for the first time. Indeed, without the high-cost program, it is doubtful that many rural areas would have wireline telephone service, even today. Edge has been successful in competing for second lines. However, the rural ILECs serving the proposed ETC service area retain close to 100% of the local exchange market primarily because it is impossible for any company to compete with a monopoly that receives explicit subsidies from the government as well as substantial implicit subsidies that are unavailable to competitors (even those designated as ETCs). If only wireline providers receive universal service support, consumers will continue to have no service alternatives, and will be left behind their urban counter-parts. The Washington Utilities and Transportation Commission expressly recognized this fact when designating United States Cellular as an ETC, stating:

The fact that its competitors receive universal service support puts USCC at a disadvantage in its ability to make cellular technology more widely available at competitive prices. Allowing USCC to receive universal service support increases the likelihood that

³⁹ See *In the Matter of Edge Wireless, LLC Application for Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996*, Order No. 05-965 (OPUC Docket No. UM 1177, August 29, 2005).

cellular technology will become available to more rural consumers at an affordable price.⁴⁰

Designation of Edge as an ETC will begin to level the playing field among carriers competing in the local exchange market – to the benefit of consumers.

In addition, consumers will benefit from access to advanced wireless data communications. Historically, Edge has been on the forefront in offering advanced wireless communications to rural areas. Edge was the first carrier to bring mobile wireless data applications to many rural areas in Southeastern Idaho by launching its GPRS wireless packet data system in 2003. This system offered wireless data rates of up to 40 kilobytes per second (“kbs”). In 2004, Edge upgraded its GPRS packet data system to “EDGE” technology, which increased the data rates up to 150kbs. In 2006, Edge installed 3G wireless core switching equipment, and has installed 3G cell sites and has customer trials in progress in Twin Falls County. The 3G cell sites support 3G handsets for advanced voice and data services. 3G devices available today support wireless data rates of up to 3.6 megabits per second (“mbs”) upgrading to 7.2 mbs in 2008. Edge can now offer internet access in rural areas with very good data rates.

Moving forward the service will be advanced by:

- Upgrading EDGE packet data core software and hardware to increase data through-put;
- Installing additional 3G sites and core equipment for expanded 3G coverage;
- Improving access to the network by adding additional rural Base Transceiver Systems (“BTS”);
- Making antenna systems available for rural residences that boost signals between wireless modems and BTS;
- Providing access to upgraded wireless handsets as they become available for rural users that enhance voice quality and data rates; and

⁴⁰ See *In the Matter of United States Cellular*, Third Supplemental Order Granting Petition for Designation as Eligible Telecommunications Carrier, WUTC Docket No. UT-970345 (Jan. 27, 2000), at ¶43.

- Improving wireless feature sets by improving applications, such as picture messaging, video messaging, video conferencing, text messaging, wireless internet access, wireless security systems and wireless email.

Designating Edge as an ETC in Idaho will provide a framework for providing consumers increased choice of service offerings consistent with the goals established by the Act, the FCC and this Commission.⁴¹

B. Health and Safety Benefits.

Designation of Edge will advance important health and safety goals. Edge's mobile offering will allow rural consumers the flexibility to communicate while on the go and still retain access to emergency services. In addition to being able to reach emergency services while in their homes, wireless subscribers are able to reach emergency services while they are in route to their homes, workplaces and commercial centers. Wireless phone service has become essential to farming, mining, law enforcement, resource management and construction sectors.⁴²

In a recent ETC designation proceeding, the Oregon Public Utility Commission concluded that "the 'unique advantages' of wireless telephones, which allow mobile communications beneficial to safety, health and commerce, weigh in favor of the application."⁴³ Similarly, in designating the wireless carrier Smith Bagley, Inc. as an ETC in Arizona, the Arizona Corporation Commission found that carrier's designation would provide a potential solution to "health and safety risks associated with geographic isolation."⁴⁴ Designation of Edge as an ETC in Idaho will provide similar benefits.

⁴¹ See e.g., *In the Matter of the Petition of VCI Company for Designation as an Eligible Telecommunications Carrier Providing Service to Customers Under the Idaho Telecommunications Service Assistance Program*, Order No. 29686, Case No. VCI-T-04-1, p. 3 (Jan. 13, 2005)(finding ETC status in the public interest due in part to greater competition).

⁴² See Exhibit M, which is a description of the use of cell phones in rural areas by the Twin Falls Division of the Bureau of Land Management.

⁴³ *In the Matter of RCC Minnesota, Inc. Application for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. 04-355, OPUC Docket UM 1083, p. 9 (June 24, 2004).

⁴⁴ *Smith Bagley, Inc.*, Decision No. 63269, ACC Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000).

Citizens in rural areas depend on mobile phones more and more to provide critical communications needs. The provision of universal service support to Edge will enable it to improve signal strength, thereby improving the reliability of service for health and safety purposes. All wireless carriers are required to implement over the next several years Phase II E-911 service, which permits a caller to be located and tracked. For every cell site Edge constructs, the reliability and performance of its E-911 service will improve. It would be difficult to overstate the important public interest benefit that will be realized by supporting improvement to critical wireless infrastructure.

As mentioned above, when the James Kim family became lost in Oregon over the past Thanksgiving holiday, Edge was able to provide information gained from a rural cell site to Search and Rescue personnel regarding the area in which the family's phone was last active. This information was key to the survival of Mrs. Kim and her two young children. In addition, Edge installed a cell on wheels that improved telephone communications for the rescue teams.⁴⁵

In Idaho, over two dozen federal, state and local government agencies use Edge service. These include several law enforcement agencies and first responders.

Having reliable wireless phone service provides a redundant form of communications should the ILEC experience outages such as storm-related outside plant failures, fiber cuts or widespread call processing failures. For example, when activation of the tsunami warning system along rural sections of the Oregon and California coast generated high call volumes resulting in failed ILEC call processing, residents were able to stay connected using the robust call capacity provided by Edge's network. Edge has received the 2004 Excellent Network Award from Nortel Networks acknowledging Edge's commitment to operating a very reliable network.⁴⁶

C. Competitive Response.

By designating Edge as an ETC, competition will be increased in the proposed service area. As a result, both Edge and the other carriers serving that area will be motivated to

⁴⁵ See Exhibit G, CPUC letter commending Edge.

⁴⁶ See Exhibit N.

implement advanced communications services and continually improve service quality levels in order to attract customers for their respective services. The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural telephone companies emphasizes competition and consumer benefit, not incumbent protection. There is no question that, if Edge is designated as an ETC and is, therefore, better able to compete for local exchange customers, it will spur a competitive response from affected ILECs: service quality and customer service will improve; new investments in plant will be made; high speed data (*e.g.*, DSL) may be deployed more quickly to retain and attract customers; and wider local calling areas, bundled service offerings, and lower prices overall will be introduced to compete with Edge to retain and attract customers.

Another response will be increased investment in areas that are the ILEC's strengths. For example, many ILECs advertise the advantage that wireline facilities offer in the area of high-speed data or Internet access. The affected ILEC can be expected to use its advantage in this area to cement and expand its customer base by investing in facilities needed to bring DSL and other high-speed connectivity to a greater percentage of people living in rural areas. Those that have constructed DS1-ready facilities may lower prices to attract customers. Rural consumers will benefit from these types of investment and price competition, and Edge believes that the use of high-cost support to develop competitive services in rural areas can be a powerful driver of broadband development by ILECs, who will be forced to respond.

Edge's enhanced coverage will also help economic development in rural areas. One of the key components in a decision to locate a new business, or to move an existing business, is the quality of overall telecommunications infrastructure in a particular area. More and more, wireless connectivity is an indispensable part of that equation. If telecommunications infrastructure is substandard in a particular area, businesses that serve the community's needs and create jobs may be compelled to leave. Preserving and expanding economic development in rural areas is in the public interest and a grant of Edge's Application will further that objective.

D. State and Federal Precedent.

Designation of Edge as an ETC is consistent with ETC decisions across the country. There are now numerous cases at the state and federal level where designation of a wireless carrier as an ETC in a rural area was found to be in the public interest. Numerous state commissions and the FCC have repeatedly found that designating wireless carriers as ETCs will promote competition, advance universal service, and further the deployment of advanced services. For example, in its decision to designate Rural Cellular Corp. (“RCC”) as an ETC, the Washington Utilities and Transportation Commission stated: “Granting ETC designation to RCC . . . will facilitate the telecommunications choices available to rural citizens, support the growth of new technologies and services, preserve and advance universal service, and promote competition and the benefits it brings.”⁴⁷ More recently, in designating Midwest Wireless Communications, LLC as an ETC in Minnesota, the Minnesota Public Utilities Commission held that, “[c]ompetition would benefit consumers in southern Minnesota by increasing customer choice (from no choice in most areas to more than one) and providing new services made possible by wireless technologies”⁴⁸ Similarly, in its decision designating Western Wireless as an ETC in the State of Wyoming, the FCC held: “Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services and new technologies.”⁴⁹

For all of the above reasons, the public interest would be served by the designation of Edge as a competitive ETC throughout its requested service area.

V. Commitment to Serve Requesting Customers

Consistent with the *IPUC ETC Requirements Order*, Appendix p. 2, Edge is committed to answering all reasonable requests for service within its proposed ETC service area. Edge

⁴⁷ *RCC Minnesota, Inc., d/b/a Cellular One*, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, WUTC Docket No. UT-023033 (Aug. 14, 2002), ¶68.

⁴⁸ *Midwest Wireless Communications, LLC*, OAH Docket No. 3-2500-14980-2, Minn. PUC Docket No. PT6153/AM-02-686, adopted Feb. 13, 2003 (order pending), adopting ALJ’s Findings of Fact, Conclusions of Law, and Recommendation (ALJ Dec. 31, 2002), ¶37.

⁴⁹ *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

wants to use high-cost support prudently, to improve service to as many people as possible, while also extending service to as many requesting customers as possible.

Edge will use the following, six-point checklist in answering requests from residents within its proposed ETC area, but outside its existing network coverage: (1) determine whether the customer's equipment can be modified or replaced to provide acceptable service; (2) determine whether a roof-mounted antenna or other network equipment can be deployed at the premises to provide service; (3) determine whether adjustments at the nearest cell site can be made to provide service; (4) determine whether there are any other adjustments to network or customer facilities that can be made to provide service; (5) explore the possibility of offering resold service; and (6) determine whether an additional cell site, a cell-extender, or repeater can be employed or constructed to provide service.

VI. LEGAL AUTHORITY

The Commission has the legal authority to grant the relief requested by Applicant pursuant to 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201; *see also, IPUC ETC Requirements Order.*

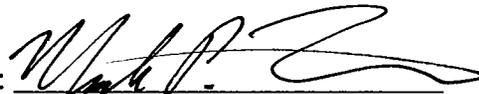
VII. RELIEF REQUESTED

For the reasons set forth above, and pursuant to Section 214(e)(2) of the Act, Edge requests that the Commission enter an Order designating Edge as an ETC for the areas described herein and that the Commission enter its Order at the earliest possible date.

Dated the 22nd day of January, 2007.

Respectfully submitted,

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RICHARDSON & O'LEARY, PLLC

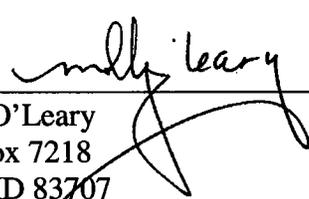
By: 
Molly O'Leary
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Boise, ID 83707
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Fax: 208-938-7904
molly@richardsonandoleary.com
Attorneys for Edge Wireless, LLC

Exhibit A

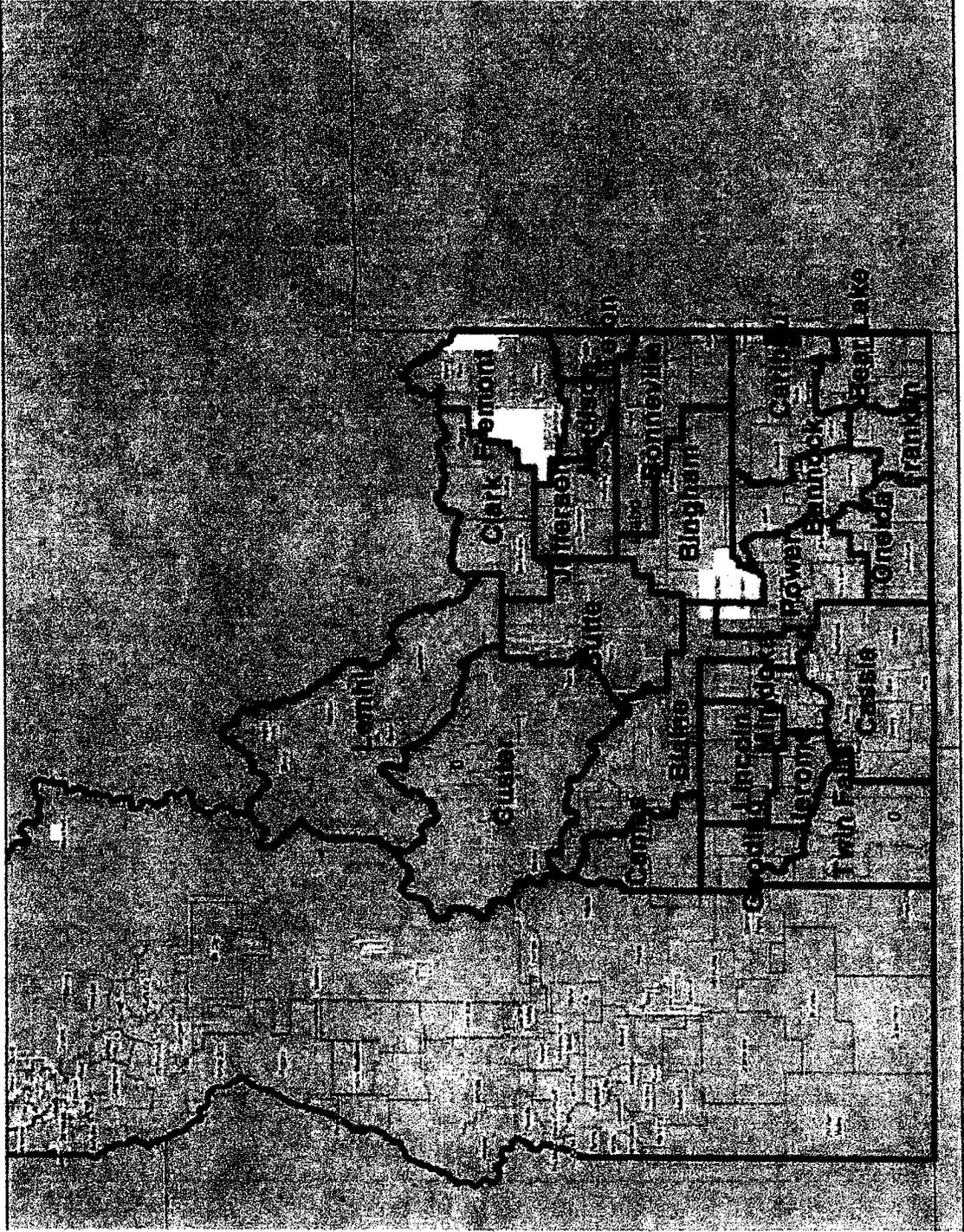


EXHIBIT C

ILEC WIRE CENTERS WITHIN EDGE WIRELESS PROPOSED ETC AREA

NON-RURAL ILEC WIRE CENTERS

Qwest Communications

AMFLIDMA (American Falls)
BLFTIDMA (Black Foot)
BLSIDMA (Bliss)
BNCRIDMA (Bancroft)
BRLYIDMA (Burley)
BUHLIDMA (Buhl)
CSFRIDMA (Castleford)
DWNIDMA (Downey)
EDHZIDMA (Eden-Hazelton)
GDNGIDMA (Gooding)
GRACIDMA (Grace)
HALYIDMA (Hailey)
HGMNIDMA (Hagerman)
IDFLIDMA (Idaho Falls)
JERMIDMA (Jerome)
KMBRIDMA (Kimberly)
KTCHIDMA (Ketchum)
LHSPIDMA (Lava Hot Springs)
MCCMIDMA (McCammon)
MRTGIDMA (Murlaugh)
MTPLIDMA (Montpeller)
PCTLIDMA (Pocatello)
PSTNIDMA (Preston)
RBRTIDMA (Roberts)
RGBYIDMA (Rigby)
RIRIIDMA (Ririe)
RXBGIDMA (Rexburg)
SDSPIDMA (Soda Springs)
SHLYIDMA (Shelley)
SHSHIDMA (Shoshone-Dietrich)
AFTNWYMA (Tygee Valley)
TWFLIDMA (Twin Falls)
WINDLIDMA (Wendell)

RURAL ILEC WIRE CENTERS

Albion Telephone Company

ALBNIDXC (Albion)
ALMOIDXC (Almo)
ARCOIDXC (Arco)
ELBAIDXC (Elba)
HLBKIDXC (Holbrook)
HOWEIDXC (Howe)
MSLTIDXC (Malta)
MCKYIDXC (Mackay)
MLCYIDXC (Malad)
MOORIDXC (Moore)
RFRVIDXC (Raft River)

CenturyTel of Idaho, Inc.

LEDRIDXC (Leadore)
NFRKIDXC (North Fork)
SLMNIDXC (Salmon)

Custer Communications

CHLSIDXC (Challis)
CYTNIDXC (Clayton)
EKBNIDXC (Elk Bend)
MAYIDXC (May)
STNLIDXC (Stanley)

Direct Communications

ARBNIDXC (Arbon)
PARSIDXC (Paris)
RKLDIDXC (Rockland)

Filer Mutual

FILRIDXC (Filer1)
FILRIDXC (Filer2)
HLSTIDXC (Hollister1)
HLSTIDXC (Hollister2)

Fremont Telecom Company

ASTNIDMA (Ashton)
STATIDMA (St. Anthony)
ISPKIDMA (Island Park)

Mud Lake

DUBSIDXC (Dubios)
HAMRIDXC (Hamer)
KLGRIDXC (Kilgore)
MNVWIDXC (Montevue)
TRTNIDXC (Terreton)

Project Mutual

MNDKIDXC (Minidoka)
NRLDIDXC (Norland)
OKLYIDXC (Oakley)
PAULIDXC (Paul)
RPRTIDXC (Rupert)

Silver Star - Teton Telephone

DRGSIDMA (Driggs)
TTNIDMA (Tetonia)
VCTRIDMA (Victor)

Silver Star Communications

FRDMWYXC (Freedom)
IRWNIDXC (Irwin)
WAYNIDXC (Wayan)

EXHIBIT D

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OR CONFIDENTIAL MATERIAL
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Customer Services

Business Services

Store Locations

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Games

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LocalEdge

The LocalEdge Plan is one of the most economical ways to enjoy all the convenience and benefits of wireless. You won't have to pay any nationwide long distance charges as long as you're calling within the U.S.

All plans also offer features like call waiting, voice mail, and call forwarding.

Included Features

- 2-Way SMS**
- Caller ID
- Call Waiting
- Call Forwarding
- Enhanced Voice Mail
- Detailed Billing
- Conference Calling
- Message Waiting Indicator

Additional Options

- "InfoEdge" #555 - 75¢ plus airtime
(on the Edge Wireless Network)
- Wireless 101 Classes.....Free!
- SpeedBills Online Bill Pay.....Free!
- Handset Insurance Available
- Roadside Assistance Available

Edge Rate Plans

- LocalEdge »
- WesternEdge »
- NationalEdge »
- Carryover »
- mephone »
- MobileMedia »
- BlackBerry Devices »



LocalEdge



New to Edge?
Try our service for 30 days.
If you don't like it,
walk away
with no cancellation fees.
Click here for details.

PLAN	MONTHLY ACCESS	INCL'D ANYTIME MINUTES*	NIGHT/ WEEKEND MINUTES*	MOBILE-TO-MOBILE MINUTES*	NATIONWIDE LONG DISTANCE*	ADDT'L/ ROAMING MINUTES
LocalEdge 800	\$34.99	800	1500	0	N/C	30¢
LocalEdge 1100	\$44.99	1100	Unlimited	Unlimited	N/C	30¢
LocalEdge 1500	\$64.99	1500	Unlimited	Unlimited	N/C	30¢
LocalEdge 2000	\$79.99	2000	Unlimited	Unlimited	N/C	30¢
LocalEdge 3000	\$99.99	3000	Unlimited	Unlimited	N/C	30¢
LocalEdge 3500	\$149.99	3500	Unlimited	Unlimited	N/C	30¢
LocalEdge 6000	\$299.99	6000	Unlimited	Unlimited	N/C	30¢
LocalEdge 10000	\$499.99	10000	Unlimited	Unlimited	N/C	30¢
LocalEdge Share	\$14.99	0	Unlimited	Unlimited	N/C	30¢

Add multiple lines to any LocalEdge plan \$44.99 and above and share minutes with the host plan.

At least 50% of your included Anytime Minutes and Night/Weekend Minutes must be on the Edge Wireless Network in each billing cycle or we may terminate your Service.

* Included Anytime Minutes and Night/Weekend Minutes are valid for voice calls made from or received in your Rate Plan

EXHIBIT C

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GDNGIDMA (Gooding)
GRACIDMA (Grace)
HALYIDMA (Hailey)
HGMNIDMA (Hagerman)
IDFLIDMA (Idaho Falls)
JERMIDMA (Jerome)
KMBRIDMA (Kimberly)
KTCHIDMA (Ketchum)
LHSPIDMA (Lava Hot Springs)
MCCMIDMA (McCammon)
MRTGIDMA (Murlaugh)
MTPLIDMA (Montpeller)
PCTLIDMA (Pocatello)
PSTNIDMA (Preston)
RBRTIDMA (Roberts)
RGBYIDMA (Rigby)
RIRIIDMA (Ririe)
RXBGIDMA (Rexburg)
SDSPIDMA (Soda Springs)
SHLYIDMA (Shelley)
SHSHIDMA (Shoshone-Dietrich)
AFTNWyMA (Tygee Valley)
TWFLIDMA (Twin Falls)
WINDLIDMA (Wendell)

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HOWEIDXC (Howe)
MSLTIDXC (Malta)
MCKYIDXC (Mackay)
MLCYIDXC (Malad)
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MAYIDXC (May)
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Direct Communications

ARBNIDXC (Arbon)
PARSIDXC (Paris)
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Filer Mutual

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Fremont Telecom Company

ASTNIDMA (Ashton)
STATIDMA (St. Anthony)
ISPKIDMA (Island Park)

Mud Lake

DUBSIDXC (Dubios)
HAMRIDXC (Hamer)
KLGRIDXC (Kilgore)
MNVWIDXC (Montevew)
TRTNIDXC (Terreton)

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Silver Star - Teton Telephone

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IRWNIDXC (Irwin)
WAYNIDXC (Wayan)

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Area. All other usage is roaming. Night/Weekend is 7:00 p.m. - 6:59 a.m. M-F, all day Saturday and Sunday. Unlimited Mobile-to-Mobile Minutes apply only to voice calls between Edge Wireless phones that are placed, received and completed on the Local Edge Wireless Network. With Nationwide Long Distance feature, standard airtim ges will not apply when calling from anywhere in the U.S. to anywhere in the U.S. Standard airtim ges apply.

** 2-Way SMS includes 50 incoming or outgoing messages per month, 10¢ per additional message.

messaging

- 2-Way SMS 250* \$4.99/Month
- 2-Way SMS 1000** \$9.99/Month
- 2-Way SMS Unlimited \$14.99/Month

*10¢ per additional message | **5¢ per additional message



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[Explanation of Rates and Charges \(PDF\)](#)

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Store Locations

Ring Tones & Games

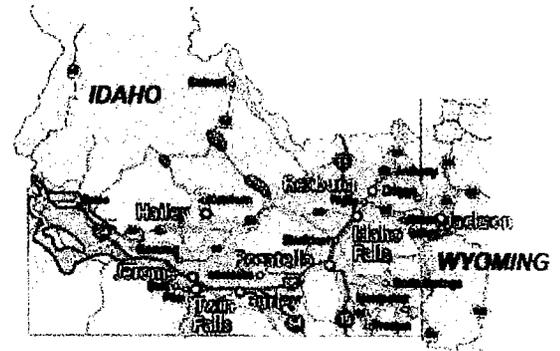
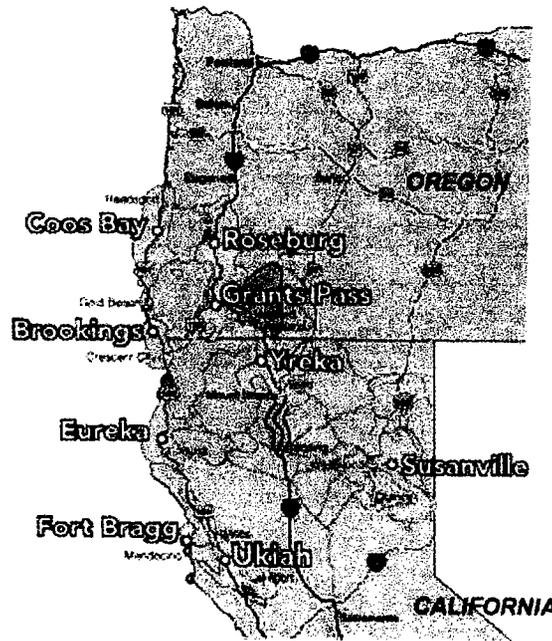
Buy Service Online

Coverage Areas

Edge Wireless LocalEdge Rate Plan areas.

▶ OR/CA

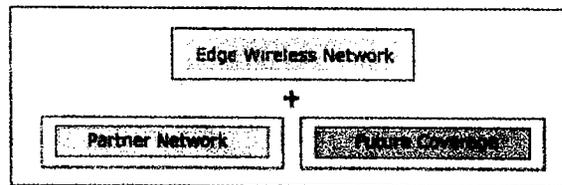
▶ ID/WY



Click map for detail

Click map for detail

Rate Plan Area



* These maps depict the Rate Plan Area, comprised of the Edge Wireless GSM Network and the Partner Network. TDM coverage may vary. See an Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other



conditions. Future Coverage areas are based on current build-out plans and are subject to change. Partner Network is based on information provided by partners and Edge Wireless does not guarantee its accuracy. Partner Network is subject to change without notice.

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LocalEdge

Explanation of Rates and Charges:

Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation, you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. When using the Call Waiting and Conference Calling features, you will be charged for the minutes of use for both lines which are being utilized during the call. If a calling card or credit card is required to complete a call, different rates apply. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month. This usage will be charged as if used in the month billed.

When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$20; InfoEdge - 75¢ per call (while on the Edge Wireless Network) plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge from your wireless device while on the Edge Wireless Network, or call 1-866-221-EDGE (3343).

Plan rates may not be available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.

IDAHO PUBLIC UTILITIES COMMISSION

IDAHO 208-334-0300

APPROVED TITLE 61 TARIFFS - PRICE LISTS

Albion Telephone Company, Inc/ dba ATC – Local Exchange Tariff

Cambridge Telephone Company, Inc. – Local Exchange Tariff

CenturyTel of Idaho, Inc./dba CenturyTel – Local Exchange Tariff

CenturyTel of the Gem State, Inc./ dba CenturyTel - Local Exchange Tariff

Citizens Telecommunications Company of Idaho – Local Exchange Tariff

Citizens Telecommunications Company of Idaho – Access Service Tariff

Direct Communications – Local Exchange Tariff

Fremont Telecom Company – Local Exchange Tariff

Idaho Rural Exchange Carriers / Pages 1 – 203 / – Access Service Tariff

Idaho Rural Exchange Carriers / Pages 204 – 406 / - Access Service Tariff

Inland Telephone Company – Local Exchange Tariff

Midvale Telephone Exchange, Inc. – Local Exchange Tariff

Midvale Telephone Exchange, Inc. – Access Service Tariff

Oregon-Idaho Utilities, Inc. – Local Exchange Tariff

Potlatch Telephone Company – Local Exchange Tariff

Sections 1 – 4

Sections 5 – 7

Sections 8 - 11

Rural Telephone Company – Local Exchange Tariff

Silver Star Communications – Local Exchange Tariff

approved

EXHIBIT F
Page 2 of 2

Teton Telecom – Local Exchange Tariff



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE
SAN FRANCISCO, CALIFORNIA 94102

RACHELLE CHONG
COMMISSIONER

December 7, 2006

TEL: (415) 703-3700
FAX: (415) 703-3352

Donnie Castleman, President
Edge Wireless
650 SW Columbia
Suite 7200
Bend, OR 97702

Re: Edge's Assistance to Authorities in Locating the James Kim Family

Dear Mr. Castleman:

I wanted to commend your two employees, Eric Fuqua and Noah Pugsley, who spent long hours assisting search and rescue teams to help locate the James Kim family of San Francisco, eventually providing key information that Oregon authorities say helped locate and rescue Kati Kim and her two young daughters. I praise your employees' dedication, determination and ingenuity in using wireless technology to help authorities focus on a particularly geographic area where the family was likely to be. I also thank Edge for making available a temporary cell-on-wheels and 30 wireless phones to search and rescue teams, so they could communicate. While I am deeply saddened by the loss of James Kim who died in a heroic attempt to seek help for his family, we cannot forget that without the efforts of so many good-hearted people like your employees, Mr. Pugsley and Mr. Fuqua, we may have lost Kati and the children.

Please extend my sincere thanks and congratulations on a job well done to both of them and to your company for your lifesaving assistance to the authorities.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rachelle B. Chong", with a long horizontal line extending to the right.

Rachelle B. Chong
Commissioner

cc: Eric Fuqua
Noah Pugsley
Steve Largent, CTIA CEO and President
Stan Sigman, Cingular CEO and President

December 17, 2006

Jeff

Several months ago our 911 dispatch center received a call requesting medical assistance for man who had fallen from a horse and had a broken his leg. The location was described as in the Mount Independence area. The area is somewhat remote and very large. We determined that the caller was using an Edge Wireless phone. We contacted Edge Wireless, explained the situation. Very soon they called use back informing us that three 911 calls had hit a cell site in Twin Falls and one had been received at a cell site in, I believe the Hansen area. They told us that the sectors that had received the call would indicate the call came from southeast of Twin Falls. The information helped us determine what side of the Mountain the injured man was located and we were able to concentrate our search. Our emergency workers located the man and he was air lifted to the hospital. The information given by Edge was extremely valuable in finding the patient and transporting him to advanced medical help.

Recently, a young man called our 911 center threatening suicide. We contacted Edge to find out what area he was calling from. However, before we faxed our written request to Edge we located the young man. However, Edge was very willing to help us.

Thanks for your help,

Kent R. Searle
Cassia County 911 coordinator



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All plans also offer features like call waiting, voice mail, and call forwarding.

Included Features

- 2-Way SMS**
- Caller ID
- Call Waiting
- Call Forwarding
- Enhanced Voice Mail
- Detailed Billing
- Conference Calling
- Message Waiting Indicator

Additional Options

- "InfoEdge" #555 - 75¢ plus airtime (on the Edge Wireless Network)
- Wireless 101 Classes.....Free!
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LifeLine 800	\$21.49***	800	1500	0	N/C	30¢
LifeLine 1100	\$31.49***	1100	Unlimited	Unlimited	N/C	30¢

*** After \$13.50 Lifeline subsidy.



Roaming and international calling are available subject to approved credit or with a security deposit. Security deposit may be waived if you elect to block roaming and international dialing. If you elect to block roaming, your phone will not work on the Partner Network (see map below).

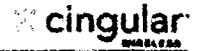


You are eligible to participate in the Edge Wireless LifeLine Rate Plan if you receive assistance from one of the following programs:

- Food Stamps
- Welfare Medical ID Card
- Temporary Assistance for Needy Families



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You must certify through the Oregon Telephone Assistance Program (OTAP) by calling (800) 848-4442, or online at www.rspf.org. Lifeline subsidies may only be applied once per household on either your landline or your wireless service. Lifeline subsidies automatically terminate upon loss of eligibility, and monthly access rates will increase by \$13.50. Any reduction in the available Lifeline subsidy will increase monthly access rate by the same amount.

* Included Anytime Minutes and Night/Weekend Minutes are valid for voice calls made from or received in your Rate Plan Area. All other usage is roaming. Night/Weekend is 7:00 p.m. - 6:59 a.m. M-F, all day Saturday and Sunday. Unlimited Mobile-to-Mobile Minutes apply only to voice calls between Edge Wireless phones that are placed, received and completed entirely on your local Edge Wireless Network. With Nationwide Long Distance feature, long distance charges will not apply when calling to anywhere in the 50 United States. Standard airtime and roaming charges apply. At least 50% of your Included Anytime Minutes and Night/Weekend Minutes must be on the Edge Wireless Network in each billing cycle or we may terminate your Service.

** 2-Way SMS includes 50 incoming or outgoing messages per month, 10¢ per additional message.

messaging

2-Way SMS 250*	\$4.99/Month
2-Way SMS 1000**	\$9.99/Month
2-Way SMS Unlimited	\$14.99/Month

*10¢ per additional message | **5¢ per additional message



[View LifeLine rate plan area.](#)

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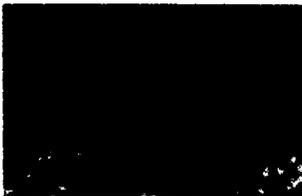
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- "InfoEdge" #555 - 75¢ plus airtime (on the Edge Wireless Network)
- Wireless 101 Classes.....Free!
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- Handset Insurance Available
- Roadside Assistance Available

Edge Rate Plans

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- WesternEdge »
- NationalEdge »
- Carryover »
- mephone »
- MobileMedia »
- BlackBerry Devices »



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PLAN	MONTHLY ACCESS	INCL'D ANYTIME MINUTES ¹	NIGHT/WEEKEND MINUTES*	MOBILE-TO-MOBILE MINUTES*	NATIONWIDE LONG DISTANCE ²	ADD'L/ ROAMING MINUTES
LifeLine 800	\$21.49***	800	1500	0	N/C	30¢
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*** After \$13.50 Lifeline subsidy.



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Roaming and international calling are available subject to approved credit or with a security deposit. Security deposit may be waived if you elect to block roaming and international dialing. If you elect to block roaming, your phone will not work on the Partner Network (see map below).



You are eligible to participate in the Edge Wireless LifeLine Rate Plan if you receive assistance from one of the following programs:

- Food Stamps
- Welfare Medical ID Card
- Temporary Assistance for Needy Families



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** 2-Way SMS includes 50 incoming or outgoing messages per month, 10¢ per additional message.

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2-Way SMS 1000**	\$9.99/Month
2-Way SMS Unlimited	\$14.99/Month

*10¢ per additional message | **5¢ per additional message



[View Lifeline rate plan area.](#)

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LifeLine

Explanation of Rates and Charges:

Activation is subject to credit approval; a deposit or valid major credit card may be required.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. When using the Call Waiting and Conference Calling features, you will be charged for the minutes of use on both lines which are being utilized during the call. If a calling card or credit card is required to complete a call, different rates apply.

When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$20; InfoEdge - 75¢ per call (while on the Edge Wireless Network) plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device (while on the Edge Wireless Network), or call 1-866-350-EDGE (3343).

Plan rates may not be available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.

EXHIBIT J

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removed.

Saddam's chief lawyer, Khaled al-Dulaimi, said he would appeal and asked that today's session be halted immediately, a request Abdel-Rahman refused. Al-Dulaimi and al-Obeidi left the court to prepare an appeal, but the remaining six members of the defense team remained.

Ibrahim stood and argued briefly with Abdel-Rahman, who repeatedly ordered him to sit down.

The defense walkout threatened the perception of fairness in the tribunal, a key issue in a trial that Iraqi and U.S. officials said would be a landmark in political progress for a country sharply torn between Sunnis and Shiites.

The defense stormed out of court Jan. 29 after Abdel-Rahman tossed out one of the lawyers for shouting. The defense then said it would boycott the trial unless Abdel-Rahman were removed, accusing him of bias against Saddam. Court-appointed lawyers sat in during sessions over the past month.

Abdel-Rahman has adopted a no-nonsense style in the court since taking over the trial in early January, replacing a previous chief judge who was criticized as being too lenient toward Saddam and Ibrahim's frequent outbursts.

Abdel-Rahman did not hesitate to throw out defendants who shouted in the courtroom — and even proceeded with the trial in several sessions in January that the eight defendants refused to attend.

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Notice to Oregon Residents

The Oregon Public Utility Commission has designated Edge Wireless as an Eligible Telecommunications Carrier within its Oregon service area. This designation allows Edge Wireless to provide subsidized Lifeline service to qualified Oregon residents who live within its service area. If you qualify, you may receive a discount of up to \$13.50 per month on your primary phone service. Low income individuals living on a federally recognized Tribal lands may also be eligible for additional discounts. Edge Wireless does not charge an activation fee and therefore the Link-Up program is not applicable to Edge Wireless. Please visit an Edge Wireless retail store or call (866) 350-3343 for more information on Lifeline service.

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ASSOCIATED PRESS WRITER

SAN FRANCISCO — As congressional conservatives press for tough-medicine steps to halt illegal immigration, another Republican spent this week hugging newly naturalized immigrants and enthusiastically hosting Mexican President Vicente Fox.

Himself an immigrant, Gov. Arnold Schwarzenegger is charting a different political course from conservatives in Washington as he seeks election to a second term this year. Schwarzenegger is emphasizing the contributions immigrants have made, and the value of relations with Mexico — not a hard-line border lockdown.

It's a pragmatic approach in a border state where Democrats dominate, Hispanic voter registration is on the rise and the GOP is still scarred from old battles on immigration. "He is trying to deal with immigration not just from the loud voices on the left and the loud voices on the right, but to find a place where you can deal with the whole breadth of the issue," said Matthew Dowd, Schwarzenegger's chief campaign strategist.

Schwarzenegger advocates tough border enforcement, and at



SCHWARZENEGGER

patrol movement.

But he has raised the sharpest questions of any border governor about President Bush's plan to send National Guard troops to the Mexican line to back federal border-control efforts. He has refused to commit his National Guard until the Bush administration answers questions about the logistics, duration and financing of the deployment.

While differing with the president on some points, he actually is aligned more closely with Bush and Senate Republicans on immigration than with House Republicans.

The House passed an immigration-reform bill in December that makes illegal presence in this country a felony, mandates fences along

700 miles of the U.S.-Mexico border and provides no path to legal residency or citizenship. A different approach was approved by the U.S. Senate on Thursday, including more border security funds but also a guest-worker program and the possibility of eventual citizenship for many illegal immigrants.

On the same day the Senate voted, Schwarzenegger met with Fox in Sacramento, saying, "Mexico and Californians have a great relationship."

820 Gold Court

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USA

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Edge Wireless is authorized to provide subsidized Lifeline service to qualified Oregon residents who live within our service area and participate in certain government assistance programs. Call 1-866-350-EDGE or visit www.edgewireless.com/rates/Lifeline for more details.

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EXHIBIT L

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Use of cell phones by the Twin Falls District Bureau of Land Management in Rural areas

The Twin Falls District of the Bureau of Land Management relies heavily on the use of cell phones during response to wildland fires and law enforcement emergencies. They are used for initial notification, ordering all types of fire resources including, personnel, aircraft, and equipment and supplies. Cell phones also assist us in directing forces to the incident and obtaining current weather data.

When we are able to directly call for services in order to troubleshoot breakdowns or deal with equipment problems that save us from returning to town this is extremely helpful. We also frequently have the need to communicate specific issues via a one-on-one cellular connection rather than over the radio system where everyone can listen in.

Although our two-way radio system covers a broad area, it is often busy with tactical and safety related communications with aircraft and ground forces. Because of this congestion the logistical portions of fire suppression have been moved to cell phone usage. When GSM cell coverage is not available and we are responding to or suppressing a fire, safety is hampered because these logistical efforts are added to the already congested two-way radio system.

BLM also has a number of employees whose prime focus is resource management. These employees often go into the rural areas to perform their jobs alone. These employees generally are not as familiar with the two-way radio system, but are more comfortable using a cell phone, especially in an emergency situation.

Lastly, our district-wide fire and law enforcement activity occurs in all areas of our district, many of which do not have reliable cell coverage. To compensate we are forced to purchase expensive satellite phones and plans. As with most cell phone users, we consider their availability, and our ability to communicate with them, an important safety factor.

Edge Wireless Receives Excellence Award

Edge Wireless, recipients of the **2004 Nortel Networks Excellence Award**

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Ralph Stegner, Sales Director with **Nortel Networks**, presents Donnie Castleman, President and COO **Edge Wireless** with the **Superior Network Award**.

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