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IDAHO PUBLIC
UTILITIES COMMISSION

August 31, 2012

VIA HAND DELIVERY

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho

GNR-T-12-06

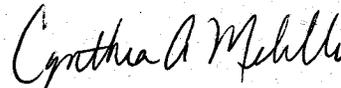
Re: Syringa Wireless LLC – ETC Annual Recertification

Dear Ms. Jewell:

I am enclosing one copy of the Eligible Telecommunication Carrier Annual Re-Certification form for Syringa Wireless, LLC.

Please note the enclosed document 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 re-certification document.

Sincerely,



Cynthia A. Melillo

CAM

Enclosures

cc: Scott Dike (*via electronic mail, w/ encl.*)
Jessica Pearson (*via electronic mail, w/ encl.*)

ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL RE-CERTIFICATION

Syringa Wireless, LLC
PO Box 1117
233 North Main Street.
Pocatello, Idaho 83204

August 31st 2012

CONTENTS

- Section 1: ETC Information
- Section 2: Description of Carrier's Local Usage Plan
- Section 3: Detailed Outage Information
- Section 4: Unfulfilled Service Requests
- Section 5: Customer Complaints
- Section 6: Service Quality and Consumer Protection Certification
- Section 7: Ability to Remain Functional in an Emergency
- Section 8: Federal USF High-Cost Support Certification
- Section 9: Two-Year Network Improvement Plan and Progress Report

Section 1: Eligible Telecommunication Carrier Information

Date of ETC Annual Report: **August 31st 2012**

Company Name: **Syringa Wireless LLC**

Address: **PO Box 1117
233 North Main Street.
Pocatello. Idaho 83204**

Company Contact Person/Title: **Scott Dike, General Manager**

Telephone Number: **.208-830-6996**

Email Address: **sdike@syringawireless.com**

Service Area Code (SAC): **479008, 479010**

Number of Idaho Telephone Service Assistance Program (ITSAP) recipients:
(Use number from last report submitted to the ITSAP Administrator)

1105

Section 2: Description of Carrier's Local Usage Plan-- Competitive Eligible Telecommunications Carrier (CETC) Only

ETC applicants must demonstrate that their usage plan is comparable to the ILEC(s) in the service areas for which it seeks designation. C.F.R. § 54.202(a)(4). Local Usage Plan may be a descriptive narrative of the carrier's basic usage plan or it may be a copy of ILEC(s) tariff sheets as filed with the Idaho Public Utilities Commission.

Description: **Please see attached Exhibit A for Description of Local Usage Plans**

Section 3: Detailed Outage Information §54.209(a)(2)

Provide detailed information on any outage, as that term is defined in 47 C.F.R. § 4.5, of at least thirty (30) minutes in duration for each service area in which an ETC is designated for any facilities it owns, operates, leases or otherwise uses that potentially affect (a) at least ten percent of the end users served in a designated service area; or (b) a 9-1-1 special facility, as defined in 47 C.F.R. § 4.5(e). Specifically, the annual report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the steps taken to prevent a similar situation in the future; and (f) the number of customers affected. Reporting period is January 1, 2011—December 31, 2011. See Order No. 29841, page 18.

This information was previously filed as part of the Section § 54.313 report (as required by the FCC)

Section 4: Unfulfilled Service Requests §54.202(a)(1)(A)

Provide the number of requests for service from potential customers within the ETC's service area(s) that were unfulfilled in the previous year (January 1, 2011—December 31, 2011). The ETC shall also detail how it attempted to provide service to those potential customers. See Order No. 29841, page 19.

This information was previously filed as part of the Section § 54.313 report (as required by the FCC)

Section 5: Customer Complaints §54.209(a)(4)

Provide the number of complaints per 1,000 handsets or lines for the previous year (January 1, 2011 – December 31, 2011).

This information was previously filed as part of the Section § 54.313 report (as required by the FCC)

Section 6: Service Quality and Consumer Protection Certification

§54.202(a)(3)

Provide certification that the carrier is complying with applicable service quality standards and consumer protection rules.

Consistent with the *IPUC ETC Requirements Order*, Syringa Wireless continues to comply with all applicable service quality standards and consumer protection rules, and abides by the consumer protection standards established by the CTIA Consumer Code. In addition Syringa Wireless has adopted and is using a CPNI and Red Flag Rules policy consistent with FCC requirements.

NOTE: See attached Exhibit B, *Affidavit of Business or Corporate Officer* for the above certification requirements.

Section 7: Ability to Remain Functional in Emergencies Certification

§54.201(a)(2)

ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Consistent with the *IPUC ETC Requirements Order*, Syringa Wireless has the ability to remain functional in emergency situations. Syringa Wireless has designed a fault-tolerant network that employs the following features:

1. Mobile Switching Center located in Roosevelt, Utah

- o Nortel MTX switch with fully redundant fault-tolerant processors
- o 24 hours of back-up battery
- o 250 KW generator with the fuel supply connected directly to the public natural gas utility
- o Complete complement of spare circuit boards

2. Self-Healing Diverse Alternate Route Protection Service for Fiber Facilities interconnection

- o Multiple alternate trunk routes for PSTN interconnection trunks
- o Redundant Microwave radio links where used
- o Automated 7x24 network monitoring

3. Cell sites

- o Overlapping cell site coverage with retry for blocked calls
- o Backhaul network engineered with surplus back-bone capacity
- o Ready access to growth radio stock for all field technicians
- o 8 hours battery back-up for all cell sites

- o Four Standby Generators at 4 different locations ready for deployment when and where needed.
- o Leased fiber and copper facilities to major network T-1 aggregation to multiple Syringa Networks Backhaul locations
- o Quick-connect plugs for portable generator at all sites
- o Compact generator system stored in Driggs, Idaho for use with Snow Cat-only accessible sites
- o Remote monitoring 7x24 of all sites

4. Monitoring Network and Outage Resolution procedures

- o Syringa Wireless has a network operating center (“NOC”), in Roosevelt, Utah;
- o All Switches and cell sites are remotely monitored 7x24, with critical and major alarms escalated to the next level of management every 20 minutes
- o Syringa Wireless’ 7x24 on-call staff is sent a text message and called immediately when the monitoring system detects system problems

5. Staffing and Additional Equipment

- o The Syringa Wireless Technical Operations team consists of 5 people strategically located within Southeastern Idaho in the following locations: 1 in Jerome, 1 in Firth, 3 in Pocatello
- o Syringa Wireless staff is well trained and equipped to respond quickly in the event of outages, alarms or emergencies
- o Complete inventory of alternate-access equipment, including:
 - All field staff are equipped with 4 wheel drive pickups; (1) Tucker Snow Cat is stored at Driggs, Idaho facility; (2) snowmobiles are located at Pocatello, Idaho facility; and (2) Polaris 4-wheeler ATV’s are located in Pocatello, Idaho.
 - All field staff are trained in operation for all alternative site-access equipment
- o Tower crew is ready for emergency tower and antenna repairs
- o Technicians are equipped with complete complement of spares for cell site
- o Microwave and DACs equipment is available to insure quick recovery

Syringa Wireless has consistently demonstrated that it not only can provide customers with needed emergency services, but that it also can also remain fully functional in emergencies.

Section 8: Federal USF High-Cost Support Certification §54.313, §54.314

Pursuant to FCC regulations, in order for ETCs to continue to receive federal USF, the Commission "must file an annual certification with the USAC and the [FCC] stating that all federal high-cost support provided to such carriers within that State will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."

NOTE: See attached Exhibit B, " Affidavit of Business or Corporate Officer for the above certification requirements.

Section 9: Two-Year Network Improvement Plan and Progress Report

The annual report must include a progress report on the carrier's two-year service quality improvement plan, including maps detailing its progress toward meeting the plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled. This information shall be submitted at the wire center level. The annual report must also include an updated two-year network improvement plan indicating plans for future investment.

Two-Year Network Improvement Plan Format

During the Fiscal Year of 2011, Syringa Wireless collected \$1,499,266 in universal service support. Please see attached spreadsheets and maps listed as Exhibit C for details of the 2011 build-out plan was accomplished with cost breakdowns specific to wire centers served.

Also, the attached spreadsheets and maps listed as Exhibit D detail the forward looking build out plans by wire center for the fiscal years of 2012 and 2013.

Note: Syringa Wireless intends to submit the Two-Year Network Improvement Plan as "confidential information."

Additional Information: Lifeline and Tribal Assistance Programs

Syringa Wireless continues to provide service to the Fort Hall Reservation.

As a designated ETC, Syringa Wireless offers Tribal Lifeline service to qualified residents of the Fort Hall Reservation.

Syringa Wireless also provides ITSAP and Lifeline assistance to qualifying subscribers throughout its designated ETC service territories.

EXHIBIT A



SIGNATURE FEATURES

- Unlimited nights and weekends (7pm-7am)
- Unlimited Syringa Wireless mobile-to-mobile
- Unlimited incoming minutes
- Call waiting, caller ID, call forwarding, 25 text messages, and voicemail

SIGNATURE ADD-ONS

Text and Picture Messaging



Messaging Plan	Per Month
600 text messages (SMS)	\$5/line
300 text/picture messages (SMS/MMS)	\$10/line
Unlimited text messages (SMS)	\$15/line
Unlimited text/picture messaging* (SMS/MMS)	\$20/line
Shared unlimited text/picture messaging* (SMS/MMS)	\$40/account

**Only available on select handsets, handset programming required.*

Data Services



Data Plan	Per Month
Unlimited 3G in-network & unlimited 2G nationwide roaming	\$25/line



Signature Family

One price, two lines.

\$60/mo - 750 Anytime

Includes 2 service lines that share 750 anytime minutes plus unlimited, nights, weekends, mobile-to-mobile, and incoming calls.

Add up to 3 additional shared lines for \$10/mo per line.

\$100/mo - Signature Voice

Includes 2 service lines with unlimited nationwide calling.

Add up to 3 additional shared lines for \$45/mo per line.

\$50/mo - Signature Local

Includes 2 service lines with unlimited local calling within the Syringa Wireless home and extended network.

Signature Local Add-ons	Fees
Long Distance	2¢/minute
Nationwide Use	10¢/minute

Add up to 3 additional shared lines for \$25/mo per line.



Signature Personal

One service line included.

\$50/mo - 750 Anytime

Includes 1 service line with 750 anytime minutes plus unlimited nights, weekends, mobile-to-mobile, and incoming calls.

\$55/mo - Signature Voice

Includes 1 service line with unlimited nationwide calling.

\$30/mo - Signature Local

Includes 1 service line with unlimited local calling within the Syringa Wireless home and extended network.

Signature Local Add-ons	Fees
Long Distance	2¢/minute
Nationwide Use	10¢/minute

\$25/mo - Safety Plan

200 anytime/anywhere minutes. A great choice for infrequent users or as an emergency phone. Use it anytime, anywhere.



Signature Everything

PRIMARY SERVICE LINE

\$70/mo - Signature Everything
Unlimited nationwide calling, messaging and data.

*Add up to 4 additional lines,
choose from the plan options below.*

ADD-ON SHARED LINE

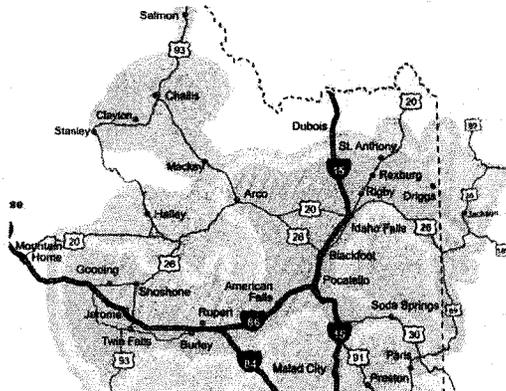
\$45/mo - Signature Voice
Unlimited nationwide calling.

**\$55/mo - Signature Voice
& Messaging**
Unlimited nationwide calling and messaging.

\$65/mo - Signature Everything
Unlimited nationwide calling, messaging and data.

**Unlimited in-network 3G data service offering 2G roaming*

Idaho's only integrated wireless provider.



Local Coverage



National Coverage

Coverage areas are depicted in a geographical representation showing approximate licensed coverage area of Syringa Wireless and our DMA roaming partners. Actual coverage may vary due to terrain, weather, signal strength and customer's equipment. Quality and reception may be diminished by obstructions such as buildings and foliage. No guarantee of coverage is available.

We've Got You Covered

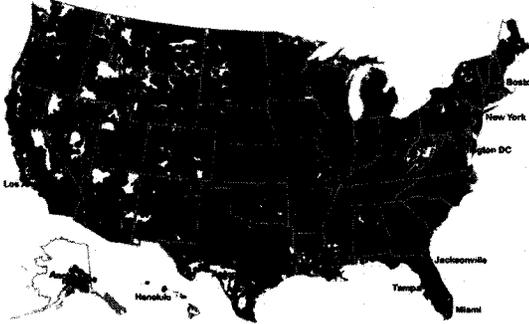


Syringa
WIRELESS*

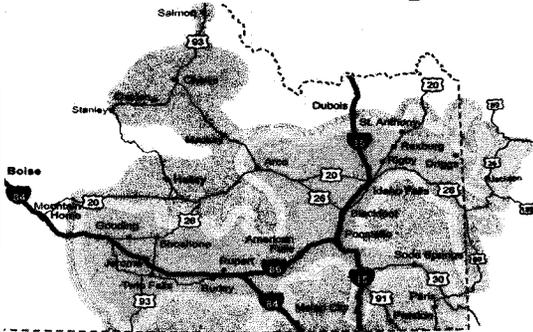
Syringa
WIRELESS*
www.SyringaWireless.com

Syringa
WIRELESS*

National Service Area



Unlimited Local Calling Area



- Blue = Syringa Wireless Home Network (Make and receive calls)
- Yellow = Syringa Wireless Extended Calling Area (Make calls to anywhere within the yellow area from within the blue area.)

Long distance and roaming minutes are available in addition to your **Pay Go** service plan. Syringa Wireless Unlimited **Pay Go** service must be active to use long distance services. Current coverage areas depicted in geographical representation shows approximate licensed coverage area of Syringa Wireless. Actual coverage may vary due to terrain, weather, signal strength, customer's equipment, location and other factors. Clarity and reception may be diminished by obstructions such as buildings and foliage. Services may not be available or limited due to equipment. Not all handsets will support SMS, MMS, Video and other service applications. No guarantee of coverage is available.

Long distance allows for calls to be made throughout the continental United States while within the Syringa Wireless network.

Phone Guard
(See Phone Guard Guide)

Syringa Wireless is a registered trademark of Syringa Wireless LLC, ©Syringa Wireless LLC 2009 PG-11/11

All service and feature charges will be billed at either a thirty day (30) or weekly usage rate of seven days (7).

THERE ARE NO REFUNDS OR PARTIAL REFUNDS once a payment has been applied to the account. **THERE ARE NO TRANSFERRING OF FUNDS** from any type of service account we offer. All **ROAMING** and **LONG DISTANCE** calls will include a per-minute charges rounded up to the next minute. Usage charges start when the **SEND** button is pressed. Usage charges will conclude when the call is completed or by pressing the **END** button. Charges will not be assessed for busy signals or incomplete calls. The Syringa Wireless Coverage Area and Roaming Service Areas are outlined in this plan guide. Fifty percent of service usage is required to be within the Syringa Wireless Network. We retain the right to terminate services for any account we feel is abusing or service offerings and/or network. We do not guarantee depicted coverage areas will process calls. Long distance service areas are defined as within the contiguous United States and include Alaska, Hawaii, and the U.S. territories. Depicted coverage areas are approximate; actual coverage may vary due to terrain, weather, signal strength, equipment and other factors. **SYRINGA WIRELESS MAKES NO WARRANTY, EXPRESS OR IMPLIED, REGARDING ITS SERVICE OR ANY WIRELESS PHONE OR DEVICE USED ON SYRINGA WIRELESS NETWORK OR ANY THIRD PARTY NETWORK, INCLUDING BUT NOT LIMITED TO, ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.**

Services may not be available or limited due to equipment. Not all handsets will support SMS, MMS, WAP, Video and other service applications. It is the responsibility of the subscriber to purchase the appropriate amount of airtime they need to make and receive calls, SMS or MMS services as well as the ability to access the web. Syringa Wireless assumes no responsibility financially or otherwise for any dropped call or the inability to process a call or service. We have made all attempts to block calls to fee based numbers (900), international and illegally routed numbers. The subscriber is responsible to cover any additional fees incurred for any additional charges. The subscriber agrees to use the service for legal transactions only. If it is determined, by Syringa Wireless, a third party, roaming partner or legal authorities that there is a violation of this clause; Syringa Wireless retains the right to suspend and/or deactivate the service without refund. Calls made to 411 directory assistance will route to a third party provider that offers free 411 services. If SMS or WAP is terminated by Syringa Wireless, for misuse or abuses as determined by us, there will be no refund or partial refund granted. Pay Go and TEXT AND TALK service plans require that local calling is active to utilize any long distance, roaming, SMS, MMS, and WAP services.

Syringa Wireless reserves the right to terminate any of its services to any customer at anytime. Syringa Wireless reserves the right to cancel or change service plan offerings at anytime without notification to subscriber.

PAY GO accounts must be active within a 30 day period or the account will be suspended. PAY GO Accounts will be terminated after thirty days of suspension. Phone numbers associated with a deactivated account may be assigned to another user. Syringa Wireless is committed to protecting your privacy. In all matters relating to your personal and call privacy you may refer to the Syringa Wireless Privacy Policy Statement. Syringa Wireless is fully compliant with all CALEA Policies and Procedures and FCC regulations relating to Network Management Practices see: www.syringawireless.com/networkpractices

Syringa
WIRELESS.



Syringa
WIRELESS.

Pay Go



Pay Go

\$30

per thirty days, plus tax
 Unlimited Pay As You Go
 Local Calling Service

\$45

per thirty days, plus tax
 Unlimited Local Calling Service &
 Your Choice of One of These Features:

- Unlimited Text Messaging
- Unlimited Nationwide Voice
- Unlimited Web (3G In Network/2G Roaming)

\$50

per thirty days, plus tax

UNLIMITED EVERYTHING

- Unlimited Text Messaging
- Unlimited Nationwide Voice
- Unlimited Web (2G)

\$55

per thirty days, plus tax

with 3G Web In Network/2G Roaming

Included In All Pay Go Service Plans

Voice Mail • Caller ID • Call Waiting

Additional Service Options

200 Long Distance Minutes	\$5.00
30 days Unlimited Long Distance Minutes	\$10.00
30 days of Unlimited Data	\$15.00
Seven days of Pay Go Calling Service	\$10.00
Seven days of Unlimited Text	\$10.00
Seven days of Unlimited Data	\$10.00



Syringa
 WIRELESS.



\$25

30 Day Rate
 Unlimited Text
 200 Minutes of Local Voice
 Caller ID



\$12⁵⁰

Weekly Rate
 Unlimited SMS
 60 Minutes of Local Voice
 Caller ID

Choose To Add:

Call Waiting / Voice Mail	\$5.00
200 Additional Local Minutes*	\$5.00
200 Long Distance Minutes	\$5.00
Unlimited Data: 7 days	\$10.00
Unlimited Data: 30 days	\$15.00

*Add these features while in current cycle

\$60

per month
Unlimited

In Network 3G Web/2G Roaming

\$20⁰⁰

per month
Unlimited
2G



(requires USB)

No Long-Term Contract

No Deposit

No Credit Check

EXHIBIT B

State of Idaho)
)ss CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER
County of Ada) OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER
 PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN
 EMERGENCIES, AND USE OF FEDERAL HIGH-COST SUPPORT.

AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER

The Idaho Public Utilities Commission Order No. 29841 requires Eligible Telecommunications Carriers to certify that they are compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Syringa Wireless LLC, an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Syringa Wireless LLC is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.201(a)(2).
5. I also certify that all federal universal service support funds received by Syringa Wireless LLC during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2012, through December 31, 2012, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.



Name/Title [Signature] GENERAL MANAGER
Date 8/29/12

SUBSCRIBED AND SWORN to before me this day 29 of August, 2012
Notary Public Faye Baxter, residing at Boise, Idaho
My Commission expires March 5, 2016