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IDAHO PUBLIC
UTILITIES COMMISSION

7 June 2010

GOL-7-10-01

Hand Delivered

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

Dear Ms. Jewell:

I am enclosing an original and seven (7) copies of GOLD STAR COMMUNICATIONS, 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

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Attorneys for Gold Star Communications, LLC

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF
GOLD STAR COMMUNICATIONS, LLC FOR }
DESIGNATION AS AN ELIGIBLE }
TELECOMMUNICATIONS CARRIER }
PURSUANT TO THE }
TELECOMMUNICATIONS ACT OF 1996 }

CASE NO. GOL-T-10-01

APPLICATION OF GOLD STAR COMMUNICATIONS, LLC FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Gold Star Communications, LLC ("Gold Star"), by and through its undersigned attorney, 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 ("the Act"), 476 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 Gold Star requests that it be

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").

designated as eligible to receive all available support from the federal Universal Service Fund (“USF”) including, but not limited to, support for rural, insular, high cost areas and low income customers in geographic areas specified in this Application, and that it be approved to participate in the Lifeline program. In support of this Application, Gold Star provides the following information:

I. APPLICANT

Gold Star is a Commercial Mobile Radio Services (“CMRS”) carrier providing “mobile service” as defined in 47 U.S.C. § 153(27) doing business as “Silver Star Wireless”. Gold Star provides such CMRS and “mobile service” on a pre-paid and post-paid basis. Gold Star’s pre-paid customers purchase a specific amount of local calling minutes in advance and do not sign a contract. In certain plans, pre-paid customers also have the ability to purchase specific amounts of long distance and roaming minutes. Gold Star’s post-paid customers sign a contract for a specific amount of monthly user-minutes and are billed for their usage.

Gold Star provides interstate telecommunications services as defined in 47 U.S.C. § 153(22) and 47 C.F.R. § 54.706. Through its cellular authorizations, Gold Star is licensed to serve the following Basic Trading Area[s] (“BTAs”) in Idaho: BTA 202 (Idaho Falls); BTA 353 (Pocatello). In addition, Gold Star has entered into a lease agreement with Syringa Wireless, LLC for use of its wireless spectrum [BTA 353] in the Wayan area and that of the Smoky Canyon Mine owned by the J.R. Simplot Company. Pursuant to these authorizations, Gold Star is authorized to provide wireless service in the following Idaho counties: Bonneville, Teton, Madison, Bingham, Butte, Custer, Lemhi, Jefferson, and Clark. Nevertheless, Gold Star is currently seeking ETC designation only in Teton County, eastern and northern Caribou County, and eastern Bonneville County.²

² CONFIDENTIAL Exhibit A, attached, is a map showing Gold Star’s current wireless coverage superimposed over a map of the counties for which it seeks ETC designation.

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 Gold Star as an ETC. Section 214(e) of the Act requires state commissions to designate as an ETC, throughout the service area for which ETC status is sought, any common carrier that: (i) offers services that are supported by federal universal support mechanisms; and (ii) advertises the availability of such services. In its First Report and Order implementing Sections 214(e) and 254 of the Act, the FCC designated the specific features a carrier must provide or agree to provide to be designated as an ETC.³ The FCC also recognized that wireless telecommunications providers are eligible to be designated as ETCs.⁴

Gold Star 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.* Gold Star, therefore, is 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 local exchange carrier’s (“LEC”) study area.⁵ Attached hereto as Exhibit B is a map depicting Gold Star’s proposed ETC service area in Idaho superimposed over the rural ILEC exchanges falling within Gold Star’s proposed ETC service area. Attached as Exhibit C-1 is a list of rural ILEC wire centers that fall within Gold Star’s BTA

³ *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8909-25 (1997) (“First Report and Order”).

⁴ *Id.* at 8858-59.

⁵ *See*, 47 C.F.R. §54.207(b).

licensed service areas for which it is seeking ETC designation.⁶ Also attached is CONFIDENTIAL Exhibit C-2, which shows the population densities of the relevant ILEC wire centers, including the specific wire center areas for which Gold Star seeks ETC designation.

III. LEGAL STANDARD FOR GRANTING ETC STATUS

Gold Star satisfies each of the statutory and regulatory prerequisites set forth in the Act, the FCC Rules⁷ and this Commission's ETC Requirements.⁸ On March 17, 2005, the FCC released its *FCC ETC Requirements Order*⁹ 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, as previously noted, issued a set of ETC designation requirements in Commission Order No. 29841.

Gold Star may be designated as an ETC in *rural*/ILEC areas upon a finding that: (1) it offers the supported universal services; (2) it advertises the availability of those services using media of general distribution in its service area; and (3) such a designation would serve the public interest.¹⁰

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

⁶ Because some ILEC exchanges include more than one ILEC wire center, there is some variation between the list of ILEC centers on Exhibit C-1 and the ILEC exchanges shown on Exhibit B.

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

⁸ See IPUC Order No. 29841.

⁹ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) ["FCC ETC Requirements Order"].

¹⁰ See, 47 C.F.R. § 54.207(c).

- Demonstration of its commitment and ability to provide supported services, including a two-year, wire center-specific network improvement plan, attached hereto as CONFIDENTIAL Exhibit D;
- Demonstration of its ability to remain functional in emergency situations;
- Its commitment to comply with all applicable service quality standards and consumer protection rules, and an agreement to comply with Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Code"); and
- A description of Gold Star's local rate plans and the local usage plans for the ILECs

A. UNIVERSAL SERVICES PROVIDED BY GOLD STAR

Gold Star 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 telephone 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; and (9) toll limitation for qualifying low-income consumers.¹¹ Gold Star 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 wireless network infrastructure (antenna, cell-sites, towers, trunking, mobile switching, and interconnection).

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

As previously noted, 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

¹¹ 47.C.F.R. 54.101(a).

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.¹²

Gold Star provides voice grade access to the public switched telephone network through interconnection arrangements with local telephone companies. Gold Star offers its subscribers this service at a bandwidth between no less than 300 to 3,000 Hz, thereby providing voice grade access consistent with the FCC's definition.

2. Local Usage.

Gold Star 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.¹³ Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs. Gold Star meets the local usage requirements by including local usage in its rate plans and Gold Star will comply with any and all minimum local usage requirements adopted by the FCC.

Consistent with the *IPUC ETC Requirements Order*, Appendix p.3, Gold Star submits its 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/tarriff/approved/title61/approved.htm>. A comparison of Gold Star's local calling rates with other carriers in Gold Star's service area 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."¹⁴ The

¹² 47 C.F.R. § 54.101(a)(1).

¹³ *Id.* at 8814

¹⁴ *IPUC ETC Requirements Order*, p.12; see also, *In the Matter of the Petition of Inland*

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.¹⁵

One of the distinct advantages to the Gold Star rate plans is that Gold Star provides significantly wide local calling areas. Whereas the relevant ILEC local calling areas are primarily limited to their local exchange boundaries and extended service area boundaries, Gold Star's local calling area for its basic "Valleys Plan" includes local calling areas in parts of Utah, Eastern Oregon and North Western Colorado. See Exhibit G, attached hereto. In addition, Gold Star offers additional "local" network coverage via switching partners Syringa Wireless, LLC and RINA Switching.

Second, Gold Star provides unlimited, toll-free service for 911 emergency calls and for 611 customer care. Gold Star also provides toll-free 511 road reports to the Idaho Department of Transportation.

Finally, all of Gold Star's nationwide and eight-state calling plans priced at \$49.95 per month and higher include unlimited nationwide long distance at no additional charge, unlimited night and weekend calling, and unlimited mobile-to-mobile calling.¹⁶

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).

¹⁵ *Id.*

¹⁶ See Exhibit E (Gold Star's rate plan brochure).

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. Gold Star 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.¹⁷ Gold Star provides single-party service, as required by 47 C.F.R. §54.101(a)(4).

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. Gold Star 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.¹⁸ In addition to providing Phase 0 E911, Gold Star provides Phase I and II wireless E911 to Public Safety Answering Points ("PSAP") when they request this improved service and are ready to receive the Phase I or II call information. To date, Gold Star has deployed requests for E911 Phase II in Bonneville County. Gold Star has not received requests in any other counties in its current service area.

¹⁷ *First Report and Order* at 8810.

¹⁸ *See Id.*, at 8815-17.

Phase I and 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. Gold Star hopes to improve its cell site coverage with the use of USF support. *See*, CONFIDENTIAL Exhibit D.

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

- Nortel MTX switch with fully redundant fault-tolerant processors
- 12 hours of back-up battery
- 250 KW generator with the fuel supply connected to the public natural gas utility
- Complete complement of spare circuit boards
- Self-Healing Alternate Route Protection Service for Fiber Facilities interconnection
- Multiple alternate trunk routes for PSTN interconnection trunks
- Redundant Microwave radio links where used
- Automated 7x24 network monitoring cell sites
- Overlapping cell site coverage with retry for blocked calls
- Backhaul network engineered with surplus back-bone capacity
- Ready access to growth channel element module stock for all field technicians

- 8 hours battery back-up for all cell sites
- Compact generator system stored in Freedom, Wyoming
- Remote monitoring 7x24 of all sites
- Ongoing monitoring of all Network and Outage Resolution procedures
- A network operating center (“NOC”), in Roosevelt, Utah
- All switches and cell sites are remotely monitored 7x24, with critical and major alarms escalated to the next level of management every 20 minutes
- Gold Star’s 7x24 on-call staff is sent a text message or called immediately when the monitoring system detects system problems
- The Gold Star’s team consists of 6 people strategically located within West Central Wyoming and Southeastern Idaho in the following locations: 3 in Star Valley, 2 in Teton Valley, and 1 in Jackson, Wyoming
- Gold Star staff is well-trained and equipped to respond quickly in the event of outages, alarms or emergencies
- Complete inventory of alternate-access equipment, including:
 - All field staff are equipped with 4-wheel drive pickups; a Snow Cat is stored at Freedom, Wyoming; snowmobiles are stored at Freedom, Wyoming and Driggs, Idaho facilities (1 each); and Polaris 4-wheeler ATVs are located in Freedom, Wyoming and Driggs, Idaho (1 each)
 - All field staff are trained in operation for all alternative site-access equipment
- Tower crews are on standby for emergency tower and antenna repairs
- Technicians are equipped with a complete complement of spares for cell site
- Microwave and DACs equipment is available to insure quick recovery

In addition to the foregoing, Gold Star is currently upgrading its MTX Switch to a version MTX 16.

Through all of these efforts, Gold Star has demonstrated that it not only provides customers with needed emergency services, but that it can also remain fully functional in emergencies.

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.¹⁹ Gold Star 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 services mechanisms."²⁰ Gold Star 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 Gold Star 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.²¹

¹⁹ *Id.*, at 8817-18

²⁰ *Id.*, at 8819.

²¹ *Id.*, at 8821.

Subscribers to Gold Star's services are able to dial "411" 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).²² In particular, all ETCs must provide toll blocking which allows customers to block the completion of outgoing toll calls.²³ Gold Star currently has no Lifeline customers in Idaho because only carriers designated as an ETC can participate in Lifeline. See 46 C.F.R. §§ 54.400-415. Once designated as an ETC, Gold Star will participate in Lifeline, as required. Gold Star has the capability and if requested provides toll blocking.

In addition, once it receives its ETC designation, Gold Star will promote its Lifeline Services through traditional media avenues such as newsprint, radio advertisements and media flyers. In addition to these methods, Gold Star will develop an information sheet that explains the program and directs interested parties to the proper agencies to assist with the program qualification process.

In addition to unlimited long distance calling at no extra charge, Gold Star's customers will have the ability to block roaming and international dialing, all of which will allow customers to avoid unexpected charges.

²² 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).

²³ *First Report and Order*, at 8821-22.

B. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE

Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. Section 54.201, Gold Star 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. Print media of general distribution in Gold Star's service area include: The Post-Register in Idaho Falls, Teton Valley News in Driggs, and the Caribou Sun which covers the Wayan area.

C. COMMITMENT TO CONSUMER PROTECTION

Consistent with the *IPUC ETC Requirements Order* at Appendix A, p.3, Gold Star 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.²⁴

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. There are no tribal lands in Gold Star's proposed ETC service area.

IV. GRANT OF THIS PETITION SERVES THE PUBLIC INTEREST

Gold Star's petition meets the stringent public interest standards established by the FCC. In its *ETC Order*, the FCC clarified its public analysis of ETC applications and

²⁴ See Exhibit H, attached.

suggested that states follow suit.²⁵ Pursuant to Section 214 of the Act, the FCC and states must determine that an ETC designation is consistent with the public interest, convenience and necessity.²⁶ The FCC and states must also consider whether an ETC designation serves the public interest consistent with Section 254 of the Act.²⁷ Further, the FCC has noted that it will analyze the public interest benefits of an ETC applicant in a manner that is consistent with the purposes of the Act, including the fundamental goals of preserving and *advancing* universal service, ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates, and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including *rural* and *high-cost areas*.²⁸ Specifically, the FCC considers three specific items when analyzing the public interest benefits of an ETC application: (1) the unique advantages and disadvantages of the competitor's service offering through a cost-benefit analysis; (2) the potential for "cream skimming"; and (3) the potential impact on the federal universal service fund (USF).²⁹

A. COST-BENEFIT ANALYSIS

In evaluating ETC applications, the FCC and states consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the competitor's service offerings. Gold Star's universal service offering will provide consumers in rural eastern Idaho

²⁵ *In re Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (March 17, 2005) ("*ETC Order*"). The Idaho Public Utilities Commission has outlined its ETC procedures in its *IPUC ETC Requirements Order*.

²⁶ 47 U.S.C. § 214(e)(2).

²⁷ 47 U.S.C. § 254(b)(7).

²⁸ *ETC Order* ¶ 40.

²⁹ *Id.* ¶ 41.

with the benefits of increased competitive choice and quality service. Gold Star's universal service offering will speed the delivery of advanced wireless services to citizens in these remote communities, including high-speed data transmission capabilities . Gold Star's universal service offering will not only increase competition in the area, but will also provide greater consumer choice. Gold Star will provide consumers in the Palisades Lake area, as well as the communities of Irwin in eastern Bonneville County and Clementsville in northern Teton County with improved cell phone coverage that is equal to or better than other providers in the area.³⁰ Without Gold Star, consumers in BEGIN REDACTED INFORMATION [REDACTED] END OF REDACTED INFORMATION would have to rely solely on traditional wireline services.

As a locally based company, Gold Star is focused on the specific needs of its rural customers, who are its one and only priority. In addition, Gold Star is the only wireless carrier who is able to port landline numbers to its wireless customers' cell phones.

Further, unlike traditional wireline services, Gold Star's mobile service affords customers increased flexibility, public safety, and service options. The FCC has noted that mobility of telecommunications assists consumers in rural areas who must drive significant distances to their jobs, schools, and critical community locations.³¹ By offering the benefits of mobility, Gold Star's universal service offering will provide unique and essential services to consumers in rural southeastern Idaho.

As an ETC, Gold Star will also offer a basic universal service package to subscribers

³⁰ See Exhibit I, attached ("A look at cell phone coverage in Teton Valley", *Teton Valley News*, August 27, 2009).

³¹ *Virginia Cellular Order* ¶ 29.

expand upon its substantial build-out and coverage plans.

With the receipt of high cost support, Gold Star BEGIN REDACTED INFORMATION [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] END OF REDACTED

INFORMATION. Gold Star's expanded presence will give consumers a choice in accessing vital telecommunications services. Gold Star's designation as an ETC is crucial to its plans to provide service in the currently unserved areas of BEGIN REDACTED INFORMATION

[REDACTED] END OF REDACTED INFORMATION and improve coverage and data transmission options in eastern Bonneville and northern Teton counties, and is in the public interest.

B. POTENTIAL FOR CREAM SKIMMING

Gold Star is seeking to serve ETC territories where Gold Star provides coverage and is not targeting low cost areas, or avoiding high cost areas, in order to "cream skim" high cost support. The FCC conducts a cream skimming analysis that compares the population density of each wire center in which the ETC applicant seeks designation against that of the wire centers in the study area in which the ETC applicant does not seek designation.³⁴ "Rural cream skimming occurs when competitors serve *only* the low-cost high revenue customers in a rural telephone company's study area."³⁵ Gold Star has chosen to serve all customers

³⁴ *ETC Order* ¶ 48.

³⁵ *Highland Cellular Order* ¶ 26.

where it is able to provide wireless service regardless of the population densities. Consistent with the FCC's *Highland Cellular Order*,³⁶ Gold Star is not seeking ETC designation in partial wire centers. Further, Gold Star is proposing to serve some of the least densely populated³⁷ and costliest to serve study areas in Idaho, including BEGIN REDACTED INFORMATION [REDACTED]³⁸ END OF REDACTED INFORMATION Therefore, Gold Star is not engaging in any sort of customer targeting or cream skimming.

C. IMPACT ON THE FUND

Gold Star's receipt of high cost support will have a nominal impact on the federal fund if calculated using the FCC's current "identical support" rule. Gold Star conducted a study using customer zip codes from its billing system to identify the location of its customers relative to the exchange area boundaries of the incumbent ILECs (ILEC) with whom Gold Star competes. Gold Star calculated the total per-line support that each competing ILEC currently receives, including high cost, local switching, interstate common line, and long-term support. The individual ILEC per-line support amount was then multiplied by the approximate number of Gold Star consumers residing within the competing ILEC's particular exchange and ultimately totaled. Based upon this analysis, Gold Star estimates that it will receive approximately \$648,000.00 per year in USF support. This represents less than .015% percent of the high-cost portion of the federal USF, assuming \$4.321 billion in high cost support disbursements in a single year. Accordingly, grant of

³⁶ *Id.*

³⁷ See CONFIDENTIAL Exhibit C-2, *supra*.

³⁸ See Exhibit J, Universal Service Administrative Company High Cost Support Projections Second Quarter 2010 - Idaho

Gold Star's ETC request will have minimal impact on the USF. The benefits of designating Gold Star as an ETC outweigh any potential harm to the sustainability of the fund.³⁹

D. STATE AND FEDERAL PRECEDENT

Designation of Gold Star as an ETC is consistent with ETC decisions across the country. There are now numerous cases at the state and federal level, including this Commission's recent designation of CTC Telecom, LLC, Syringa Wireless, LLC and Edge Wireless, LLC as wireless rural ETCs⁴⁰, where designation of a wireless carrier as an ETC in a rural area was found to be in the public interest. In addition to this Commission, 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,

³⁹ See *Virginia Cellular Order* ¶ 31 (holding that 0.105% of total high-cost support does not dramatically burden the USF); see also *Highland Cellular Order* ¶ 25 (holding that 0.04% of total high-cost support does not dramatically burden the USF); see also *Federal-State Joint Board on Universal Service, Advantage Cellular System, Inc., Petition for Designation as an Eligible Telecommunications Carrier in the state of Tennessee*, Memorandum Opinion and Order, CC Docket. 96-45, FCC 04-3357 ¶ 25 (October 22, 2004) (holding that 0.419% of total high-cost support does not dramatically burden the USF).

⁴⁰ *In the Matter of the Application of CTC Telecom, LLC for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C §214(e) (2)*, Order No. 30867 (IPUC Case No. CTL-T-09-01, Service Date July 24, 2009); *In the Matter of the Application of Syringa Wireless, LLC for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C §214(e) (2)*, Order No. 30629 (IPUC Case No. SYR-T-08-01, Service Date August 28, 2008); *In the Matter of the Petition of Edge Wireless, LLC for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C §214(e) (2)*, Order No. 30360 (IPUC Case No. EDG-T-07-01, Service Date June 29, 2007).

and promote competition and the benefits it brings.”⁴¹ 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. . . .”⁴² 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.”⁴³

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

IV. COMMITMENT TO SERVE REQUESTING CUSTOMERS.

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

Gold Star 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

⁴¹ *RCC Minnesota, Inc., d/b/a Cellular One*, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, WUTC Docket No. UT-023033) Aug. 24, 2002), ¶168.

⁴² *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 (ALF Dec. 31, 2002), ¶37.

⁴³ *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).

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.

V. LEGAL AUTHORITY

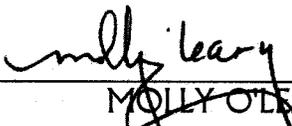
The Commission has the legal authority to grant the relief requested by Applicant pursuant to 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201; *see also, IPUC ETC Requirements Order.*

VI. RELIEF REQUESTED

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

RESPECTFULLY SUBMITTED this 3rd day of June, 2010.

RICHARDSON & O'LEARY, PLLC

By: 
MOLLY O'LEARY

Attorneys for Gold Star Communications, LLC

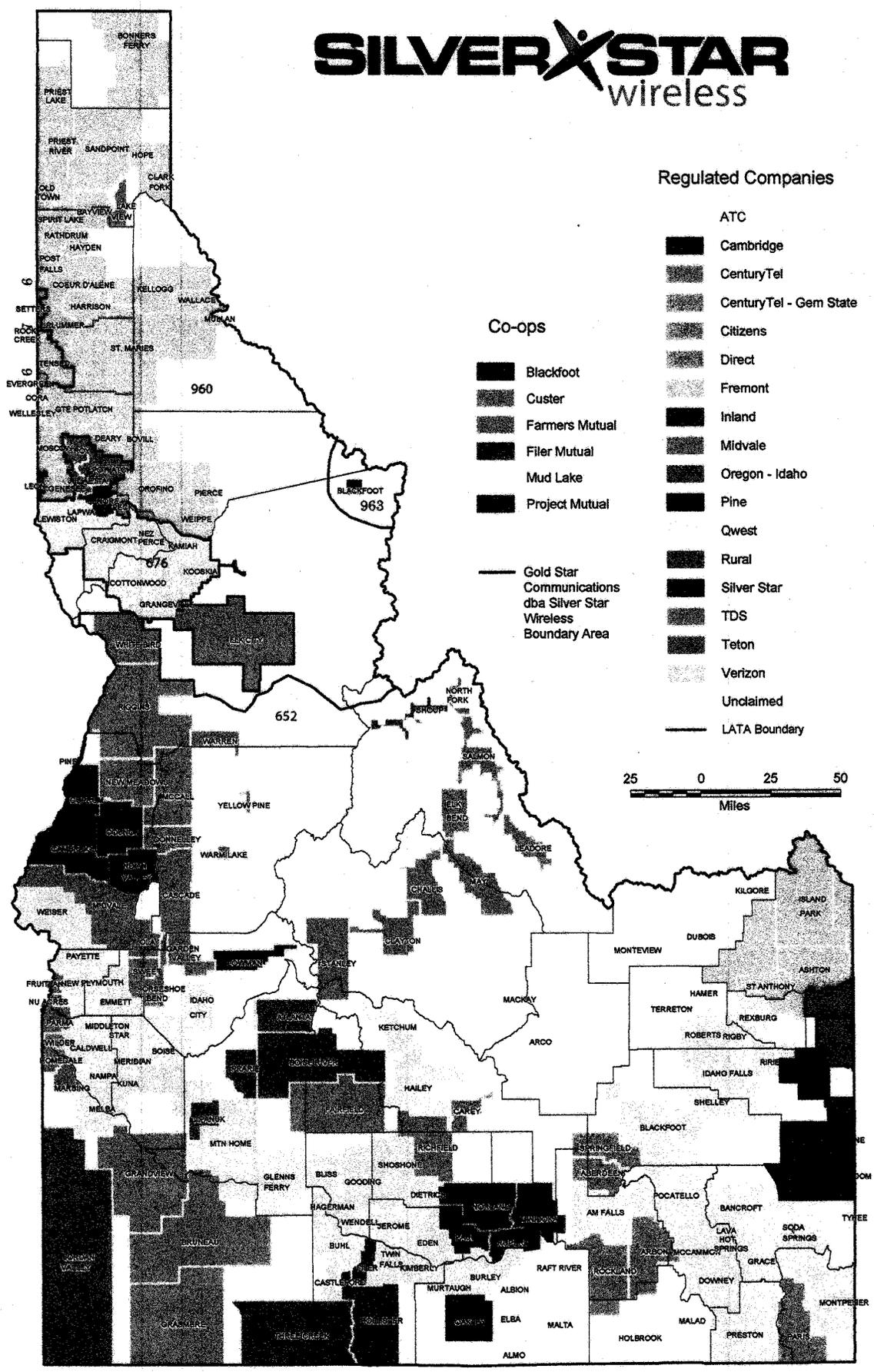
EXHIBIT A

CONFIDENTIAL

**THIS EXHIBIT ALLEGEDLY
CONTAINS TRADE SECRETS
OR CONFIDENTIAL MATERIAL
AND IS SEPARATELY FILED**

EXHIBIT B

SILVER STAR wireless



Regulated Companies

- ATC
- Cambridge
- CenturyTel
- CenturyTel - Gem State
- Citizens
- Direct
- Fremont
- Inland
- Midvale
- Oregon - Idaho
- Pine
- Qwest
- Rural
- Silver Star
- TDS
- Teton
- Verizon
- Unclaimed
- LATA Boundary

Co-ops

- Blackfoot
- Custer
- Farmers Mutual
- Filer Mutual
- Mud Lake
- Project Mutual

Gold Star Communications dba Silver Star Wireless Boundary Area

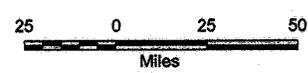


EXHIBIT C-1

Exhibit C(1)

ILEC WIRE CENTERS

SILVER STAR TELEPHONE CO., INC.
FREEDOM
IRWIN
WAYAN

WIRE CENTER CODE
FRDMWYXC
IRWINIDXC
WAYNIDXC

COLUMBINE TELEPHONE CO., INC
DRIGGS

DRGSIDMA

EXHIBIT C-2

CONFIDENTIAL

THIS EXHIBIT ALLEGEDLY
CONTAINS TRADE SECRETS
OR CONFIDENTIAL MATERIAL
AND IS SEPARATELY FILED

EXHIBIT D

CONFIDENTIAL

THIS EXHIBIT ALLEGEDLY
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AND IS SEPARATELY FILED

EXHIBIT E

Best Plus Individual Plans - Includes 8th State of Your Choice

Monthly Price	Mobile to Mobile	Nights & Weekend Minutes	Nationwide Long Distance
\$29.95	Additional	Additional	17¢ / minute
\$49.95	Included	Unlimited	Included
\$59.95	Included	Unlimited	Included
\$74.95	Included	Unlimited	Included
\$104.95	Included	Unlimited	Included
\$124.95	Included	Unlimited	Included

Best Plus Family Plans and 8th State of Your Choice

Monthly Price	Additional Lines
\$59.95	1
\$84.95	2
\$114.95	3
\$134.95	4
\$169.95	5

Additional lines for only \$9.95 each.

PLANS

Monthly Price	Mobile to Mobile	Nights & Weekend Minutes	Nationwide Long Distance
\$19.95	Additional	Additional	17¢ / minute
\$49.95	Included	Included	Included

Additional lines to the 1200-plan for only \$9.95 each.



- Mountain West Coverage
- Fifty States Coverage
- No Coverage

Local Valleys Coverage Area



Lucky 7

- Make and receive unlimited calls to any 7 people on any network or on landline phone in the United States.

Voice Mail

- Add voice mail to any basic plan.

Mobile to Mobile

- Add Mobile to Mobile to any basic plan and connect with other Silver Star PCS customers for free.

Handset Protection

- Phone \$299 and \$35 Deductible
- Two claims per phone

Phone \$399 and \$50 Deductible

- One claim per phone

- Protect your phone from theft, loss, damage, drop or other incidental damage

*Restrictions only available. Other plans apply.

Data Plans

National Coverage - Local Touch

CELLULAR PHONE AND FEATURES

Messaging & Applications

Local 1X National 1X

\$4.95 NA

all access the web, and send picture a month.

Local 1X National 1X

\$9.95 \$24.95

you can check the weather, look up a word, and a couple of ring tones.

Local 1X National EVDO

\$19.95 \$59.95

to the web all day every day. I check my e-mail.

Features**

anytime, wireless air cards are available

Terms & Conditions

Calling Plans

Included anytime minutes and night/weekend minutes are valid for voice calls made from or received in your Basic Plan Area. All other usage is roaming and will be billed at 69¢ per minute. Nights: Monday-Thursday, 7 p.m. to 6:59 a.m. Weekends: Friday 7 p.m. to Monday 6:59 a.m.

Network Requirement

At least 50% of your total minutes used must be on the Local Valleys Coverage Area in each billing cycle or we may terminate your service.

Maps and Coverage

These maps depict the coverage included in Silver Star PCS rate plans. Silver Star PCS does not guarantee the accuracy of these maps, as they are a compilation of roaming partner coverage maps.

Activation

Activation is subject to credit approval, a deposit or major credit card may be required. Activation fees of \$35 per main line and \$10 per shared line may be required unless otherwise noted in a promotion.

Features

Call Waiting, IVoice, Voice Mail, Conference Calling and Call Forwarding will incur applicable airtime, roaming, and long distance charges. All features may not work when using your phone outside of the Local Valleys Coverage Area.

Fees

Minute coverage charges will be billed at 40¢ per minute for Fifty States, 35¢ per minute for Mountain West, and 24¢ per minute for Valleys plans and include long distance. Roaming charges bill at 69¢ per minute outside of the local coverage area.

See full Terms and Conditions for further explanation of service.

Silver Star PCS is a registered trademark of Gold Star LLC.

SILVER STAR PCS

- Messaging & Applications
- Text Messaging
- 500 Messages
- Text Messages
- Unlimited
- Text/Picture Messaging
- 500 Messages
- Text Messages
- Text Messages
- Unlimited
- Applications, Games and Wallpaper
- Available at www.silverstarpcs.com

EXHIBIT F

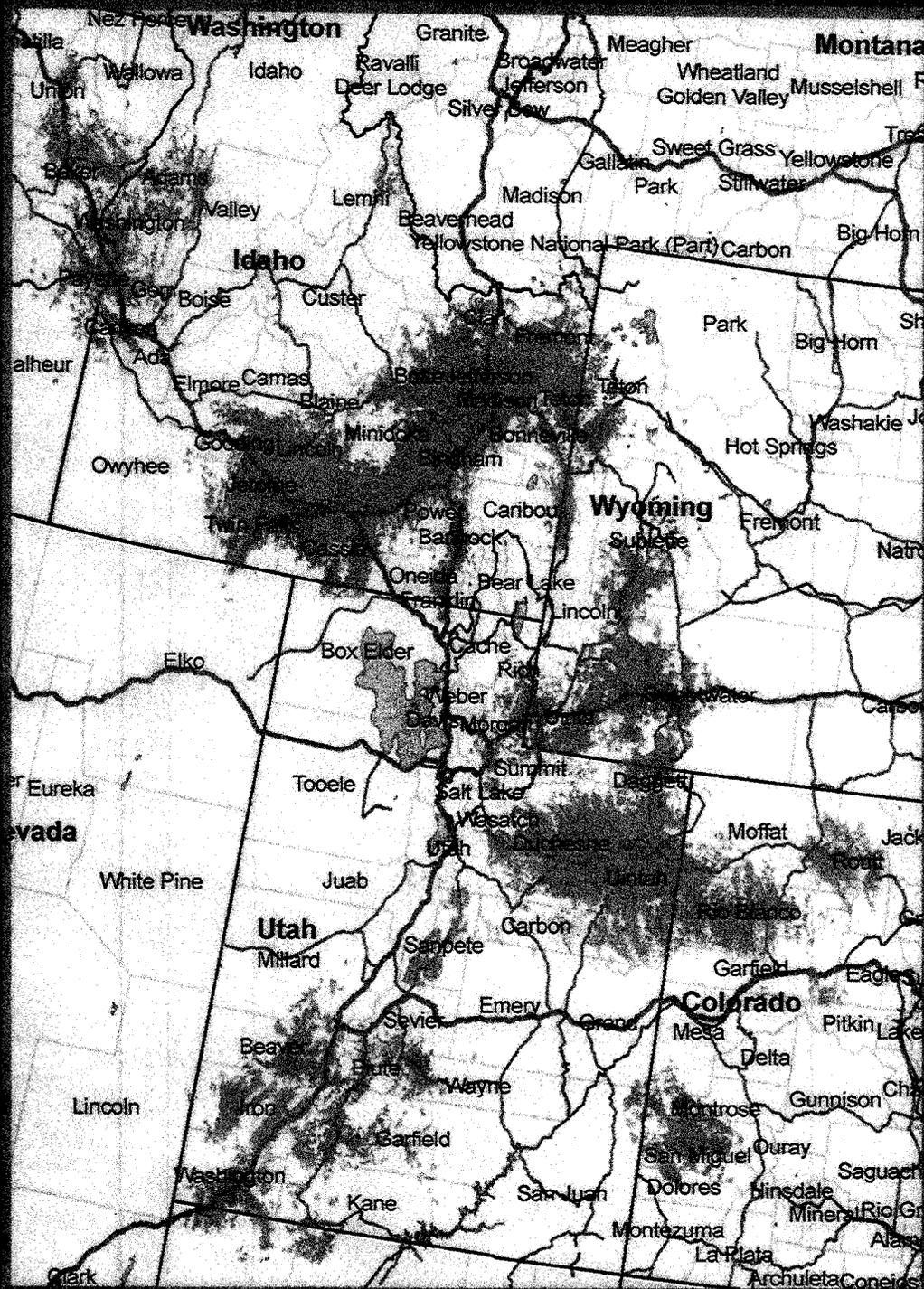
	SILVER STAR	SHARED LINE PRICE	UNION WIRELESS	SHARED LINE PRICE	VERIZON	SHARED LINE PRICE	AT&T	SHARED LINE PRICE	SPRINT
	YES		YES		NO		NO		NO
MS	19.95	N/A	\$12.50 plus \$.25 PER MINUTE	\$10.00 plus \$.25 PER MINUTE	N/A	N/A	n/a	n/a	N/A
MS	49.95	9.95	\$12.50 plus \$.25 PER MINUTE	\$10.00 plus \$.25 PER MINUTE	N/A	N/A	n/a	n/a	N/A
Individual	Yes		YES		NO		NO		NO
	29.95	N/A	\$12.50 plus \$.30 PER MINUTE	N/A	N/A	N/A	n/a	n/a	N/A
	49.95	N/A	\$12.50 plus \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A	N/A
	59.95	N/A	\$12.50 plus \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A	N/A
	74.95	N/A	\$12.50 plus \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A	N/A
	104.95	N/A	\$12.50 plus \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A	N/A
	124.95	N/A	\$12.50 plus \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A	N/A
red	YES		NO		NO		NO		NO
	59.95	SECOND FREE THEN 9.95	\$12.50 PLUS \$.30 PER MINUTE	\$10 PLUS \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A
	84.95	SECOND FREE THEN 9.95	\$12.50 PLUS \$.30 PER MINUTE	\$10 PLUS \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A
	114.95	SECOND FREE THEN 9.95	\$12.50 PLUS \$.30 PER MINUTE	\$10 PLUS \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A
	134.95	SECOND FREE THEN 9.95	\$12.50 PLUS \$.30 PER MINUTE	\$10 PLUS \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A
	189.95	SECOND FREE THEN 9.95	\$12.50 PLUS \$.30 PER MINUTE	\$10 PLUS \$.30 PER MINUTE	N/A	N/A	N/A	N/A	N/A
	YES		YES		YES		YES		YES
	49.95	14.95	39.95 (600 MIN)	15.00	39.95 (450 Min)	9.95	39.95 (450 min)	9.95	39.99 (450 M
	59.95	14.95	54.95 (800 MIN)	10.00	59.95	9.95	59.99	9.95	59.99
	79.95	14.95	69.95 (1200 MIN)	10.00	79.99	9.95	79.99	9.95	
	109.95	14.95	89.95	10.00	99.99 (unlimited)	n/a	99.95 (unlimited)	n/a	

	SILVER STAR WIRELESS	UNION WIRELESS	VERIZON	AT&T	SPRINT
	\$.69 per minute	\$.35 PER MINUTE	N/A	N/A	N/A
	\$.17 per minute	\$.08 PER MINUTE	N/A	N/A	N/A
	\$.50 per mb	n/a	\$.05 mb	\$.05 mb	\$.05 mb
	IN CALLING AREA	IN HOME NETWORK	NATIONAL	NATIONAL	NATIONAL
WKENDS	7 p.m. to 6:59 a.m.	9 p.m. to 6 a.m.	9 p.m. to 6 a.m.	9 p.m. to 6 a.m.	7 p.m. to 6:59
	\$.45 PER MINUTE	\$.30 PER MINUTE	\$.45 PER MINUTE	\$.45 PER MINUTE	\$.45 PER MINUTE
	SILVER STAR WIRELESS	UNION WIRELESS	VERIZON	AT&T	SPRINT
	\$7.00	\$0.00 on plans 54.95 or higher	\$0.00 On plans 59.95 or higher	\$0.00 on plans \$59.99 or higher	ALL MOBILE T
ION	4.95 / 9.95	4.95	4.95	4.95	4.95
	14.95 UNLIMITED	n/a	n/a	4.99	n/a
JS	19.95 UNLIMITED	15.00 unlimited	20.00 unlimited	20.00 unlimited	10.00 unlimite
	59.95 UNLIMITED 3G NATIONAL	\$40.00 unlimited 1x	\$59.95	15.00/59.95	10.00/59.95
	29.95 UNLIMITED NATIONAL	n/a	44.95	30.00	189.98 for unli
					pkg (talk, data

Monthly Rate is \$24.50.

EXHIBIT G

The Valleys Pay as you Go & Mobile to Mobile Network



SILVER STAR
wireless

EXHIBIT H

CTIA

Consumer Code for Wireless Service

To provide consumers with information to help them make informed choices when selecting wireless service, to help ensure that consumers understand their wireless service and rate plans, and to continue to provide wireless service that meets consumers' needs, the CTIA and the wireless carriers that are signatories below have developed the following Consumer Code. The carriers that are signatories to this Code have voluntarily adopted the principles, disclosures, and practices here for wireless service provided to individual consumers.

THE WIRELESS CARRIERS THAT ARE SIGNATORIES TO THIS CODE WILL:

ONE

DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS

For each rate plan offered to new consumers, wireless carriers will make available to consumers in call-center or other disclosures at point of sale and on their web sites, at least the following information, as applicable: (a) the calling area for the plan; (b) the monthly access fee or base charge; (c) the number of airtime minutes included in the plan; (d) any nights and weekend minutes included in the plan or other differing charges for different time periods and the time periods when nights and weekend minutes or other charges apply; (e) the charges for excess or additional minutes; (f) per-minute long distance charges or whether long distance is included in other rates; (g) per-minute roaming or off-network charges; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) whether a fixed-term contract is required and its duration; (k) any activation or initiation fee; and (l) any early termination fee that applies and the trial period during which no early termination fee will apply.

TWO

MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Wireless carriers will make available at point of sale and on their web sites maps depicting approximate service coverage applicable to each of their rate plans currently offered to consumers. To enable consumers to make comparisons among carriers, these maps will be generated using generally accepted methodologies and standards to depict the carrier's outdoor coverage. All such maps will contain an appropriate legend concerning limitations and/or variations in wireless coverage and map

usage, including any geographic limitations on the availability of any services included in the rate plan. Wireless carriers will periodically update such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, carriers will request and incorporate coverage maps from roaming partners that are generated using similar industry-accepted criteria, or, if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

THREE

PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE

When a customer initiates service with a wireless carrier or agrees to a change in service whereby the customer is bound to a contract extension, the carrier will provide or confirm the material terms and conditions of service with the subscriber.

FOUR

ALLOW A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates service with a wireless carrier, the customer will be informed of and given a period of not less than 14 days to try out the service. The carrier will not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including airtime usage, may still apply.

FIVE

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service or devices, wireless carriers will disclose material charges and conditions related to the advertised prices, including if applicable and to the extent the advertising medium reasonably allows: (a) activation or initiation fees; (b) monthly access fees or base charges; (c) any required contract term; (d) early termination fees; (e) the terms and conditions related to receiving a product or service for "free;" (f) the times of any peak and off-peak calling periods; (g) whether different or additional charges apply for calls outside of the carrier's network or outside of designated calling areas; (h) for any rate plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; (i) whether prices or benefits apply only for a limited time or promotional period and, if so, any different fees or charges to be paid for the remainder of the contract term; (j) whether any additional taxes, fees or surcharges apply; and (k) the amount or range of any such fees or surcharges collected and retained by the carrier.

SIX

SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, carriers will distinguish (a) monthly charges for service and features, and other charges collected and retained by the carrier, from (b) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Carriers will not label cost recovery fees or charges as taxes.

SEVEN

**PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE
FOR CHANGES TO CONTRACT TERMS**

Carriers will not modify the material terms of their subscribers' contracts in a manner that is materially adverse to subscribers without providing a reasonable advance notice of a proposed modification and allowing subscribers a time period of not less than 14 days to cancel their contracts with no early termination fee.

EIGHT

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access a carrier's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers' web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier's customer service departments.

NINE

**PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS
RECEIVED FROM GOVERNMENT AGENCIES**

Wireless carriers will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

TEN

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online.

EXHIBIT I

A look at cell phone coverage in Teton Valley

Mike Polansky
TWT Staff

Most people complain that their cell phone provider from work will tell them people haven't used enough cell phone service to warrant their coverage in others available in the area. Even if that isn't any provider, it's dramatically better or worse than the others, we took four phones through out the country and used them to see how they did. We succeeded in this only in the dramatic cases of Grand Targhee and Teton Pass, where, just if the investment these providers have made in coverage and speed is any indication of their performance in more obscure parts of the country, a couple providers stand out among the others.

SPRINT



Sprint was a sort of dark horse

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

VERIZON



...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

the call again from that area.

AT&T



AT&T Wireless

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.



CONCLUSION

If you spend a lot of time driving at Grand Targhee or while driving your car across the country and over the Pass, the best choice is probably Silver Star. But if you're not planning to stay in the area for long, Silver Star is a

Sprint was a sort of dark horse in the nation of service providers. A company with a reputation in the valley for poor service. This report

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

dairy side were all well within range for the Verizon phone. Near the Hoopes farm on Highway 33 it lost service, but carried a steady signal from there to the base of Teton Pass, where it lost service again and did not return until the top.

SILVER STAR



Silver Star was impressive, despite some pre-test griping about the service from coworkers. Silver Star worked equally well on top of Grand Targhee and at the bottom, it easily handled Mike Harris, 500 South and the Broun's dairy side, and near the Hoopes farm, where other phones lost calls, Silver Star had only a brief weak spot that didn't lose the call. Driving south from there on Highway 33, the phone disconnected once just past Driggs, but reconnected almost immediately and didn't miss a beat until we were about 20 feet over the other side of Teton Pass, where it lost the call again. Redialing from the same spot, the phone reconnected with a strong signal, and we couldn't get it to drop

...to the top of Grand Targhee. Unfortunately, where Verizon, Sprint and AT&T were all in the same area, Verizon was the only one that had a signal. Verizon was the only one that had a signal. Verizon was the only one that had a signal.

larger, national companies. Customer service at Silver Star was excellent, and a spokesperson said the company prides itself on reliable service to the region and works hard to upgrade areas where residents report poor coverage. AT&T came in a close second behind Silver Star, with about the same level of out-of-network coverage, but what seemed like a weaker signal in the more areas. If you're young and hip, you may want this carrier because it is currently (though possibly not for long) the only carrier compatible with an iPhone.

Verizon and Sprint both performed intermediately at Targhee and on the Pass, but both seemed much better than critics described them.

Rates for Silver Star start as low as \$29.99/month, and the nearest office is in Driggs.

AT&T rates start as low as \$39.99/month, and the nearest office is in Jackson.

Verizon rates start as low as \$39.99/month, and the nearest office is in Driggs.

Sprint rates start as low as \$40/month, and the nearest office is in Armon.

To contact Mike Polansky e-mail report: mpolansky@tetonvalleynews.com

Kubota

* 0% FOR 42 MONTHS

with 15% down

APR 2012

L440HST Loader

- 43hp
- 4wd
- PowerShift OverShift Transmission
- Cruise Control

\$22,900

BC24 Tractor/Loader/Backhoe

- 23hp
- 4wd
- Hydrostatic Drive Trans

\$15,500

Limited Offer: Bring this ad in & get a new Kubota with 0% financing!

MSRP. Excludes tax, title, license, dealer fees, and optional equipment. *0% financing available on select models. See dealer for details. ©2012 Kubota Tractor Corp.

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IT'S HERE!

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www.tetonvalleynews.com

EXHIBIT J

