

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300

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IDAHO PUBLIC
UTILITIES COMMISSION



INC-T-06-01

January 18, 2006

Via Federal Express overnight delivery

Ms. Jean Jewel, Executive Secretary
Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720
Boise, ID 83720-0074
(208) 375-7382

Dear Ms. Washburn:

Enclosed please find one original and seven (7) copies of the Petition of Inland Cellular for Designation as Eligible Telecommunications Carrier ("Petition"). Inland Cellular Telephone Company ("ICTC") is the sole general partner of Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular). ICTC is submitting the Petition on behalf of the partnership.

If there are any questions concerning the foregoing, please contact me at (509) 649-2500. Thank you for your consideration of this Petition.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. Brooks".

James K. Brooks
Controller

Enclosures

cc: Joe Cusik (IPUC Staff)

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 IDAHO PUBLIC
 UTILITIES COMMISSION

**Before the
 Idaho Public Utilities Commission**

In the Matter of the Petition of)	
)	Case No. <u>INC-T-06-01</u>
Inland Cellular)	
)	PETITION OF INLAND CELLULAR
For Designation as Eligible)	FOR DESIGNATION AS ELIGIBLE
Telecommunications Carriers)	TELECOMMUNICATIONS CARRIERS
Under 47 U.S.C. § 214(e)(2))	

Inland Cellular Telephone Company ("ICTC"), on behalf of Washington RSA No. 8 Limited Partnership d/b/a Inland Cellular (hereinafter referred to as "Inland Cellular" or the "Partnership"), submits this Petition to the Idaho Public Utilities Commission ("IPUC") for Designation of Inland Cellular as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Telecommunications Act of 1934, as amended ("Act"), 47 U.S.C. § 214(e)(2), and Section 54.201 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 54.201. To benefit the State, further competition, and to provide lifeline service, ICTC requests that Inland Cellular 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 support of this Petition, the following is respectfully shown:

I. Name and Address of Petitioner

1. The name and address of Petitioner is Inland Cellular Telephone Company, 103 South 2nd Street, P.O. Box 688, Roslyn, Washington 98941. James K. Brooks shall be the designated representative with the same mailing address as Petitioner. Official documents to be sent electronically, are to be sent to jbrooks@inlandnet.com.

II. Applicable Statutes and Rules

2. The statutes and rules implicated by the instant Petition are as follows: 47 U.S.C. §§ 153(27), 153(44), 214(e), 253(b) and 254(d); 47 C.F.R. §§ 51.5, 54.5, 54.101, 54.201, 54.207, 54.307, 54.313, and 54.314.

III. Authorization and Service Area

3. Inland Cellular is a telecommunications carrier as defined in 47 U.S.C. § 153(44) and 47 C.F.R. § 51.5, and for the purposes of Part 54 of the FCC's rules.¹ Inland Cellular is therefore considered a common carrier under the Act.

4. Inland Cellular is authorized by the FCC as the "B Band" cellular carrier in the northern section (within Idaho County) of Idaho 2 (B-2) Rural Service Area ("RSA"). Inland Cellular is licensed by the FCC as the "B Band" cellular carrier and has the authority to serve the southern section (Clearwater, Latah, Lewis, and Nez Perce Counties) of Idaho 1 (B-2) RSA² through a Rural Service Area Service Agreement and Option, dated as of January 12, 1994, held by Inland Telephone Company. A map of Inland Cellular's proposed service area with current service contours is attached hereto as Exhibit A. Inland Cellular is a commercial mobile radio service ("CMRS") provider pursuant to the definition of "mobile service" provided in 47 U.S.C. § 153(27). Inland Cellular provides interstate telecommunications services as defined in 47 U.S.C. § 254(d) and 47 C.F.R. § 54.5.

5. A telecommunications carrier may be designated as an ETC and receive universal service support throughout its designated service area if it agrees to: (i) offer services that are

¹ 47 U.S.C. § 54.1 *et seq.*

² The operating entity for both South Idaho 1 RSA and North Idaho 2 RSA is Washington RSA No. 8 Limited Partnership d/b/a Inland Cellular. ICTC is the sole managing and general partner.

supported by federal universal service support mechanisms, and (ii) advertise the availability of such services.³ In its *First Report and Order* implementing Sections 214(e) and 254, the FCC set forth the services a carrier must provide to be designated as an ETC in order to receive federal universal service support.⁴

6. Section 214(e)(2) of the Act provides that ETC designations shall be made for a "service area" designated by the state commission. In areas served by a non-rural company, the state commission may establish an ETC service area for a competitor without federal concurrence.⁵ Accordingly, Inland Cellular requests designation for its service area in the non-rural wire centers listed in Exhibit B, attached hereto. Where Inland Cellular serves only a portion of a wire center listed, it requests that it be designated as an ETC in that portion of the wire center where it is authorized to serve.⁶

7. In areas served by a rural telephone company, "service area" means the local exchange carrier ("LEC") study area unless and until the FCC and the states, taking into account recommendations of the Federal-State Joint Board on Universal Service, establish a different definition of service area for such company.⁷

³ See 47 U.S.C. § 214(e)(1).

⁴ *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, 8809-25 (1997) ("First Report and Order")

⁵ See 47 U.S.C. § 214(e)(5).

⁶ Those wire centers that Inland Cellular partially serves are indicated on Exhibit B with the word "partial."

⁷ See 47 C.F.R. § 54.207(b).

Inland Cellular serves the entire study areas of the rural LECs listed in Exhibit C and therefore, disaggregation is not an issue. Accordingly, with respect to the rural LECs wire centers⁸ within the Partnership's service territories, the IPUC may designate the Partnership as an ETC without the need to redefine the LEC service areas.

10. There are rural LEC wire centers that the Partnership does not cover entirely, generally because the Partnership is not licensed by the FCC strictly along LEC boundaries.⁹ In order to accommodate CMRS carriers who have authorized service areas that do not match LEC wire centers, the FCC permits the state to designate the competitive ETC's service area along boundaries that are not identical with LEC wire center boundaries. To do otherwise would effectively exclude wireless carriers as a class from receiving universal service support and, as discussed in Section VI, *infra*, would be contrary to the pro-competition policies articulated by the FCC. Accordingly, pursuant to 47 C.F.R. § 54.207, for the LEC wire centers that are only partially covered by the Partnership's authorized service areas, the Partnership requests that the IPUC designate the portion of the wire centers where the Partnership is authorized to provide service.

IV. The Partnership Offers the Supported Services to Qualify for Federal USF Support

11. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that carriers designated as ETCs shall, throughout their service area, (1) offer the services that are supported by federal universal service support mechanisms either using their own facilities or a combination of their own facilities and resale of another carrier's services, and (2) advertise the availability of such services and the charges therefore using media of general distribution. 47

⁸ With the exception of certain non-rural areas, wire centers are generally synonymous with exchanges.

⁹ These wire centers are identified in Exhibit D by the word "partial."

U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d). The services which are supported by the federal USF 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; and
- 9) toll limitation for qualifying low-income consumers.

47 C.F.R. § 54.101(a).

12. The Partnership is a full-service wireless carrier, which offers all of these services, as described in detail below, throughout its service areas. The Partnership therefore satisfies the requirements of Section 214(e)(1) of the Act.

13. Voice Grade Access. The Partnership provides voice grade access to the public switched network through interconnection arrangements with local telephone companies. The Partnership offers its subscribers this service at bandwidth between 300 and 3,000 hertz as required by 47 C.F.R. 54.101(a)(1), thereby providing voice grade access.

14. Local Usage. The Partnership has a variety of rate plans that provide local usage consistent with 47 C.F.R. § 54.101(a)(2). To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue.¹⁰ As it relates to local usage, the *October 1998 NPRM* sought comment on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comment on how much, if any, local usage should be required to be

¹⁰ See *Guam Cellular and Paging, Inc.*, CC Docket No. 96-45, DA 02-174 at para. 11 (C.C.B. rel. Jan. 25, 2002) (“*Guamcell*”); *Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) (“*October 1998 NPRM*”).

provided to customers as part of a universal service offering.¹¹ 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.¹² Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs, and the Partnership will comply with any and all minimum local usage requirements adopted by the FCC or the IPUC.

15. DTMF Signaling. The Partnership provides dual tone multi-frequency ("DTMF") signaling to facilitate the transportation of signaling throughout its network. The Partnership currently uses out-of-band digital signaling and in-band multi-frequency ("MF") signaling that is functionally equivalent to DTMF signaling.

16. Single Party Service. "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.¹³ The Partnership provides single party service, as that term is defined in Section 54.101 of the FCC's rules. *See* 47 C.F.R. § 54.101.

17. Access to Emergency Services. The Partnership currently provides 911 access to emergency services throughout its service area.

18. Access to Operator Services. The Partnership provides customer access to operator services. Customers can reach operator services in the traditional manner by dialing "0".

19. Access to Interexchange Services. ICTC has signed interconnection agreements with interexchange carriers on behalf of the Partnership. These arrangements enable the Partnership to provide their customers access to interexchange services.

¹¹ *See October 1998 NPRM*, 13 FCC Rcd at 21277-21281.

¹² *See First Report and Order*, 12 FCC Rcd at 8813.

¹³ *See id.* At 8810.

20. Access to Directory Assistance. Subscribers to the Partnership's services are able to dial "555-1212" with the appropriate area code to reach directory assistance or "411" from their mobile phones.

21. Toll Limitation. The Partnership has toll blocking capabilities which will enable the Partnership to provide toll blocking service for Lifeline customers once the Partnership is designated an ETC.

22. Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. § 54.201, the Partnership will 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 television, radio, newspaper, magazine, direct mailings, public exhibits and displays, bill inserts, and telephone directory advertising. ETC designation will also enable Inland Cellular the ability to offer and advertise the availability of Lifeline and Link-Up Assistance Programs.

V. FCC ETC Designation

23. In addition to Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules, the FCC adopted additional requirements for a telecommunications carrier to be designated as an eligible telecommunications carrier (ETC) by the FCC.¹⁴ The FCC's *ETC Order* effectively states that an ETC Applicant must now: (1) provide a five-year plan demonstrating how high-cost universal service support will be used to improve coverage, service quality or capacity throughout the service area for which it seeks designation; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate that it will satisfy consumer protection and service quality standards; (4) offer local usage plans comparable to those offered by the

¹⁴ See *In re Federal-State Joint Board On Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-06 (March 17, 2005)(*ETC Order*).

incumbent local exchange carrier (LEC) in the areas for which it seeks designation; and (5) acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations. Inland Cellular believes that it could comply with these additional requirements should the IPUC choose to adopt them for State certification, however, prior to adoption, we would ask the IPUC to consider the following: (1) is a five year plan required of all providers that receive Universal Service Support; (2) for extension of facilities to accommodate a subscriber or subscribers, doesn't the wireline provider charge the subscriber(s) for all or a portion of the extension; (3) does the IPUC order all wireline carriers to serve all subscribers within their designated service areas (e.g. Qwest-Soldiers Meadows) without compensation; (4) would the IPUC require Inland Cellular to confine its customers to the wireline service area, since today an Inland Cellular subscriber in Grangeville, ID, can talk to another Inland Cellular subscriber in Lewiston, ID, (or any other Inland Cellular subscriber within our entire coverage area, cell-to-cell) for 5,000 minutes a month on our U.S.A. calling plans without additional charges; how is "comparable" local usage defined; (5) if a "local usage plan comparable to those offered by the incumbent local exchange carrier (LEC) in the areas for which it seeks designation" means unlimited local calling within the exchange (cell-to-wireline), will facilities be available from the LEC's at reasonable rates?

VI. Statement of Need

24. Many residents of Idaho live in rural areas where it is cost-prohibitive for a competitive wireline telecommunications company to offer service. As a result, consumers generally have only one service provider from which to choose. The Partnership seeks to offer citizens of Idaho in its service area an alternative to traditional wireline service. In order for the Partnership's network to expand into underserved areas, federal high-cost funding must be

provided so that needed infrastructure can be fully deployed and competitive service can be delivered.

25. By granting ETC status to the Partnership, this Commission will expedite the provision of competitive telephone service to the people living in remote areas and provide a meaningful choice for many subscribers who have access to only one service provider.

VII. Grant of ICTC's Application Would Serve the Public Interest

26. In areas served by non-rural LECs, the Commission can designate Inland Cellular as an ETC upon finding that the company meets the nine-point checklist and that it agrees to advertise the supported services.¹⁵ In areas served by a rural telephone company, the Commission must also determine whether granting ETC status to a competitor would serve the public interest.¹⁶ In numerous cases decided by the FCC and state commissions, the answer has been in the affirmative.¹⁷

27. Designation of the Partnership as an ETC will promote competition and facilitate the provision of advanced communications services to the residents of rural Idaho. Residents in many rural areas have long trailed urban areas in receiving competitive local exchange service and advanced telecommunications services. In many rural areas, no meaningful choice of local exchange carrier exists.

¹⁵ See *Cellular South Licenses, Inc.*, Docket No. 01-UA-0451 (Dec. 18, 2001) (Mississippi).

¹⁶ See 47 U.S.C. § 214(e)(2).

¹⁷ See, e.g., *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 48, 55 (2000) ("*Western Wireless*"), *aff'd*, 24 CR 1216 (Oct. 19, 2001) ("*Western Wireless Recon. Order*"); *Smith Bagley, Inc., Final Order*, Utility Case No. 3026 (Feb. 19, 2002) (New Mexico).

28. To date, a number of wireless carriers have been designated as ETCs in multiple states.¹⁸ Recognizing the advantages wireless carriers can bring to the universal service program, the FCC has found that "imposing additional burdens on wireless entrants would be particularly harmful to competition in rural areas, where wireless carriers could potentially offer service at much lower costs than traditional wireline service."¹⁹ One of the principal goals of the Telecommunications Act of 1996 was to "promote competition and reduce regulation in order to secure lower prices and high-quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies."²⁰ Competition in rural areas increases facilities and spurs development of advanced communications as carriers vie for a consumer's business.

29. The FCC recognized that rural customers will benefit from the increased availability of wireless service in its initial decision designating Western Wireless as an ETC in the State of Wyoming, observing: "Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."²¹ Similarly, in designating the cellular carrier Smith Bagley, Inc. as an ETC in Arizona, the state commission found competitive entry to provide additional consumer choice and a potential solution to "health and safety risks associated with geographic

¹⁸ See, e.g., *Yelm Telephone Company et al., Order Designation Eligible Telecommunications Carriers*, Docket Nos. UT-970333 et al. (Dec. 23, 1997) (Washington); *Guamcell, supra*; *Cellular South Licenses, Inc., supra*; *N.E. Colorado Cellular, Inc.*, Docket No. 00A-315T (Dec. 21, 2001) (Colorado); *Minnesota Cellular Corporation's Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. P5695/M-98-1285 (Oct. 27, 1999) (Minnesota).

¹⁹ *First Report and Order*, 12 FCC Rcd at 8881-82.

²⁰ Telecommunications Act of 1996, Public Law, 104-104, 100 Stat. 56 (1996).

²¹ *Western Wireless Corporation; supra*, 16 FCC Rcd at 55.

isolation.”²² By designating a wireless carrier as an ETC, the IPUC will foster competition and provide a meaningful choice of services and service providers to the residents of Idaho.

30. 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. In considering the impact that Western Wireless' ETC designation in Wyoming would have on rural telephone companies, the FCC said:

We do not believe that it is self-evident that rural telephone companies cannot survive competition from wireless providers. Specifically, we find no merit to the contention that designation of an additional ETC in areas served by rural telephone companies will necessarily create incentives to reduce investment in infrastructure, raise rates, or reduce service quality to consumers in rural areas. To the contrary, we believe that competition may provide incentives to the incumbent to implement new operating efficiencies, lower prices, and offer better service to its customers.²³

Further, Congress has mandated that universal service provisions be “competitively neutral” and “necessary to preserve and advance universal service.” *See* 47 U.S.C. § 253(b). The Partnership will provide consumers with wider local calling areas, mobile communications, a variety of service offerings, high-quality service, and competitive rates. By offering customers new choices, the incumbent LECs will have an incentive to introduce new, innovative, or advanced service offerings.

31. In most rural areas, wireless telephone service is today a convenience, but it will not emerge as a potential alternative to wireline service unless high-cost support is made available to drive infrastructure investment. Indeed, without the high-cost program it is doubtful

²² *Smith Bagley, Inc., Order*, Decision No. 63269, Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000) (Arizona).

²³ *Western Wireless, supra*, 16 FCC Rcd at 57.

that many rural areas would have wireline telephone service even today. Provision of high-cost support to Inland Cellular will begin to level the playing field with the incumbent LECs and make available for the first time a potential competitor for primary telephone service in remote areas of Idaho in the Idaho 1 (B-2) RSA and the Idaho 2 (B-2) RSA.

32. The consumer benefits of designating a competitive ETC are already becoming evident. In South Dakota, shortly after WWC License, LLC entered the market as a competitive carrier, the incumbent LEC lowered its prices and upgraded its switch. Competitive carriers in Arizona and Mississippi have earmarked high-cost support funds for additional channel capacity, new cell sites, and expedited upgrading of facilities from analog to digital.

33. With high-cost support, Inland Cellular will have an opportunity to create a network that is capable of convincing customers to rely on wireless service as their primary phone.

VIII. High-Cost Certification

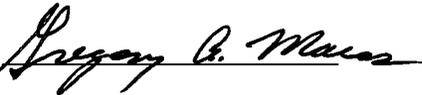
34. Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify with the FCC and the Universal Service Administrative Corporation ("USAC") their compliance with Section 254(e) of the Federal Telecommunications Act of 1996. 47 C.F.R. §§ 54.313, 54.314. ICTC attaches its high-cost certification letter as Exhibit E hereto. ICTC respectfully requests that the IPUC issue a finding that the Partnership has met the high-cost certification requirement and that the Partnership is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.²⁴

²⁴ See, e.g. *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, CC Docket 96-45 (filed Feb. 6, 2002).

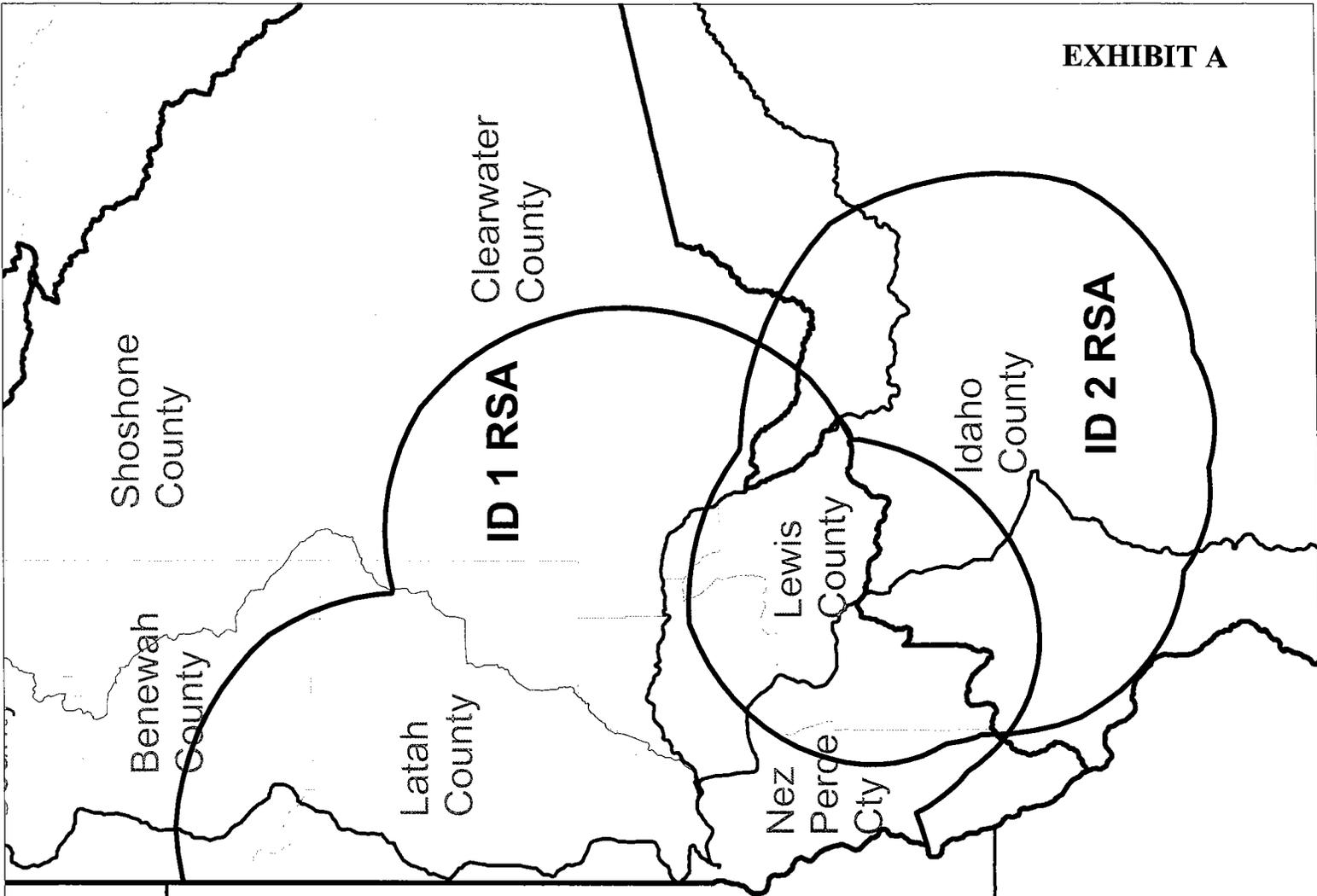
WHEREFORE, pursuant to Section 214(e)(2) of the Act, ICTC respectfully requests that the Commission, (1) enter an Order designating the Partnership as an ETC for its requested ETC service area as shown on Exhibit A hereto, and (2) certify to the FCC that the Partnership will use the support for its intended purpose.

Respectfully submitted,

**Inland Cellular Telephone Company
As General Partner for
Washington RSA No. 8 Limited Partnership**

By: 

Gregory A. Maras
Secretary



ETC AREA APPLICATION

Washington RSA No. 8 Limited Partnership
 (ID RSA 2 / CMA389-B2 / Call Sign KNKR277)

—— **North ID2 RSA Service Area**
 2,677 Sq. Miles

Washington RSA No. 8 Limited Partnership
 (ID RSA 1 / CMA388-B2 / Call Sign KNKQ400)

—— **South ID1 RSA Service Area**
 3,888 Sq. Miles

0 15 30
 miles

IA 5

Exhibit B

NON-RURAL LEC WIRE CENTERS

LEC: Verizon Northwest, Inc. – ID – SAC 472416

Wire Center : Bovil
Deary
Genesee
Moscow
Orofino
Peck
Pierce
Potlatch (GTE)
Weippe

LEC: Qwest Corp. – ID

Wire Centers: Cottonwood
Craigmont
Grangeville
Kamiah
Kooskia
Lapwai
Lewiston
Nez Perce

Exhibit C

RURAL LEC WIRE CENTERS

LEC: Inland Telephone Company – SAC 472423

Wire Centers: Leon
 Lenore

LEC: Potlatch Telephone Company, Inc. – SAC 472230

Wire Centers: Juliaetta
 Kendrick
 Troy

Exhibit D

RURAL LEC WIRE CENTERS

LEC: Citizens Telephone Co. of ID DBA Frontier Communications of Idaho – SAC 474427

Wire Centers: Elk City (partial)
White Bird (partial)

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300



January 18, 2006

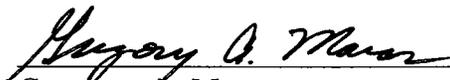
Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720
Boise, ID 83720-0074

Re: High-Cost Certification of Inland Cellular

To the Commission:

Inland Cellular Telephone Company ("ICTC") has submitted a Petition for Eligible Telecommunications Carrier ("ETC") designation in the State of Idaho for Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular)("Inland Cellular" hereafter). As required by Sections 54.313(b) and 54.314(b) of the Federal Communications Commission's rules, 47 C.F.R. §§ 54.314(a), (c) and (d), ICTC hereby submits the certification below in order to begin receiving high-cost support in Inland Cellular's designated ETC areas.

Accordingly, as Secretary of ICTC, I hereby certify on behalf of Inland Cellular and under penalty of perjury that all high-cost support provided to Inland Cellular will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996, 47 U.S.C. § 254(e). I also certify that I am authorized to make this certification on Inland Cellular's behalf.

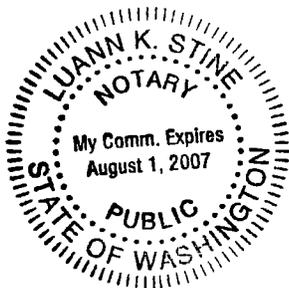


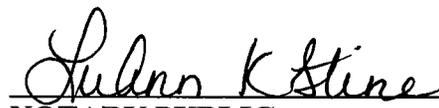
Gregory A. Maras

1-18-06

Date

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this 18th day of January, 2006.





NOTARY PUBLIC

My Commission Expires: 08/01/07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

CERTIFICATE OF SERVICE

I, James K. Brooks, hereby certify that I have, on this 18th day of January, 2006, served the foregoing PETITION FOR INLAND CELLULAR FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER upon all parties believed to be of interest in this proceeding. A copy of the foregoing PETITION FOR INLAND CELLULAR FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER filed today was placed in the United States mail, first-class postage pre-paid, to the following:

Citizens Telecommunications Company of ID
DBA Frontier Communications of ID
Ingo Henningson, Manager, Regulatory
4 triad Center, Suite 200
Salt Lake City, Utah 84180

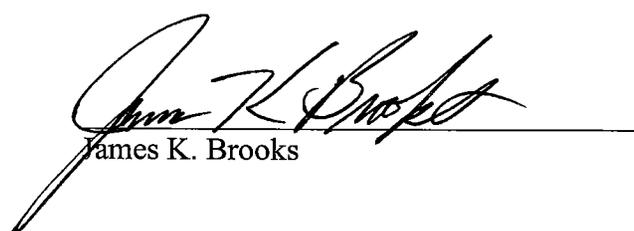
Qwest Corporation
Theresa Jensen, Director-Regulatory
1600 - 71st Avenue
Room 1806
Seattle, Washington 98191

Inland Telephone Company
John P. Coonan, Treasurer
Post Office Box 171
Roslyn, Washington 98941

Verizon Northwest, Inc.
David Valdez, Vice President
1800 41st Street
Post Office Box 1003
Everett, Washington 98206

Potlatch Telephone Company, Inc.
TDS Telecom
Gail Long, Regulatory Contact
Post Office Box 1566
Oregon City, Oregon 97045

Conley Ward, Esq, ITA Legal Counsel
Givens Pursley LLP
P.O. Box 2720
Boise, Idaho 83701


James K. Brooks