

**INLAND CELLULAR TELEPHONE COMPANY**  
Corporate Offices

103 S. 2nd St.  
P.O. Box 688  
Roslyn, WA 98941  
Telephone: (509) 649-2500  
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June 26, 2006

*INC t-06-02*

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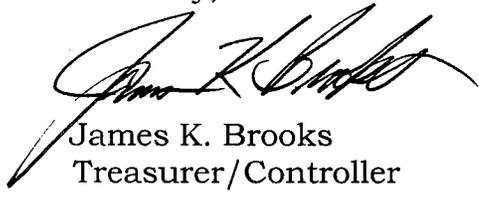
Ms. Jean Jewel, Executive Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
P.O. Box 83720  
Boise, ID 83720-0074  
(208) 375-7382

Dear Ms. Jewel:

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,

  
James K. Brooks  
Treasurer/Controller

Enclosures

cc: Joe Cusik (IPUC Staff)

**Before the  
Idaho Public Utilities Commission**

In the Matter of the Petition of	)	Case No. <u>INCT-06-02</u>
	)	
Inland Cellular	)	
	)	
For Designation as Eligible	)	
Telecommunications Carriers	)	PETITION OF INLAND CELLULAR
Under 47 U.S.C. § 214(e)(2)	)	FOR DESIGNATION AS ELIGIBLE
	)	TELECOMMUNICATIONS CARRIERS

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 residents and promote business growth within Inland Cellular's Idaho service area, 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 2<sup>nd</sup> 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](mailto: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.<sup>1</sup> 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) RSA<sup>2</sup> 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 ETC 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

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<sup>1</sup> 47 U.S.C. § 54.1 *et seq.*

<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup>

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.<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup>

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<sup>3</sup> See 47 U.S.C. § 214(e)(1).

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

<sup>5</sup> See 47 U.S.C. § 214(e)(5).

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

<sup>7</sup> See 47 C.F.R. § 54.207(b).

Inland Cellular's service area encompasses 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 centers<sup>8</sup> 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.<sup>9</sup> 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. Inland Cellular 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

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

<sup>9</sup> 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.<sup>10</sup> 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

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<sup>10</sup> 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.<sup>11</sup> 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.<sup>12</sup> 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.<sup>13</sup> 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.

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<sup>11</sup> *See October 1998 NPRM*, 13 FCC Rcd at 21277-21281.

<sup>12</sup> *See First Report and Order*, 12 FCC Rcd at 8813.

<sup>13</sup> *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 ETC by the FCC.<sup>14</sup> 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 incumbent local exchange carrier (LEC) in the

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<sup>14</sup> 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*).

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.

## **VI. IPUC ETC Designation**

24. On August 4<sup>th</sup> of 2005, the IPUC, through Order No. 29841<sup>15</sup>, adopted additional requirements to Section 214(e)(1) of the Act for a telecommunications carrier to be designated as an ETC by the IPUC. These requirements are: (1) The Commitment and Ability to Provide Supported Services (including a two-year network improvement plan); (2) The Ability to Remain Functional in Emergencies; (3) A Commitment to Consumer Protection and Service; and. (4) Description of the Local Usage Plans. Inland Cellular believes that it currently meets these additional requirements.

25. The Commitment and Ability to Provide Supported Services (including a two-year network improvement plan): The Partnership was formed in 1989 and turned up its first analog cell site in 1991. Over the years, Inland Cellular has steadily grown and expanded its coverage in order to provide increasingly better service. Changing to digital coverage and now expanding into data and eventually offering broadband services. Today, Inland Cellular has sixty-eight (68) sites; twenty-two (22) of which are in Idaho. Our customers, their respective communities and community emergency management personnel generate much of our continued expansion. Being a relatively small cellular carrier, Inland Cellular has learned that in order to gain customer loyalty and respect, it must listen to those that it will serve.

26. As was stated in section IV above, Inland Cellular currently meets the basic requirements of supported services. Its two-year plan, 2006 and 2007, involves an estimated investment of \$2,100,000 in Idaho; budgeted sites or site improvements at Genesee, Kamiah,

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<sup>15</sup> *In the Matter of the Application of WWC Holding Co., Inc. DBA Cellular-One Seeking Designation as an Eligible Telecommunications Carrier that may receive Federal Universal Service Support*, Case No. WST-T-05-1, Order No. 29841 (August 4, 2005).

Nuxall (near Kooskie), Troy, Track (outside of Moscow), Highway 95 North and Highway 95 Summit. These sites will increase the availability of service for rural Idaho and although not specifically addressed by the FCC or the IPUC, the majority of the Idaho sites should be data capable (1XRTT platform) and then upgraded to broadband data capable (EVDO) in the near future. Inland Cellular has budgeted for 19 sites to be upgraded to EVDO (approximately \$1,500,000) in 2006-2007, but have not committed to which sites. This is in addition to the aforementioned \$2,100,000 in Idaho sites. In addition, traffic loads are constantly reviewed and additional carrier investment is added when the need is determined.

27. The Ability to Remain Functional in Emergencies: Inland Cellular has battery back-up and a standby generator at the central office, as well as at all cell sites. The generators are checked regularly and are alarmed for failure. Inland Cellular maintains redundant routes to connect to the outside world should one route be cut-off. Inland Cellular has technicians on call should trouble develop at any time.

28. A Commitment to Consumer Protection and Service: Customer service is very important to Inland Cellular. It is the one portion of our business that we believe distinguishes us from our competition in a highly competitive business. Although it can be time consuming, we like for our customers to have a face for them to talk to should questions arise. Pursuant to FCC regulations, Inland Cellular must certify that it complies with the Consumer Proprietary Network Information rules, set forth in 47 CFR §64.2001 through 64.2009, to protect consumer information.

29. Description of the Local Usage Plans: Inland Cellular offers many calling plans for consumers to choose from that should fit their calling needs. The post-pay plans range from \$29.95 for unlimited minutes of in-network calling (within the Inland Cellular calling area network cell-to-cell) per month and 200 other minutes to \$789.95 for 5,000 minutes of in-

network calling per month, 5,000 minutes of incoming calls per month and 8,000 minutes of calling per month within the 50 United States for no additional charges (i.e. no toll or roaming when on another carriers network). Exhibit E lists the various calling plans offered by Inland Cellular and are posted on its website ([www.inlandcellular.com](http://www.inlandcellular.com)) as well as the coverage areas and other service offerings.

## **VI. Statement of Need**

29. 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.

30. 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**

31. 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.<sup>16</sup> In areas served by a rural telephone company, the Commission must also determine whether granting ETC status to a competitor would serve the

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<sup>16</sup> See *Cellular South Licenses, Inc.*, Docket No. 01-UA-0451 (Dec. 18, 2001) (Mississippi).

public interest.<sup>17</sup> In numerous cases decided by the FCC and state commissions, the answer has been in the affirmative.<sup>18</sup>

32. 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.

33. To date, a number of wireless carriers have been designated as ETCs in multiple states.<sup>19</sup> 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."<sup>20</sup> 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."<sup>21</sup> Competition in

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<sup>17</sup> See 47 U.S.C. § 214(e)(2).

<sup>18</sup> 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).

<sup>19</sup> 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).

<sup>20</sup> *First Report and Order*, 12 FCC Rcd at 8881-82.

<sup>21</sup> Telecommunications Act of 1996, Public Law, 104-104, 100 Stat. 56 (1996).

rural areas increases facilities and spurs development of advanced communications as carriers vie for a consumer's business.

34. 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."<sup>22</sup> 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 isolation."<sup>23</sup> 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.

35. 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

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<sup>22</sup> *Western Wireless Corporation; supra*, 16 FCC Rcd at 55.

<sup>23</sup> *Smith Bagley, Inc., Order*, Decision No. 63269, Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000) (Arizona).

efficiencies, lower prices, and offer better service to its customers.<sup>24</sup>

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.

36. 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 that many rural areas would have wireline telephone service even today; in fact there are areas within Inland Cellular’s service area where wireline service is not available 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.

37. 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.

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<sup>24</sup> *Western Wireless, supra*, 16 FCC Rcd at 57.

38. 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**

39. 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.<sup>25</sup>

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.

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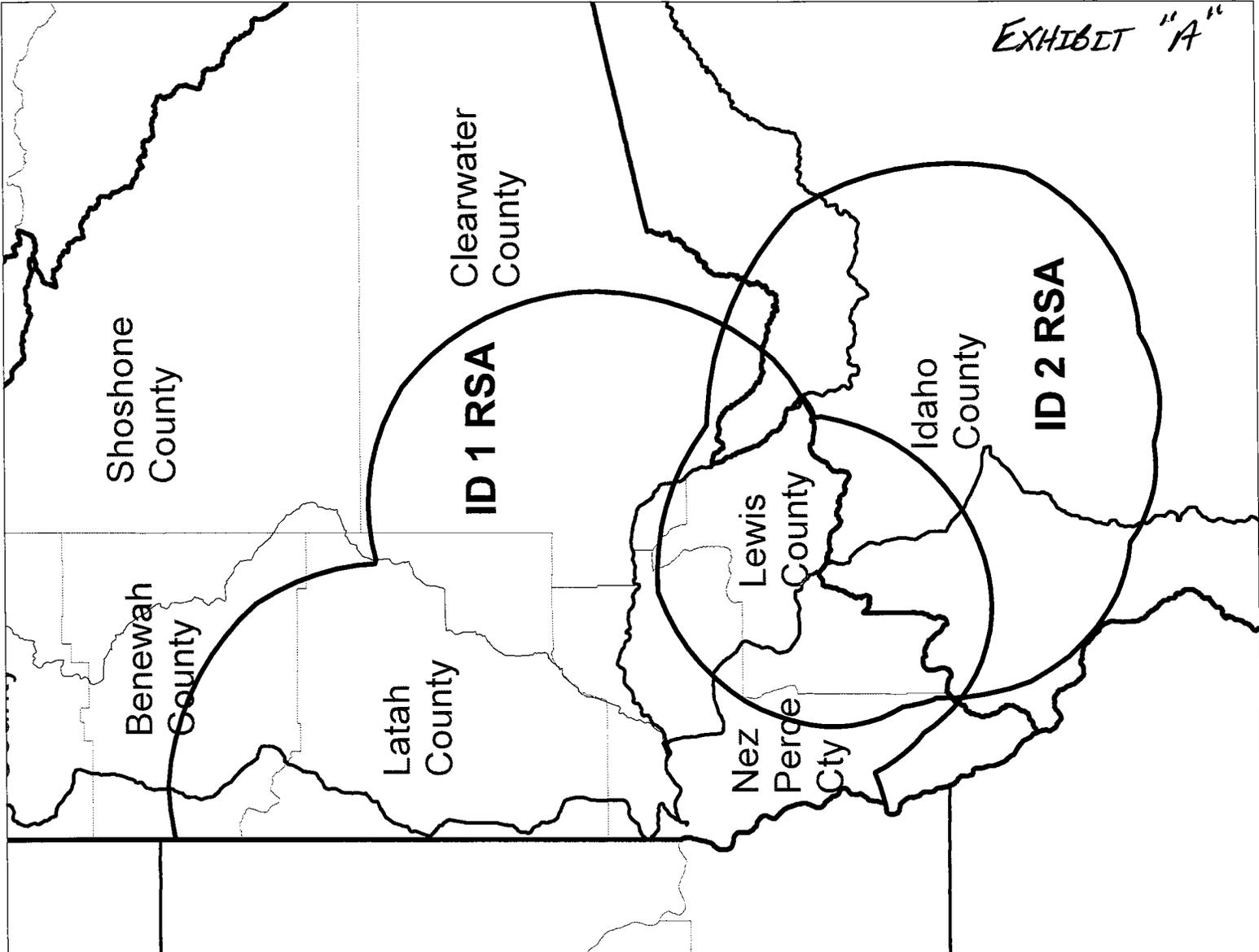
<sup>25</sup> See, e.g. *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, CC Docket 96-45 (filed Feb. 6, 2002).

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**

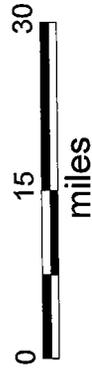
(ID RSA 2 / CMA389-B2 / Call Sign KNKR277)

— **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



**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  
CALLING PLANS AND PREPAID SERVICE**

Plan	Lines	Minutes Included	Monthly Rate	Add'l Mins	50 State Roaming**	Incoming Calls**	Cell to Cell**	Long Distance	500 Night & Weekend Mins**	Voice Mail	Standard T-Mail	Add'l Lines	Free Add'l Mins
Tek Pak	1	200	\$ 29.90	\$ 0.26	N/A	Unlimited	Unlimited	\$ 0.18	Unlimited	Included	Included	N/A	N/A
U.S.A. 350*	1	350	\$ 39.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 500*	1	500	\$ 44.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 750*	1	750	\$ 64.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 1000*	1	1000	\$ 89.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
U.S.A. 1250*	1	1250	\$ 114.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 1500*	1	1500	\$ 139.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 3000*	1	3000	\$ 289.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 4500*	1	4500	\$ 439.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 6000*	1	6000	\$ 589.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
U.S.A. 8000*	1	8000	\$ 789.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	\$9.95	200
Twins U.S.A.* **	2	500	\$ 69.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
Trips U.S.A.* **	3	1000	\$ 99.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A
Quad U.S.A.* **	4	1250	\$ 124.95	\$ 0.25	Included	5000	5000	Included	\$ 7.95	\$ 2.95	Included	N/A	N/A

NOTE: All applicable Federal, State, and local taxes, surcharges, and fees will apply.

NOTE: Service is not available in all areas. We have agreements with other service providers in most areas across the U.S. Service in those areas is provided by a different carrier and Inland Cellular does not guarantee their service.

\* To get service on a U.S.A. plan, you must have a Tri-Mode CDMA phone that is compatible with our service and has the most current PRL loaded. See store for details.

\*\* Applies only to calls made or received within our Home Service Area on our towers. Cell to cell calls to other Inland Cellular customers within our Home Service Area only. Weekends: 12:01 a.m. Saturday to midnight on Sunday. Night: 7:01 p.m. to 6:59 a.m. Monday-Thursday; Monday 12:01 a.m. to 6:59 a.m.; Friday 7:01 p.m. to 12:00 a.m.

++ Shared minutes

Prepaid Plan	Setup Fee	Monthly Access Fee	Included Minutes	Add'l Mins	Long Distance	Roaming Rate	Minimum Replenish	Voice Mail
Q Plan	20	\$ -	0	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included
Q 150	20	\$ 19.95	150	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included
Q 300	20	\$ 29.95	300	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included
Q 500	20	\$ 39.95	500	\$ 0.28	\$ 0.18	\$ 0.95	\$ 15.00	Included

NOTE: All applicable Federal, State, and local taxes, surcharges, and fees will apply.

ALL CALLING PLANS INCLUDE CALL WAITING, CONFERENCE CALLING, AND CALL FORWARDING.

**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



June 26, 2006

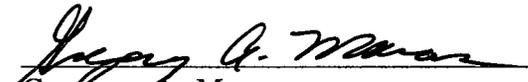
Idaho Public Utilities Commission  
472 W. Washington Street  
P.O. Box 83720  
Boise, ID 83720-0074

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

6-26-06  
\_\_\_\_\_  
Date

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this 26 day of June, 2006.



  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: Aug. 28, 2007

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

CERTIFICATE OF SERVICE

I, James K. Brooks, hereby certify that I have, on this 27<sup>th</sup> day of June, 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:

Ms. Jean Jewel, Executive Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Post Office Box 83720  
Boise, Idaho 83702

Nez Perce Tribal Executive Committee  
Rebecca Miles, Chairman  
Post Office Box 305  
Lapwai, Idaho 83540

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

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

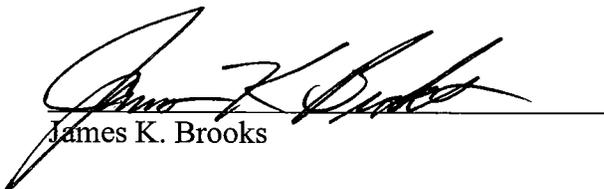
Conley Ward, Esq, ITA Legal Counsel  
Givens Pursley LLP  
Post Office Box 2720  
Boise, Idaho 83701

Qwest Corporation  
Theresa Jensen, Director-Regulatory  
1600 – 71<sup>st</sup> Avenue  
Room 1806  
Seattle, Washington 98191

The Coeur d'Alene Tribe  
Chief James Allen, Tribal Chairman  
850 A Street  
Post Office Box 408  
Plummer, Idaho 83851

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

Inland Telephone Company  
Douglas Weis, President  
Post Office Box 171  
Roslyn, Washington 98941

  
James K. Brooks