

**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

RECEIVED

2006 OCT 12 AM 11:15

IDAHO PUBLIC  
UTILITIES COMMISSION



October 11, 2006

INC-t-06-02

Via Federal Express overnight delivery

Ms. Jean Jewel, Executive Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
P.O. Box 83720  
Boise, ID 83702  
(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 – Supplement 2 to be added to the Petition of Inland Cellular for Designation as Eligible Telecommunications Carrier (“Petition”) that was filed on June 26, 2006. 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  
Treasurer/Controller

Enclosures

cc: Grace Seaman (IPUC Staff)

RECEIVED

Before the  
Idaho Public Utilities Commission

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IDAHO PUBLIC  
UTILITIES COMMISSION

In the Matter of the Petition of	)	
	)	Case No. INC-T-06-02
Inland Cellular	)	
	)	PETITION OF INLAND CELLULAR
For Designation as Eligible	)	FOR DESIGNATION AS ELIGIBLE
Telecommunications Carriers	)	TELECOMMUNICATIONS CARRIER
Under 47 U.S.C. § 214(e)(2)	)	- SUPPLEMENT 2

On June 29, 2006, 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"), filed a 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 requested 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. On August 29, 2006, Idaho Public Utilities Commission ("IPUC") Staff requested further clarifications and noted deficiencies to the Petition. That Supplement ("Supplement") was submitted to the IPUC and interested parties and/or interveners of record on or about September 26, 2006. On October 6, 2006, IPUC Staff requested additional clarifications on paragraphs 26 and 28, and Inland Cellular's certification. This filing is a supplement ("Supplement 2") made to further clarify

Inland Cellular's Petition to the IPUC for Designation of Inland Cellular as an ETC. In support of the Petition, the following is respectfully submitted:

**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. Paragraph 26. Two-year plan.**

2. Attached as Supplement 2 – Exhibit A and Supplement 2 – Exhibit A1 are estimated population figures<sup>1</sup> covering the Inland Cellular service area in Idaho. Although in the Supplement, estimated investment figures were provided for proposed sites, we re-iterate that Inland Cellular is in a highly competitive business and in order to answer customer demand, Inland Cellular must have the flexibility to redirect investment to those areas requiring additional facilities. This flexibility is also important in order to be in compliance with the requirement on page 8 of IPUC Order 29841, as contained in the included certifications, which states:

“ETC applicant must certify that it will: (1) provide service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises; and (2) provide service within a reasonable period of time, if the potential customer is within the applicant's licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer's equipment; (b) deploying roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling service from another carrier's facilities to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.”

**III. Paragraph 28. A Commitment to Consumer Protection and Service.**

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<sup>1</sup> Information taken from the U.S. Census Bureau website, <http://www.census.gov>, with a query of the State of Idaho.

3. In the Supplement filed on September 26, 2006, Inland Cellular addressed its commitment to consumer protection, location of customer service offices and office hours however, Inland Cellular did not elaborate on other important areas of customer service; services that Inland Cellular believes to be the backbone of why it can compete against the larger cellular carriers.

4. Order Fulfillment. Inland Cellular generally fills an order immediately. When a customer comes into our customer service offices wanting cellular service from Inland Cellular, they generally leave the office with a working cellular device. The term “generally” is used because there is such a large selection of cellular devices that Inland Cellular cannot stock every make and model. If a customer wants a device that Inland Cellular does not normally carry, that item would have to be ordered which may take up to a week to be delivered.

5. Besides the sales made in the customer service offices, which Inland Cellular refers to as inside sales, Inland Cellular also has outside salespeople. Their job is to sell services to businesses as well as individuals in areas where Inland Cellular may not have a convenient customer service location. When making a sales call, the salesperson checks-out of inventory a number of devices that they believe to be appropriate; generally after a telephone conversation with the business or individual prior to the meeting. If the customer decides that they want a device that the outside salesperson did not bring to the meeting then there may be a delay. If it is a device that Inland Cellular has in stock, depending on the distance that the salesperson must travel, the customer may receive service that day or the next.

6. Another avenue that a customer may attain service is through a contracted agent of Inland Cellular. In Idaho, Inland Cellular has contracted agents in Cottonwood, Grangeville, Kamiah, Kooskia and Orofino. Again, if the agent has the device that the customer wants on hand, the customer’s service is immediately activated. If it is a device that Inland Cellular has in

its inventory, Inland Cellular will send an employee to the agent's location to delivery the device.

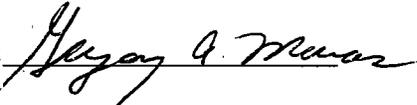
7. Standard Resolution Goal for Outages. Inland Cellular assumes that this is referring to its network. Inland Cellular's goal is to have zero outages and to the best of our knowledge, we have not experienced a network outage however, if there was an outage at a cell site, the outage could be limited to how long it would take for a our repair people to get to the site and whatever repair time that was required. As part of the ability to remain functional in emergencies that was unintentionally not mentioned in the Supplement, was that Inland Cellular also has a cell site-on-wheels ("COW") that it can deploy when needed and has been deployed. The most recent use of the COW was in Lewiston when Inland Cellular was having capacity issues and needed to construct another site. The COW was placed in service at the location where the site was being built and not turned-down until the site was turned-up.

8. An Inland Cellular customer may never know when or if an outage has occurred, since Inland Cellular has roaming agreements with its competitors. If a signal cannot be attained from an Inland Cellular site, a signal may be obtained from a roaming partner.

9. Repair Problems. Inland Cellular assumes that this is referring to the customer's device. If a customer's device is no longer functional and the phone is either under warranty or the customer would like it repaired, Inland Cellular provides the customer with a loaner at no charge other then their regular monthly service charge while the device is being repaired.

Respectfully submitted,

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

By: 

Gregory A. Maras  
Secretary

ESTIMATED POPULATION - CITIES, TOWNS AND COMMUNITIES WITHIN SERVICE AREA

Table 4. Annual Estimates of the Population for Incorporated Places in Idaho, Listed Alphabetically - April 1, 2000 to July 1, 2004

Geographic Area	Population estimates					April 1, 2000	
	July 1, 2004	July 1, 2003	July 1, 2002	July 1, 2001	July 1, 2000	Estimates base	Census
<b>SERVING COMPANY &amp; WIRE CENTER</b>							
<b>INLAND TELEPHONE COMPANY - SAC 472423</b>							
Gifford	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Lenore	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Leon	No Data	No Data	No Data	No Data	No Data	No Data	No Data
<b>POTLATCH TELEPHONE COMPANY, INC. - SAC 472230</b>							
Juliaetta city	582	583	594	601	606	609	609
Kendrick city	356	356	362	365	368	369	369
Southwick	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Troy city	769	769	781	787	795	798	798
<b>CITIZENS TELEPHONE CO. OF ID DBA FRONTIER COMMUNICATIONS OF IDAHO - SAC 474427</b>							
Elk River city	142	143	143	147	155	156	156
White Bird city	107	106	106	106	106	106	106
<b>VERIZON NORTHWEST, INC-ID - SAC 472416</b>							
Ahsahka	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Bovill city	295	295	300	302	304	305	305
Deary city	528	529	539	545	550	552	552
Elk River	142	143	143	147	155	156	156
Genesee city	903	906	922	932	942	946	946
Grangemont	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Greer	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Harvard	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Headquarters	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Helmer	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Joel	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Moscow city	21,900	21,739	21,400	21,527	21,297	21,331	21,291
Onaway city	222	222	226	227	229	230	230
Orofino city	3,151	3,176	3,153	3,217	3,246	3,247	3,247
Peck city	183	184	183	183	186	186	186
Pierce city	556	563	568	583	612	617	617
Potlatch city	760	761	773	780	787	791	791
Princeton	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Viola	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Weippe city	390	386	386	395	413	416	416

SUPPLEMENT 2 - EXHIBIT A

ESTIMATED POPULATION - CITIES, TOWNS AND COMMUNITIES WITHIN SERVICE AREA

SUPPLEMENT 2 - EXHIBIT A

Geographic Area	Population estimates					April 1, 2000	
	July 1, 2004	July 1, 2003	July 1, 2002	July 1, 2001	July 1, 2000	Estimates base	Census
<b>QWEST CORP-ID</b>							
Clearwater	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Cottonwood city	1,028	1,035	1,023	951	941	944	944
Craigmont city	551	553	551	536	556	556	556
Culdesac	373	374	372	372	377	378	378
Fenn	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Ferdinand	146	147	149	144	144	145	145
Grangeville city	3,156	3,170	3,194	3,207	3,218	3,228	3,228
Greencreek	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Kamiah city	1,152	1,155	1,149	1,118	1,159	1,160	1,160
Keuterville	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Kooskia city	662	667	674	678	674	675	675
Lapwai city	1,119	1,122	1,114	1,113	1,132	1,134	1,134
Lewiston city	31,028	30,951	30,552	30,445	30,863	30,906	30,904
Lowell	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Mount Idaho	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Nezperce city	515	516	515	503	522	523	523
Reubens	74	72	71	69	72	72	72
Stites	228	225	225	225	225	226	226
Spalding	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Syringa	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Westlake	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Winchester	308	308	308	299	308	308	308
Woodland	No Data	No Data	No Data	No Data	No Data	No Data	No Data

Note: The April 1, 2000 Population Estimates Base reflects modifications to the Census 2000 population as documented in the Count Question Resolution program, updates from the Boundary and Annexation Survey, and geographic program revisions. An "(X)" in

**Suggested Citation:**

Table 4: Annual Estimates of the Population for Incorporated Places in Idaho, Listed Alphabetically: April 1, 2000 to July 1, 2004 (SUB-EST2004-04-16)

Source: Population Division, U.S. Census Bureau

Release Date: June 30, 2005

NOTE: All information is per the U.S. Census Bureau. This information has been rearranged to the appropriate serving telephone company as known by Inland Cellular and non-service area has been removed. The CLLI codes were added by Inland Cellular to those known wire centers within the Geographic areas. If there are any cities, towns or communities that have been included, omitted or are incorrectly classified, it is not intentional, and Inland Cellular reserves the right to include any omissions or revise any mistakes as they become known.

COUNTY STATISTICS - INLAND CELLULAR SERVING AREA

	COUNTIES SERVED				NEZ PERCE	IDAHO
	CLEARWATER	LATAH	LEWIS	LEWIS		
Population, 2005 estimate	8,373	34,714	3,750	3,750	37,931	15,697
Population, 2000	8,930	34,935	3,747	3,747	37,410	15,511
Occupied Housing Units, 2000	3,456	13,059	1,554	1,554	15,286	6,084
Persons per household, 2000	2.41	2.38	2.39	2.39	2.40	2.46
Per capita money income, 1999	\$15,463	\$16,690	\$15,942	\$15,942	\$18,544	\$14,411
Housing Units with No Telephone Service	154	181	52	52	255	270
Poverty Status in 1999 (below poverty level)	240	620	93	93	872	541
Families	85	146	45	45	487	134
Families with female householder, no husband present	1,128	5,186	447	447	4,468	2,445
Individuals						

	IDAHO COUNTY		WHITE BIRD
	GRANGEVILLE	ELK RIVER	
Population, 2005 estimate	3,228	156	106
Population, 2000	1,333	75	59
Occupied Housing Units, 2000	943	60	45
Owner-occupied	390	15	14
Renter-Occupied	36	2	7
Housing Units with No Telephone Service	93	6	4
Poverty Status in 1999 (below poverty level)	42	2	0
Families	420	20	25
Families with female householder, no husband present			
Individuals			

NOTE: All statistical information is per the U.S. Census Bureau. Since Inland Cellular does not serve Idaho County in its entirety (as the filing indicates, licensed to serve only the northern portion of Idaho RSA No. 2), communities of interest have been listed above.

NOTE: Inland Cellular believes that it is pertinent to list the Poverty Status since part of attaining Eligible Telecommunications Carrier (ETC) status is the ability to offer Lifeline and Link-up to qualifying subscribers.

**AFFIDAVIT CONTAINING CERTIFICATIONS  
PURSUANT TO IPUC ORDER NO. 29841**

I, Gregory A. Maras, being of lawful age, state that I am Secretary of Inland Cellular Telephone Company, general partner of Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular)(“Company”), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit are true to the best of my knowledge, information and belief. On this basis, I hereby certify to the Idaho Public Utilities Commission (“Commission”) for use by the Commission in providing the certification to the Federal Communications Commission (“FCC”) and Universal Service Administrative Company required by 47 C.F.R. §§ 54.307, 54.313 and/or 54.314, as follows:

(1) That the Company will use federal high-cost universal service fund support only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;

(2) That the Company certifies that it will: (1) provide service on a timely basis to requesting customers within the applicant’s service area where the applicant’s network already passes the potential customer’s premises; and (2) provide service within a reasonable period of time, if the potential customer is within the applicant’s licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer’s equipment; (b) deploying roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling service from another carrier’s facilities to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment;

(3) That the Company’s operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009, as well as those found in 47 C.F.R. § 54.202(3) and IPUC Order 29841;

(4) That the Company substantially maintains the ability to function in emergency situations under the standard found in 47 C.F.R. § 54.202(2) and IPUC Order 29841; and

(5) That the Company will publicize the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company’s judgment, include advertisements likely to reach those who are not current customers of the Company within the Company’s designated service area.

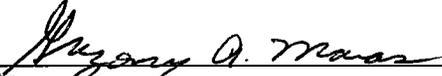
I certify under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

Dated this 26<sup>th</sup> day of September 2006, at Roslyn, Washington.

INLAND CELLULAR TELEPHONE COMPANY

As general partner of and on behalf of

Washington RSA No. 8 Limited Partnership (*d/b/a* Inland Cellular)

By:   
Gregory A. Maras

Its: Secretary

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**CERTIFICATE OF SERVICE**

I, James K. Brooks, hereby certify that on this 11<sup>TH</sup> day of October 2006, I caused to be served a true and correct copy of the foregoing PETITION FOR INLAND CELLULAR FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER - SUPPLEMENT 2 upon all parties believed to be of interest in this proceeding and was placed in the United States mail, first-class postage pre-paid, to the following (overnight to IPUC Executive Secretary):

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

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

Frontier Communications  
Ingo Henningson, Manager, Regulatory  
Post Office Box 708970  
Sandy, Utah 84070-8970

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

Frontier Communications  
Kevin Saville, Associate Gen. Counsel  
2378 Wilshire Blvd.  
Mound, Minnesota 55364

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

Richards Law Firm  
Morgan W. Richards Jr.  
804 East Pennsylvania Lane  
Boise, Idaho 83706

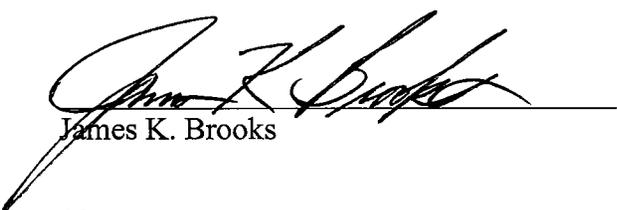
Potlatch Telephone Company, Inc.  
TDS Telecom  
Gail Long, Manager, External Relations  
Post Office Box 1566  
Oregon City, Oregon 97045

Guillory & Hjort  
Barry L. Hjort  
2111 West Boulevard  
Rapid City, South Dakota 57701

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

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

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

  
James K. Brooks