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IDAHO PUBLIC  
UTILITIES COMMISSION

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30 April 2008

SYR-T-08-01

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

*Hand Delivered*

RE: Syringa Wireless, LLC Application for ETC Designation

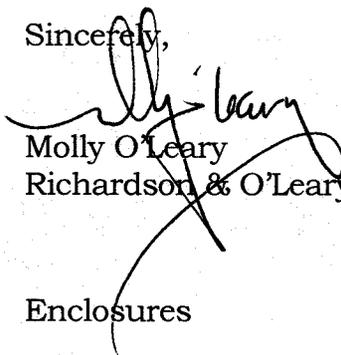
Dear Ms. Jewell:

I am enclosing an original and seven (7) copies of Syringa Wireless, 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

Enclosures

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Attorneys for Syringa Wireless, LLC

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF )  
SYRINGA WIRELESS, LLC FOR )  
DESIGNATION AS AN ELEGIBLE )  
TELECOMMUNICATIONS CARRIER )  
PURSUANT TO THE )  
TELECOMMUNICATIONS ACT OF 1996 )  
(RURAL AND NON-RURAL AREAS) )

CASE NO. SYR-T-08-01

APPLICATION OF SYRINGA WIRELESS, LLC FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER

Syringa Wireless, LLC ("Syringa Wireless"), by and through its undersigned attorneys, 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”).<sup>1</sup> Syringa Wireless requests that it 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, 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, Syringa Wireless provides the following information:

## I. APPLICANT

Syringa Wireless is a Commercial Mobile Radio Services (“CMRS”) carrier providing “mobile service” as defined in 47 U.S.C. § 153(27). Syringa Wireless provides such CMRS and “mobile service” on a pre-paid and post-paid basis. Syringa Wireless’ 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. Syringa Wireless’ post-paid customers sign a contract for a specific amount of monthly user-minutes and are billed for their usage.

Syringa Wireless provides interstate telecommunications services as defined in 47 U.S.C. § 153(22) and 47 C.F.R. § 54.706. Through its cellular authorizations, Syringa is licensed to serve the following Basic Trading Areas (“BTAs”) in Idaho: BTA 202 (Idaho Falls); BTA 353 (Pocatello), and BTA 451 (Twin Falls).<sup>2</sup> Pursuant to these authorizations, Syringa provides service in the following counties: Gooding, Twin Falls, Jerome, Lincoln, Minidoka, Cassia, Butte, Clark, Fremont, Madison, Teton, Bonneville, Jefferson, Bingham, Bannock, Power, and Oneida.<sup>3</sup>

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<sup>1</sup> 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”).

<sup>2</sup> Although Syringa Wireless was founded in January of 2007, it already has 27 employees in Idaho and anticipates hiring an additional 8 employees provided its ETC Application is granted.

<sup>3</sup> CONFIDENTIAL **Exhibit A**, attached, is a map showing Syringa Wireless’ current coverage superimposed over a map of the counties encompassed within Syringa Wireless’ FCC licensed territory in Idaho.

## 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 Syringa Wireless 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.<sup>4</sup> The FCC also recognized that wireless telecommunications providers are eligible to be designated as ETCs.<sup>5</sup>

Syringa Wireless 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.* Syringa Wireless, 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.<sup>6</sup> Attached hereto as **Exhibit B** is a map depicting Syringa’s proposed ETC service area in Idaho superimposed over the rural ILEC exchanges falling within Syringa Wireless’ proposed ETC service area. Attached as **Exhibit C-1** is a list of non-rural ILEC and rural ILEC wire centers that fall within Syringa Wireless’ BTAs.<sup>7</sup>

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<sup>4</sup> *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8909-25 (1997) (“First Report and Order”).

<sup>5</sup> *Id.* at 8858-59.

<sup>6</sup> *See*, 47 C.F.R. §54.207(b).

<sup>7</sup> 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

Also attached is CONFIDENTIAL **Exhibit C-2**, which shows the densities of the relevant ILEC wire centers and the areas for which Syringa Wireless seeks ETC designation.

### **III. LEGAL STANDARD FOR GRANTING ETC STATUS IN NON-RURAL AREAS.**

Syringa Wireless satisfies each of the statutory and regulatory prerequisites set forth in the Act, the FCC Rules<sup>8</sup> and this Commission's ETC Requirements.<sup>9</sup> On March 17, 2005, the FCC released its *FCC ETC Requirements Order*<sup>10</sup> 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.

Syringa Wireless may be designated as an ETC in non-rural ILEC areas upon a finding that: (1) Syringa Wireless offers the supported services; and (2) Syringa Wireless will advertise the availability of those services using media of general distribution.<sup>11</sup> Syringa Wireless may be designated as an ETC in *rural* ILEC areas upon a finding that, in addition to the foregoing two criteria, it is shown that such a designation would serve the public interest.<sup>12</sup>

To comply with the additional requirements set forth in the *FCC ETC Requirements Order* and the *IPUC ETC Requirements Order*, Syringa Wireless includes in this Application the following:

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Exhibit B.

<sup>8</sup> 47 U.S.C. § 214(e)(1)-(2), and 47 C.F.R. § 54.201.

<sup>9</sup> See IPUC Order No. 29841.

<sup>10</sup> *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) ("FCC ETC Requirements Order").

<sup>11</sup> See, e.g., *In the Matter of the Petition of IAT Communications, Inc. dba NTCH-Idaho, Inc. or Clear Talk for Designation as an Eligible Telecommunications Carrier*, Order No. 29261 (IPUC Case No. GNR-T-03-8, served June 11, 2003).

<sup>12</sup> 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 Syringa Wireless' ability to remain functional in emergency situations.
- 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").
- Description of Syringa Wireless' local rate plans and the local usage plans for the ILECs and an agreement to comply with CTIA: The Wireless Association's Consumer Code.

#### A. SERVICES PROVIDED BY SYRINGA WIRELESS

Syringa Wireless 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.<sup>13</sup> Syringa Wireless 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 a

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<sup>13</sup> 47.C.F.R. 54.101(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.<sup>14</sup>

Syringa Wireless provides voice grade access to the public switched telephone network through interconnection arrangements with local telephone companies. Syringa Wireless 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.

Syringa Wireless' 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.<sup>15</sup> Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs. Syringa Wireless meets the local usage requirements by including local usage in its rate plans and Syringa Wireless will comply with any and all minimum local usage requirements adopted by the FCC.

Consistent with the *IPUC ETC Requirements Order*, Appendix p.3, Syringa Wireless 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 Syringa Wireless' local calling rates with other carriers in Syringa Wireless' 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

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<sup>14</sup> 47 C.F.R. § 54.101(a)(1).

<sup>15</sup> *Id.* at 8814

ILEC.”<sup>16</sup> The 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.<sup>17</sup>

One of the distinct advantages to the Syringa Wireless rate plans is that Syringa Wireless 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, Syringa Wireless’ local calling area includes most of Southeastern Idaho. In addition, Syringa Wireless offers additional “local” network coverage via switching partners Silver Star PCS, Farmers Mutual Telephone, and Cambridge Telephone wireless networks.

Second, Syringa Wireless provides unlimited, toll-free service for 911 emergency calls and for 611 customer care. Syringa Wireless also provides toll-free 511 road reports to the Idaho Department of Transportation, 711 calls to TRS/TTY operators and 211 calls to social service agencies, as well as 811 “Digline of Idaho” service for local utilities.

Finally, all of Syringa Wireless’ nationwide and eight-state calling plans include unlimited nationwide long distance at no additional charge. The Syringa Wireless calling plans priced at \$59.95 and higher per month also include unlimited night and weekend calling, unlimited mobile-to-mobile calling, and unlimited incoming calling.<sup>18</sup>

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<sup>16</sup> *IPUC ETC Requirements Order*, p.12; see also, *In the Matter of the Petition of Inland 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).

<sup>17</sup> *Id.*

<sup>18</sup> See Exhibit E (Syringa Wireless 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. Syringa Wireless 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.<sup>19</sup> Syringa Wireless 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. Syringa Wireless 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 of the delivery of such information.<sup>20</sup> In addition to providing Phase 0 E911, Syringa Wireless 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, Syringa Wireless has deployed requests for E911 Phase II in three counties: Bingham, Bonneville, and Fremont. Six other counties; Jefferson, Bannock, Twin Falls, Gooding, Jerome, and Lincoln have requested Phase II E911 deployments and are currently scheduled for deployment in 2008. Syringa has not

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<sup>19</sup> *First Report and Order* at 8810.

<sup>20</sup> *See Id.*, at 8815-17.

received requests in any other counties in its current service area.

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.

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

- **Mobile Switching Center located in Roosevelt, Utah**
  - 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 radio stock for all field technicians
  - 8 hours battery back-up for all cell sites
  - 4 Standby Generators at 4 different locations ready for deployment when and where needed
  - Leased fiber and copper facilities to major network T-1 aggregation to Syringa Networks Backhaul location
  - Quick-connect plugs for portable generator at all sites
  - Compact generator system stored in Albion, Idaho for use with Snow Cat-only accessible sites
  - Remote monitoring 7x24 of all sites
- **Monitoring Network and Outage Resolution procedures**
  - Syringa Wireless has a network operating center (“NOC”), in Roosevelt, Utah;
  - All Switches and cell sites are remotely monitored 7x24, with critical and major

**CONFIDENTIAL**

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- alarms escalated to the next level of management every 20 minutes
- Syringa Wireless' 7x24 on-call staff is sent a text message or called immediately when the monitoring system detects system problems

- **Staffing and Additional Equipment**

- The Syringa Wireless Technical Operations team consists of 6 people strategically located within Southeastern Idaho in the following locations: 1 in Rexburg, 1 in Jerome, 1 in American Falls, 3 in Pocatello
- Syringa Wireless 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; (1) Tucker Terra Snow Cat is stored at Albion, Idaho facility; (2) snowmobiles are stored at Albion, Idaho facility; and (2) Polaris 4-wheeler ATV's are located in Pocatello
  - 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 complete complement of spares for cell site
- Microwave and DACs equipment is available to insure quick recovery

In addition to the foregoing, Syringa Wireless is performing the following network upgrades for improved reliability:

- MTX Switch upgrade to version MTX 13
- Continued deployment of 1XRTT upgrades to remaining digital sites in network.

Through all of these efforts, Syringa Wireless has demonstrated that it not only provides customers with needed emergency services, but that it can also remain fully functional in emergencies. In addition, if granted ETC status, Syringa Wireless plans the following 2008 reliability and technology upgrades: **CONFIDENTIAL INFORMATION**

- **END OF CONFIDENTIAL INFORMATION**

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.<sup>21</sup> Syringa Wireless 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.”<sup>22</sup> Syringa Wireless presently meets this requirement by providing all of its post-paid customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements Syringa Wireless 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.<sup>23</sup> Subscribers to Syringa Wireless’ 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

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<sup>21</sup> *Id.*, at 8817-18

<sup>22</sup> *Id.*, at 8819.

<sup>23</sup> *Id.*, at 8821.

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).<sup>24</sup> In particular, all ETCs must provide toll blocking which allows customers to block the completion of outgoing toll calls.<sup>25</sup>

Syringa Wireless 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, Syringa Wireless will participate in Lifeline, as required. Syringa Wireless has the capability and if requested provides toll blocking.

In addition, once it receives its ETC designation, Syringa Wireless will promote its Lifeline Services through traditional media avenues such as newsprint, radio advertisements and media flyers. In addition to these methods, Syringa Wireless 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, Syringa Wireless' post-paid customers will have the ability to block roaming and international dialing, all of which will allow customers to avoid unexpected charges.

#### B. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE.

Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. Section 54.201, Syringa Wireless 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

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<sup>24</sup> *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).*

<sup>25</sup> *First Report and Order, at 8821-22.*

Syringa Wireless' service area include: the Morning News (Blackfoot); the South Idaho Press (Burley); the Post-Register (Idaho Falls); the Sho-Ban News (Fort Hall); the Idaho State Journal (Pocatello); and the Times-News (Twin Falls).

C. COMMITMENT TO CONSUMER PROTECTION

Consistent with the *IPUC ETC Requirements Order* at Appendix A, p.3, Syringa Wireless 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.<sup>26</sup>

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. Syringa Wireless is seeking ETC designation for a portion of the Fort Hall Reservation. Consistent with this requirement, contemporaneous with the filing of the Application with the Commission, Syringa Wireless has provided a copy of its Application to:

Shoshone-Bannock Tribes of the Fort Hall Reservation of Idaho  
Attention: Ms. Diana Yupe  
Shoshone-Bannock Heritage Tribal Office  
P.O. Box 306  
Fort Hall, ID 83203

Syringa Wireless currently provides service to portions of the Fort Hall Reservation. Upon designation as an ETC, Syringa Wireless will offer Tribal Lifeline service to qualified residents of the Fort Hall Reservation for as little as one dollar a day plus applicable taxes.

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<sup>26</sup> See **Exhibit G**, attached.

#### IV. GRANT OF THIS PETITION SERVES THE PUBLIC INTEREST

Syringa Wireless' 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 suggested that states follow suit.<sup>27</sup> 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.<sup>28</sup> The FCC and states must also consider whether an ETC designation serves the public interest consistent with Section 254 of the Act.<sup>29</sup> 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.<sup>30</sup> Specifically, the FCC considers three specific items when analyzing the public interest benefits of an ETC application: 1) unique advantages and disadvantages of the competitor's service offering through a cost-benefit analysis; 2) potential for cream skimming; and 3) impact on the federal universal service fund (USF).<sup>31</sup>

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<sup>27</sup> *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*.

<sup>28</sup> 47 U.S.C. § 214(e)(2).

<sup>29</sup> 47 U.S.C. § 254(b)(7).

<sup>30</sup> *ETC Order* ¶ 40.

<sup>31</sup> *Id.* ¶ 41.

## 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 offering. Syringa Wireless' universal service offering will provide consumers in rural Idaho with the benefits of increased competitive choice and quality service. Syringa Wireless' universal service offering will speed the delivery of advanced wireless services to rural Idaho citizens. Syringa Wireless' universal service offering not only increases competition in the area, but also provides greater consumer choice. In many of the areas it serves, Syringa Wireless is the only wireless carrier providing high-quality voice and data services to customers. Without Syringa Wireless, many consumers in Idaho would have to rely solely on traditional wireline services.

Further, unlike traditional wireline services, Syringa Wireless' mobile service affords customers increased flexibility, public safety, and service options. Syringa Wireless' universal service offering provides this flexibility and public safety. 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.<sup>32</sup> By offering the benefits of mobility, Syringa Wireless' universal service offering will provide unique and essential services to consumers in rural Idaho.

As an ETC, Syringa Wireless will also offer a basic universal service package to subscribers who are eligible for Lifeline support. As stated earlier, Syringa Wireless will offer the "core" or designated services that are supported by federal universal service support mechanisms.<sup>33</sup> In addition to the core services, designating Syringa Wireless as an ETC will

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<sup>32</sup> *Virginia Cellular Order* ¶ 29.

<sup>33</sup> *See* 47 U.S.C. § 254(c); 47 C.F.R. § 54.101.

allow customers in rural Idaho to choose service based on pricing, service quality, customer service, and service availability. Syringa Wireless' universal service offering provides several advantages including mobility, access to E911, voicemail, three-way calling, call waiting, call forwarding, expanded calling scopes and several calling plans to allow customers to purchase plans that fit their telecommunications needs. Syringa Wireless expects that its service offering will be competitive with those of the incumbent wireline carriers within its service area.

Upon designation as an ETC, Syringa Wireless will use the high cost support it receives to improve its infrastructure in rural areas. Syringa Wireless has evaluated its projected levels of support, along with identifying areas where Syringa Wireless' coverage needs improvement and demand for services coincide.<sup>34</sup> In fact, in 2007, Syringa Wireless built out some previously underserved or un-served areas in rural Idaho. This network construction included areas such as Filer, Rogerson, Salmon Falls, Oakley, Howe, Albion, Malta, Arco, Malad, Devils Creek, Rockland, Mud Lake, East Arco Butte, Ashton, Saint Anthony, New Dale, Aberdeen, Cold Water, Raft River, Acequia, and Paul. In addition, Syringa Wireless also built out some non-rural Qwest underserved territories, including Declo, Burley, Kimberley, Gooding, Shoshone, Wendell, Jerome, Buhl, and Castleford. Syringa Wireless also plans to build in other underserved areas in eastern Idaho, including Fish Haven, Paris, Montpelier, Georgetown, Soda Springs, the Gem Valley, and Lava Hot Springs. Finally, Syringa Wireless plans to continue its implementation of its 1XRTT wireless packet data system that offers speeds of up to 288 kilobytes per second (kbps). Designation as an ETC and high cost support will allow Syringa Wireless to expand upon its substantial build out and coverage plans.

With the receipt of high cost support, Syringa Wireless will be able to increase its

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<sup>34</sup> See Confidential Syringa Wireless Two-Year Network Improvement Plan (**Exhibit D**).

wireless coverage in rural Idaho and provide more robust access to E911 services for residents, travelers, and recreators in remote areas. Access to vital communications services, including emergency services, will have a positive effect on the tourism industry since most tourists are reluctant to be “out of touch” with loved ones or the office. Syringa Wireless will also be able to provide additional data services in rural areas, using universal service support to migrate from digital only to 1XRTT and to EVDO broadband speeds. The development of a high-speed wireless network in rural Idaho will help with local jobs and economic development since businesses tend to relocate to areas that have reliable wireless technology. Universal service funds will also allow Syringa Wireless to offer voice and data services in areas that have never had wireless coverage before. As Syringa Wireless expands coverage upon the receipt of high cost support, it will also expand its local presence in rural communities as it has already done so in Arco, Malad, Rupert, Filer, Albion, and Rockland. Syringa Wireless’ expanded presence will give consumers a choice in accessing vital telecommunications services. Syringa Wireless’ designation as an ETC is crucial to its plans to provide high-speed wireless services and essential communications services in rural Idaho and is in the public interest.

#### B. POTENTIAL FOR CREAM SKIMMING

Syringa Wireless is seeking to serve ETC territories where Syringa Wireless 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.<sup>35</sup> “Rural cream skimming occurs when competitors serve *only* the low-cost high revenue

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<sup>35</sup> ETC Order ¶ 48.

customers in a rural telephone company's study area."<sup>36</sup> Syringa Wireless has chosen to serve all customers where it is able to provide wireless service of varied population densities. Consistent with the FCC's *Highland Cellular Order*,<sup>37</sup> Syringa Wireless is not seeking ETC designation in partial wire centers. Further, Syringa Wireless is proposing to serve some of the least densely populated<sup>38</sup> and costliest to serve study areas in Idaho.<sup>39</sup> Therefore, Syringa Wireless is not engaging in any sort of customer targeting or cream skimming.

### C. IMPACT ON THE FUND

Syringa Wireless' receipt of high cost support will have a nominal impact on the federal fund if calculated using the FCC's current "identical support" rule. Syringa Wireless 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 LECs (ILEC) with whom Syringa Wireless competes. Syringa Wireless 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 Syringa Wireless consumers residing within the competing ILEC's particular exchange and ultimately totaled. Based upon this analysis, Syringa Wireless estimates that it will receive approximately \$1,095,948 per year in USF support. This represents less than 0.0261 percent of the high-cost portion of the federal USF, assuming \$4.2 billion in high cost support disbursements in a single year. Accordingly, grant of Syringa Wireless' ETC request

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<sup>36</sup> *Highland Cellular Order* ¶ 26.

<sup>37</sup> *Id.*

<sup>38</sup> See Confidential Exhibit C-2, *supra*.

<sup>39</sup> See **Exhibit H**, Universal Service Administrative Company High Cost Support Projections Second Quarter 2008.

will have minimal impact on the USF. The benefits of designating Syringa Wireless as an ETC outweigh any potential harm to the sustainability of the fund.<sup>40</sup>

#### D. STATE AND FEDERAL PRECEDENT

Designation of Syringa Wireless 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 Edge Wireless, LLC as Idaho's first wireless rural ETC<sup>41</sup>, 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, and promote competition and the benefits it brings."<sup>42</sup> In designating Midwest Wireless Communications, LLC as an ETC in Minnesota, the Minnesota Public Utilities Commission held that, "[c]ompetition would benefit consumers in

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<sup>40</sup> 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).

<sup>41</sup> *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).

<sup>42</sup> *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), ¶68.

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. . . .”<sup>43</sup> 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.”<sup>44</sup>

For all the above reasons, the public interest would be served by the designation of Syringa Wireless 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, Syringa Wireless is committed to answering all reasonable requests for service within its proposed ETC service area. Syringa Wireless 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.

Syringa Wireless 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 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

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<sup>43</sup> *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.

<sup>44</sup> *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).

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.*

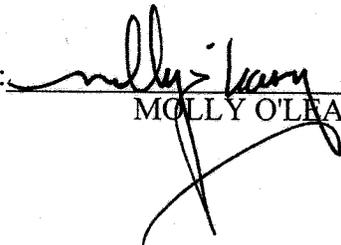
**VI. RELIEF REQUESTED**

For the reasons set forth above, and pursuant to Section 214(e)(2) of the Act, Syringa Wireless requests that the Commission enter an Order designating Syringa Wireless 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 30th day of April, 2008.

RICHARDSON & O'LEARY, PLLC

BENNET & BENNET, PLLC

By:   
MOLLY O'LEARY

/s/ \_\_\_\_\_  
KENNETH JOHNSON

Attorneys for Syringa Wireless, LLC

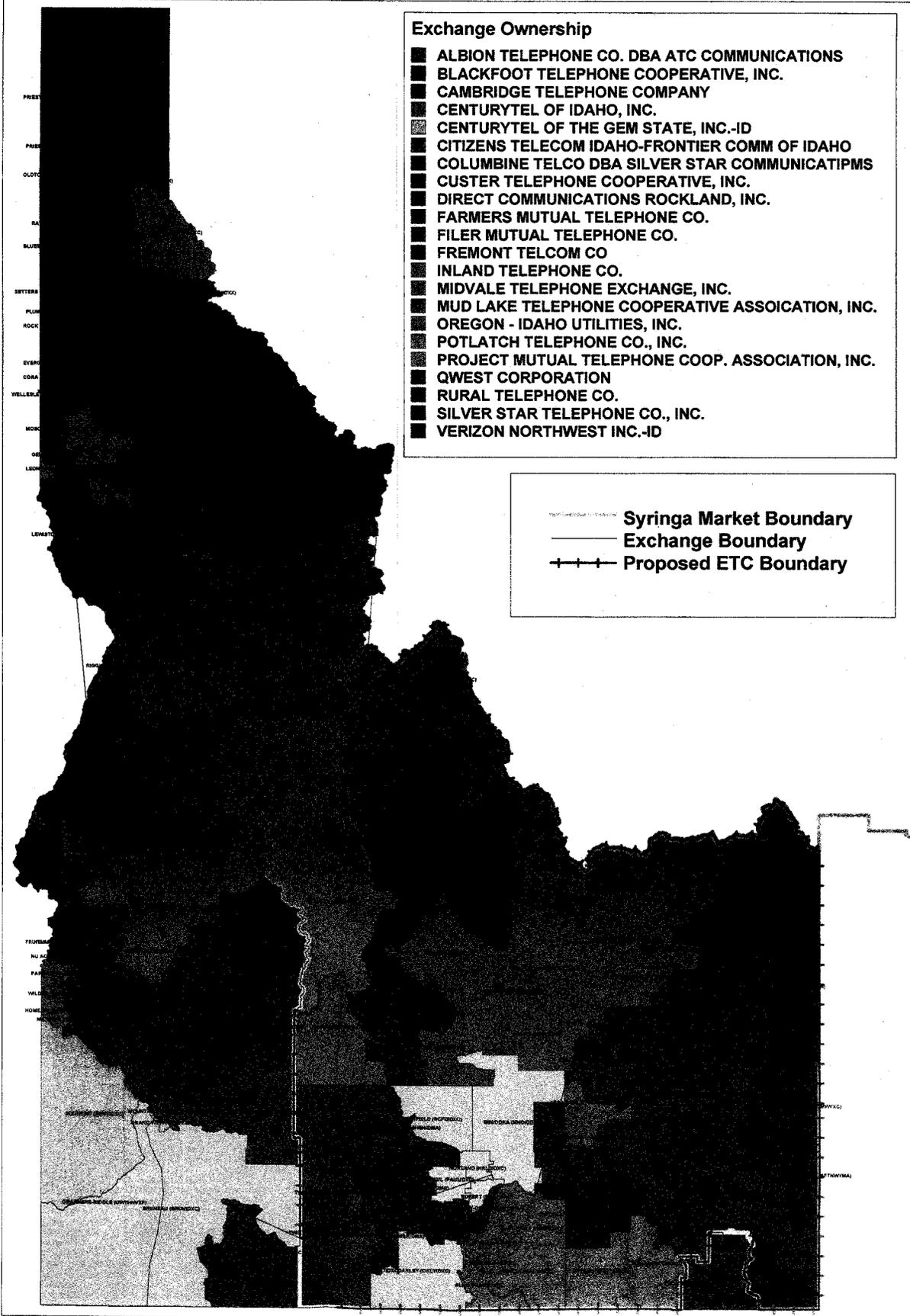
Attorneys for Syringa Wireless, LLC

# **EXHIBIT A**

## **CONFIDENTIAL**

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

# EXHIBIT B



March 26, 2008



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 10 G Street, NE  
 7th Floor  
 Washington, DC 20002  
 (202) 371-1500

# **EXHIBIT C1**

**ILEC WIRE CENTERS WITHIN  
SYRINGA WIRELESS PROPOSED ETC AREA**

**NON-RURAL ILEC WIRE CENTERS**

<b>Qwest Communications</b>
AMFLIDMA (American Falls)
BLFTIDMA (Black Foot)
BLSIDMA (Bliss)
BN CRID MA (Bancroft)
BRL YIDMA (Burley)
BUHLIDMA (BOOJ)
CSFRIDMA (Castleford)
DWNYIDMA (Downey)
EDHZIDMA (Eden-Hazelton)
GDNGIDMA (Gooding)
GRACIDMA (Grace)
HAL YIDMA (Hailey)
HGMNIDMA (Hagerman)
IDFLIDMA (Idaho Falls)
JERMIDNM (Jerome)
KMBRIDMA (Kimberly)
KTCHIDMA (Ketchum)
LHSPIDMA (Lava Hot Springs)
M CCMID MA (McCammon)
MRTGIDMA (Murtaugh)
MTPLIDMA (Montpeller)
PCTLIDMA (Pocatello)
RBRTIDMA (Roberts)
RGBYIDMA (Rigby)
RIRIIDMA (Ririe)
RXBGIDMA (Rexburg)
SDSPIDMA (Soda Springs)
SHL YIDMA (Shelley)
SHSHIDMA (Shoshone-Dietrich)
AFTNWWYMA (Tygee Valley)
TWFLIDMA (Twin Falls)
WINDLIDMA (Wendell)

<b>RURAL ILEC WIRE CENTERS</b>
<b>Albion Telephone Company</b>
ALBNIDXC (Albion)
ALMOIDXC (Almo)
ARCOIDXC (Arco)
ELBAIDXC (Elba)
HLBKIDXC (Holbrook)
HOWEIDXC (Howe)
MSL TIDXC (Malta)
MCKYIDXC (Mackay)
MLCYIDXC (Malad)
MOORIDXC (Moore)
RFRVIDXC (Raft River)
<b>CenturyTel of Idaho, Inc.</b>
LEDRIDXC (Leadore)
NFRKIDXC (North Fork)
SLMNIDXC (Salmon)
<b>Citizens Communications / Frontier Communications</b>
ABRIDXCDS0 (Aberdeen)
SPFDIDXCDS0 (Springfield)
FRFDIDXCDS0 (Fairfield)
CARYIDXCDS0 (Carey)
<b>Custer Communications</b>
CHLSIDXC (Challis)
CYTNIDXC (Clayton)
EKBNIDXC (Eik Bend)
MAYIDXC (May)
<b>Direct Communications</b>
ARBNIIDXC (Arbon)
PARSIIDXC (Paris)
RKLDIDXC (Rockland)
<b>Filer Mutual</b>
FILRIDXC (Filer1)
FILRIDXC (Filer2)
HLSTIDXC (Hollister)

HLSTIDXC (Hollister2)
PDX 1575371v1 0054189-000049
<b>Fremont Telecom Company</b>
ASTNIDMA (Ashton)
STATIDMA (St. Anthony)
ISPKIDMA (Island Park)
<b>Midvale Telephone</b>
STNLIDXCDS0 (Stanley)
<b>Mud Lake</b>
DUBSIDXC (Dubios)
HAMRIDXC (Hamer)
KLGRIDXC (Kilgore)
MNVWIDXC (Montevieu)
TRTNIDXC (Terreton)
<b>Project Mutual</b>
MNDKIDXC (Minidoka)
NRLDIDXC (Norland)
OKL YIDXC (Oakley)
PAULIDXC (Paul)
RPRTIDXC (Rupert)
<b>Rural Telephone</b>
SHOPIDXCDS0 (Shoup)
BRVEIDXCDS0 (Boise River)
<b>Silver Star - Teton Telephone</b>
DRGSIDMA (Driggs)
TTNIDMA (Tetonia)
VCTRIDMA (Victor)
<b>Silver Star Communications</b>
FRDMWYXC (Freedom)
IRWNIDXC (Irwin)
WAYNIDXC (Wayan)

# **EXHIBIT C-2**

**CONFIDENTIAL**

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# **EXHIBIT D**

## **CONFIDENTIAL**

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CONTAINS TRADE SECRETS  
OR CONFIDENTIAL MATERIAL  
AND IS SEPARATELY FILED.**

# **EXHIBIT E**

## FREE!

- **Nationwide Long Distance**
- **Nights & Weekend Minutes - Start at 7 pm!**  
Nights are Monday - Thursday 7 p.m. - 7 a.m.  
and Weekend minutes are Friday 7 p.m. - Monday 7 a.m.
- **Mobile-to-Mobile Minutes**  
Mobile-to-Mobile minutes allow Syringa Wireless customers to call each other for free.

### EXTRAS

#### FeaturePak \$4.95

- 50 Text Messages
- 1 VOICE

#### ChatPak \$9.95

- Unlimited Text Messages
- 1 VOICE

#### Text Messaging

- Unlimited Text Messaging \$12.95
- 1000 Text Messages \$9.95
- 500 Text Messages \$4.95

#### Unlimited Picture Messaging \$14.95

#### MediaPak \$24.95

- Unlimited Text Messaging, Unlimited Picture Messaging

#### Phone Guard \$3.95

- Phone replacement program per month per line

#### Detailed Paper Bill \$2.95 per month

### Terms & Conditions

- Term contract required
- No activation fee on 30 month contract, \$10 on 2 year contract and \$25 on 1 year contract
- Text message overages will be billed at .10¢ per message
- Subscribers can move to a higher rate plan within the first six months of service
- 50% of airtime usage is required within the Syringa Network
- 14 day return policy
- E911 State and Federal taxes and regulatory fees apply
- Optional feature charges are billed per phone
- All charges are billed at minute increments rounded to the next highest minute
- CDMA Digital E911 compatible phone required on all rate plans
- Minute overage charges will be billed at .50¢ per minute and includes long distance

\*Current coverage areas depicted in graphical representation shows approximate licensed coverage area of Syringa Wireless and our CDMA roaming partners. Actual coverage may vary due to terrain, weather, signal strength, customer equipment and other factors. Clarity and reception may be diminished by obstructions such as buildings and foliage. No guarantee of coverage is available.

**Syringa**  
WIRELESS.

Syringa Wireless LLC reserves the right to cancel or change service plan offerings at anytime without notification to subscriber.  
Syringa Wireless is a registered trademark and "Ring Me" is a registered service mark of Syringa Wireless LLC. ©Syringa Wireless LLC 2007

rev. 01/06/07

## National



**Introductory Service Offers!**

**Syringa**  
WIRELESS.

# Talk All You Want

Ring me!



- FREE Caller ID
- FREE Voicemail<sup>1</sup>
- FREE Call Waiting<sup>1</sup>
- FREE Call Forwarding<sup>1</sup>

## Included in Plans \$59.95 and Above

- **FREE INCOMING CALLS**  
(\$10 per month value)
- **1VOICE** (Voice-activated E-mail reading)<sup>1</sup>
  - Unlimited Directory Assistance<sup>1,2</sup>
  - Mobile Conference<sup>1,3</sup>
- FREE 50 Text Messages<sup>1</sup>

■ Nationwide Coverage Area



<sup>1</sup> Airtime minutes apply  
<sup>2</sup> Unlimited Directory Assistance uses local telephone directories  
<sup>3</sup> Mobile Conference up to 10 numbers at the same time and only be billed for one call

Monthly Access	Minutes	Nationwide
<b>\$19<sup>95</sup>*</b>	60	anytime
<b>\$49<sup>95</sup></b>	400 1000 1000 1000	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$59<sup>95</sup></b>	600 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$79<sup>95</sup></b>	800 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$109<sup>95</sup></b>	1600 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$149<sup>95</sup></b>	2000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$199<sup>95</sup></b>	4000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls

All Primary and Share Lines include Voice Mail, Caller ID, Call Waiting and Call Forwarding

Add up to 4 Share Lines for only **\$14<sup>95</sup>** each per month

\* Plan allowed only with qualified phone selection, share lines not available. Freebies include Caller ID, Voicemail, Call Waiting, and Call Forwarding. Additional service offering can be purchased separately, see plan guide for full details.

## ¡Gratis!

### • Larga distancia nacional

### • Noches y fines de semana - Empezamos a 7 pm

Noches son Lunes a Jueves 7 pm a 7 am  
y fines de semana son Viernes 7 pm a Lunes 7 am

### • Minutos de Móvil a Móvil

Minutos de móvil a móvil permite a los clientes de Syringa Wireless llamadas gratis del uno al otro.

### EXTRAS

#### Oferencia característica \$4.95

- 50 mensajes de texto
- 1 VOICE

#### Oferencia de Platicar \$9.95

- Mensaje de texto ilimitado
- 1 VOICE

#### Mensajes de Foto ilimitado \$14.95

#### Mensaje de texto

- Mensajes de texto ilimitado \$12.95
- 1000 mensajes de texto \$9.95
- 500 mensajes de texto \$4.95

#### Oferencia de Media \$24.95

Mensajes de texto ilimitado, mensajes de foto ilimitada, y acceso ilimitado de la red

#### Protección para su teléfono \$3.95

- Programa de reemplazo por mes y por líneas.

#### Cuenta por correo con detalles \$2.95 por mes.

#### Términos y Condiciones:

- Contrato por tiempo especificado es requerido.
- Sin tarifa de activación en contratos de 30 meses, tarifa de \$10.00 en contratos por dos años, y tarifa de \$25.00 en contratos por un año.
- Mensajes de texto serán cargados a \$0.10 por mensaje.
- Suscriptores podrán cambiarse a un plan de más costo durante los primeros seis meses de contrato.
- Se requiere que un 50% de cargado minutos usados sea dentro Syringa Network.
- Norma de devolución es de 14 días.
- E911 Impuestos Estatales y Federales aplican.
- Cargos por características opcionales serán cargados por cada teléfono.
- Las tarifas serán cobradas en incrementos de minutos redondeados al próximo minuto más alto.
- CDMA teléfono digital requerido en todas las áreas.
- Llamadas originadas fuera de Syringa Network serán cobradas a \$0.50 por minuto.
- Tarifa por minutos cubiertos serán cargados a \$0.50 por minuto y incluye larga distancia.

\*Las áreas de servicio representadas actualmente indican el área que cubre el servicio de Syringa Wireless. Este mapa representa las áreas cubiertas para el 2007. Las áreas de servicio podrían variar dependiendo del terreno, el clima, fuerza de la señal, equipo del cliente y otros factores. Claridad y recepción podría ser disminuida por obstrucciones tales como edificios y follaje (árboles). Garantía de servicio no está disponible.

**Syringa**  
WIRELESS

Syringa Wireless LLC reserva el derecho de cancelar o cambiar planes de servicios en cualquier momento sin notificar al miembro.  
Syringa Wireless es una de fábrica registrada y "llamenme" es una marca registrada de servicio de Syringa Wireless LLC. ©Syringa Wireless LLC, 2007  
rev. 03/22/07

## Nacional



Ofertas de Servicio Introductorio

**Syringa**  
WIRELESS

**¡llámame!**



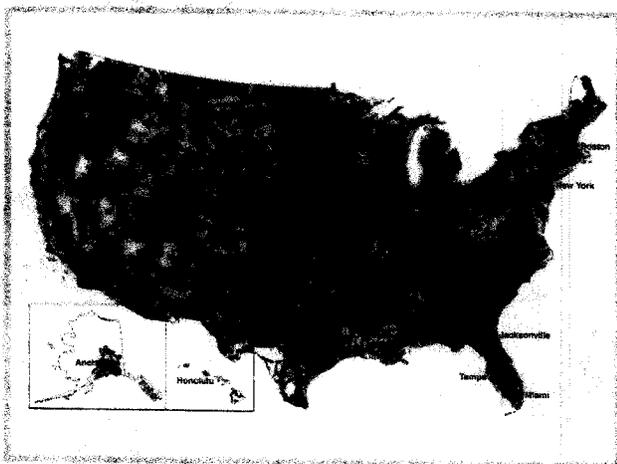
## Hable Todo Que Quieras

- Identificación de línea llamante GRATIS
- Correo de voz GRATIS<sup>1</sup>
- Llamada en espera GRATIS<sup>1</sup>
- Avance de llamada GRATIS<sup>1</sup>

### Incluido en planes de \$59.95 y más

- **Llamadas Recibidas Gratis**  
(Valor de \$10 por mes)
- **1VOICE** (correo electrónico leído activado por voz)<sup>1</sup>
- Asistencia de directorio ilimitado<sup>1,2</sup>
- Conferencias de móvil<sup>1,3</sup>
- 50 mensajes de texto GRATIS<sup>1</sup>

### ■ Área Cubierta Nacional



Acceso Mensual	Minutos	Por Toda La Nación
<b>\$19<sup>95</sup>*</b>	60	cualquier momento
<b>\$49<sup>95</sup></b>	400 1000 1000 1000	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$59<sup>95</sup></b>	600 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$79<sup>95</sup></b>	800 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$109<sup>95</sup></b>	1600 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$149<sup>95</sup></b>	2000 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$199<sup>95</sup></b>	4000 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas

Todas líneas primario y líneas compartidas incluyen correo de voz, identificación de línea, llamante en espera, y avance de llamada

**Puedas añadir hasta 4 líneas compartidas por solamente \$14<sup>95</sup> cada línea por mes**

<sup>1</sup> Minutos de servicio que aplican.

<sup>2</sup> Asistencia de información telefónica ilimitada usa directorios telefónicos locales.

<sup>3</sup> Conferencia móvil usando 10 números telefónicos a la misma vez pagando solamente por una llamada.

\* Cualquier momento con teléfono seleccionado especial. Líneas compartidas no están disponible. Artículo gratis incluye identificación de línea llamante, correo de voz, llamada en espera y avance de llamada. Servicios adicionales se pueden comprar separados, lee el manual para detalles.

Uamenne Plata

Uamenne!



Uamenne

Hable todo que quieras

**\$34.95**  
por mes



**¡ TODOS APROBADOS SIN  
CONTRACTO O DEPÓSITO!**

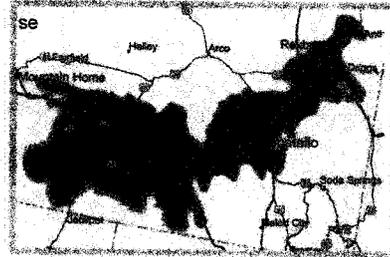
**Minutos sin limitad en  
llamadas entrando/saliendo.**

- GRATIS Correo de voz, identificación de línea llamante, y llamada en espera

**EXTRAS**

- **1VOICE** -Correo electrónica leído activado por voz **\$4.95**
  - Asistencia de directorio ilimitado
  - Conferencias de móvil
- **Mensajes de texto ilimitado \$12.95**
- **Mensajes de foto ilimitado \$14.95**
- **Oferta de Platícar (1VOICE y textos ilimitado) \$14.95**
- **Oferta de Media (1VOICE, textos y fotos ilimitado, y acceso ilimitado de la red) \$24.95**
- **Cuenta por correo \$2.95 por mes**

Área cubierta local de Syringa



Las áreas de servicio representadas actualmente indican el área que cubre el servicio de Syringa Wireless. Este mapa representa las áreas cubiertas para el 2007. Las áreas de servicio podrían variar dependiendo del terreno, el clima, fuerza de la señal, equipo del cliente y otros factores. Cobertura y recepción podría ser disminuida por obstrucciones tales como edificios y follaje (árboles). Garantía de servicio no esta disponible. Llamadas de larga distancia fuera de la red de servicio requerirá el uso de una tarjeta pre-pagada. Los suscriptores que pagan según van usando el teléfono tienen que ser mayores de 14 años, y tienen que presentar prueba de identificación.

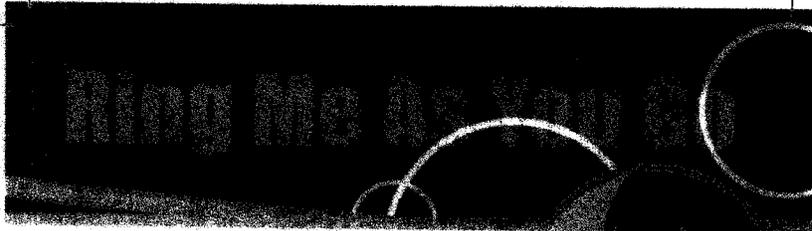
Equipo manual E911 compatible con CDMA es requerido en todos los planes. Asistencia de Directorio Nacional: Llamadas de Asistencia de Directorio Nacional 411 tendrán un cargo de \$1.25 por llamada en adición de los minutos usados. Teléfonos comprados a precios fuera del precio por contrato. Primer mes de acceso pagado por adelantado. E911 Impuestos del Estado y Federales y tarifas regulativas serán aplicadas. Un cargo de \$15.00 será aplicado para reconectar el servicio si este no ha sido pagado durante los primeros cinco días de la fecha de vencimiento. Pregunte un representante por más detalles. Líneas compartidas no están disponibles. Minutos aplican al correo electrónico de voz. Syringa Wireless, LLC reserva los derechos de alterar/cancelar servicio de planes y características en cualquier momento.

Syringa Wireless LLC reserva el derecho de cancelar o cambiar planes de servicios en cualquier momento sin notificar al miembro. Syringa Wireless es una de fábrica registrada y "¡llámenme!" es una marca registrada de servicio de Syringa Wireless LLC, ©Syringa Wireless LLC, 2007 rev. 04/03/07

Pay As You Go

Ring  
me!

2000  
Sprint



**Talk All You Want**

**\$34.95**  
per month

**EVERYONE'S APPROVED  
NO CONTRACT OR DEPOSIT!**



**Ring  
me!**

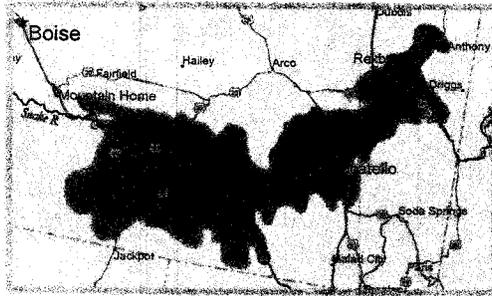
**Unlimited Incoming/Outgoing Minutes  
While Calling From Our Network.**

- FREE Voice Mail, Caller ID and Call Waiting

**EXTRAS**

- **1VOICE** - Voice-activated E-mail reading **\$4.95**
  - Unlimited directory assistance
  - Mobile conferencing
- **Unlimited Text Messaging \$12.95**
- **Unlimited Picture Messaging \$14.95**
- **ChatPak (1VOICE and Unlimited Text) \$14.95**
- **MediaPak (1VOICE, Unlimited Text and Pictures) \$24.95**
- **Paper Bill \$2.95**

**Local Syringa Coverage Area**



Current coverage areas depicted in graphical representation shows approximate licensed coverage areas of Syringa Wireless. This coverage map depicts 2007 coverage. Actual coverage may vary due to terrain, weather, signal strength, customer equipment and other factors. Clarity and reception may be diminished by obstructions such as buildings and foliage. No guarantee of coverage is available. Long Distance charges are in addition to monthly service rate charges, and may only be available through a third party pre-pay calling card provider. Pay as You Go subscribers must be 14 years of age or older having proof of ID.

E911 compatible CDMA handsets are required on all rate plans. National Directory Assistance: 411 Directory assistance calls charged at \$1.25 per call plus airtime. Telephones must be purchased at non-contract retail price. 1st month access fee paid in advance. E911 State and Federal taxes and regulatory fees apply. \$15 reconnect fee applies if access fee is not paid within 5 days of due date. Ask representative for details. Share lines are not available. Airtime applies to Voice Mail and 1Voice services.

Syringa Wireless LLC reserves the right to cancel or change service plan offerings at anytime without notification to subscriber. Syringa Wireless is a registered trademark and "Ring Me" is a registered service mark of Syringa Wireless LLC. ©Syringa Wireless LLC 2007



Illegible text at the top of the advertisement.

**Hamenme!**

Hamenme!

# Llamame Oro

**Hable todo que quieras**

**\$39.95**  
por mes

**¡TODOS APROBADOS SIN  
CONTRACTO O DEPÓSITO!**

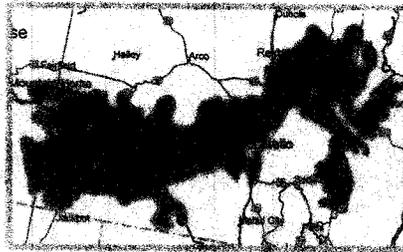
**Minutos ilimitados en  
llamadas entrando/saliendo.**

- GRATIS Correo de voz, identificación de línea llamante, y llamada en espera

### EXTRAS

- **1VOICE** -Correo electrónico leído activado por voz **\$4.95**  
-Asistencia de directorio ilimitado  
-Conferencias de móvil
- **Mensajes de texto ilimitado \$12.95**
- **Mensajes de foto ilimitado \$14.95**
- **Oferta de Platicar (1VOICE y textos ilimitado) \$14.95**
- **Oferta de Media (1VOICE, textos y fotos ilimitado,  
y acceso ilimitado de la red) \$24.95**
- **Cuenta por correo \$2.95 por mes**

**Ilimitada  
área cubierta**



Las áreas de servicio representadas actualmente indican el área que cubre el servicio de Syringa Wireless. Este mapa representa las áreas cubiertas para el 2007. Las áreas de servicio podrían variar dependiendo del terreno, el clima, fuerza de la señal, equipo del cliente y otros factores. Claridad y recepción podría ser disminuida por obstrucciones tales como edificios y follaje (árboles). Garantía de servicio no está disponible. Llamadas de larga distancia fuera de la red de servicio requerirá el uso de una tarjeta pre-pagada. Los suscriptores que pagan según van usando el teléfono tienen que ser mayores de 14 años, y tienen que presentar prueba de identificación.

Equipo manual E911 compatible con CDMA es requerido en todos los planes. Asistencia de Directorio Nacional: Llamadas de Asistencia de Directorio Nacional 411 tendrán un cargo de \$1.25 por llamada en adición de los minutos usados. Teléfonos comprados a precios fuera del precio por contrato. Primer mes de acceso pagado por adelantado. E911 Impuestos del Estado y Federales y tarifas regulativas serán aplicadas. Un cargo de \$15.00 será aplicado para reconectar el servicio si este no ha sido pagado durante los primeros cinco días de la fecha de vencimiento. Pregunte un representante por más detalles. Líneas compartidas no están disponibles. Minutos aplican al correo electrónico de voz. Syringa Wireless, LLC reserva los derechos de alterar/cancelar servicio de planes y características en cualquier momento.

Syringa Wireless LLC reserva el derecho de cancelar o cambiar planes de servicios en cualquier momento sin notificar al miembro. Syringa Wireless es una de fábrica registrada y "Llamame!" es una marca registrada de servicio de Syringa Wireless LLC, ©Syringa Wireless LLC, 2007

rev. 04/03/07



# Ring Me Unlimited

Talk All You Want

**\$39.95**  
per month

EVERYONE'S APPROVED  
NO CONTRACT OR DEPOSIT!



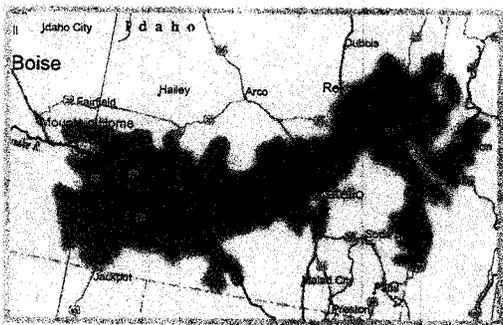
**Unlimited Incoming/Outgoing Minutes  
While Calling From Our Network.**

- FREE Voice Mail, Caller ID and Call Waiting

**EXTRAS**

- **1VOICE** - Voice-activated E-mail reading **\$4.95**
  - Unlimited directory assistance
  - Mobile conferencing
- **Unlimited Text Messaging \$12.95**
- **Unlimited Picture Messaging \$14.95**
- **ChatPak (1VOICE and Unlimited Text) \$14.95**
- **MediaPak (1VOICE, Unlimited Text and Pictures) \$24.95**
- **Paper Bill \$2.95**

**Unlimited Coverage Area**



<sup>1</sup> Airtime minutes apply  
<sup>2</sup> Unlimited Directory Assistance uses local telephone directories  
 Current coverage areas depicted in graphical representation shows approximate licensed coverage areas of Syringa Wireless. This coverage map depicts 2007 coverage. Actual coverage may vary due to terrain, weather, signal strength, customer equipment and other factors. Clarity and reception may be diminished by obstructions such as buildings and foliage. No guarantee of coverage is available. Long Distance charges are in addition to monthly service rate charges, and may only be available through a third party pre-pay calling card provider. Pay as You Go subscribers must be 14 years of age or older having proof of ID.

E911 compatible CDMA handsets are required on all rate plans. National Directory Assistance: 411 Directory assistance calls charged at \$1.25 per call plus airtime. Telephones must be purchased at non-contract retail price. 1st month access fee paid in advance. E911 State and Federal taxes and regulatory fees apply. \$15 reconnect fee applies if access fee is not paid within 5 days of due date. Ask representative for details. Share lines are not available. Airtime applies to Voice Mail and 1Voice services.

Syringa Wireless LLC reserves the right to cancel or change service plan offerings at anytime without notification to subscriber. Syringa Wireless is a registered trademark and "Ring Me" is a registered service mark of Syringa Wireless LLC, ©Syringa Wireless LLC 2007  
 rev. 01/08/07

## ¡Gratis!

### • Larga distancia nacional

### • Noches y fines de semana - Empieza a 7 pm

Noches son Lunes a Jueves 7 pm a 7 am  
y fines de semanas son Viernes 7 pm a Lunes 7 am

### • Minutos de Móvil a Móvil

Minutos de móvil a móvil permite a los clientes de Syringa Wireless llamadas gratis del uno al otro.

#### EXTRAS

#### Oferta característica \$4.95

- 50 mensajes de texto
- 1 VOICE

#### Oferta de Platicar \$9.95

- Mensaje de texto ilimitado
- 1 VOICE

#### Mensajes de Foto Ilimitado \$14.95

#### Mensaje de texto

- Mensajes de texto ilimitado \$12.95
- 1000 mensajes de texto \$9.95
- 500 mensajes de texto \$4.95

#### Oferta de Media \$24.95

Mensajes de texto ilimitado, mensajes de foto ilimitado, y acceso ilimitado de la red.

#### Protección para su teléfono \$3.95

- Programa de reemplazo por mes y por líneas.

#### Cuenta por correo con detalles \$2.95 por mes.

#### Términos y Condiciones:

- Contrato por tiempo especificado es requerido.
- Sin tarifa de activación en contratos de 30 meses, tarifa de \$10.00 en contratos por dos años, y tarifa de \$25.00 en contratos por un año.
- Mensajes de texto serán cargado a \$0.10 por mensaje.
- Suscriptores podrán cambiarse a un plan de más costo durante los primeros seis meses de contrato.
- Se requiere que un 50% de cargado minutos usados sea dentro Syringa Network.
- Norma de devolución es de 14 días.
- E911 Impuestos Estatales y Federales aplican.
- Cargos por características opcionales serán cargados por cada teléfono.
- Las tarifas serán cobradas en incrementos de minutos redondeados al próximo minuto mas alto.
- CDMA teléfono digital requerido en todas los planes.
- Llamadas originadas fuera de Syringa Network serán cobradas a \$0.50 por minuto.
- Tarifa por minutos cubiertos serán cargados a \$0.50 por minuto y incluye larga distancia.

\*Las áreas de servicio representadas actualmente indican el área que cubre el servicio de Syringa Wireless. Esta mapa representa las áreas cubiertas para el 2007. Las áreas de servicio podrían variar dependiendo del terreno, el clima, fuerza de la señal, equipo del cliente y otros factores. Claridad y recepción podría ser disminuida por obstrucciones tales como edificios y follaje (árboles). Garantía de servicio no está disponible.

**Syringa**  
WIRELESS

Syringa Wireless LLC reserva el derecho de cancelar o cambiar planes de servicios en cualquier momento sin notificar al miembro.  
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rev. 03/27/07

## Ocho Estados

¡llámenme!

Ofertas de Servicio Introdutorio

**Syringa**  
WIRELESS



## Hable Todo Que Quieras



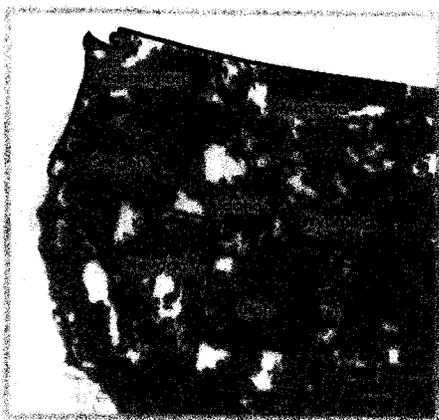
- Identificación de línea llamante GRATIS
- Correo de voz GRATIS<sup>1</sup>
- Llamada en espera GRATIS<sup>1</sup>
- Avance de llamada GRATIS<sup>1</sup>

### Incluido en planes de \$59.95 y más

- **Llamadas Recibidas Gratis**  
(Valor de \$10 por mes)
- **1VOICE** (correo electrónico leído activado por voz)<sup>1</sup>
- Asistencia de directorio ilimitado<sup>1,2</sup>
- Conferencias de móvil<sup>1,3</sup>
- 50 mensajes de texto GRATIS<sup>1</sup>

### Área cubierta por ocho estados

Área cubierta incluye estos siete estados: Washington, Oregon, Idaho, Montana, Wyoming, Nevada, Utah y un Estado adicional de su selección!



Acceso Mensual	Minutos	Cobertura de Ocho Estados
<b>\$19<sup>95</sup>*</b>	90	cualquier momento (con teléfono seleccionado especial)
<b>\$39<sup>95</sup>*</b>	500 1000 1000	cualquier momento noches/fines de semana móvil a móvil
<b>\$49<sup>95</sup></b>	1000 1000 1000 1000	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$59<sup>95</sup></b>	1000 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$79<sup>95</sup></b>	1500 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$109<sup>95</sup></b>	2000 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$149<sup>95</sup></b>	3000 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$199<sup>95</sup></b>	5000 Ilimitado Ilimitado Ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas

<sup>1</sup> Minutos de servicio que aplican  
<sup>2</sup> Asistencia de información telefónica ilimitada usa directorios telefónicos locales.  
<sup>3</sup> Conferencia móvil usando 10 números telefónicos a la misma vez pagando solamente por una llamada.

Todas líneas primario y líneas compartidas incluyen correo de voz, identificación de línea, llamante en espera, y avance de llamada

**Puedas añadir hasta 4 líneas compartidas por solamente \$9<sup>95</sup> cada línea por mes**

\* Líneas compartidas no están disponibles. Artículo gratis incluye identificación de línea llamante, correo de voz, llamada en espera y avance de llamada. Servicios adicionales se pueden comprar separados, lee el manual para detalles.

## FREE!

- **Nationwide Long Distance**
- **Nights & Weekend Minutes - Start at 7 pm!**  
Nights are Monday - Thursday 7 p.m. - 7 a.m.  
and Weekend minutes are Friday 7 p.m. - Monday 7 a.m.
- **Mobile-to-Mobile Minutes**  
Mobile-to-Mobile minutes allow Syringa Wireless customers to call each other for free.

### EXTRAS

#### FeaturePak \$4.95

- 50 Text Messages
- 1 VOICE

#### ChatPak \$9.95

- Unlimited Text Messages
- 1 VOICE

#### Text Messaging

- Unlimited Text Messaging \$12.95
- 1000 Text Messages \$9.95
- 500 Text Messages \$4.95

#### Unlimited Picture Messaging \$14.95

#### MediaPak \$24.95

- Unlimited Text Messaging, Unlimited Picture Messaging

#### Phone Guard \$3.95

- Phone replacement program per month per line

#### Detailed Paper Bill \$2.95 per month

### Terms & Conditions

- Term contract required
- No activation fee on 30 month contract, \$10 on 2 year contract and \$25 on 1 year contract
- Text message overages will be billed at .10¢ per message
- Subscribers can move to a higher rate plan within the first six months of service
- 50% of airtime usage is required within the Syringa Network
- 14 day return policy
- E911 State and Federal taxes and regulatory fees apply
- Optional feature charges are billed per phone
- All charges are billed at minute increments rounded to the next highest minute
- CDMA Digital E911 compatible phone required on all rate plans
- Minute overage charges will be billed at .50¢ per minute and includes long distance

\*Current coverage areas depicted in graphical representation shows approximate licensed coverage area of Syringa Wireless and our CDMA roaming partners. Actual coverage may vary due to terrain, weather, signal strength, customer equipment and other factors. Clarity and reception may be diminished by obstructions such as buildings and foliage. No guarantee of coverage is available.

**Syringa**  
WIRELESS.

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rev. 01/08/07

## Eight States

**Ring  
me!**

**Introductory Service Offers!**

**Syringa**  
WIRELESS.

# Talk All You Want

Ring  
me!



## Freebies

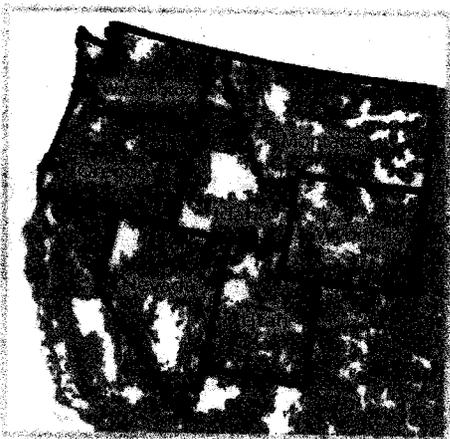
- FREE Caller ID
- FREE Voicemail<sup>1</sup>
- FREE Call Waiting<sup>1</sup>
- FREE Call Forwarding<sup>1</sup>

## Included in Plans \$59.95 and Above

- **FREE INCOMING CALLS**  
(\$10 per month value)
- **1VOICE** (Voice-activated E-mail reading)<sup>1</sup>
  - Unlimited Directory Assistance<sup>1,2</sup>
  - Mobile Conference<sup>1,3</sup>
- FREE 50 Text Messages<sup>1</sup>

### Eight States Coverage Area

Coverage includes these seven states: Washington, Oregon, Idaho, Montana, Wyoming, Nevada and Utah plus an additional state of your choice!



## Monthly Access

**\$19<sup>95</sup>\***

90

## Minutes Eight States Coverage

anytime  
(with special phone selection)

**\$39<sup>95</sup>\***

500  
1000  
1000

anytime  
nights/weekends  
mobile-to-mobile

**\$49<sup>95</sup>**

1000  
1000  
1000  
1000

anytime  
nights/weekends  
mobile-to-mobile  
incoming calls

**\$59<sup>95</sup>**

1000  
Unlimited  
Unlimited  
Unlimited

anytime  
nights/weekends  
mobile-to-mobile  
incoming calls

**\$79<sup>95</sup>**

1500  
Unlimited  
Unlimited  
Unlimited

anytime  
nights/weekends  
mobile-to-mobile  
incoming calls

**\$109<sup>95</sup>**

2000  
Unlimited  
Unlimited  
Unlimited

anytime  
nights/weekends  
mobile-to-mobile  
incoming calls

**\$149<sup>95</sup>**

3000  
Unlimited  
Unlimited  
Unlimited

anytime  
nights/weekends  
mobile-to-mobile  
incoming calls

**\$199<sup>95</sup>**

5000  
Unlimited  
Unlimited  
Unlimited

anytime  
nights/weekends  
mobile-to-mobile  
incoming calls

All Primary and Share Lines include  
Voice Mail, Caller ID, Call Waiting  
and Call Forwarding

Add up to 4 Share  
Lines for only **\$9<sup>95</sup>**  
each per month

<sup>1</sup> Airtime minutes apply

<sup>2</sup> Unlimited Directory Assistance uses local telephone directories

<sup>3</sup> Mobile Conference up to 10 numbers at the same time and only be billed for one call

\* Share lines not available. Freebies include Caller ID, Voicemail, Call Waiting, and Call Forwarding. Additional service offering can be purchased separately, see plan guide for full details.



# Llamenme Nacional

# Para

# El Trabajo

# Ocho Estados

## ¡llamenme!

### Hablo Todo Que Quieras

- **Llamadas Recibidas Gratis**  
(Valor de \$10 por mes)
- Identificación de línea llamante GRATIS
- Correo de voz GRATIS<sup>1</sup>
- Llamada en espera GRATIS<sup>1</sup>
- Avance de llamada GRATIS<sup>1</sup>
- **1VOICE** (correo electrónico leído activado por voz)<sup>1</sup>
- Asistencia de directorio ilimitado<sup>1,2</sup>
- Conferencias de móvil<sup>1,3</sup>

Acceso Mensual	Minutos	Por Toda La Nación	Acceso Mensual	Minutos	Cobertura de Ocho Estados
<b>\$69<sup>95</sup></b>	500 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas	<b>\$59<sup>95</sup></b>	700 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$89<sup>95</sup></b>	750 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas	<b>\$79<sup>95</sup></b>	1000 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$129<sup>95</sup></b>	1000 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas	<b>\$109<sup>95</sup></b>	1500 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$159<sup>95</sup></b>	1500 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas	<b>\$149<sup>95</sup></b>	2500 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$179<sup>95</sup></b>	1750 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas	<b>\$199<sup>95</sup></b>	4000 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas
<b>\$199<sup>95</sup></b>	2000 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas			
<b>\$249<sup>95</sup></b>	3000 ilimitado ilimitado ilimitado	cualquier momento noches/fines de semana móvil a móvil llamadas recibidas			

Todas líneas primario y líneas compartidas incluyen correo de voz, identificación de línea llamante, llamada en espera, y avance de llamada. 1VOICE y llamadas recibidas gratis.

Puedas añadir hasta 4 líneas compartidas por solamente \$19<sup>95</sup> cada línea por mes

<sup>1</sup> Minutos de servicio que aplican  
<sup>2</sup> Asistencia de información telefónica ilimitada usa directorios telefónicos locales.  
<sup>3</sup> Conferencia móvil usando 10 números telefónicos a la intima vez pagando solamente por una llamada



# Bring me FOR WORK

**Bring  
me!**

## Talk All You Want

- **FREE INCOMING CALLS**  
(\$10 per month value)
- FREE Caller ID
- FREE Voicemail<sup>1</sup>
- FREE Call Waiting<sup>1</sup>
- FREE Call Forwarding<sup>1</sup>
- **1 VOICE** (Voice-activated E-mail reading)<sup>1</sup>
- Unlimited Directory Assistance<sup>1,2</sup>
- Mobile Conference<sup>1,3</sup>

<sup>1</sup> Airtime minutes apply  
<sup>2</sup> Unlimited Directory Assistance uses local telephone directory  
<sup>3</sup> Mobile Conference up to 10 numbers at the same time and only one billed for one call

# National 8 States

Monthly Access	Minutes	Nationwide	Monthly Access	Minutes	Eight States Coverage
<b>\$69<sup>95</sup></b>	500 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls	<b>\$59<sup>95</sup></b>	700 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$89<sup>95</sup></b>	750 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls	<b>\$79<sup>95</sup></b>	1000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$129<sup>95</sup></b>	1000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls	<b>\$109<sup>95</sup></b>	1500 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$159<sup>95</sup></b>	1500 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls	<b>\$149<sup>95</sup></b>	2500 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$179<sup>95</sup></b>	1750 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls	<b>\$199<sup>95</sup></b>	4000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls
<b>\$199<sup>95</sup></b>	2000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls	<b>\$199<sup>95</sup></b>		
<b>\$249<sup>95</sup></b>	3000 Unlimited Unlimited Unlimited	anytime nights/weekends mobile-to-mobile incoming calls			

All Primary and Share Lines include Voice Mail, Caller ID, Call Waiting, Call Forwarding, 1 Voice and FREE incoming calls.

Add up to 10 Share  
Lines for only **\$19<sup>95</sup>** each per month

# EXHIBIT F

Local Calling Amount Monthly Service Rate	Syringa Wireless		Clear Talk		ATC		Direct		Fairpoint		Filer		Mud Lake Telephone		PMT		Rual Telephone		Silver Star		Quest	
	Unlimited*	\$34.95 / \$39.95*	Wireless	Unlimited**	landline	Unlimited	landline	Unlimited	landline	Unlimited	landline	Unlimited	landline	Unlimited	landline	Unlimited	landline	Unlimited	landline	Unlimited	landline	Unlimited
			\$32.95	\$32.00	\$24.10	\$35.95	\$27.89	\$15.00	\$16.75	\$21.63-24.10	\$24.10	\$24.10	N/A	\$19.75	\$199.95							

\*\*Up to  
5,000  
minutes

# **EXHIBIT G**

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# 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 collateral 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 voice 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

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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**

**W**hen 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**

**W**hen 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**

**I**n 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**

**O**n 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.

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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 H

