



# Davis Wright Tremaine LLP

ANCHORAGE    BELLEVUE    LOS ANGELES    NEW YORK    PORTLAND    SAN FRANCISCO    SEATTLE    SHANGHAI    WASHINGTON, D.C.

MARK P. TRINCHERO  
Direct (503) 778-5318  
marktrinchero@dwt.com

SUITE 2300  
1300 SW FIFTH AVENUE  
PORTLAND, OR 97201-5682

TEL (503) 241-2300  
FAX (503) 778-5299  
www.dwt.com

February 11, 2005

**VIA e-filing and**  
**UPS NEXT DAY MAIL**

Ms. Annette Taylor, Administrative Specialist  
Administrative Hearings Division  
**PUBLIC UTILITY COMMISSION OF OREGON**  
550 Capitol Street N.E., Suite 215  
Salem, Oregon 97301-2551

Re:    Dockets UM 1176/UM 1177

Dear Ms. Taylor:

Enclosed for filing are an original and five copies of each of the following:

1. Edge Wireless' Motion to Consolidate Dockets UM 1176 and UM 1177; and
2. Amended Combined Application of Edge Wireless, LLC for Designation as an Eligible Telecommunications Carrier (Rural and Non-Rural Areas).

Thank you for your assistance. Please call me if you have any questions.

Thank you for your assistance.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'Mark P. Trinchero', written over a horizontal line.

Mark P. Trinchero  
MPT:djr  
Enclosures  
cc w/encl: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

<b>APPLICATION OF EDGE WIRELESS, LLC</b>	)	
<b>FOR DESIGNATION AS AN ELIGIBLE</b>	)	
<b>TELECOMMUNICATIONS CARRIER</b>	)	<b>Consolidated Docket Nos.</b>
<b>PURSUANT TO THE</b>	)	<b>UM 1176 and UM 1177</b>
<b>TELECOMMUNICATIONS ACT OF 1996</b>	)	
<b>(RURAL AND NON-RURAL AREAS)</b>	)	

**AMENDED COMBINED APPLICATION OF EDGE WIRELESS, LLC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
(RURAL AND NON-RURAL AREAS)**

Edge Wireless, LLC (“Edge”), by its attorneys, hereby submits this Amended Combined Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Sections 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended (“Act”), 47 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. Edge 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 and high cost areas and low income customers in the geographic areas specified in this Application. In support of this Application, the following is respectfully shown:

**I. APPLICANT**

Edge is a Commercial Mobile Radio Service (“CMRS”) carrier providing “mobileservice” as defined in 47 U.S.C. § 153(27). Edge provides interstate telecommunications services as defined in 47 U.S.C. § 254(d) and 47 C.F.R. § 54.703(a). Through its cellular authorizations, Edge is licensed to serve the following Basic Trading Areas (“BTAs”) in Oregon:

Coos Bay 97, Roseburg 385, and the portion of Medford 288 encompassing Josephine County. Pursuant to these authorizations, Edge provides service to the following counties in Oregon: Coos, Curry, Douglas, and Josephine. Edge’s authorized service area in Oregon is coextensive with the boundaries of Coos, Curry, Douglas and Josephine counties.

## **II. ALLEGATION OF FACTS**

### **A. Eligibility and Identification of the Service Area.**

Under Sections 214(e) and 254 of the Act, the Public Utility Commission of Oregon (“OPUC” or “Commission”) is authorized to designate Edge as an ETC. Section 214(e)(2) 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 service support mechanisms; and (ii) advertises the availability of such services. In its First Report and Order implementing Sections 214(e) and 254, the FCC designated the specific features a carrier must provide or agree to provide to be designated as an ETC.<sup>1</sup> The FCC also recognized that wireless telecommunications providers are eligible to be designated as ETCs.<sup>2</sup>

Edge 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.* Edge is, therefore, 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 LEC study area.<sup>3</sup> Attached hereto as Exhibit A is a map depicting Edge’s proposed ETC service area in Oregon superimposed over the rural incumbent local exchange carrier

---

<sup>1</sup> *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8809-25 (1997) (“First Report and Order”).

<sup>2</sup> *Id.*, at 8858-59.

<sup>3</sup> *See*, 47 C.F.R. §54.207(b).

("ILEC") wire centers falling within Edge's proposed ETC service area. Attached as Exhibit B is a list of non-rural ILEC and rural ILEC wire centers that fall either entirely or partially within Edge's basic trading area ("BTA").

**B. The Legal Standard for Granting ETC Status in Non-Rural Areas.**

In areas served by non-rural ILECs, the Commission can designate Edge as an ETC immediately upon finding that the company meets the nine-point checklist and that it agrees to offer and advertise the supported services throughout the proposed ETC service area, without addressing whether such designation otherwise serves the public interest.

Edge originally filed two separate applications for ETC status with the Commission: one for specified areas within the service areas of non-rural ILECs and another for specified areas within the service areas of rural ILECs. The non-rural area application was filed on October 1, 2004 and docketed at UM 1176. The rural area application was filed on October 19, 2004 and docketed as UM 1177. Edge's decision to file separate applications was based on FCC precedent and conferences with Commission Staff indicating that the requirements for obtaining ETC status in non-rural ILEC territories were less stringent than the requirements for obtaining ETC status in rural ILEC territories.

On November 18, 2004, after Edge had filed its initial applications in UM 1176 and UM 1177, the FCC's Wireless Telecommunications Bureau released the *Sprint ETC Order*.<sup>4</sup> Commission Staff interprets the *Sprint ETC Order* as requiring the Commission to apply the public interest standard applicable to ETC applications in rural ILEC areas to Edge's application for ETC status in non-rural areas.<sup>5</sup> While Edge does not believe the Commission must or should

---

<sup>4</sup> *In the Matter of the Application of SPRINT CORPORATION for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. 04-3617, CC Docket No. 96-45 (released November 18, 2004).

<sup>5</sup> In the *Sprint ETC Order*, the FCC approved Sprint's non-rural area ETC application based on a finding that Sprint satisfied the public interest standard by making commitments similar to those made by ETCs in rural areas in the *VTC ETC Order, In the Matter of VIRGINIA CELLULAR, LLC for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. FCC 03-338, CC Docket No. 96-45 (released January 22, 2004), and the *HTC ETC Order, In the Matter of HIGHLAND CELLULAR, INC. for*

conduct such an analysis, it hereby combines its non-rural and rural applications.<sup>6</sup> Should the Commission, however, decide to apply a public interest test to the non-rural ILEC portion of Edge's application, the statements contained in this amended combined application regarding the public interest apply with equal vigor to the non-rural ILEC and rural ILEC territories for which Edge seeks ETC status.

**C. Redefinition in Non-Rural Areas.**

Edge's BTA boundaries in Oregon follow county lines. While most of the Qwest and Verizon wire centers in Southwestern Oregon fall completely within Edge's BTA, two wire centers, Qwest's Grants Pass wire center and Verizon's Provolt wire center, straddle the county line and, therefore, extend beyond Edge's BTA.

In order to accommodate CMRS carriers who have authorized service areas that do not match non-rural ILEC wire centers, state commissions may designate the competitive ETC's service area along boundaries that are not identical to non-rural ILEC wire center boundaries. To do otherwise would effectively exclude wireless carriers as a class from receiving universal service support throughout their licensed serving areas and would be contrary to the pro-competition policies articulated by Congress, the FCC and other states.

---

*Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996, Order No. FCC 04-37, CC Docket No. 96-45 (released April 12, 2004).*

<sup>6</sup> FCC ETC orders are not binding on this Commission when exercising its authority under Section 214(e)(2). The Commission should not follow the FCC's *Sprint ETC Order* as to the non-rural ILEC portion of Edge's application. Doing so would be contrary to the statutory scheme adopted by Congress and inconsistent with prior decisions of this Commission. 47 U.S.C. 214 (e)(2) clearly mandates that a state "shall" designate additional ETCs in non-rural areas "so long as each additional requesting carrier meets the requirements of paragraph (1)". Paragraph (1) of Section 214(e) does not include a public interest test. Under Section 214(e)(2) a public interest finding is required with respect to rural ILEC areas only. This Commission has previously recognized this scheme when it granted, without applying a public interest test, ETC status to RCC Minnesota, Inc. ("RCC"). See, *In the Matter of the Application of RCC MINNESOTA, INC. for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996, Order No. 04-355, Docket UM 1083 (June 24, 2004)* ("RCC ETC Order") and United States Cellular Corporation ("USCC"), *In the Matter of the Application of US CELLULAR CORPORATION for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996, Order No. 04-356, Docket UM 1084 (June 24, 2004)* ("USCC ETC Order").

The Commission has unfettered discretion to define a competitive ETC's boundaries within the service territories of non-rural ILECs. Unlike in the redefinition of rural ILEC study areas, which require FCC concurrence<sup>7</sup>, the Commission has the discretion to split non-rural ILEC wire centers. Accordingly, Edge requests that the Commission redefine the Grants Pass and Provolt wire centers to coincide with Edge's BTA for purposes of federal universal service funding.

Defining Edge's ETC area to match its BTA in non-rural ILEC areas is consistent with the approach taken by the in the *RCC ETC Order* and the *USCC ETC Order*.<sup>8</sup> Both RCC and USCC sought ETC designation coextensive with their respective service areas in the non-rural ILEC territories in Oregon.<sup>9</sup> In the *RCC ETC Order* and the *USCC ETC Order*, the Commission granted those requests.<sup>10</sup>

Having previously redefined non-rural ILEC study areas below the wire center level, there is no reason for the Commission to refuse Edge's request to redefine the Grants Pass and Provolt wire centers coextensive with Edge's BTA. However, should the Commission determine that it does not wish to redefine the non-rural ILEC study area boundaries below the wire center level, in the alternative Edge, commits to provide service to requesting customers throughout the Qwest Grants Pass and Verizon Provolt wire centers consistent with its commitment to serve the entire rural ILEC wire centers of Azalea, Drain and Yoncalla.

---

<sup>7</sup> See the OPUC's Redefinition Petitions for FCC concurrence in the *RCC* and *USCC* matters, submitted by this Commission with the FCC.

<sup>8</sup> See, *RCC ETC Order* at 7, 16 and *USCC ETC Order* at 6, 15.

<sup>9</sup> See, *RCC ETC Application* ¶ 6 ("Accordingly, RCC requests designation for its ETC service are in the non-rural wire centers listed in Exhibit B, attached hereto. Where RCC serves only a portion of a wire center listed, it requests that it be designated as an ETC in that portion of the wire center where it is authorized by the FCC to serve"), see also, *USCC ETC Application* at section II.A.

<sup>10</sup> See, *RCC ETC Order* at 7 ("RCC's application as to the wire centers served by Qwest and Verizon should be granted.") and 16 ("RCC's amended application for designation as an ETC is granted in compliance with the terms of this order. The designation is effective in the area specified in Appendix A and the wire centers listed in Appendix B"), see also, *USCC ETC Application* at 6, 15.

**D. The Legal Standard for Granting ETC Status in Rural Areas.**

Edge's revised proposed ETC area covers the rural ILEC wire centers set forth in the Exhibits hereto in their entirety.<sup>11</sup> Edge may be designated as an ETC in these rural ILEC wire centers upon a finding that: (1) Edge offers the supported services; (2) Edge will advertise the availability of such services using media of general distribution; and (3) such designation would serve the public interest.<sup>12</sup> Edge's proposed ETC area covers the entire study area of Citizens Telecommunications Company of Oregon, Inc. ("Citizens"). No redefinition of the Citizens study area is required. Edge's proposed ETC area covers some but not all of the wire centers in the study areas of Cascade Utilities, Inc. ("Cascade"), CenturyTel of Oregon, Inc. ("CenturyTel") and United Telephone Company of the Northwest ("United"). The Commission has already found that the rural ILEC service areas of Cascade, CenturyTel and United should be redefined to the wire center level.<sup>13</sup> The Commission's Petition to the FCC for concurrence in its redefinition plan has been granted. The FCC concurred in the Commission's redefinition petition. Accordingly, no additional redefinition is required.

**III. SERVICES PROVIDED BY PETITIONER**

Edge 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 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>14</sup> Edge 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 facilities – including its own

---

<sup>11</sup> See Exhibits A, B, D and E (i.e., revised proposed ETC service area maps showing detail regarding the Azalea, Drain and Yoncalla wire centers).

<sup>12</sup> See, 47 C.F.R. § 54.207(c).

<sup>13</sup> See the *RCC ETC Order* at 16 and *USCC ETC Order* at 15.

<sup>14</sup> 47 C.F.R. §54.101(a).

antennas, towers, and mobile switching offices. Therefore, Edge satisfies the requirements of Section 254(c) of the Act.

**A. Voice-grade access to the public switched telephone network.**

FCC Rule Section 54.101(a)(1) requires voice grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Megahertz within the 300 to 3000 Megahertz frequency range.<sup>15</sup> Edge provides voice grade access to the public switched network through interconnection arrangements with local telephone companies. Edge offers its subscribers this service at a bandwidth between 1850 and 1990 Megahertz, thereby providing voice grade access pursuant to the FCC's definition.

**B. Local usage.**

Edge's 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>16</sup> Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs. Edge meets the local usage requirements by including local usage in its rate plans and Edge will comply with any and all minimum local usage requirements adopted by the FCC.

**C. 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. Edge currently provides DTMF signaling consistent with the FCC's Rules.

**D. 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>17</sup> Edge provides single party service, as

---

<sup>15</sup> *First Report and Order*, at 8810-11.

<sup>16</sup> *Id.* at 8814.

<sup>17</sup> *Id.*, at 8810.



required by 47 C.F.R. §54.101(a)(4).

**E. Access to emergency services.**

The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Edge currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement. Phase I E911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information.<sup>18</sup> To date, Edge has received no requests for Phase I or Phase II E911 from any Public Safety Answering Points (“PSAPs”) in Oregon.

**F. 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>19</sup> Edge 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.

**G. 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 service mechanisms.”<sup>20</sup> Edge presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXC.

---

<sup>18</sup> *See Id.*, at 8815-17.

<sup>19</sup> *Id.*, at 8817-18.

<sup>20</sup> *Id.*, at 8819.

**H. Access to directory assistance.**

The ability to place a call to directory assistance is a required service offering.<sup>21</sup> Subscribers to Edge's services are able to dial "411" or "555-1212" to reach directory assistance from their mobile phones.

**I. Toll limitation for qualifying low income consumers.**

An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9).<sup>22</sup> In particular, all ETCs must provide toll blocking which allows customers to block the completion of outgoing toll calls.<sup>23</sup> Edge currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. §§ 54.400-415. Once designated as an ETC, Edge will participate in Lifeline, as required, and will provide toll blocking capability in satisfaction of the FCC's requirement.

**IV. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. Section 54.201, Edge 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.<sup>24</sup> Edge intends to offer advertising similar to USCC's advertising in Oregon to promote Lifeline service, primarily through print advertising and direct outreach by Edge's direct and indirect sales staff to community health, welfare and employment offices as well as Indian tribes. Edge will not be promoting Linkup service because Edge does

---

<sup>21</sup> *Id.*, at 8821.

<sup>22</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>23</sup> *First Report and Order*, at 8821-22.

<sup>24</sup> *See Confidential Exhibit F* which provides data regarding Edge's advertising expenditures in 2004. Edge expects to engage in similar, if not greater, levels of advertising in 2005.

not charge for activation of wireless services. Edge will advertise that fact that it does not charge activation fees as a functional equivalent of advertising Linkup.

## V. PUBLIC INTEREST FACTORS

As explained above, in areas served by non-rural ILECs, the Commission must designate Edge as an ETC immediately upon finding that the company meets the nine-point checklist and that it agrees to offer and advertise the supported services throughout the proposed ETC service area, without addressing whether such designation otherwise serves the public interest. However, the public interest discussion in this amended combined application applies with equal vigor to the non-rural ILEC areas within Edge's BTA.

For those portions of the state served by rural ILECs, the Commission must make the findings set forth in the previous paragraph, and must also find that Edge's designation as an ETC would serve the public interest.<sup>25</sup> Edge considers Citizens, Cascade, CenturyTel and United to be "rural telephone companies," as defined by Section 153 of the Act.

The public interest must be determined by following guidance provided by Congress in adopting the Act and the FCC in its enabling orders.<sup>26</sup> The overarching principles embodied in the Act are to "promote competition and reduce regulation . . . secure lower prices and higher quality services . . . and encourage the rapid deployment of new technologies."<sup>27</sup> In its implementing orders, the FCC ruled that the pro-competitive and deregulatory directives from

---

<sup>25</sup> See, Section 214(e)(2) of the Act.

<sup>26</sup> Pub. L. No. 104-104, 110 Stat. 56 (1996); See also, *First Report and Order, supra; Federal-State Joint Board on Universal Service, Ninth Report and Order and Eighteenth Order on Reconsideration*, 14 FCC Rcd 20432 ("Ninth Report and Order"); *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 16 FCC Rcd 11244 (2001) ("Fourteenth Report and Order"); See also *NAACP v. FCC*, 425 U.S. 662, 669 (1976); accord, e.g., *Office of Communication of the United Church of Christ v. FCC*, 707 F. 2d 1413, 1427 (D.C. Cir. 1983); *Bilingual Bicultural Coalition on Mass Media, Inc. v. FCC*, 595 F. 2d 621, 628 & n. 22 (D.C. Cir. 1978).

<sup>27</sup> See Act (preamble).

Congress required universal service support mechanisms to be competitively neutral and portable among eligible carriers.<sup>28</sup>

As shown herein, the public interest objectives set forth in the Act, the FCC's Orders, and precedent established in Oregon and across the country will be furthered by the designation of Edge as an ETC in the rural ILEC wire centers listed in Exhibit B.

**A. Increased Consumer Choice and Service Quality.**

Designation of Edge as an ETC is in the public interest because such designation will promote competition and thereby facilitate the provision of advanced communications services and higher quality services to the residents of rural Oregon. A central tenet of federal universal service policy is that consumers in rural areas are entitled to the same kind of choices of telecommunications services as those in urban areas.<sup>29</sup> In many rural areas, no meaningful choice of local exchange carriers exists. Designation of Edge as an ETC will provide rural consumers with a choice among carriers and service features. Edge will provide wider local calling areas,<sup>30</sup> mobile communications, a variety of service offerings, high-quality service,<sup>31</sup> and competitive rates. Consumers will be able to choose those service features that best meet their needs.

Upon receipt of ETC designation in Oregon, Edge will use the high-cost support it receives to improve its infrastructure in rural areas. Edge is currently evaluating the projected levels of support, along with identifying areas where poor coverage and demand for service coincide.<sup>32</sup> The improved service quality, reliability, and increased choices to rural Oregon will be significant.

---

<sup>28</sup> *First Report and Order*, at 8861-62; *Ninth Report and Order*, at 20480.

<sup>29</sup> See 47 U.S.C. § 254(b)(3).

<sup>30</sup> Edge's local calling area includes most of Northern California and Southwestern Oregon. ILEC local calling areas are primarily limited to their local exchange boundaries and extended area service boundaries.

<sup>31</sup> See Confidential Exhibit G, describing service quality metrics to which Edge adheres.

<sup>32</sup> See Confidential Exhibit H, designating proposed infrastructure investment in Edge's BTA should Edge receive ETC status.

As Edge constructs additional cell sites in high-cost areas to improve the quality of its radio frequency (“RF”) signal, its customers will have a greater choice among service providers and will receive more reliable service. Some will have the option to receive Edge’s service for the first time. Others will see service quality and reliability improvement such that they may choose Edge’s service instead of the ILECs, as opposed to confining their use of wireless service to an ancillary communications tool. The company has every incentive to meet its commitment because use of such funds in this manner will improve its competitive position in the marketplace. Moreover, it has every incentive to maintain or improve reliability and to lower its prices over time because it can only receive high-cost support when it has a customer.<sup>33</sup>

In most rural areas, wireless telephone service is today a convenience, but it will not emerge as a potential alternative to wireline service unless high-cost loop support is made available to drive infrastructure investment. Indeed, without the high-cost program, it is doubtful that many rural areas would have wireline telephone service, even today. Edge has been successful in competing for second lines. However, the rural ILECs serving the proposed ETC service area retain close to 100% of the local exchange market primarily because it is impossible for any company to compete with a monopoly that receives explicit subsidies from the government as well as substantial implicit subsidies that are unavailable to competitors (even those designated as ETCs). Designation of Edge as an ETC will begin to level the playing field among carriers competing in the local exchange market – to the benefit of consumers.<sup>34</sup>

In addition, consumers will benefit from access to advanced wireless data communications. Historically, Edge has been on the forefront in offering advanced wireless

---

<sup>33</sup> Lowering of prices has never been an issue in the wireless industry, not to mention that if a carrier does not use funding as required, ETC status may be revoked.

<sup>34</sup> See United States Cellular, Third Supplemental Order Granting petition for Designation as Eligible Telecommunications Carrier, Docket No. UT-970345 (Jan. 27, 2000), at ¶43 (“The fact that its competitors receive universal service support puts USCC at a disadvantage in its ability to make cellular technology more widely available at competitive prices. Allowing USCC to receive universal service support increases the likelihood that cellular technology will become available to more rural consumers at an affordable price.”)

communications to rural areas. Edge was the first carrier to bring wireless data applications to many rural areas in Southwestern Oregon by launching its GPRS wireless packet data system in 2003. This system offered wireless data rates of up to 40 kilobytes per second (“kbs”). In 2004, Edge upgraded its GPRS packet data system to “EDGE” technology, which increased the data rates up to 150kbs. Edge can now offer internet access in rural areas with very good data rates. Moving forward the service will be advanced by:

- Upgrading EDGE packet data core software and hardware to increase data throughput.
- Improving access to the network by adding additional rural Base Transceiver Systems (BTS).
- Making antenna systems available for rural residences that boost signals between wireless modems and BTS.
- Providing access to upgraded wireless modems as they become available for rural users that enhance data rates.
- Improving wireless feature sets by improving applications such as: Picture messaging, video messaging, text messaging, wireless internet access, wireless security systems and wireless email.

**B. Health and Safety Benefits.**

Designation of Edge will advance important health and safety goals. Edge’s mobile offering will allow rural consumers the flexibility to communicate while on the go and still retain access to emergency services. In addition to being able to reach emergency services while in their homes, wireless subscribers are able to reach emergency services while they are in route to their homes, workplaces, and commercial centers. In designating *USCC* as an ETC in the State of Oregon, the Commission concluded that “the ‘unique advantages’ of wireless telephones, which allow mobile communications beneficial to safety, health, and commerce, weigh in favor of the application.”<sup>35</sup> Similarly, in designating the wireless carrier Smith Bagley, Inc. as an ETC in Arizona, the Arizona Corporation Commission found that carrier’s designation would provide a potential solution to “health and safety risks associated with geographic isolation.”<sup>36</sup> Designation of Edge as an ETC in Oregon will provide similar benefits.

---

<sup>35</sup> *USCC ETC Order* at 8; *see also RCC ETC Order* at 9.

<sup>36</sup> Smith Bagley, Inc., Order, Decision No. 63269, Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000).

Citizens in rural areas depend on mobile phones more and more to provide critical communications needs. The provision of USF funding to Edge will enable it to improve signal strength, thereby improving the reliability of service for health and safety purposes. All wireless carriers are required to implement over the next several years Phase II E-911 service, which permits a caller to be located and tracked. For every cell site Edge constructs, the reliability and performance of its E-911 service will improve. It would be difficult to overstate the important public interest benefit that will be realized by supporting improvement to critical wireless infrastructure.

**C. Competitive Response.**

By designating Edge as an ETC, competition will be increased in the proposed service area. As a result, both Edge and the other carriers serving that area will be motivated to implement advanced communications services and continually improve service quality levels in order to attract customers for their respective services. The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural telephone companies emphasizes competition and consumer benefit, not incumbent protection. There is no question that, if Edge is designated as an ETC and is able to compete for local exchange customers, it will spur a competitive response from affected ILECs: service quality and customer service will improve; new investments in plant will be made; high speed data (DSL) may be deployed more quickly to retain and attract customers; and wider local calling areas, bundled service offerings, and lower prices overall will be introduced to compete with Edge to retain and attract customers.

Another response will be increased investment in areas that are the ILEC's strengths. For example, many ILECs advertise the advantage that wireline facilities offer in the area of high-speed data or Internet access. The affected ILEC can be expected to use its advantage in this area to cement and expand its customer base by investing in facilities needed to bring DSL and other high-speed connectivity to a greater percentage of people living in rural areas. Those that have constructed DS1-ready facilities may lower prices to attract customers. Rural consumers will benefit from these types of investment and price competition, and Edge

believes that the use of high-cost support to develop competitive services in rural areas can be a powerful driver of broadband development by ILECs, who will be forced to respond.

Edge's entry will also help economic development in rural areas. One of the key components in a decision to locate a new business, or to move an existing business, is the quality of overall telecommunications infrastructure in a particular area. More and more, wireless connectivity is an indispensable part of that equation. If telecommunications infrastructure is substandard in a particular area, businesses that serve the community's needs and create jobs may be compelled to leave. Preserving and expanding economic development in rural areas is in the public interest, and a grant of Edge's petition will further that objective.

**D. State and Federal Precedent.**

Designation of Edge as an ETC is consistent with ETC decisions across the country, including the decisions of the Commission.<sup>37</sup> There are now at least twenty cases at the state and federal level where designation of a wireless carrier as an ETC in a rural area was found to be in the public interest. 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 *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>38</sup> More recently, in designating Midwest Wireless Communications, LLC as an ETC in Minnesota, the Minnesota Public Utilities Commission held that, "Competition would benefit consumers in southern Minnesota by increasing customer choice (from no choice in most areas to more than one) and

---

<sup>37</sup> See generally the *USCC ETC Order* and the *RCC ETC Order*.

<sup>38</sup> *RCC Minnesota, Inc., d/b/a Cellular One, Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-023033 (Aug. 14, 2002), ¶68.



providing new services made possible by wireless technologies . . . .”<sup>39</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>40</sup>

This Commission recently concluded that designating wireless carriers as ETCs in rural ILEC territories in Oregon is in the public interest.<sup>41</sup> In coming to this conclusion, the Commission stated:

Ultimately, each of the [public interest] factors discussed above are calculated in a cost-benefit analysis. OTA cites the cost-benefit analysis of *Virginia Cellular* at ¶4, which weighs competitive choice, impact of designation on the USF, the advantages and disadvantages of the service offering, quality of service commitments, and the applicant’s ability to provide the supported services throughout the designated service area within a reasonable amount of time. As we have discussed, USCC’s application would bring competition, spurring innovation; provide advantages through increased mobile wireless offerings; and offer the supported services to customers who request service in the designated area. We acknowledge the costs of the application – a growing burden on the USF and no service quality guarantees – but believe that to the extent that those factors are an issue, they are more than outweighed by the benefits of granting the application. Therefore, we find that USCC’s application for designation as an ETC in its designated area is in the public interest.<sup>42</sup>

As in the case of the USCC and RCC applications, the public interest benefits of designating Edge as an ETC far outweigh any costs associated with doing so.

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

---

<sup>39</sup> Midwest Wireless Communications, LLC, OAH Docket No. 3-2500-14980-2, PUC Docket No. PT6153/AM-02-686, adopted Feb. 13, 2003 (order pending), adopting ALJ’s Findings of Fact, Conclusions of Law, and Recommendation (ALJ Dec. 31, 2002), ¶37.

<sup>40</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).

<sup>41</sup> See *RCC ETC Order* at 16; see also *USCC ETC Order* at 15.

<sup>42</sup> *USCC ETC Order* at 13-14; see also *RCC ETC Order* at 13.

### E. Cream-Skimming

In two recent ETC designation orders,<sup>43</sup> the FCC has addressed concerns relating to perceived cream-skimming in rural areas. According to the FCC, cream-skimming occurs when competitors seek to serve only the low-cost, high revenue customers in a rural telephone company's study area. Neither the *VC ETC Order* nor the *HC ETC Order* is binding on this Commission, and the Commission is free to ignore the FCC's analysis should it so choose. The Commission, however, applied the *VC ETC/HC ETC* cream-skimming analysis in its recent wireless ETC designation decisions.<sup>44</sup> In those orders, the Commission applied this test where the applicants proposed to serve some but not all of the wire centers in a given rural ILEC's study area. In both instances, cost of service and population density evidence in the record showed that the applicants were not proposing to serve only the low-cost wire centers in the rural ILECs' study areas and the Commission found that the applicants passed the cream-skimming test.<sup>45</sup>

A review of the cost and population density data upon which the Commission relied in the *USCC ETC Order* and the *RCC ETC Order* shows that granting Edge's Application will similarly create no cream-skimming, intended or unintended. Exhibit I sets forth a comparison of CenturyTel's average cost of serving customers in wire centers served by Edge with CenturyTel's average cost of serving customers in wire centers not served by Edge. This data, which is taken from Appendix C to the Commission's *USCC ETC Order*, shows that CenturyTel's average cost of serving customers in the wire centers that Edge will serve is \$71.75, while CenturyTel's average cost of serving customers in the wire centers that Edge will

---

<sup>43</sup> *In re Federal-State Joint Board on Universal Service, Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, FCC 03-338, 19 FCC Rcd 1563 (released January 22, 2004) ("*Virginia Cellular*"); *In re Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, FCC 04-37, 19 FCC Rcd 6422 (released April 12, 2004) ("*Highland Cellular*").

<sup>44</sup> *USCC ETC Order* at 10-12; *RCC ETC Order* at 11-12.

<sup>45</sup> *Id.*

not serve is \$53.27. Thus, Edge is actually serving higher cost wire centers, and no cream-skimming will occur.

Exhibit I sets forth a comparison of households per square mile in Cascade's wire centers served by Edge with households per square mile in Cascade's wire centers not served by Edge.<sup>46</sup> This data, also taken from Appendix C to the Commission's *USCC ETC Order*, shows that the households per square mile in Cascade wire centers served by Edge is 5.18, while the average households per square mile in Cascade wire centers that Edge will not serve is 11.55. Thus, Edge is actually serving less densely populated and higher cost wire centers, and no cream-skimming will occur.<sup>47</sup>

#### **F. Commitment to Serve Requesting Customers**

Edge is committed to answering all reasonable requests for service within its proposed ETC service area. Edge 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. There are three rural ILEC wire centers – Azalea, Drain and Yoncalla – with boundaries that extend beyond Edge's BTA. *See* Exhibits C, D and E. Edge commits to provide service to requesting customers throughout the entirety of these wire centers through: (1) incursion agreements with neighboring wireless carriers, (2) resale of wireless service provided by other carriers, or (3) resale of wireline service.

Edge will use the following, six-point checklist in answering requests from residents within its proposed ETC area: (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)

---

<sup>46</sup> In the absence of cost of service data, both the FCC and this Commission have used population density data as a surrogate for cost of service data in applying the *VTC ETC/HTC ETC* cream-skimming analysis.

<sup>47</sup> Edge's proposed ETC area covers one United wire center, Diamond Lake. The United study area stretches across the State and covers numerous wire centers that are far more densely populated and therefore lower cost than Diamond Lake. Accordingly, no cream-skimming will occur.

determine whether adjustments at the nearest cell site can be made to provide service; (4) determine whether there are any other adjustments to network or customer facilities that can be made to provide service; (5) explore the possibility of offering resold service; and (6) determine whether an additional cell site, a cell-extender, or repeater can be employed or constructed to provide service. If there is possibility of providing service, Edge will notify the customer and provide Commission with an annual report of how many requests for service it could not fill.

Whether a consumer's request for service is reasonable is determined on a case-by-case basis. This is the same for all ETCs. For example, if Edge determines that the cost of providing service to the consumer is \$300,000 (and no other consumers would be served by the construction), Edge would advise the consumer that service can be provisioned for that amount. If the consumer requests that the service be provisioned for the standard connection fee, Edge would determine whether its available high-cost support would be wisely spent on the construction. If Edge believed that support would be better spent on other consumers, it would view the request as unreasonable, advise the consumer, provide the consumer with the Commission's contact information, and include the occurrence in Edge's annual report of how many requests for service it could not fill.

#### **G. Annual Recertification Process**

In addition to the above public interest test, Edge also agrees that on or before July 15 of each year beginning in 2006, Edge will file extensive reports as part of the annual recertification process, including reports on the following items:

1. Line counts for federal USF supported services, itemized by rural ILEC wire center, as off December 31 of the precedent year;
2. The amount of federal USF support Edge received for operations in Oregon during the period January 1 through December 31 of the preceding year;
3. A description of how the federal USF support was used in the previous year. For expenses such as maintenance and provisioning, the information should be segregated by asset type and the rural ILEC wire center where the investment was made;

4. An estimate of the federal USF support to be received during the current year and a detailed budget of how such support is expected to be used, as described in 3 above;
5. Documentation establishing that Edge advertised the supported services throughout the entire designated area;
6. As to requests for service coming from areas within Edge's designated area, but outside its BTA, a report listing the number of requests and, for requests where service was not provided, the reason(s) service was not provided;
7. A description of actions taken to enhance wireless internet service throughout the ETC area in the past year and plans to enhance such service in the future;
8. A description of how many service quality complaints were received, by wire center, and how those complaints were resolved;
9. An affidavit from an Edge official stating that either:
  - a. Edge has resale agreements in place that cover the portions of wire centers that are within its ETC boundary but outside its BTA; or
  - b. Edge has not received any requests for service in portions of wire centers that are within its ETC boundary but outside its BTA that are not covered by resale agreements.
10. If Edge has received requests for service in portions of wire centers that are within its ETC boundary but outside its BTA, Edge shall provide:
  - a. A description of the steps taken by Edge to obtain a resale agreement with other telecommunications service to the requesting parties;
  - b. Whether each party requesting service eventually received such service via Edge acting in the capacity of a reseller; and
  - c. Edge's estimated timeframe for negotiating resale agreements in each wire center where it was unable to accommodate a request for service because Edge has no existing resale agreement in place.
11. If certification of a resale agreement is made and someone challenges the existence of an agreement, Edge will provide needed for Staff to conduct an *in camera* review pursuant to a nondisclosure agreement or use of Commission subpoena and protective order to preserve the confidentiality of the resale agreement.

## VI. HIGH-COST CERTIFICATION

Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administrative Corporation (“USAC”) their compliance with Section 254(e) of the Telecom Act. Edge submits its high-cost certification herewith at Exhibit K. Edge respectfully requests that the Commission issue a finding that Edge has met the high-cost certification requirement and that Edge is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status. By issuing such a finding promptly at the time of designating Edge as an ETC, the Commission will obviate the need for a waiver request from the FCC.<sup>48</sup>

## VII. 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, In the Matter of Applications to be Designated Eligible Telecommunications Carriers in the State of Oregon*, Commission Order No. 97-481, Docket UM 873, entered December 16, 1997; *see also RCC ETC Order*; *see also USCC ETC Order*.

---

<sup>48</sup> *See, e.g. RFB Cellular, Inc., Petitions for Waiver of Sections 54.314(d) and 54.307(c) of the Commission’s Rules and Regulations*, CC Docket No. 96-45, DA 02-3316 (December 4, 2002).

**VIII. RELIEF REQUESTED**

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

Dated the 18<sup>th</sup> day of October, 2004.

Respectfully submitted,

EDGE WIRELESS, LLC

By: 

Mark P. Trinchero, OSB #88322

DAVIS WRIGHT TREMAINE, LLP

1300 S.W. 5<sup>th</sup> Avenue, Suite 2300

Portland, Oregon 97201

(503) 778-5318

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **“AMENDED COMBINED APPLICATION OF EDGE WIRELESS, LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER (RURAL AND NON-RURAL AREAS)”** upon the parties named on the attachment.

I further certify that said copies were placed in sealed envelopes addressed to said partys’/attorneys’ last known addresses as shown and deposited in the United States Mail at Portland, Oregon, and that the postage thereon was prepaid.

DATED this 11<sup>th</sup> day of February, 2005.

DAVIS WRIGHT TREMAINE LLP

By: 

Mark P. Trincherro  
Attorney for Edge Wireless LLC



**SERVICE LIST**  
**UM 1176-1177**

OREGON TELECOMMUNICATIONS ASSN  
707 13TH ST SE STE 280  
SALEM OR 97301-4036

STEPHANIE S ANDRUS --  
**CONFIDENTIAL**  
DEPARTMENT OF JUSTICE  
REGULATED UTILITY & BUSINESS  
SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
stephanie.andrus@state.or.us

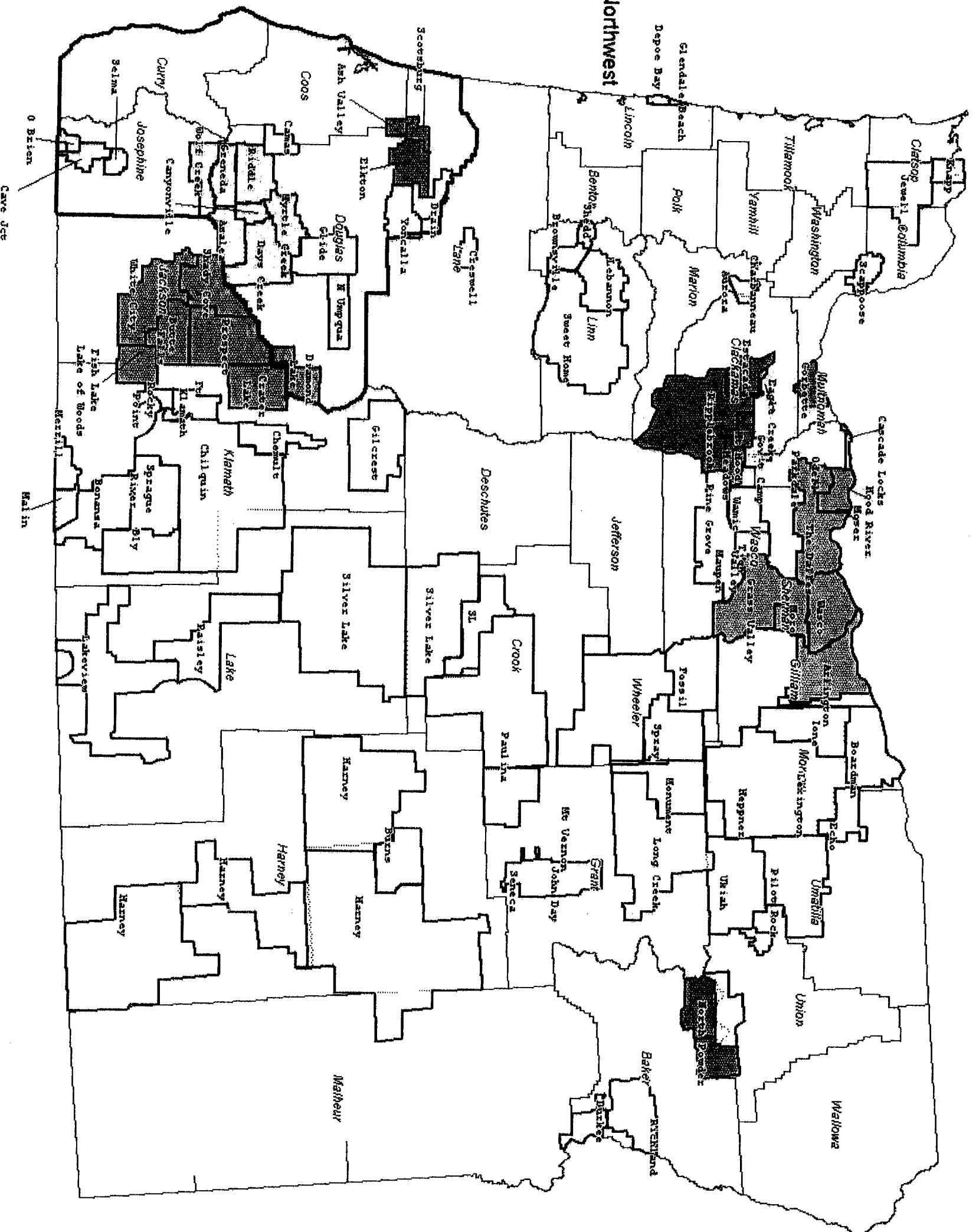
DAVE BOOTH  
PUBLIC UTILITY COMMISSION  
PO BOX 2148  
SALEM OR 97308-2148  
dave.booth@state.or.us

RICHARD A FINNIGAN  
LAW OFFICE OF RICHARD A FINNIGAN  
2405 EVERGREEN PARK DR SW STE B-1  
OLYMPIA WA 98502  
rickfinn@ywave.com

KAY MARINOS  
PUBLIC UTILITY COMMISSION OF  
OREGON  
PO BOX 2148  
SALEM OR 97308-2148  
kay.marininos@state.or.us

# Exhibit A

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- Citizens
- United Telephone Company of the Northwest



# Edge Wireless Proposed ETC Area and Rural ILEC Exchanges

**Exhibit B**  
**EDGE WIRELESS PROPOSED ETC AREA (NON-RURAL)**

**Verizon Northwest. Wire Centers**  
**In Coos, Curry, Douglas and Josephine Counties:**

RDPTORXX (Reedsport)  
LKSDORXX (Lakeside)  
NBNDORXX (North Bend)  
CSBYORXX (Coos Bay)  
CQLLORXX (Coquille)  
BNDNORXX (Bandon)  
MYPNORXX (Myrtle Point)  
LNGLORXX (Langlois)  
PTORORXX (Port Orford)  
PWRSORXX (Powers)  
GLBHORXX (Gold Beach)  
BKNGORXX (Brookings)  
MRPHORXX (Murphy)  
PRVTORXX (Provolt) \*  
EMPRORXX (Empire)

**Qwest Corporation Wire Centers**  
**in Coos, Curry, Douglas and Josephine Counties:**

STHROR58 (Sutherlin)  
RSBGOR57 (Roseburg)  
WNTNOR57 (Winston)  
GRPSOR29 (Grants Pass) \*

\*Partially covered.

## Exhibit B

### List of Rural ILEC Wire Centers in Edge's Proposed ETC Area

#### Citizens

Azalea \*  
Canyonville  
Cave Junction  
Days Creek  
Glendale  
Myrtle Creek  
O'Brien  
Riddle  
Selma  
Wolf Creek

#### Cascade

Ash Valley  
Elkton  
Scottsburg

#### CenturyTel

Camas Valley  
Drain \*  
Glide  
North Umpqua  
Yoncalla \*

#### United

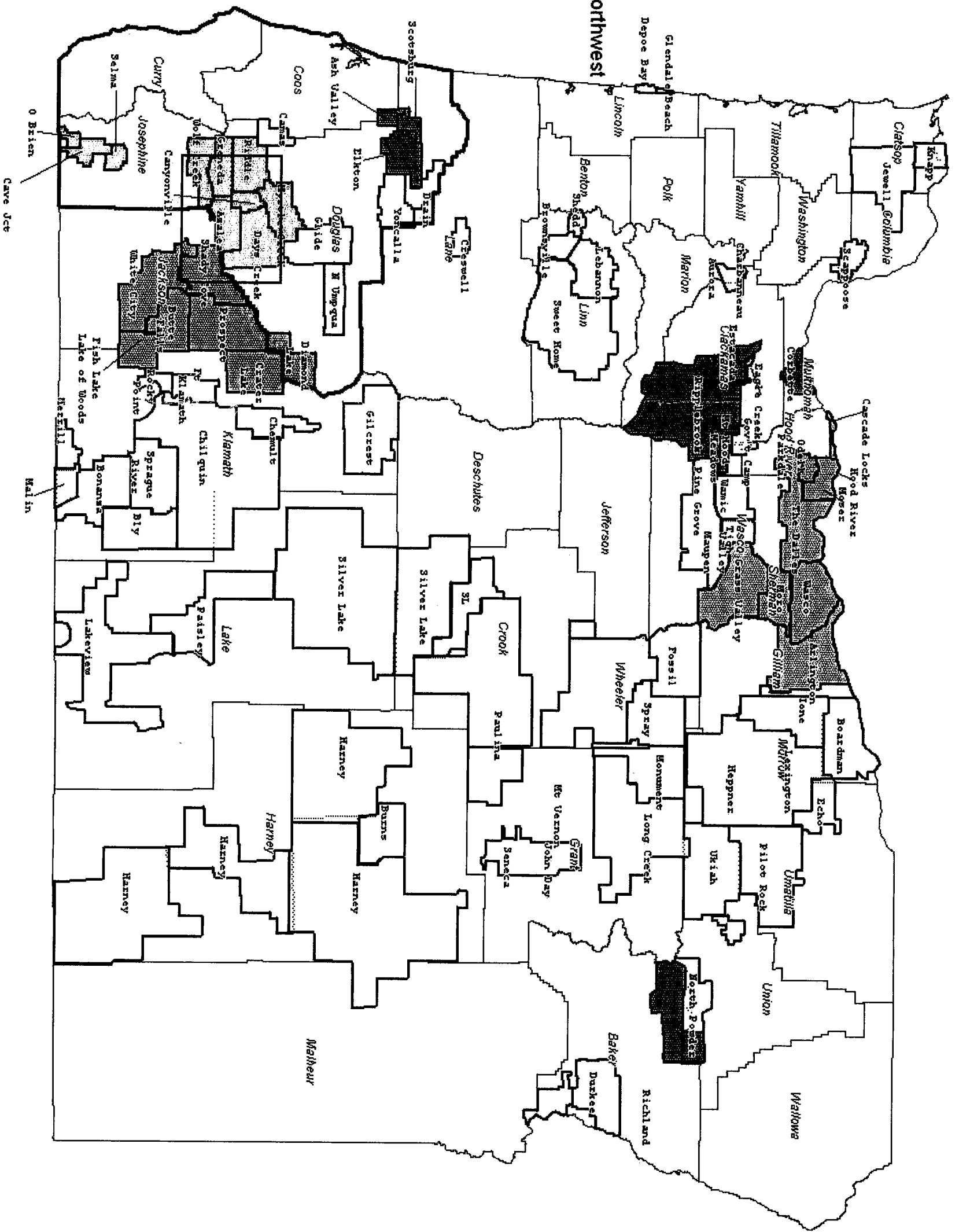
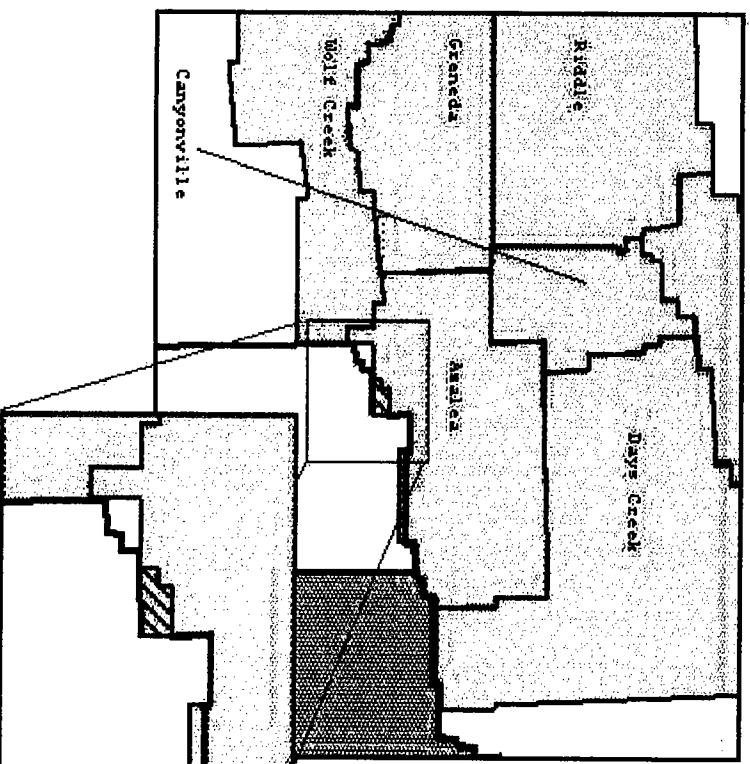
Diamond Lake

\*Partially covered.

Exhibit C

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- ▨ Citizens
- ▩ United Telephone Company of the Northwest

Inset: Azalea Wire Center  
 Jackson County T33S, R4W, Section 3  
 & three fourths of Section 4

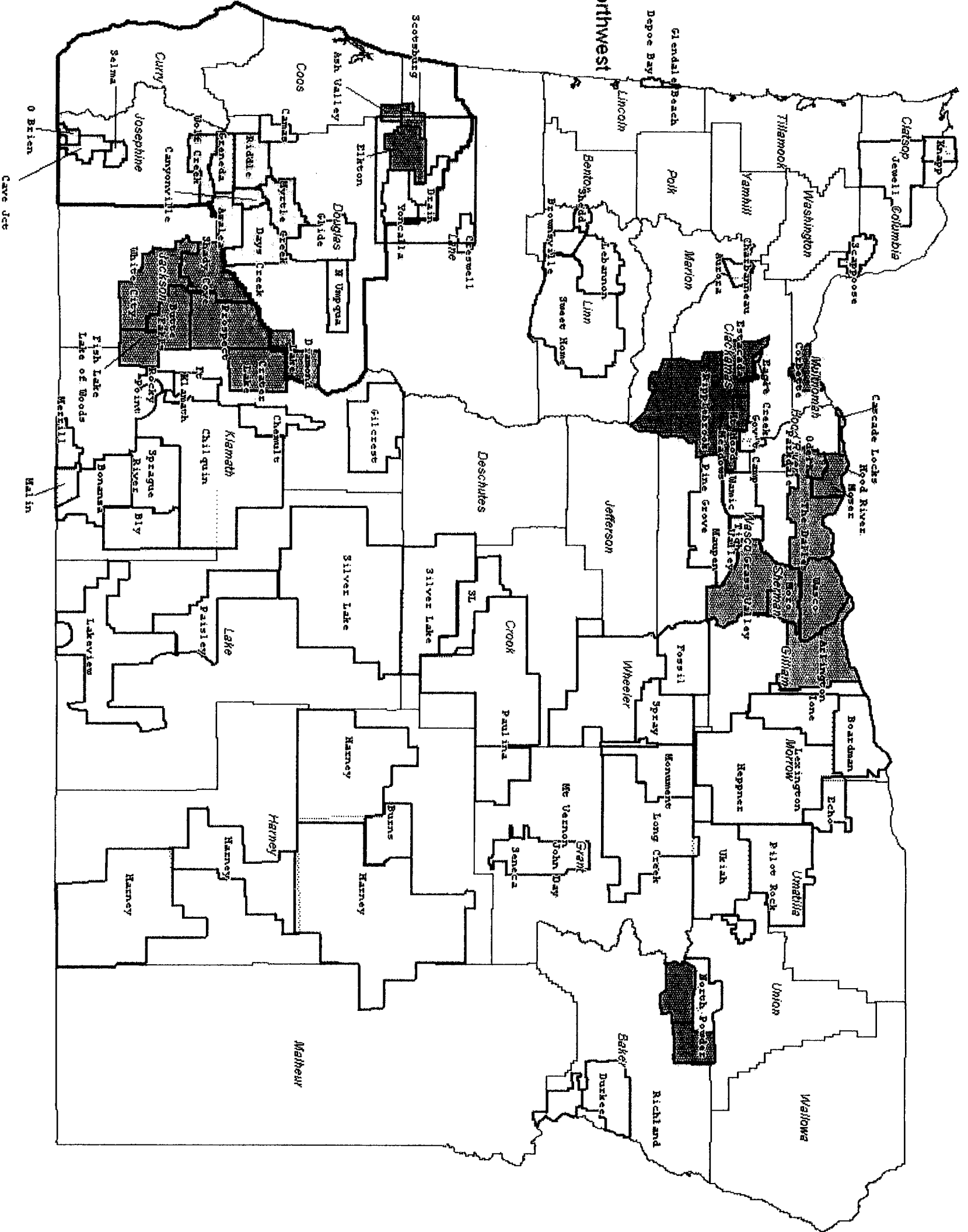
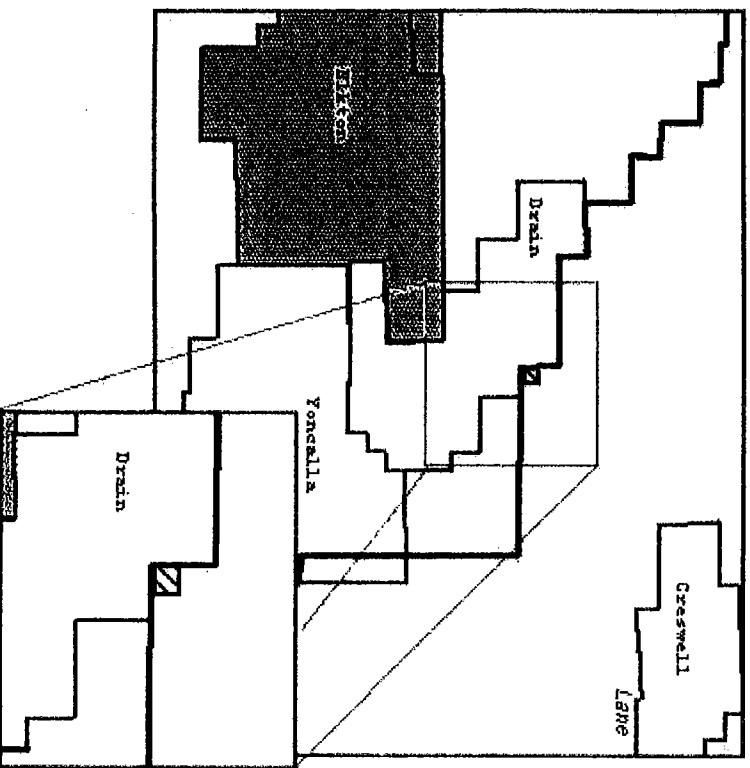


# Edge Wireless Proposed ETC Area and Rural ILEC Exchanges

Exhibit D

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- Citizens
- United Telephone Company of the Northwest

Inset: Drain Wire Center  
Lane County T20S, R5W, Section 31

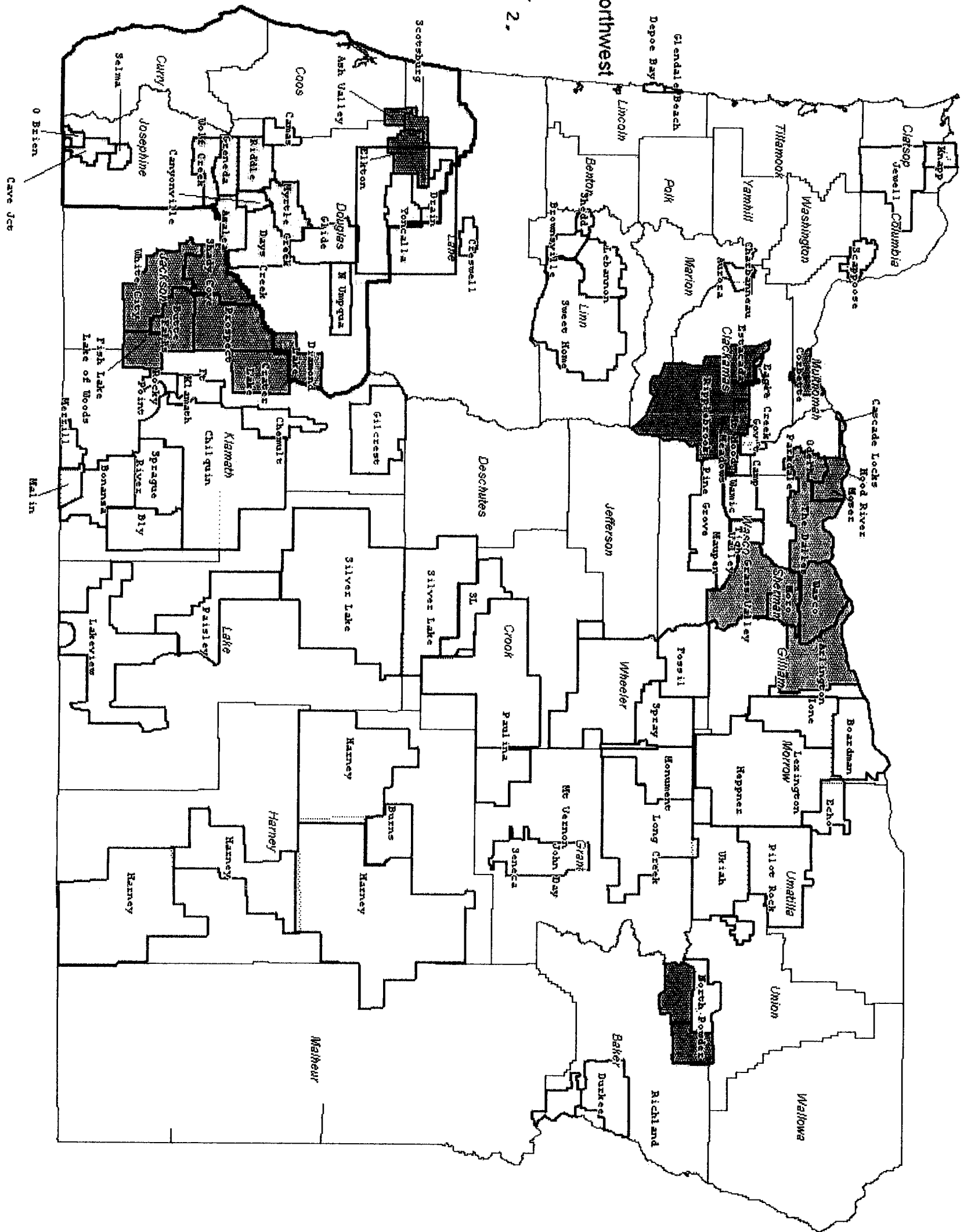
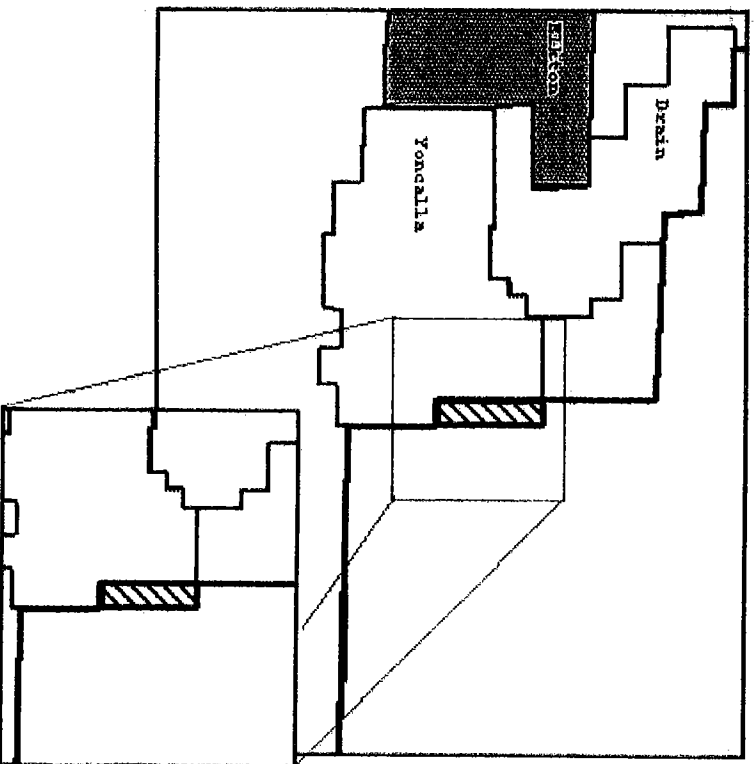


Edge Wireless Proposed ETC Area and Rural ILEC Exchanges

Exhibit E

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- Citizens
- United Telephone Company of the Northwest

Inset: Yoncalla Wire Center  
 Lane County T22S, R4W, Sections 1,  
 12, 13, 24, 36 and one half of Sections 2,  
 11, 14, 23, 26, and 35



Edge Wireless Proposed ETC Area and Rural ILEC Exchanges

**EXHIBIT F**  
**CONFIDENTIAL**



**EXHIBIT G**  
**CONFIDENTIAL**

**EXHIBIT H**  
**CONFIDENTIAL**

## CenturyTel Cost by Wire Center

Not in Edge Application

Name of Wire Center	Monthly Cost	Access Lines	Total Monthly Cost by W/C
Aurora*	\$32.59	3,731	\$121,593.29
Bly	\$86.03	345	\$29,681.45
Boardman	\$40.85	2,045	\$83,543.77
Bonanza	\$108.99	1,185	\$129,155.52
Brownsville	\$53.72	1,426	\$76,607.71
Burns	\$38.39	3,661	\$140,553.48
Charbonneau*	\$26.76	2,006	\$53,680.56
Chemult	\$99.65	268	\$26,706.87
Chiloquin	\$78.24	1,782	\$139,417.44
Creswell	\$33.04	3,669	\$121,223.76
Depoe Bay	\$42.93	1,439	\$61,771.23
Durkee	\$166.04	129	\$21,418.90
Echo	\$74.42	534	\$39,738.95
Fossil	\$93.40	467	\$43,615.75
Ft Klamath	\$147.04	166	\$24,407.98
Gilchrist	\$89.98	1,162	\$104,562.45
Gleneden Beach	\$42.23	2,351	\$99,293.31
Government Camp	\$156.80	614	\$96,275.20
Harney	\$155.45	846	\$131,514.08
Heppner	\$59.28	1,410	\$83,588.33
Huntington	\$62.57	382	\$23,901.74
Ione	\$82.66	393	\$32,484.24
Jewell	\$131.14	816	\$107,008.61
John Day	\$35.45	2,554	\$90,535.72
Knappa	\$53.89	1,555	\$83,791.33
Lakeview	\$40.22	3,501	\$140,808.12
Lebanon	\$32.97	14,633	\$482,450.01
Lexington	\$95.27	289	\$27,533.38
Long Creek	\$114.26	359	\$41,017.55
Malin	\$59.36	688	\$40,837.34
Maupin	\$54.61	445	\$24,300.38
Merrill	\$45.57	965	\$43,974.95
Mitchell	\$138.14	327	\$45,172.11
Monument	\$112.83	320	\$36,106.56
North Powder	\$117.05	413	\$48,340.41
Paisley	\$96.27	349	\$33,598.51
Paulina	\$173.87	251	\$43,640.62
Pilot Rock	\$72.47	1,270	\$92,031.82
Pine Grove	\$109.68	161	\$17,657.84
Rocky Point	\$98.27	256	\$25,158.20
Scappoose	\$37.50	5,684	\$213,151.71
Seneca	\$109.12	161	\$17,567.52
Shedd	\$79.26	355	\$28,136.87
Silver Lake	\$144.88	918	\$133,002.59
Sprague River	\$138.27	628	\$86,834.19

**CenturyTel Cost by Wire Center**

**Not in Edge Application**

Spray	\$118.20	323	\$38,176.99
Starkey	0.00	0	0.00
Sweet Home	\$39.66	6,501	\$259,755.26
Tygh Valley	\$113.65	203	\$23,069.94
Ukiah	\$65.92	201	\$13,250.78
Wamic	\$94.95	667	\$63,333.45
<b>TOTAL UNSERVED:</b>	<b>\$4,293.79</b>	<b>74,804</b>	<b>\$3,984,977.40</b>

**AVERAGE COST:**

<b>\$53.27</b>
----------------

\*Aurora/Charbonneau are combined for purposes of calculating access lines by area per Exhibit OTA/24

Information taken from Oregon Public Utility Commission Order No. 04-356, Appendix C.

## CenturyTel Cost by Wire Center

Covered in Edge Application

<b>Name of Wire Center</b>	<b>Monthly Cost</b>	<b>Access Lines</b>	<b>Total Monthly Cost by W/C</b>
Camas Valley	\$91.97	394	\$36,237.68
Drain	\$69.56	1,265	\$87,998.46
Glide	\$60.87	1,724	\$104,936.60
North Umpqua	\$178.58	151	\$26,966.18
Yoncalla	\$69.58	1,177	\$81,895.19
<b>TOTAL SERVED:</b>	<b>\$470.56</b>	<b>4,711</b>	<b>\$338,034.11</b>
	<b>AVERAGE COST:</b>		<b>\$71.75</b>
<b>TOTAL CENTURYTEL</b>	<b>\$4,764</b>	<b>79,515</b>	<b>\$4,323,013</b>
<b>AVERAGE COST TOTAL CENTURYTEL:</b>			<b>\$54.37</b>

Not in Edge Application

<b>Name of Wire Center</b>	<b>Households</b>	<b>Area</b>	<b>Households/sq. mile</b>
Corbett	3,657	116.18	31.48
Estabcada	9,760	122.05	79.97
Eagle Creek	2,950	27.38	107.73
Haines	1,111	179.07	6.20
Mt. Hood	170	235.60	0.72
Medical Springs	130	114.39	1.14
Ripplebrook	330	773.42	0.43
<b>TOTAL UNSERVED:</b>	<b>18.108</b>	<b>1,568.09</b>	<b>11.55</b>

Information taken from OPUC Order No. 04-356, Appendix C.

Cascade Households Per Sq. Mile

Covered in Edge Application

<b>Name of Wire Center</b>	<b>Households</b>	<b>Area</b>	<b>Households/sq. mile</b>
Ash Valley	74	38.82	1.9
Elkton	946	168.07	5.63
Scottsburg	304	48.80	6.23
<b>TOTAL UNSERVED:</b>	<b>1,324</b>	<b>255.69</b>	<b>5.18</b>
<b>TOTAL UNSERVED:</b>	<b>19,432</b>	<b>1,823.78</b>	<b>10.65</b>

Information taken from OPUC Order No. 04-356, Appendix C.

edge WIRELESS®

MEMBER OF THE AT&T WIRELESS NETWORK



September 24, 2004

Mr. Phil Nyegaard  
Administrator  
Telecommunications Division  
Public Utility Commission of Oregon  
550 Capitol St. NE  
Salem, Oregon 97310-1380

Re: Edge Wireless, LLC  
Certification for High Cost Loop Support

Dear Mr. Nyegaard:

I am Donald Castleman, President and Chief Operations Officer for Edge Wireless, LLC ("Edge"). This certification is submitted on behalf of Edge in accordance with FCC rule Sections 54.313 and 54.314. On behalf of Edge, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

Edge Wireless, LLC

By: *Donald Castleman*

Title: President and Chief Operations Officer

Date: Sept. 30, 2004

SUBSCRIBED AND SWORN TO AND ACKNOWLEDGED before me this 30<sup>th</sup> day of Sept., 2004.

*Jane E Venable*  
NOTARY PUBLIC

My Commission Expires:

12/14/07

