

1 **II. ALLEGATION OF FACTS**

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

3 Under Sections 214(e) and 254 of the Act, the Public Utility Commission of
4 Oregon (“OPUC” or “Commission”) is authorized to designate Wantel as an ETC. Section
5 214(e)(2) of the Act provides that state commissions have the primary responsibility for
6 designating ETCs. The FCC recently amended its rules governing Universal Service. See Part
7 54 of Title 47 CFR, and Report and Order, issued March 17, 2005. Wantel submits maps of
8 service territory as Exhibit A, to support its application for ETC status.

9 **B. The Legal Standard for Granting ETC Status**

10 In order to obtain ETC designation, an applicant must demonstrate the following:
11 (1) a commitment and ability to provide the services to all customers in the area proposed to be
12 served; (2) emergency back up functionality; (3) that it meets applicable consumer protection
13 standards and service quality standards, (4) that local usage offered is comparable to that offered
14 by the incumbent LEC; and (5) that the applicant understands that it may be required to provide
15 equal access if all other ETCs in the designated service area relinquish their designations.

16 As part of the commitment to provide services to all customers in the proposed
17 area to be served, the applicant must submit a five year plan describing with specificity, on a
18 wire center-by-wire center basis, proposed improvements and upgrades to the applicant’s
19 network.

20 **III. SERVICES PROVIDED BY PETITIONER**

21 In order to be designated an ETC, a common carrier must demonstrate pursuant to
22 Section 214(e)(6) that they offer services and agree to offer and advertise the supported services
23 throughout the proposed ETC service area. In addition, the common carrier must meet the public
24 interest standard.

25 Wantel will offer the federally designated services listed at 47 C.F.R. Section 54.101(a):
26 (1) voice grade access to the public switched network, (2) local usage, (3) dual tone multi-

1 frequency signaling or its functional equivalent, (4) single-party service or its functional
2 equivalent, (5) access to emergency services, (6) access to operator services, (7) access to
3 interexchange service, (8) access to directory assistance, and (9) toll limitation for qualifying
4 low-income consumers. Wantel is a facilities-based carrier that offers these services throughout
5 the areas where it seeks ETC designation. Wantel will offer throughout Roseburg, Winston, and
6 Sutherlin exchange areas basic telephone service using Wantel's own subscriber plant (i.e. loop
7 facilities), leased UNE loop facilities, or resale of another carrier's retail service.

8 **A. Voice-grade access to the public switched telephone network. 47**

9 C.F.R. Section 54.101(a)(1) requires a carrier to offer voice grade access to the public switched
10 telephone network. Wantel provides voice grade access to the public switched telephone
11 network. Wantel provides voice grade access pursuant to the FCC's definition.

12 **B. Local Usage.** Wantel's service provides unlimited local usage and is

13 consistent with 47 C.F.R. Section 54.101(a)(2).¹

14 **C. Dual-tone, multi-frequency signaling or its functional equivalent.**

15 Pursuant to 47 C.F.R. Section 54.101(a)(3) an ETC must provide dual tone multi-frequency
16 signaling ("DTMF") to facilitate the transportation of signaling throughout its network. Wantel
17 provides DTMF signaling throughout its network, consistent with FCC rules.

18 **D. Single-party service or its functional equivalent.** "Single-party service"

19 means that only one party will be served by a subscriber loop or access line in contract to a
20 multi-party line.² Wantel provides single party service, as required by 47 C.F.R. Section
21 54.101(a)(4).

22 **E. Access to emergency services.** The ability to reach a public emergency

23 service provided by dialing 911 is a required service in any universal service offering. Wantel
24

25
26 ¹ *First Report and Order*, at 8814

² *Id.* at 8810

1 currently provides all of its customers with access to emergency service by dialing 911. Wantel
2 offers E-911 throughout its calling area.

3 **F. Access to operator services.** Access to operator services is defined as
4 any automatic or live assistance provided to a consumer to arrange for the billing or completion,
5 or both, of a telephone call.³ Wantel provides customer access to operated services on 24/7 basis
6 consistent with 47 C.F.R. Section 54.101(a)(6).

7 **G. Access to interexchange service.** An ETC must offer consumers access
8 to interexchange service to make and receive toll or interexchange calls. Wantel meets this
9 requirement by providing all of its customers with the ability to make and receive interexchange
10 or toll calls through interconnection arrangements it has with several IXCs. Wantel is an equal
11 access provider.

12 **H. Access to directory assistance.** The ability to place a call to directory
13 assistance is a required ETC service offering.⁴ Wantel customers are able to obtain directory
14 assistance from live operators.

15 **I. Toll limitation for qualifying low income consumers.** An ETC must
16 offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no
17 charge. In particular, an ETC must provide toll blocking which allows customers to block the
18 completion of outgoing calls.⁵ Wantel provides this service now and will continue to do so in the
19 future.

20 **IV. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

21 Pursuant to Section 54.201 of the FCC’s rules, 47 C.F.R. Section 54.201, Wantel plans to
22 advertise the availability of each of the supported services detailed above, through its licensed
23 service area, by media of general distribution. The methods of advertising utilized may include
24 newspaper, magazine, radio, direct mailings, public exhibits and displays, bill inserts, and

25 ³ *Id.* at 8817-18.

26 ⁴ *Id.* at 8817-18.

⁵ *Id.* at 8821-22.

1 telephone directory advertising. This information is currently advertised by Wantel in its service
2 area.

3 V. PUBLIC INTEREST FACTORS

4 Granting Wantel's application to become an ETC in the Roseburg, Winston, and
5 Sutherlin area is in the public's interest. Wantel is committed to provide service throughout its
6 designated service area to all customers who make a reasonable request for services.⁶ Further,
7 Wantel agrees to provide service to requesting customers where its facilities already exist, as
8 well as to those in its service area but outside its existing network coverage within a reasonable
9 period of time and at a reasonable cost.⁷ See attached Exhibit B (Wantel's original Application
10 for OUS Support). Wantel seeks to use the high cost support prudently, in a manner that will
11 extend the provision of its services to customers in the high cost areas.

12 Wantel, in support of its ETC application, has provided a Five Year Plan for
13 improvements and upgrades to its network.⁸ This plan covers the entire service area that Wantel
14 serves and seeks ETC status. Through Wantel's planned improvements it will be able to provide
15 advanced services to all of its customers, including those in traditional high cost areas. These
16 improvements include high speed data services, as well as facilities that will allow the provision
17 of "triple play" services: voice, video and high speed data. Wantel also provides access to
18 several different ISPs in the area. Wantel's plan to extend its fiber infrastructure in its service
19 area will be in the public interest as it will be able to offer advanced services and increased
20 reliability and capacity to its customers.

21 This infrastructure will allow customers to obtain advanced services that were previously
22 unavailable in high cost areas. By extending these advanced services, customers will be
23 provided with increased choice as well. Granting ETC status to Wantel will further serve to

24 ⁶ *Report and Order*, Released March 17, 2005, at 11-12.

25 ⁷ Note, the criteria in the recently released *Report and Order, Id.*, generally apply to wireless ETC applicant. Wantel
is a facilities based provider, and does not employ antennae and abse stations in its network.

26 ⁸ The Five Year Plan is submitted as a confidential exhibit, as it contains confidential information regarding planned
network upgrades. Exhibit C.

1 achieve the national policy of extending these advanced services to all regions of the nation.⁹
2 These new customers will have access to voicemail, call waiting, caller identification, three way
3 calling, and last call return. In addition, Wantel will be extending Digital Subscriber Line
4 (“DSL”) service to these customers. Providing these services to customers in high cost areas
5 meets the public interest goals for an ETC provider.

6 Service quality will increase for customers of Wantel in high cost areas. A review of the
7 five year plan shows how the network upgrades (including those funded by the company) will
8 extend Wantel’s fiber network further into the high cost areas. By doing so, this new
9 infrastructure will increase call and service quality in these areas. The result will be improved
10 local access via new facilities with fiber-optic runs to the neighborhood enabling more customer
11 connections, more reliable service, and a broader choice of features and benefits. Improved
12 service quality will result from the new infrastructure, fiber-optic transport, SONET ring
13 topology and newer state of the art equipment in the field, customer premises and wire centers.
14 Improved service quality will also result from local involvement by consumers in the service
15 area, enabled by Wantel’s walk-in offices located in the service area where customers can
16 interact with Wantel employees on a person-to-person basis as well as having Wantel’s core
17 technical staff on hand locally for instant response to situations as they arise. There will also be
18 more reliable emergency services due to diverse traffic routing and SONET ring technologies, as
19 well as eight hour battery back-up and generators distributed throughout Wantel’s network as
20 required.

21 Wantel will be providing enhanced access to IXCs via its FG-D trunking to the access
22 Tandems serving its areas, as well as the company’s regional fiber-optic network. Wantel’s
23 service will enable more reliable 911 and provide a secondary route for access to the Eugene,
24 Oregon PSAP and provide a direct diverse secondary link to the local Sheriff’s Office 911
25 center.

26 ⁹ *Report and Order*, Released March 17, 2005, at 18-19.

1 In addition, as part of its Five Year Plan, Wantel describes its interest in PCINW
2 Regional Fiber. Wantel owns one-third interest in this dark fiber run that serves to connect local
3 Wantel communicates to a regional high speed transport network providing advanced services.
4 Extending connections to the PCINW Regional Fiber will offer increased cost savings and
5 connectivity to customers being served in the high cost areas of Wantel's service area.

6 In addition, designation of Wantel as an ETC is in the public interest because it will
7 promote competition. Competition promotes consumer benefits in the form of lower prices,
8 increased service quality, and innovation. As a competitor to the incumbent, Wantel must offer
9 prices that equal or are less than the incumbent's. It must also offer good service quality or it
10 will lose customers. Also, by designating Wantel as an ETC it will make available Lifeline and
11 Link Up, including OTAP, services to customers of Wantel in the Roseburg, Winston, and
12 Sutherlin area. For these reasons designation of Wantel as an ETC is in the public interest.

13 **VI. COMMITMENT TO SERVE REQUESTING CUSTOMERS**

14 *See Exhibit B Wantel's original Application for OUS Support.* In it, Wantel certifies and
15 agrees to provide its services to all customers for a reasonable cost within a reasonable time
16 frame.

17 **VII. EQUAL ACCESS**

18 As an applicant for ETC status, Wantel acknowledges that it must provide equal access in
19 its service area. It further acknowledges that should all other ETCs in its service area relinquish
20 their designations, it must continue to provide equal access. *See Exhibit D, Wantel's Equal*
21 *Access Script, and Exhibit B, Wantel's original Application for OUS Support.*

22 **VIII. EMERGENCY BACK-UP FUNCTIONALITY**

23 In order to be designated an ETC, the applicant must be able to demonstrate a reasonable
24 back-up power to ensure a functioning network. Wantel has eight hour battery back-up at each
25
26

1 location where its equipment requires power. It also has LNP/LPG powered generators with
2 automatic transfer switches where it is required.¹⁰

3 **IX. CONSUMER PROTECTION**

4 Wantel is subject to the Oregon consumer protection laws. It also submits service quality
5 reports to the Commission. Attached as Exhibit E is a summary of Trouble Reports,
6 Provisioning Commitments, Held Orders, Access to Representatives for Repair and Business
7 Office, and Call Blocking. Each of these standards have been met or surpassed by Wantel.

8 Respectfully submitted this 31st day of March, 2005.

9 ATER WYNNE LLP

10
11 By: 

Arthur A. Butler, WSBA #04678

aab@aterwynne.com

Joel R. Paisner, WSBA #16405

jrp@aterwynne.com

Ater Wynne LLP

601 Union Street, Suite 5450

Seattle, WA 98101-2327

Telephone: (206) 623-4711

Of Attorneys for Wantel, Inc. d/b/a ComspanUSA

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26 ¹⁰ Referring to Wantel's confidentially submitted Five Year plan will demonstrate the redundancy in the network to provide a reroute of traffic and how the network can address traffic spikes during an emergency.

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3

4 APPLICATION OF WANTEL, INC. d/b/a
5 COMSPANUSA FOR DESIGNATION AS AN
6 ELIGIBLE TELECOMMUNICATIONS CARRIER
7 PURSUANT TO THE TELECOMMUNICATIONS
8 ACT OF 1996 – NON-RURAL AREAS

Docket No. _____

9 Wantel, Inc. d/b/a ComspanUSA (“Wantel”) respectfully submits this Application for
10 Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Sections 214(e)(1)-
11 (2) of the Telecommunications Act of 1934, as amended (“Act”), 47 U.S.C. (e)(1)-(2) and
12 Section 54.201 of the Federal Communications Commission’s (“FCC”) rules, 47 C.F.R. Section
13 54.201. Wantel requests that it be designated as eligible to receive all available support from the
14 federal Universal Service Fund (“USF”) including, but not limited to, interstate access support
15 for high cost areas and support for low income customers in the geographic areas specified in
16 this Application. Wantel is requesting ETC status primarily to allow customers it serves in the
17 Roseburg, Sutherlin and Winston exchange areas of Qwest Corporation (“Qwest”) to be eligible
18 to receive Oregon Telephone Assistance Program (“OTAP”) and Lifeline/Link Up assistance and
19 because designation as a federal ETC is effectively a prerequisite for participating in the Oregon
20 Universal Service Fund.

21 **I. APPLICANT**

22 Wantel is a competitive local exchange company (“CLEC”) and obtained its competitive
23 registration from the Oregon Public Utilities Commission on August 20, 1999 under Order No.
24 99-507.
25
26

1 **II. ALLEGATION OF FACTS**

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

3 Under Sections 214(e) and 254 of the Act, the Public Utility Commission of
4 Oregon (“OPUC” or “Commission”) is authorized to designate Wantel as an ETC. Section
5 214(e)(2) of the Act provides that state commissions have the primary responsibility for
6 designating ETCs. The FCC recently amended its rules governing Universal Service. See Part
7 54 of Title 47 CFR, and Report and Order, issued March 17, 2005. Wantel submits maps of
8 service territory as Exhibit A, to support its application for ETC status.

9 **B. The Legal Standard for Granting ETC Status**

10 In order to obtain ETC designation, an applicant must demonstrate the following:
11 (1) a commitment and ability to provide the services to all customers in the area proposed to be
12 served; (2) emergency back up functionality; (3) that it meets applicable consumer protection
13 standards and service quality standards, (4) that local usage offered is comparable to that offered
14 by the incumbent LEC; and (5) that the applicant understands that it may be required to provide
15 equal access if all other ETCs in the designated service area relinquish their designations.

16 As part of the commitment to provide services to all customers in the proposed
17 area to be served, the applicant must submit a five year plan describing with specificity, on a
18 wire center-by-wire center basis, proposed improvements and upgrades to the applicant’s
19 network.

20 **III. SERVICES PROVIDED BY PETITIONER**

21 In order to be designated an ETC, a common carrier must demonstrate pursuant to
22 Section 214(e)(6) that they offer services and agree to offer and advertise the supported services
23 throughout the proposed ETC service area. In addition, the common carrier must meet the public
24 interest standard.

25 Wantel will offer the federally designated services listed at 47 C.F.R. Section 54.101(a):
26 (1) voice grade access to the public switched network, (2) local usage, (3) dual tone multi-

1 frequency signaling or its functional equivalent, (4) single-party service or its functional
2 equivalent, (5) access to emergency services, (6) access to operator services, (7) access to
3 interexchange service, (8) access to directory assistance, and (9) toll limitation for qualifying
4 low-income consumers. Wantel is a facilities-based carrier that offers these services throughout
5 the areas where it seeks ETC designation. Wantel will offer throughout Roseburg, Winston, and
6 Sutherlin exchange areas basic telephone service using Wantel's own subscriber plant (i.e. loop
7 facilities), leased UNE loop facilities, or resale of another carrier's retail service.

8 **A. Voice-grade access to the public switched telephone network.** 47

9 C.F.R. Section 54.101(a)(1) requires a carrier to offer voice grade access to the public switched
10 telephone network. Wantel provides voice grade access to the public switched telephone
11 network. Wantel provides voice grade access pursuant to the FCC's definition.

12 **B. Local Usage.** Wantel's service provides unlimited local usage and is

13 consistent with 47 C.F.R. Section 54.101(a)(2).¹

14 **C. Dual-tone, multi-frequency signaling or its functional equivalent.**

15 Pursuant to 47 C.F.R. Section 54.101(a)(3) an ETC must provide dual tone multi-frequency
16 signaling ("DTMF") to facilitate the transportation of signaling throughout its network. Wantel
17 provides DTMF signaling throughout its network, consistent with FCC rules.

18 **D. Single-party service or its functional equivalent.** "Single-party service"

19 means that only one party will be served by a subscriber loop or access line in contract to a
20 multi-party line.² Wantel provides single party service, as required by 47 C.F.R. Section
21 54.101(a)(4).

22 **E. Access to emergency services.** The ability to reach a public emergency

23 service provided by dialing 911 is a required service in any universal service offering. Wantel
24

25 _____
26 ¹ *First Report and Order*, at 8814

² *Id.* at 8810

1 currently provides all of its customers with access to emergency service by dialing 911. Wantel
2 offers E-911 throughout its calling area.

3 **F. Access to operator services.** Access to operator services is defined as
4 any automatic or live assistance provided to a consumer to arrange for the billing or completion,
5 or both, of a telephone call.³ Wantel provides customer access to operated services on 24/7 basis
6 consistent with 47 C.F.R. Section 54.101(a)(6).

7 **G. Access to interexchange service.** An ETC must offer consumers access
8 to interexchange service to make and receive toll or interexchange calls. Wantel meets this
9 requirement by providing all of its customers with the ability to make and receive interexchange
10 or toll calls through interconnection arrangements it has with several IXCs. Wantel is an equal
11 access provider.

12 **H. Access to directory assistance.** The ability to place a call to directory
13 assistance is a required ETC service offering.⁴ Wantel customers are able to obtain directory
14 assistance from live operators.

15 **I. Toll limitation for qualifying low income consumers.** An ETC must
16 offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no
17 charge. In particular, an ETC must provide toll blocking which allows customers to block the
18 completion of outgoing calls.⁵ Wantel provides this service now and will continue to do so in the
19 future.

20 **IV. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

21 Pursuant to Section 54.201 of the FCC’s rules, 47 C.F.R. Section 54.201, Wantel plans to
22 advertise the availability of each of the supported services detailed above, through its licensed
23 service area, by media of general distribution. The methods of advertising utilized may include
24 newspaper, magazine, radio, direct mailings, public exhibits and displays, bill inserts, and

25 ³ *Id.* at 8817-18.

26 ⁴ *Id.* at 8817-18.

⁵ *Id.* at 8821-22.

1 telephone directory advertising. This information is currently advertised by Wantel in its service
2 area.

3 **V. PUBLIC INTEREST FACTORS**

4 Granting Wantel's application to become an ETC in the Roseburg, Winston, and
5 Sutherlin area is in the public's interest. Wantel is committed to provide service throughout its
6 designated service area to all customers who make a reasonable request for services.⁶ Further,
7 Wantel agrees to provide service to requesting customers where its facilities already exist, as
8 well as to those in its service area but outside its existing network coverage within a reasonable
9 period of time and at a reasonable cost.⁷ See attached Exhibit B (Wantel's original Application
10 for OUS Support). Wantel seeks to use the high cost support prudently, in a manner that will
11 extend the provision of its services to customers in the high cost areas.

12 Wantel, in support of its ETC application, has provided a Five Year Plan for
13 improvements and upgrades to its network.⁸ This plan covers the entire service area that Wantel
14 serves and seeks ETC status. Through Wantel's planned improvements it will be able to provide
15 advanced services to all of its customers, including those in traditional high cost areas. These
16 improvements include high speed data services, as well as facilities that will allow the provision
17 of "triple play" services: voice, video and high speed data. Wantel also provides access to
18 several different ISPs in the area. Wantel's plan to extend its fiber infrastructure in its service
19 area will be in the public interest as it will be able to offer advanced services and increased
20 reliability and capacity to its customers.

21 This infrastructure will allow customers to obtain advanced services that were previously
22 unavailable in high cost areas. By extending these advanced services, customers will be
23 provided with increased choice as well. Granting ETC status to Wantel will further serve to

24 ⁶ *Report and Order*, Released March 17, 2005, at 11-12.

25 ⁷ Note, the criteria in the recently released *Report and Order, Id.*, generally apply to wireless ETC applicant. Wantel
is a facilities based provider, and does not employ antennae and abse stations in its network.

26 ⁸ The Five Year Plan is submitted as a confidential exhibit, as it contains confidential information regarding planned
network upgrades. Exhibit C.

1 achieve the national policy of extending these advanced services to all regions of the nation.⁹

2 These new customers will have access to voicemail, call waiting, caller identification, three way
3 calling, and last call return. In addition, Wantel will be extending Digital Subscriber Line
4 (“DSL”) service to these customers. Providing these services to customers in high cost areas
5 meets the public interest goals for an ETC provider.

6 Service quality will increase for customers of Wantel in high cost areas. A review of the
7 five year plan shows how the network upgrades (including those funded by the company) will
8 extend Wantel’s fiber network further into the high cost areas. By doing so, this new
9 infrastructure will increase call and service quality in these areas. The result will be improved
10 local access via new facilities with fiber-optic runs to the neighborhood enabling more customer
11 connections, more reliable service, and a broader choice of features and benefits. Improved
12 service quality will result from the new infrastructure, fiber-optic transport, SONET ring
13 topology and newer state of the art equipment in the field, customer premises and wire centers.
14 Improved service quality will also result from local involvement by consumers in the service
15 area, enabled by Wantel’s walk-in offices located in the service area where customers can
16 interact with Wantel employees on a person-to-person basis as well as having Wantel’s core
17 technical staff on hand locally for instant response to situations as they arise. There will also be
18 more reliable emergency services due to diverse traffic routing and SONET ring technologies, as
19 well as eight hour battery back-up and generators distributed throughout Wantel’s network as
20 required.

21 Wantel will be providing enhanced access to IXCs via its FG-D trunking to the access
22 Tandems serving its areas, as well as the company’s regional fiber-optic network. Wantel’s
23 service will enable more reliable 911 and provide a secondary route for access to the Eugene,
24 Oregon PSAP and provide a direct diverse secondary link to the local Sheriff’s Office 911
25 center.

26 ⁹ *Report and Order*, Released March 17, 2005, at 18-19.

1 In addition, as part of its Five Year Plan, Wantel describes its interest in PCINW
2 Regional Fiber. Wantel owns one-third interest in this dark fiber run that serves to connect local
3 Wantel communicates to a regional high speed transport network providing advanced services.
4 Extending connections to the PCINW Regional Fiber will offer increased cost savings and
5 connectivity to customers being served in the high cost areas of Wantel's service area.

6 In addition, designation of Wantel as an ETC is in the public interest because it will
7 promote competition. Competition promotes consumer benefits in the form of lower prices,
8 increased service quality, and innovation. As a competitor to the incumbent, Wantel must offer
9 prices that equal or are less than the incumbent's. It must also offer good service quality or it
10 will lose customers. Also, by designating Wantel as an ETC it will make available Lifeline and
11 Link Up, including OTAP, services to customers of Wantel in the Roseburg, Winston, and
12 Sutherlin area. For these reasons designation of Wantel as an ETC is in the public interest.

13 **VI. COMMITMENT TO SERVE REQUESTING CUSTOMERS**

14 *See Exhibit B Wantel's original Application for OUS Support.* In it, Wantel certifies and
15 agrees to provide its services to all customers for a reasonable cost within a reasonable time
16 frame.

17 **VII. EQUAL ACCESS**

18 As an applicant for ETC status, Wantel acknowledges that it must provide equal access in
19 its service area. It further acknowledges that should all other ETCs in its service area relinquish
20 their designations, it must continue to provide equal access. *See Exhibit D, Wantel's Equal*
21 *Access Script, and Exhibit B, Wantel's original Application for OUS Support.*

22 **VIII. EMERGENCY BACK-UP FUNCTIONALITY**

23 In order to be designated an ETC, the applicant must be able to demonstrate a reasonable
24 back-up power to ensure a functioning network. Wantel has eight hour battery back-up at each
25
26

1 location where its equipment requires power. It also has LNP/LPG powered generators with
2 automatic transfer switches where it is required.¹⁰

3 **IX. CONSUMER PROTECTION**

4 Wantel is subject to the Oregon consumer protection laws. It also submits service quality
5 reports to the Commission. Attached as Exhibit E is a summary of Trouble Reports,
6 Provisioning Commitments, Held Orders, Access to Representatives for Repair and Business
7 Office, and Call Blocking. Each of these standards have been met or surpassed by Wantel.

8 Respectfully submitted this 31st day of March, 2005.

9 ATER WYNNE LLP

10
11 By: _____

12 Arthur A. Butler, WSBA #04678

13 aab@aterwynne.com

14 Joel R. Paisner, WSBA #16405

15 jrp@aterwynne.com

16 Ater Wynne LLP

17 601 Union Street, Suite 5450

18 Seattle, WA 98101-2327

19 Telephone: (206) 623-4711

20 Of Attorneys for Wantel, Inc. d/b/a ComspanUSA
21
22
23
24
25
26

¹⁰ Referring to Wantel's confidentially submitted Five Year plan will demonstrate the redundancy in the network to provide a reroute of traffic and how the network can address traffic spikes during an emergency.

March 31, 2005

COPY VIA EMAIL
ORIGINAL VIA UPS NEXT DAY AIR

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE, Suite 215
Salem, OR 97308-2148

Re: *Application of Wantel, Inc. d/b/a ComspanUSA's Application for Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996 – Non-Rural Areas*

Dear Clerk:

Enclosed for filing in the above-referenced matter please find an original and five (5) copies of Wantel, Inc. d/b/a ComspanUSA's Application for Federal ETC Status. Confidential portions are filed under separate "Confidential Cover". Once a docket has been assigned we will request entry of a protective order. If you have any questions please let me know.

Very truly yours,
ATER WYNNE LLP

Arthur A. Butler
Joel R. Paisner

Enclosures
cc: Marty Patrovsky, Wantel, Inc.