

McDowell & Rackner PC



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April 27, 2007

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: **Docket UM** _____

Enclosed for filing, please find the following documents:

1. Application of Wantel, Inc. d/b/a ComspanUSA for Designation as an Eligible Telecommunications Carrier in the Myrtle Point Wire Center Pursuant to the Telecommunications Act of 1996 – Non-Rural Areas; and
2. Wantel Inc.'s Motion for Standard Protective Order.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa F. Rackner".

Lisa F. Rackner

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM _____

Application of Wantel, Inc. d/b/a
ComspanUSA for Designation as an Eligible
Telecommunications Carrier in the Myrtle
Point Wire Center Pursuant to the
Telecommunications Act of 1996 – Non-
Rural Areas

APPLICATION

I. INTRODUCTION

Wantel Inc, d/b/a ComspanUSA ("Wantel") respectfully submits this Application for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to § 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended (the "Act"),¹ and § 54.201 of the Federal Communications Commission's (the "FCC") rules.² Wantel first received designation as an ETC in 2005 in the Roseburg, Sutherlin, and Winston wire centers³ and in 2006 in the Bandon wire center.⁴ Since that time Wantel has served customers in all four wire centers. In this Application, Wantel requests that the Commission extend its designation as an ETC in the Myrtle Point wire center.

Wantel seeks this extension of its ETC status to assist it in financing a state-of-the-art fiber optic network in the City of Myrtle Point. When the network is completed, Wantel will offer customers located in Myrtle Point access to broadband telecommunications, data, and video services. Because Myrtle Point is currently designated as a "high cost area," Wantel requests that it be designated as an ETC eligible to receive all available support from the federal Universal Service Fund ("USF") including, but not limited to, interstate

¹ 47 U.S.C. § 214(e)(1)-(2).
² 47 CFR § 54.201.
³ Order 05-926, Docket UM 1212 (Aug. 18, 2005).
⁴ Order No. 06-681, Docket UM 1255 (Dec 21, 2006).

1 access support for high cost areas and support for low income customers. Wantel is
2 requesting ETC status primarily to allow customers it will serve in the Myrtle Point area to be
3 eligible to receive Oregon Telephone Assistance Program ("OTAP") and Lifeline/Link-Up
4 assistance, and because designation as a federal ETC is effectively a prerequisite for
5 participating in the Oregon Universal Service Fund ("OUSF").

6 In this Application Wantel will show that it satisfies all requirements for ETC status in
7 Myrtle Point, and in particular that its Application is in the public interest.

8 II. APPLICANT

9 Wantel is a competitive local exchange carrier ("CLEC") and obtained its competitive
10 registration from the Public Utility Commission of Oregon ("OPUC" or the "Commission") on
11 August 20, 1999 pursuant to Order No. 99-50. Wantel provides all types of telephone
12 services, including, for example, long distance, OS/DA, E911, EAS, OTAP, Link-Up, and
13 Lifeline. Wantel provides these services in Roseburg, Winston, Sutherlin and Bandon.

14 III. ALLEGATION OF FACTS

15 A. Eligibility and Identification of the Service Area.

16 Section 214(e)(2) of the Act provides that state commissions have the primary
17 responsibility for designating ETCs. Under §§ 214(e) and 254 of the Act, the OPUC is
18 authorized to designate Wantel as an ETC.

19 Wantel proposes to serve the entire Myrtle Point wire center, shown in the map
20 attached as Exhibit A. Wantel's Phase 1 fiber deployment will reach all businesses and
21 residences shown in the colored areas of the map. Wantel will serve the remaining areas of
22 the wire center via resold services through the incumbent local exchange carrier ("ILEC") for
23 Myrtle Point, Verizon Northwest Inc. ("Verizon").

24 Wantel's service area will mirror that of Verizon. In addition, Wantel attaches
25 Exhibit B, which identifies the wire center that constitutes the proposed service area with the
26 following information: wire center name, wire center CLLI code, and the corresponding

1 ILEC study area name. Wantel proposes to include the entire Myrtle Point wire center in its
2 service area.

3 **B. Facilities Used to Offer Supported Services**

4 Wantel intends to employ fiber-to-the-home throughout Myrtle Point linked to its long
5 distance access tandem. Wantel has implemented Hitachi GPON to provide enhanced and
6 expanded services. Wantel's Phase 1 fiber deployment will reach most of the Myrtle Point
7 wire center. Wantel will serve all customers not initially reached by its fiber using Verizon
8 resold services purchased under its interconnection agreement approved by the
9 Commission in Docket ARB 490.

10 **C. The Legal Standard for Granting ETC Status.**

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

18 As part of the commitment to provide services to all customers in the proposed area
19 to be served, the applicant must submit a five-year plan describing with specificity, on a wire
20 center-by-wire center basis, proposed improvements and upgrades to the applicant's
21 network.⁶

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25 ⁵ *Id.* § 54.202(1).

26 ⁶ *Id.* § 54.202(a)(1)(ii).

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IV. SERVICES PROVIDED BY PETITIONER

In order to be designated an ETC, a carrier must demonstrate, pursuant to § 214(e)(2) of the Act, that it offers services and agrees to offer and advertise the supported services throughout the proposed ETC service area. In addition, the carrier must meet the public interest standard.

Wantel proposes to build and operate a state-of-the-art fiber optic network in the City of Myrtle Point, through which it will provide advanced telecommunications, data, and video services to its customers. Wantel's network may not initially reach every customer within the Myrtle Point wire center. Thus, in order to provide services to customers within the wire center boundaries who are not reached by its fiber optic network, Wantel will resell other carriers' (including Verizon's) retail services.

Wantel will offer the federally-designated services required by 47 CFR § 54.101(a): (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.

A. Voice Grade Access to the Public Switched Telephone Network.

An ETC must offer voice grade access to the public switched telephone network.⁷ Wantel will provide voice grade access to the public switched telephone network in accordance with the FCC's definition.

⁷ *Id.* § 54.101(a)(1).

1 **B. Local Usage.**

2 FCC regulations require ETCs to provide unlimited local usage.⁸ Wantel will provide
3 unlimited local usage. Wantel's basic local usage plans are comparable to those of the
4 ILEC, Verizon. Wantel will mirror Verizon in defining the local calling areas and extended
5 area service ("EAS"). Wantel plans to submit to the Commission its residential and business
6 basic local service prices, basic feature package prices, and other service prices when a
7 protective order is signed in this docket. Comparison with Verizon's basic service prices will
8 demonstrate that Wantel's prices are comparable.

9 **C. Dual-Tone, Multi-Frequency Signaling or Its Functional Equivalent.**

10 An ETC must provide dual tone multi-frequency signaling ("DTMF") to facilitate the
11 transportation of signaling throughout its network.⁹ Wantel will provide DTMF signaling
12 throughout its network, consistent with FCC rules.

13 **D. Single-Party Service or Its Functional Equivalent.**

14 FCC regulations also require ETCs to provide single-party service or its functional
15 equivalent.¹⁰ "Single-party service" means that only one party will be served by a subscriber
16 loop or access line in contrast to a multi-party line.¹¹ Wantel will provide single party service.

17 **E. Access to Emergency Services.**

18 The ability to reach a public emergency service provided by dialing 911 is a required
19 service in any universal service offering.¹² Wantel provides all of its customers with access
20 to emergency service by dialing 911. Wantel will offer E-911 throughout its calling area.

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⁸ *Id.* § 54.101(a)(2).

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⁹ *Id.* § 54.101(a)(3).

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¹⁰ *Id.* § 54.101(a)(4).

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¹¹ *Id.*

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¹² *Id.* § 54.101(a)(5).

1 **F. Access to Operator Services.**

2 Access to operator services is a required service for ETCs and is defined as any
3 automatic or live assistance provided to a consumer to arrange for the billing or completion,
4 or both, of a telephone call.¹³ Wantel will provide customer access to operator services on a
5 24/7 basis.

6 **G. Access to Interexchange Service.**

7 An ETC must offer consumers access to interexchange service to make and receive
8 toll or interexchange calls.¹⁴ Wantel will meet this requirement by providing all of its
9 customers with the ability to make and receive interexchange or toll calls through
10 interconnection arrangements it has with several interexchange carriers ("IXCs"). Wantel is
11 an equal access provider.

12 **H. Access to Directory Assistance.**

13 The ability to place a call to directory assistance is a required ETC service offering.¹⁵
14 Wantel customers will be able to obtain directory assistance from live operators.

15 **I. Toll Limitation for Qualifying Low Income Consumers.**

16 An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline
17 customers at no charge.¹⁶ In particular, an ETC must provide toll blocking, which allows
18 customers to block the completion of outgoing calls.¹⁷ Wantel will provide this service.

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¹³ *Id.* § 54.101(a)(6).

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¹⁴ *Id.* § 54.101(a)(7).

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¹⁵ *Id.* § 54.101(a)(8).

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¹⁶ *Id.* § 54.101(a)(9).

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¹⁷ *Id.* § 54.400(b).

1 **J. Link-Up and Lifeline Services.**

2 Wantel will offer Link-Up and Lifeline services throughout the Myrtle Point exchange.
3 These services are available in accordance with the guidelines as published and amended
4 from time to time by the federal agency or agencies that administer such programs.

5 **V. FIVE-YEAR PLAN**

6 Wantel commits to use the support funds only for their intended purposes. In
7 support of this commitment, Wantel submits as Exhibit C, a copy of the certification required
8 by the FCC to receive Interstate Access Support ("IAS").

9 Wantel has developed and will file a Five-Year Plan (the "Plan") for the Myrtle Point
10 project after a protective order has been signed in this docket. The Plan will demonstrate in
11 detail how IAS and OUSF support will be used for service improvements that would not
12 occur absent receipt of such support. Wantel will use the OUSF funds to pay for the build-
13 out and improvements required to serve the Myrtle Point area.

14 As noted above, Wantel's main objective is to become a state ETC in order to
15 receive OUSF support. To achieve this objective, Wantel must first obtain federal ETC
16 status. As demonstrated in this Application, Wantel is willing to meet ETC requirements.
17 Wantel's plan outlines its planned use of OUSF funds, demonstrating Wantel's commitment
18 to being an ETC. In order for Wantel to complete the projects identified in the Plan, it is
19 necessary to obtain both IAS and OUSF funds. Because obtaining federal ETC status is
20 effectively a condition precedent to qualifying as an ETC for purposes of the OUSF, the IAS
21 funds that would be available as a result of becoming a federal ETC are essential for the
22 identified projects, notwithstanding the fact that the dollar amounts are relatively small.

23 **VI. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

24 As required by 47 CFR § 54.201, Wantel plans to advertise the availability of each of
25 the supported services detailed above throughout its licensed service area by media or
26 general distribution. The methods of advertising utilized may include newspaper, magazine,

1 radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory
2 advertising. Wantel will distribute literature offering Lifeline and Link-Up services to
3 hospitals, clinics, hospices, senior centers, welfare offices, and other locations where those
4 likely to be eligible for the program(s) would encounter the brochures.

5

VII. PUBLIC INTEREST FACTORS

6 Granting Wantel's application to become an ETC in the Myrtle Point area is in the
7 public interest. As stated above, Wantel will use the monies it receives from both the state
8 and federal universal service funds to help finance its plan to offer high speed broadband
9 voice, data and video services over a state-of-the-art IP-enabled network. Wantel is
10 committed to providing service throughout its designated service area to all customers who
11 make a reasonable request for services. Wantel plans to serve most customers in the
12 Myrtle Point wire center via Wantel's own facilities. Wantel is also prepared to serve
13 customers outside its existing network coverage within a reasonable period of time and at a
14 reasonable cost, using UNEs leased from Verizon. In the longer term, Wantel plans to use
15 the high cost support prudently, and to extend the reach of its own facilities to virtually all of
16 the customers in the wire center areas.

17 Wantel will offer Myrtle Point customers all of the same services that are currently
18 offered by Verizon. Specifically, Wantel will provide all Myrtle Point customers with a
19 minimum of the following services:

- 20 i. Basic telephone service including
- 21 ii. EAS
- 22 iii. E911 (included in all areas)
- 23 iv. Caller ID
- 24 v. Call Waiting w/Caller ID
- 25 vi. Call Forward
- 26 vii. Call Forward No Answer
- viii. Call Rejection
- ix. Call Transfer
- x. Caller ID Block/Unblock
- xi. Continuous Redial
- xii. Call Forward Remote Access w/ Pin#
- xiii. Last Call Return

- 1 xiv. Priority Call
- 2 xv. Selective Call Forwarding
- 3 xvi. Selective Call Acceptance
- 4 xvii. Speed call 8 and 30
- 5 xviii. Three Way Calling
- 6 xix. Anonymous Call Rejection
- 7 xx. Voice Mail, basic, expanded and premium
- 8 xxi. Inside Wire Protection
- 9 xxii. Custom Ring
- 10 xxiii. Dial-up Internet
- 11 xxiv. **BROADBAND INTERNET ACCESS UP TO 3MB**
- 12 xxv. Open Access to long distance 1 + dialing and choice of any PIC/LPCI

13 Through the deployment of its fiber optic network, Wantel will be able to provide
 14 improved basic and advanced services to its customers, including those in traditionally high
 15 cost areas. These improvements include high speed data services, voice and video, and
 16 access to several different ISPs in the area.

17 In addition, service quality will increase for Wantel customers in high cost areas. A
 18 review of the Plan shows how the network upgrades will extend Wantel's fiber network
 19 further into the high cost area. By doing so, this new infrastructure will increase call and
 20 service quality in these areas. The result will be improved local access via new facilities with
 21 fiber optic runs to the neighborhood enabling more customer connections, more reliable
 22 service, and a broader choice of features and benefits. Improved service quality will result
 23 from the new infrastructure, fiber optic transport, SONET ring topology, and newer state-of-
 24 the-art equipment in the field, customer premises and wire centers. Improved service quality
 25 will also result from local involvement by consumers in the service area, enabled by
 26 Wantel's walk-in offices, located in the service area, where customers can interact with
 Wantel employees on a person-to-person basis as well as having Wantel's core technical
 staff on hand locally for instant response to technical problems. There will also be more
 reliable emergency services due to diverse traffic routing and SONET ring technologies, as
 well as eight-hour battery back-up and generators distributed throughout Wantel's network
 as required.

1 Finally, designation of Wantel as an ETC is in the public interest because it will
2 promote competition. Competition promotes consumer benefits in the form of lower prices,
3 increased service quality, and innovation. Also, by designating Wantel as an ETC it will
4 make available Lifeline and Link-Up, including OTAP, services to customers of Wantel in the
5 Myrtle Point area. For these reasons designation of Wantel as an ETC is in the public
6 interest.

7 **VIII. COMMITMENT TO SERVE REQUESTING CUSTOMERS**

8 Wantel agrees to provide its services to all customers for a reasonable cost within a
9 reasonable timeframe.

10 **IX. EQUAL ACCESS**

11 Wantel acknowledges that it must provide equal access in its service area. It further
12 acknowledges that should all other ETCs in its service area relinquish their designations, it
13 must continue to provide equal access.

14 **X. ABILITY TO REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS**

15 In order to be designated an ETC, the applicant must be able to demonstrate a
16 reasonable ability to remain functional in an emergency situation. There are three areas for
17 demonstration: back-up power to ensure a functioning network; network redundancy for re-
18 routing; and how traffic spikes are addressed. The applicant also must describe the current
19 status of its E911 deployment and compliance.

20 **A. Back-up power**

21 Wantel has eight-hour battery back-up at each location where its equipment requires
22 power. It also has generators with automatic transfer switches where required.¹⁸

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25 ¹⁸ Referring to Wantel's confidentially submitted Plan will demonstrate the redundancy in the
26 network to provide a reroute of traffic and how the network can address traffic spikes during an
emergency.

1 **B. Network redundancy**

2 Wantel has its own fiber routes in certain areas and leases fiber from others to obtain
3 redundancy in its network. Wantel operates diverse interconnect trunking on physically
4 redundant paths to multiple diverse switches in the Verizon network. Wantel's SS7 network
5 is dual-homed to Tigard and Hillsboro.

6 Wantel has excess capacity on all its routes. As an example, Wantel has four DS1
7 trunks to the Eugene Access Tandem, as well as four more FG-D trunks to the
8 EUGNOR53C9T tandem switch. With respect to standard interconnect trunking to the ILEC,
9 Wantel meets or exceeds all required grades of service and reviews traffic distribution on
10 these facilities on a monthly basis, with changes occurring as needed.

11 Wantel currently has two voice switches in its network with one tandem switch
12 serving the Wantel networks.

13 **C. Status of E911.**

14 Wantel has achieved full deployment of E911 in its service area and is in full
15 compliance with E911 requirements.

16 **XI. CONSUMER PROTECTION**

17 Wantel is subject to the Oregon consumer protection laws. It also submits service
18 quality reports to the Commission. Attached as Exhibit D is a summary of Trouble Reports,
19 Provisioning Commitments, Held Orders, Access to Representatives for Repair and
20 Business Office, and Call Blocking. Each of the standards in the Oregon Administrative
21 Rules have been met or surpassed by Wantel. Wantel has a commitment to resolve
22 complaints made by consumers to the Commission and has designated Marty Patrovsky as
23 the contact person who will work with the Commission's Consumer Services Complaint
24 Division for complaint resolution.

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XII. CONCLUSION

For all of the above reasons, Wantel respectfully requests that the Commission grant its Application.

DATED: April 27, 2007.

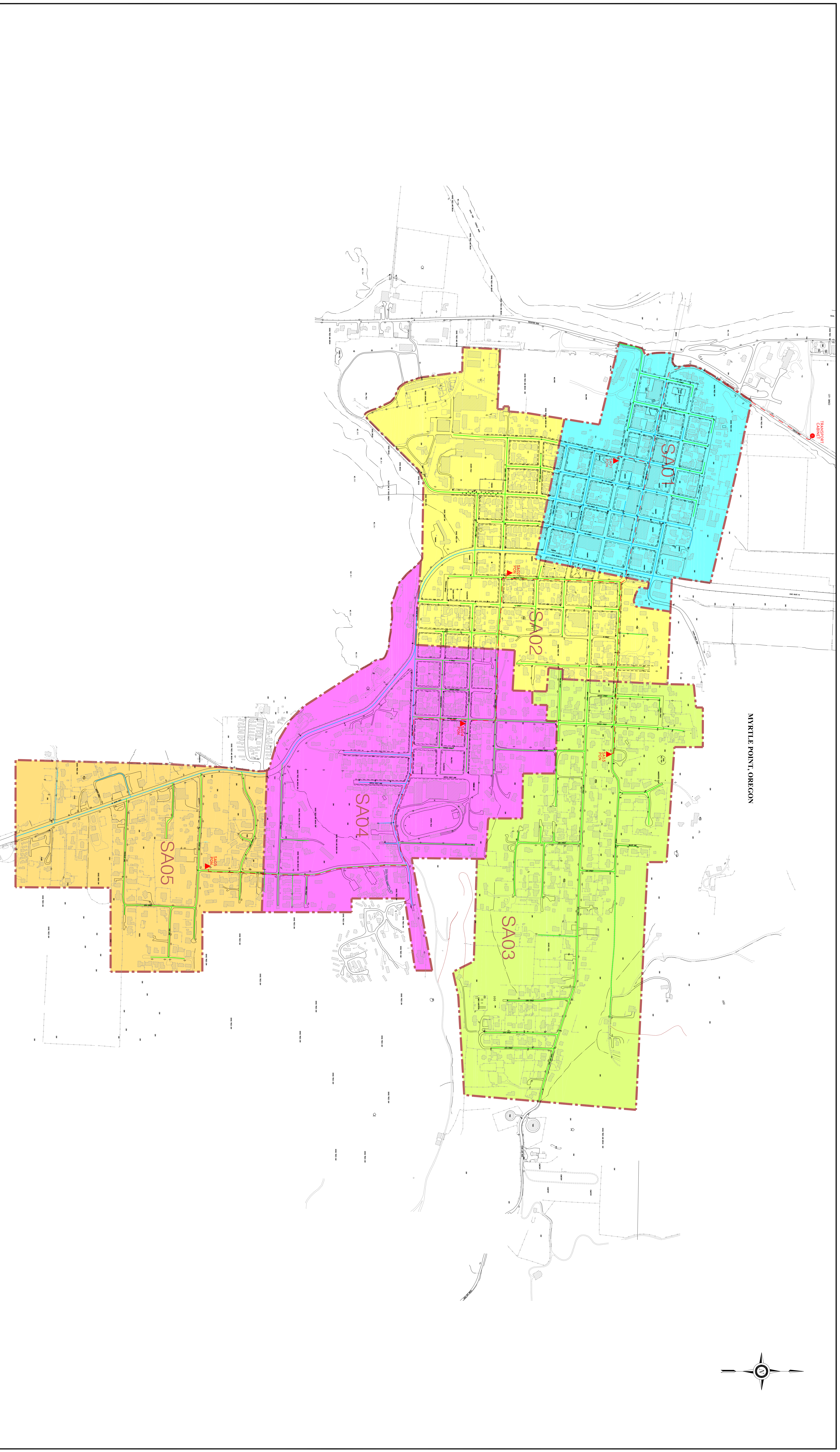
McDOWELL & RACKNER PC



Lisa F. Rackner

Attorneys for Wantel d/b/a ComspanUSA

PLANNING MAP FOR MYRTLE POINT, OREGON




STATE PLANE COORDINATE SYSTEM
OREGON SOUTH ZONE - NAD-27 - U.S. FOOT PROJECTION

PRELIMINARY

Legend

- Serving Area Bndry
- Backbone Path
- PON Cabinet
- UG Dist.
- Aerial Dist.
- Transport Cabinet
- ▲ Transport Cabinet
- Transport Cabinet



| | |
|--------|------------|
| DATE: | 04/16/2007 |
| SHEET: | CITY MAP |

Exhibit B

Exhibit B

Wantel requests that it be designated as an ETC in the Myrtle Point wire center served by the incumbent Verizon Northwest Inc. The wire center name, CLLI codes, and corresponding ILEC study area name is:

Wire Center
Myrtle Point, OR

CLLI Codes
MYPN

ILEC Study Area
Myrtle Point

Exhibit C

**Interstate Access Support (IAS)
2005**

May 12, 2005

To: Marlene H. Dortch
Office of Secretary
Federal Communications Commission
445 -12th Street, SW
Washington, DC 20554

Irene Flannery
Vice President - High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

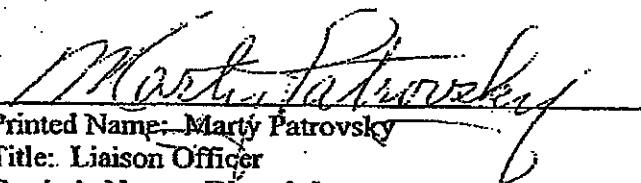
Re: CC Docket No. 96-45
Interstate Access Support - IAS
Annual Certification Filing

This is to certify that Wantel, Inc. d/b/a ComspanUSA will use its Universal Service **INTERSTATE ACCESS SUPPORT - IAS** only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below.

| Company Name | State | Study Area Code |
|-------------------------------|-------|-----------------|
| Wantel, Inc. d/b/a ComspanUSA | OR | Not Available |

Signed,



Date: MAY 12TH 2005

Printed Name: Marty Patrovsky
Title: Liaison Officer
Carrier's Name: Wantel, Inc.
Carrier's Address: 1016 SE Oak Street
Roseburg, OR 97470
Carrier's Telephone Number: (541) 229-0229

Exhibit D

For September 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 7032 Access Lines and 5 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

1. Wantel 48 Hour clearance rate is 100% 5 of 5.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat September 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

1. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,

Darrell Hicks
Network Operations
Manager-Network Operations Center
541-229-2108

For October 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 7054 Access Lines and 4 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

1. Wantel 48 Hour clearance rate is 100% 4 of 4.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat September 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

1. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,

Darrell Hicks
Network Operations
Manager-Network Operations Center
541-229-2108



Exhibit D

Community Headquarters
1012 SE Oak Avenue, Suite 200
Roseburg, OR 97470

541-672-9895
www.comspanusa.net

For January 2007

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 6375 Access Lines and 2 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

1. Wantel 48 Hour clearance rate is 100% 2 of 2.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat January 2007 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

1. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,

Marty Patrovsky
Liaison Officer
Wantel, Inc.



Exhibit D

Community Headquarters
1012 SE Oak Avenue, Suite 200
Roseburg, OR 97470

541-672-9895

www.comspanusa.net

For December 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 6363 Access Lines and 3 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

1. Wantel 48 Hour clearance rate is 100% 3 of 3.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat December 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

1. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,

Marty Patrovsky
Liaison Officer
Wantel, Inc.

Exhibit D



Community Headquarters
1012 SE Oak Avenue, Suite 200
Roseburg, OR 97470

541-672-9895

www.comspanusa.net

For November 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

- 1. We had 6214 Access Lines and 63 Trouble Reports a ratio of 1.1/100 Access Lines
 - a. We had power related damage to two muxes in our collocation in Roseburg Qwest office one night in November resulting in a massive influx of trouble reports. All services were restored in less than six hours.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

- a. Wantel 48 Hour clearance rate is 100% 63 of 63.

3. Commitments met/ Provisioning (OAR Standard 90%)

- a. Wantel met or beat November 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

- a. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

- a. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

- a. All our calls are answered 7/24 by live representatives. We do not use automated answering.

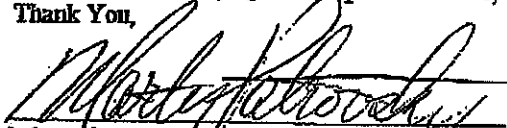
7. Access to Representatives Business Office Call Center.

- a. See 6.1 above

8. Call Blocking

- 1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,



Marty Patrovsky liaison officer
Wantel, Inc. (d/b/a ComspanUSA)

For August 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 7028 Access Lines and 3 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

1. Wantel 48 Hour clearance rate is 100% 3 of 3.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat August 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

1. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,

Darrell Hicks
Network Operations
Manager-Network Operations Center
541-229-2108

For July 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 6197 Access Lines and 4 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

1. Wantel 48 Hour clearance rate is 100% 4 of 4.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat July 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

1. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,
Thank You,

Darrell Hicks
Network Operations
Manager-Network Operations Center
541-229-2108