

McDowell & Rackner PC



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June 15, 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 Wantel, Inc. d/b/a Comspan Communications' Application for Eligible Telecommunications Provider (ETP) to Provide OTAP Services.

Very truly yours,


Lisa F. Rackner (KNP)

Enclosures

cc: Eugene Eng, Verizon Northwest, Inc.

Oregon Telephone Assistance Program (OTAP) Application
for Eligible Telecommunications Provider (ETP) to provide OTAP Services

Part I. Application Information and Service Plan

1. Legal name of applicant: Wantel, Inc.
2. Name or names that applicant is doing business as: Comspan Communications
3. Contact information pertaining to your designated staff who would be handling OTAP communication:

Name: Michelle Elkins

Address: 1012 SE Oak Ave

City: Roseburg State: OR Zip: 97470

Phone number: (541) 229-0229 Fax: (541) 229-2148

E-Mail: michelle.elkins@comspanusa.net

4. Are you authorized to provide telecommunications services in the State of Oregon

Yes Oregon PUC Telecommunications Service Provider ID No. 7439

No **Stop.** You must apply for and obtain Oregon PUC approval to offer telecommunications services in the State of Oregon before you can participate in the OTAP program.

5. Are you currently designated as a federal Eligible Telecommunications Carrier (ETC) by Oregon Public Utility Commission in the service areas where you intend to participate in OTAP?

Yes Docket No. UM 1307 Order No. 07-210

No **Stop.** OTAP is an adjunct to the federal universal service fund Lifeline and Linkup programs. You must apply for and obtain designation as a federal eligible telecommunications carrier (ETC) in those service areas where you intend to participate in OTAP.

6. List the specific Oregon exchanges where you seek to participate in OTAP. If your current federal ETC service area is not coextensive with specific Oregon exchanges, please list the incumbent local exchange carrier (ILEC) wire centers

8. The number of residential, business and tribal basic service customers served by the applicant as of December 31, of the most recent calendar year. Specify whether these customers are served by wireline service or wireless instruments.

Part II. Conditions to Provide OTAP Services to Qualifying Oregonians

These conditions apply in addition to the general conditions of certification. Violating these conditions, or misrepresenting information provided to PUC in the course of administering the OTAP programs may result in cancellation of your Telecommunications Provider's Certificate, your authority to provide OTAP Services and/or an order requiring you to refund with interest and penalties of any OTAP support distributed under false information.

1. The applicant agrees to offer reduced residential rates to eligible low-income customers pursuant to the Oregon Telephone Assistance program (OTAP). See OAR 860-033-0001 through 0046.
2. The applicant understands that only PUC may approve OTAP benefits for the consumer and provide benefits to OTAP consumers after PUC has notified the applicant of their eligibility. A telecommunication provider who grants OTAP benefits to ineligible customers will have the total amount of the OTAP benefits that were given to those customers deducted from the monthly or quarterly OTAP reimbursement invoices that the telecommunications provider submits to the Commission (OAR 860-033-0045 (1) (d)).
3. The applicant agrees that they will ensure the consumer will see their OTAP credit within 30 days from the date that the applicant has been notified of the consumer's eligibility status, and to remove consumers within 30 days after they no longer qualify for OTAP benefits.
4. The applicant agrees that if an OTAP consumer did not receive his or her benefits from the applicant after being approved by the Commission, that the applicant will reimburse the consumer up to a maximum of one year of OTAP benefits credited to their telephone line (OAR 860-033-0030 (7)).
5. The applicant agrees that they will submit reports for reimbursement quarterly (if they have less than 1,000 OTAP consumers) or monthly (if they have more than 1,000 OTAP consumers). Reports are expected to be submitted even if there are zero consumers (OAR 860-033-0045 (1)).
6. The applicant agrees that upon request, a qualifying OTAP recipient shall be entitled to toll limitation service from an eligible telecommunications carrier, when available, at no additional charge. Further, the applicant agrees not to deny or disconnect basic service to an OTAP customer for failure to pay toll charges, or require a deposit from OTAP consumers who voluntarily elect to receive toll-blocking services. (OAR 360-021-0200 (5), and 360-021-0335 (4) (b)).

7. An OTAP recipient is required to be the named subscriber to the local telecommunication service in order for that household to qualify for OTAP benefits. PUC may waive this requirement if it determines that good cause exists. Applicant agrees to comply with reimbursing OTAP consumers who are not named subscribers at the Commission's request.
8. The applicant agrees to ensure that confidential information (including phone number, addresses, contact information and social security numbers) of OTAP recipients is protected (OAR 360-033-0030 (5)). The applicant agrees to maintain a written policy to ensure that the applicant's staff does not breach the confidentiality of OTAP consumers, and to do background checks on employees who have access to customer records.
9. The applicant agrees to have in place database encryption and firewall technologies to protect customer service information stored electronically.

APPLICANT UNDERSTANDS ALL OF THE ABOVE CONDITIONS AND AGREES TO ABIDE BY ALL APPLICABLE COMMISSION RULES, STATE LAW AND THE CONDITIONS OF CERTIFICATION. PLEASE INITIAL BOX AT LEFT.

Marty Patrovsky
Signature of person authorized to represent applicant

Liason Officer
Title

Marty Partovsky
Printed Name

June 14, 2007
Date

ATTACHMENT A
(Wantel's ETC Application)

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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 Coquille
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 Coquille 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 Coquille. When the network is completed, Wantel will offer customers located in Coquille access to broadband telecommunications, data, and video services. Because Coquille 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 access

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

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

8 **II. APPLICANT**

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

15 **III. ALLEGATION OF FACTS**

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

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

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

25 Wantel's service area will mirror that of Verizon. In addition, Wantel attaches
26 Exhibit B, which identifies the wire center that constitutes the proposed service area with the

1 following information: wire center name, wire center CLLI code, and the corresponding
2 ILEC study area name. Wantel proposes to include the entire Coquille wire center in its
3 service area.

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

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

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

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

19 As part of the commitment to provide services to all customers in the proposed area
20 to be served, the applicant must submit a five-year plan describing with specificity, on a wire
21 center-by-wire center basis, proposed improvements and upgrades to the applicant's
22 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 common 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 common 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 Coquille, 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 Coquille 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 C.F.R. § 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
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 Coquille 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 Coquille
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 OUS funds to pay for the build out
13 and improvements required to serve the Coquille area.

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

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

24 As required by 47 C.F.R. § 54.201, Wantel plans to advertise the availability of each
25 of the supported services detailed above throughout its licensed service area by media of
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 senior
3 services, hospitals, clinics, hospices, senior centers, welfare offices, and other locations
4 where those 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 Coquille area is in the public
7 interest. As stated above, Wantel will use the monies it receives from both the state and
8 federal universal service funds to help finance its plan to offer high speed broadband voice,
9 data and video services over a state-of-the-art IP-enabled network. Wantel is committed to
10 providing service throughout its designated service area to all customers who make a
11 reasonable request for services. Wantel plans to serve most customers in the Coquille wire
12 center via Wantel's own facilities. Wantel is also prepared to serve customers outside its
13 existing network coverage within a reasonable period of time and at a reasonable cost,
14 using UNEs leased from Verizon. In the longer term, Wantel plans to use the high cost
15 support prudently, and to extend the reach of its own facilities to virtually all of the customers
16 in the wire center areas.

17 Wantel will offer Coquille customers all of the same services that are currently
18 offered by Verizon. Specifically, Wantel will provide all Coquille customers with a minimum
19 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
- xv. Selective Call Forwarding
- 2 xvi. Selective Call Acceptance
- xvii. Speed call 8 and 30
- 3 xviii. Three Way Calling
- xix. Anonymous Call Rejection
- 4 xx. Voice Mail, basic, expanded and premium
- xxi. Inside Wire Protection
- 5 xxii. Custom Ring
- xxiii. Dial-up Internet
- 6 xxiv. BROADBAND INTERNET ACCESS UP TO 3MB
- 7 xxv. Open Access to long distance 1 + dialing and choice of any PIC/LPCI

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

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

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

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

9 **IX. EQUAL ACCESS**

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

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

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

19 **A. Back-up power**

20 Wantel has eight-hour battery back-up at each location where its equipment requires
21 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.

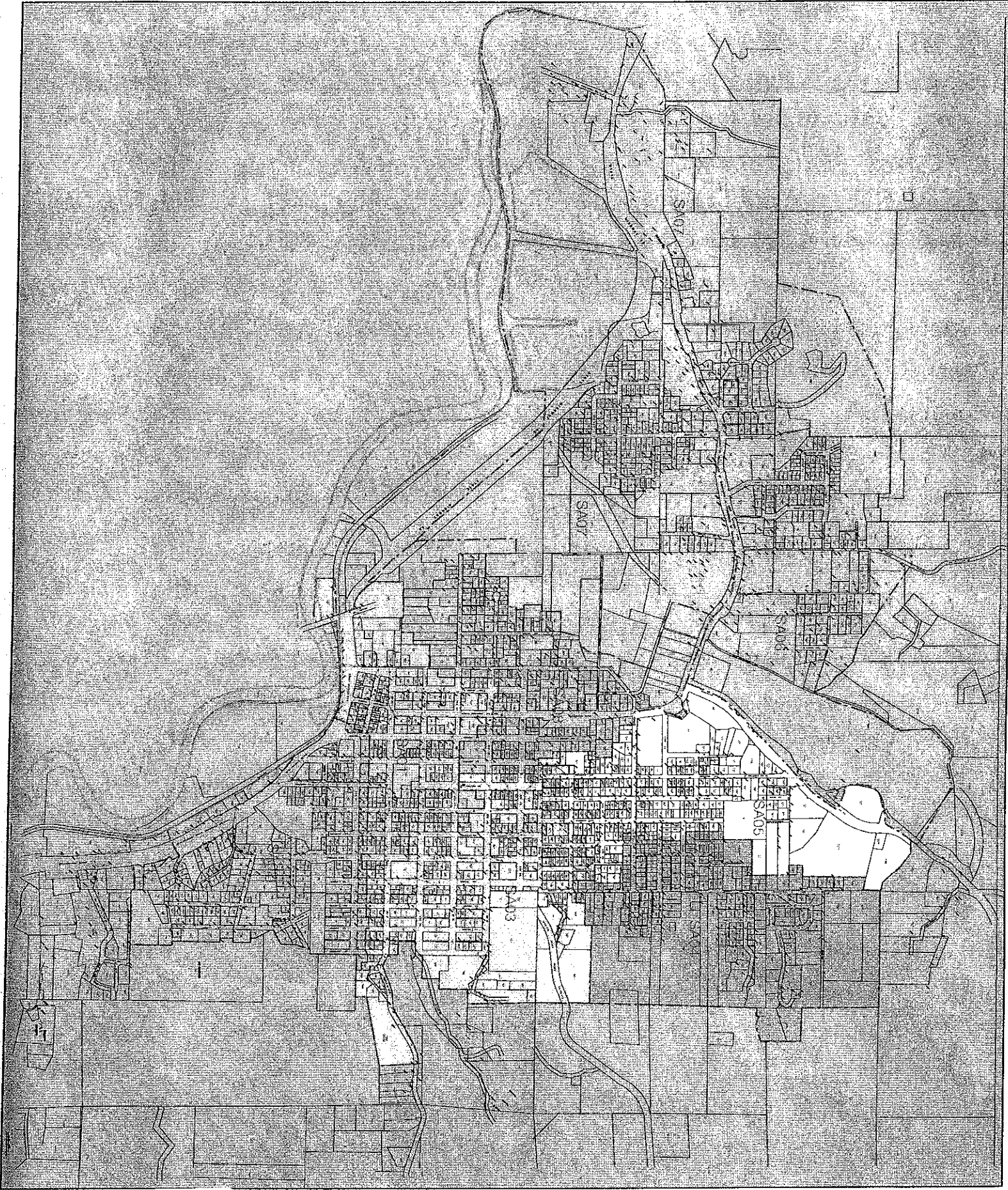
DATED: March 21, 2007.

McDOWELL & RACKNER PC



Lisa F. Rackner

Attorneys for Wantel d/b/a ComspanUSA



SA 1-5
Phase 1 Fiber Deployment

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

Wire Center
Coquille, OR

CLLI Codes
Wantel: CQLLOR050MD
Verizon: CQLLOR050MD

ILEC Study Area
Verizon – Coquille

**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

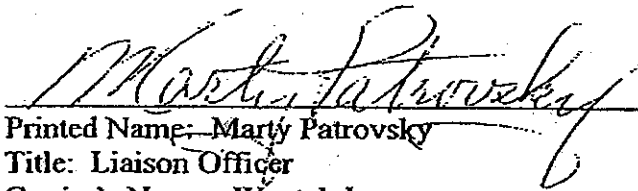
Re: CC Docket No. 96-45
Interstate Access Support – IAS
Annual Certification Filing

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

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.



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 #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. (t/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 #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