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January 29, 2008

VIA ELECTRONIC FILING

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

Re: Docket UM ___ - Comspan Communications Inc.'s Application for Approval of Eligibility to Participate in the Oregon Universal Service Fund

Dear Sir or Madam:

Enclosed for filing, please find the following

1. Application of Comspan Communications Inc.'s for Approval of Eligibility to Participate in the Oregon Universal Service Fund; and
2. Affidavit of Jan Summarell.

Please note we are filing an unsigned copy of Mr. Summarell's affidavit and will file the original signed and notarized copy at a later date. Please contact me with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Amie Jamieson'.

Amie Jamieson

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM _____

Application of Comspan Communications
Inc. for Approval of Eligibility to Participate
in the Oregon Universal Service Fund.

APPLICATION

I. INTRODUCTION

Comspan Communications Inc. (fka Wantel, Inc.) ("Comspan") respectfully submits this Application for Approval of Eligibility to Participate in the Oregon Universal Service Fund ("Application") in the Veneta, Reedsport, and Myrtle Point wire centers (collectively, the "Requested Wire Centers"). The Public Utility Commission of Oregon (the "Commission") has already granted Comspan's federal Application for Designation as an Eligible Telecommunications Carrier for the Requested Wire Centers ("Federal ETC Application")¹ finding that it has satisfied all of the requirements for federal eligible telecommunications carrier ("ETC") status.² A copy of Comspan's Federal ETC Application is appended hereto as Exhibit A and incorporated by reference. In addition, Comspan will be submitting its Application for Eligibility to receive Oregon Telephone Assistance Program ("OTAP") funds in the Requested Wire Centers, and expects to receive approval of that Application prior to a decision on this Application.

Comspan seeks eligibility for participation in the Oregon Universal Service Fund ("OUSF") to assist it in financing, operating, and maintaining a state-of-the-art fiber optic network in the Requested Wire Centers. When the network is completed, Comspan will

¹ The Federal ETC Application was filed pursuant to the federal Telecommunications Act of 1996, 47 U.S.C. § 214(e)(1)-(2).

² *In re. Comspan Communications, Inc.*, Order No. 08-101, Docket UM 1316 (Jan. 28, 2008).

1 offer customers located throughout the wire center access to voice, broadband, data, and
2 video services.

3 The Commission has already granted Comspan federal and state ETC status in the
4 Winston, Sutherlin, Roseburg, Bandon, and Coquille wire centers.³ Since that time the
5 Company has invested monies received from OUSF funds to provide customers in Winston,
6 Sutherlin, Roseburg, and Bandon with its state-of-the-art fiber-based services.⁴ In making
7 this Application, Comspan requests the opportunity to make similar investments in and
8 extend its cutting edge services throughout the Requested Wire Centers.⁵

9 Because it has satisfied all of the requirements for participation in the OUSF, and
10 because the evidence shows that Comspan's investments will continue to serve the public
11 interest, the Commission should grant Comspan's Application.

12 II. BACKGROUND

13 A. Applicant

14 Comspan is a competitive local exchange carrier ("CLEC") and obtained its
15 certificate of authority to offer telecommunications services as a competitive provider from
16 the Commission on August 20, 1999, under Order No. 99-507. Comspan provides various
17 telephone services, including, for example, dial tone (POTS), long distance, OS/DA, E911,
18 EAS, OTAP, Link Up, and Lifeline.

19

20 ³ Order No. 05-856, entered July 14, 2005, in Docket UM 1202 (Winston, Sutherlin, and
21 Roseburg federal ETC status); Order No. 06-081, entered February 23, 2006, in Docket UM 1190
22 (Winston, Sutherlin, and Roseburg state ETC status); Order No. 06-681, issued December 21, 2006,
23 in Docket UM 1255 (Bandon federal ETC status); Order No. 07-116 issued April 2, 2007, in Docket
24 UM 1300 (Bandon state ETC status); Order No. 07-403, entered on September 18, 2007, in Docket
25 UM 1325 (Coquille federal ETC status); and Order No. 07-574, entered on December 20, 2007, in
26 Docket UM 1321 (Coquille state ETC status).

24 ⁴ OUSF support payments to Comspan based on the Coquille wire center will begin on
25 March 30, 2008.

25 ⁵ See Five Year Network Improvement Plan, filed in Docket UM 1316 on Oct. 31, 2007, and
26 amended on Jan. 8, 2008.

1 **B. Eligibility and Identification of the Service Area.**

2 Comspan submitted maps of the Requested Wire Centers with wire center
3 boundaries highlighted in yellow as Confidential Exhibit D to the Federal ETC Application.
4 Comspan's service area will mirror that of the incumbent local exchange carriers ("ILECs")
5 serving these wire centers, Verizon Northwest, Inc. ("Verizon") and Qwest Corporation
6 ("Qwest"). In addition, Comspan attached Exhibit A to its Federal ETC Application, which
7 identifies the wire centers that constitute the proposed service areas with the following
8 information: wire center name, wire center CLLI code, and the corresponding ILEC study
9 area name. Comspan proposes to include the entire Requested Wire Centers in its service
10 area.

11 **C. Facilities Used to Offer Supported Services**

12 Comspan intends to employ fiber-to-the-home throughout the Requested Wire
13 Centers linked to its long distance access tandem. Comspan has implemented Hitachi
14 GPON to provide enhanced and expanded services. In each of the Requested Wire
15 Centers, Comspan will initiate a Phase 1 fiber deployment that will reach most customers in
16 the wire centers. Comspan will serve all customers not initially reached by its fiber by
17 reselling ILEC services. In addition, Comspan will continue to build out its networks to reach
18 additional customers in each wire center, where economically feasible. Comspan will
19 purchase services for resale in the Qwest wire centers from Qwest under its interconnection
20 agreement with Qwest; Comspan will purchase services for resale in the Verizon wire
21 centers from Verizon under its interconnection agreement with Verizon.

22 **III. CRITERIA FOR ELIGIBILITY**

23 In Docket UM 731, the Commission first considered the eligibility requirements for
24 participation in the OUSF. The Commission found that in order to participate in the Oregon
25 fund, a carrier would be required to demonstrate that it satisfied all of the criteria established
26 for participation in the federal Universal Service Fund ("USF"), as well as two additional

1 criteria proposed by Commission Staff.⁶ Through its Federal ETC Application, and this
2 Application, Comspan clearly satisfies all fourteen requirements. A discussion of each
3 requirement, and the evidence produced by Comspan in satisfaction of each requirement,
4 follows:

5 **Requirement No. 1 Comspan must offer, throughout the designated service area,**
6 **services we have defined to be basic local exchange services,**
7 **using the carrier's own facilities, leased UNE facilities, or a**
8 **combination of its own or leased facilities and resale of another**
9 **carrier's retail services;**

8 In its Federal ETC Application, Comspan established its commitment to provide
9 basic local exchange services in a timely fashion to all customers in the Requested Wire
10 Centers. In that application Comspan explained that, eventually, it plans to serve all
11 customers in the wire centers using its own facilities. However, its facilities are not yet built
12 out to every household in the wire center. Thus, in the event Comspan receives a request
13 for service from a customer whom it cannot immediately serve using its own facilities,
14 Comspan will initially serve the customer using facilities leased or resold from Verizon or
15 Qwest.⁷

16 In its recommendation in support of Comspan's Federal ETC Application, Staff found
17 that Comspan was committed to provide the requisite services to all customers in the
18 Requested Wire Centers. Specifically Staff stated:

19 Comspan currently offers all required supported services,
20 including a local usage plan comparable to that of the
21 incumbents in its currently designated service area. Comspan
22 commits to provide all supported services in the requested
23 wire centers.⁸

23 ⁶ Order No. 00-312.

24 ⁷ Federal ETC Application at 3.

25 ⁸ *In re. Comspan Communications, Inc.*, Order No. 08-101, Docket UM 1316 Appendix A at 3
26 (Jan. 28, 2008).

1 In addition Staff stated:

2 Comspan commits to provide timely service to all requesting
3 customers, and will lease facilities or resell Qwest or Verizon
4 service if it cannot initially serve a customer using its own
5 facilities.⁹

6 The Commission adopted Staff's view that Comspan is committed to providing the
7 requisite services to all customers in the Requested Wire Centers in Order No. 08-101.¹⁰

8 Finally, in approving Comspan's Federal ETC Application, the Commission implicitly
9 found that Comspan had fulfilled the two federal requirements analogous to this state OUSF
10 Requirement No. 1—*i.e.*, "Commitment and ability to provide all supported services;" and
11 "Commitment and ability to provide supported services throughout the designated service
12 area." Thus, based on the confirmation provided herein and in the Federal ETC Application,
13 the Commission should find that Comspan has fulfilled Requirement No. 1.

14 **Requirement No. 2 Advertise in media of general distribution through the
15 designated service area the availability and prices of supported
16 basic local exchange services;**

17 In its Federal ETC Application, Comspan explained that it plans to advertise the
18 availability of each of the supported services throughout its licensed service area by media
19 of general distribution. Comspan explained that such advertising might include newspaper,
20 magazine, radio, direct mailings, etc. Comspan further explained that it would distribute
21 literature offering Lifeline and Link-Up service to senior services, hospitals, clinics, etc.¹¹

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26 ⁹ *Id.* at Appendix A at 3.

¹⁰ *Id.*

¹¹ See Federal ETC Application at 7–8.

1 The Commission adopted Staff's view that Comspan is committed to advertising the
2 supported services.¹² Therefore the Commission should find that Comspan has satisfied
3 Requirement No. 2.

4 **Requirement No. 3 Offer Oregon Telephone Assistance (OTAP) in compliance with**
5 **Oregon Administrative Rules 860-033-0046;**

6 Comspan has agreed to provide OTAP in compliance with Oregon law. Comspan
7 already provides this service in the Winston, Sutherlin, Roseburg, Bandon, and Coquille wire
8 centers,¹³ and expects to receive authority to do so in the Requested Wire Centers as well.

9 In its recommendation to the Commission regarding Comspan's Federal ETC
10 Application, Staff states: "Comspan commits to offer federal Lifeline and Link Up discounts,
11 as well as state OTAP discounts, to qualifying low-income customers."¹⁴ Therefore the
12 Commission should find that Comspan has satisfied Requirement No. 3.

13 **Requirement No. 4 Not deny or disconnect basic local exchange service to an OTAP**
14 **customer for failure to pay for toll charges;**

15 Comspan agrees to fulfill all requirements for providing OTAP service, including the
16 requirement not to deny or disconnect local exchange service for failure to pay toll charges.
17 Therefore the Commission should find that Comspan has satisfied Requirement No. 4.¹⁵

18 **Requirement No. 5 Not require a deposit from OTAP customers who voluntarily elect**
19 **to receive toll-blocking service;**

21 ¹² *In re. Comspan Communications, Inc.*, Order No. 08-101, Docket UM 1316 Appendix A at
22 4 (Jan. 28, 2008).

23 ¹³ See Order No. 05-926 issued on August 18, 2005 in Docket UM 1212; Order No. 07-102
24 issued on March 16, 2007 in Docket UM 1305; Order No. 07-403 issued on September 18, 2007 in
25 Docket UM 1325.

24 ¹⁴ *In re. Comspan Communications, Inc.*, Order No. 08-101, Docket UM 1316 Appendix A at
25 4 (Jan. 28, 2008).

26 ¹⁵ See Summarell Affidavit, ¶ 4.

1 Comspan agrees to fulfill all requirements for providing OTAP service including the
2 requirement not to demand a deposit from customers who voluntarily elect to receive toll-
3 blocking service.¹⁶ Therefore the Commission should find that Comspan has satisfied
4 Requirement No. 5.

5 **Requirement No. 6 Accept the duty to interconnect directly or indirectly with the**
6 **facilities and equipment of other telecommunications carriers;**

7 Comspan is obligated to fulfill this requirement under the federal
8 Telecommunications Act, and commits to doing so with this Application.¹⁷ Therefore the
9 Commission should find that Comspan has satisfied Requirement No. 6.

10 **Requirement No. 7 Not install network features, functions, or capabilities that do not**
11 **comply with the Telco Act's requirements for access by persons**
12 **with disabilities and coordination for interconnectivity;**

13 Comspan is obligated to fulfill this requirement under the federal
14 Telecommunications Act, and commits to doing so with this Application.¹⁸ Therefore the
15 Commission should find that Comspan has satisfied Requirement No. 7.

16 **Requirement No. 8 Not prohibit or impose unreasonable or discriminatory**
17 **conditions or limitations on the resale of telecommunications**
18 **services;**

19 Comspan is obligated to fulfill this requirement under the federal
20 Telecommunications Act, and commits to doing so with this Application.¹⁹ Therefore the
21 Commission should find that Comspan has satisfied Requirement No. 8.

22 **Requirement No. 9 Provide, to the extent technically feasible, number portability in**
23 **compliance with FCC rules;**

24 ¹⁶ See Summarell Affidavit, ¶ 5.

25 ¹⁷ See Summarell Affidavit, ¶ 6.

26 ¹⁸ See Summarell Affidavit, ¶ 7.

¹⁹ See Summarell Affidavit, ¶ 8.

1 Comspan is obligated to fulfill this requirement under the federal
2 Telecommunications Act, and commits to doing so with this Application.²⁰ Therefore the
3 Commission should find that Comspan has satisfied Requirement No. 9.

4 **Requirement No. 10 Provide dialing parity to other telecommunications providers;**

5 Comspan is obligated to fulfill this requirement under the federal
6 Telecommunications Act and commits to doing so with this Application.²¹ Therefore the
7 Commission should find that Comspan has satisfied Requirement No. 10.

8 **Requirement No. 11 Provide access to rights-of-way to other telecommunications
9 carriers;**

10 Comspan is obligated to fulfill this requirement under the federal
11 Telecommunications Act and commits to doing so with this Application.²² Therefore the
12 Commission should find that Comspan has satisfied Requirement No. 11.

13 **Requirement No. 12 Establish reciprocal compensation arrangements for the
14 transport and termination of telecommunications.**

15 Comspan is obligated to fulfill this requirement under the federal
16 Telecommunications Act, and commits to doing so with this Application.²³ Therefore the
17 Commission should find that Comspan has satisfied Requirement No. 12.

18 **Requirement No. 13 Provide supported services on a standalone basis.**

19 Comspan does and will continue to provide all supported services on a standalone
20 basis.²⁴ To fulfill this requirement, Comspan offers residential single line, POTSS service
21 with unlimited local calling at \$16.03 a month exclusive of all taxes, fees, or surcharges.

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²⁰ See Summarell Affidavit, ¶ 9.

23 ²¹ See Summarell Affidavit, ¶ 10.

24 ²² See Summarell Affidavit, ¶ 11.

25 ²³ See Summarell Affidavit, ¶ 12.

26 ²⁴ See Summarell Affidavit, ¶ 13.

1 **Requirement No. 14 Build its own loop facilities to serve a customer where no**
2 **facilities currently exist.**

3 Comspan established in its Federal ETC Application that it plans to build out its
4 network to reach all customers within the Requested Wire Centers,²⁵ and commits to doing
5 so in this Application.²⁶ Comspan's Five Year Plan, filed with its Federal ETC Application,
6 shows how Comspan will use the OUSF support it expects to receive to build out a fiber-
7 based network that will enable existing and new customers to have access to high quality
8 reliable and efficient advanced residential and business service.²⁷ Therefore the
9 Commission should find that Comspan has satisfied Requirement No. 14.

10 **Additional Requirements Imposed by the Commission.**

11 In the past, the Commission has granted Comspan OUSF support eligibility subject
12 to two conditions.²⁸ First, the Commission ordered that the sharing of per-line support
13 amounts with the ILEC must be calculated based on current percentages, with no true-ups
14 or disbursements if percentages are revised.²⁹ In addition, the Commission ordered
15 Comspan to abide by all rules related to OUSF participation, including maintaining its state
16 certification and federal eligibility telecommunication carrier status.³⁰

17 In this application Comspan agrees to abide by these two conditions with respect to
18 its participation in the OUSF in the Requested Wire Centers as well.³¹

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²⁵ See Order No. 00-312.

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²⁶ See Summarell Affidavit, ¶ 14.

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²⁷ See also discussion of Requirement No. 1 above.

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²⁸ See Order No. 07-574, Docket No. 1321 (Dec. 20, 2007) (approving application for OUSF support eligibility in the Coquille Wire Center.

24

²⁹ *Id.* at 1

25

³⁰ *Id.*

26

³¹ See Summarell Affidavit, ¶¶ 15 and 16.

1 **IV. CONCLUSION**

2 Comspan has demonstrated that it satisfies (or will satisfy) all of the criteria for
3 eligibility to participate in the OUSF. Most importantly, as the Commission found in Docket
4 UM 1316, granting Comspan's petition is in the public interest. Comspan will use the
5 monies it receives from both the state and federal universal service funds to help finance its
6 plan to offer enhanced voice, high speed broadband, data, and video services over a state-
7 of-the-art IP-enabled network. Comspan is committed to providing service throughout its
8 designated service area to all customers who make a request for services. Comspan will be
9 able to serve most customers in the Requested Wire Centers via Comspan's own facilities,
10 and is prepared to serve customers outside its existing network coverage within a
11 reasonable period of time and at a reasonable cost, using UNEs leased from Verizon or
12 Qwest, or resold Verizon or Qwest services. In the longer term, Comspan plans to use the
13 high-cost support prudently, and to extend reach of its own facilities to virtually all of the
14 customers in the wire center areas.

15 Comspan will offer customers in the Requested Wire Centers all of the same
16 services that are currently offered by Verizon and Qwest. In addition, through the
17 deployment of its fiber-optic network, Comspan will be able to provide improved basic and
18 advanced services to its customers, including those in traditional high cost areas. These
19 improvements include voice, high-speed data services, video, and access to several
20 different ISPs in the area—services that have not been available to customers in the
21 Requested Wire Centers to date.

22 In addition, service quality will increase for customers of Comspan in high cost areas.
23 A review of the Comspan's Five Year Plan shows how the network upgrades will extend
24 Comspan's fiber network further into the high-cost area. This new infrastructure will
25 increase call and service quality in these areas. The result will be improved local access via
26

1 new facilities with fiber-optic runs to the neighborhood enabling more customer connections,
2 more reliable service, and a broader choice of features and benefits.

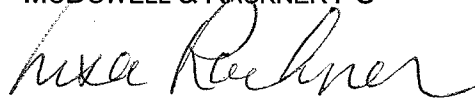
3 Finally, granting Comspan's petition will allow the company to compete on equal
4 footing with the incumbent carrier. Competition promotes consumer benefits in the form of
5 lower prices, increased service quality, and innovation. Also, if this Application is granted,
6 Comspan will be authorized to make available Lifeline and Link-Up, including OTAP,
7 services to customers of Comspan in the Requested Wire Centers. For these reasons the
8 Commission should grant Comspan's Application.

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10 DATED: January 29, 2008.

MCDOWELL & RACKNER PC

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Lisa F. Rackner

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Of Attorneys for Comspan Communications, Inc.

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Exhibit A

McDowell & Rackner PC



LISA F. RACKNER
Direct (503) 595-3925
lisa@mcd-law.com

January 8, 2008

VIA ELECTRONIC FILING

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

Re: Docket UM 1316

Enclosed for filing is a Second Amended Application of Comspan Communications (f/k/a Wantel) for Designation as an Eligible Telecommunications Carrier in the Veneta, Reedsport and Myrtle Point Wire Centers Pursuant to the Telecommunications Act of 1996 – Non-Rural Areas. This Second Amended Application is revised from the previously filed Amended Application as follows:

1. The CLLI Codes for Exhibit A have been revised.
2. The confidential maps for Exhibit D have been revised to include the entire wire center.
3. The calculations in Confidential Exhibits E and F have been revised.
4. Exhibit H, containing ComSpan's local service rate plan information, has been added.

Very truly yours,

Lisa F. Rackner

Enclosures

cc: Kay Marinos
Alex Duarte
Eugene Eng

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1316

Application of Comspan Communications,
for Designation as an Eligible
Telecommunications Carrier in the Veneta,
Reedsport and Myrtle Point Wire Centers
Pursuant to the Telecommunications Act of
1996 – Non-Rural Areas

SECOND AMENDED APPLICATION

I. INTRODUCTION

Comspan Communications (fka Wantel, Inc.) (“Comspan”) 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 Comspan 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 Comspan has served customers in all four wire centers. In this Application, Comspan requests that the Commission extend its designation as an ETC in the Veneta, Reedsport and Myrtle Point wire centers (collectively, the “Requested Wire Centers”).

Comspan seeks this extension of its ETC status to assist it in financing a state-of-the-art fiber optic network in the Requested Wire Centers. When the network is completed, Comspan will offer customers located in these cities access to broadband telecommunications, data, and video services. Because the Requested Wire Centers are currently designated as “high cost areas,” Comspan requests that it be designated as an

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 ETC eligible to receive all available support in the Requested Wire Centers from the federal
2 Universal Service Fund ("USF") including, but not limited to, interstate access support for
3 high cost areas and support for low income customers.

4 In this Application Comspan will show that it satisfies all requirements for ETC status
5 in the Requested Wire Centers, and in particular that its Application is in the public interest.

6 **II. APPLICANT**

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

13 **III. ALLEGATION OF FACTS**

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

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

18 Comspan proposes to serve the entire areas of the Requested Wire Centers. Maps
19 for each of the Requested Wire Centers are attached as Confidential Exhibit D. These
20 maps show the wire center boundaries within which Comspan agrees to serve all customers
21 upon request.

22 Comspan's service areas will mirror that of the ILECs serving these wire centers,
23 Verizon and Qwest. Comspan attaches Exhibit A, which identifies the wire centers that
24 constitute the proposed service areas with the following information: wire center name, wire
25 center CLLI code, and the corresponding ILEC study area name. Comspan proposes to
26 include the entire areas of the Requested Wire Centers in its service area.

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

2 Comspan intends to employ fiber-to-the-home throughout the Requested Wire
3 Centers linked to its long distance access tandem. Comspan has implemented Hitachi
4 GPON to provide enhanced and expanded services. In each of the Requested Wire
5 Centers Comspan will initiate a Phase 1 fiber deployment that will reach most customers
6 within the wire center. Comspan will serve all customers not initially reached by its fiber by
7 reselling ILEC services. In addition, Comspan will continue to build out its networks to reach
8 additional customers in each wire center, where economically feasible. Comspan will
9 purchase services for resale in the Qwest wire centers from Qwest under its interconnection
10 agreement with Qwest; Comspan will purchase services for resale in the Verizon wire
11 centers under its interconnection agreement with Verizon.

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

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

20 As part of the commitment to provide services to all customers in the proposed area
21 to be served, the applicant must submit a five-year plan describing with specificity, on a wire
22 center-by-wire center basis, proposed improvements and upgrades to the applicant's
23 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.

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

Comspan 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 Comspan 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 Comspan will
3 provide unlimited local usage. Comspan's basic local usage plans are comparable to those
4 of the ILECs, Qwest and Verizon in their respective wire centers. Comspan will mirror
5 Qwest and Verizon in defining the local calling areas and extended area service ("EAS").
6 Comspan submits to the Commission its residential and business basic local service prices,
7 basic feature package prices, and other service prices as Exhibit H. Comparison with
8 Qwest's and Verizon's basic service prices will demonstrate that Comspan's prices are
9 comparable.

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

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

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

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

19 **E. Access to Emergency Services.**

20 The ability to reach a public emergency service provided by dialing 911 is a required
21 service in any universal service offering.¹² Comspan provides all of its customers with

22 _____
⁸ *Id.* § 54.101(a)(2).

23 ⁹ *Id.* § 54.101(a)(3).

24 ¹⁰ *Id.* § 54.101(a)(4).

25 ¹¹ *Id.*

26 ¹² *Id.* § 54.101(a)(5).

1 access to emergency service by dialing 911. Comspan will offer E-911 throughout its calling
2 area.

3 **F. Access to Operator Services.**

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

8 **G. Access to Interexchange Service.**

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

14 **H. Access to Directory Assistance.**

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

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

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

21

22

¹³ *Id.* § 54.101(a)(6).

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¹⁴ *Id.* § 54.101(a)(7).

24

¹⁵ *Id.* § 54.101(a)(8).

25

¹⁶ *Id.* § 54.101(a)(9).

26

¹⁷ *Id.* § 54.400(b).

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

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

6 **V. FIVE-YEAR PLANS**

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

10 Comspan has developed Five-Year Plans (the "Plans") for each of the Requested
11 Wire Centers. These Plans which are attached as Confidential Exhibits E, F and G,
12 demonstrate in detail how IAS and OUSF support will be used for service improvements that
13 would not occur absent receipt of such support. Comspan will use the OUSF funds to pay
14 for the build-out and improvements required to serve the Requested Wire Centers.

15 As noted above, Comspan's main objective is to become an ETC in the Requested
16 Wire Centers order to receive OUSF support. To achieve this objective, Comspan must first
17 obtain federal ETC status. As demonstrated in this Application, Comspan is willing to meet
18 ETC requirements. Comspan's Plan outlines its planned use of OUSF funds, demonstrating
19 Comspan's commitment to being an ETC.

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

21 As required by 47 CFR § 54.201, Comspan plans to advertise the availability of each
22 of the supported services detailed above throughout its licensed service area by media or
23 general distribution. The methods of advertising utilized may include newspaper, magazine,
24 radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory
25 advertising. Comspan will distribute literature offering Lifeline and Link-Up services to
26

1 hospitals, clinics, hospices, senior centers, welfare offices, and other locations where those
2 likely to be eligible for the program(s) would encounter the brochures.

3 **VII. PUBLIC INTEREST FACTORS**

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

15 Comspan will offer customers in the Requested Wire Centers all of the same
16 services that are currently offered by Qwest and Verizon. Specifically, Comspan will provide
17 all customers in the Requested Wire Centers with a minimum of the following services:

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

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

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

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

25
26

1 Finally, designation of Comspan 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 Comspan as an ETC it will
4 make available Lifeline and Link-Up, including OTAP, services to customers of Comspan in
5 the Requested Wire Centers. For these reasons designation of Comspan as an ETC is in
6 the public interest.

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

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

10 **IX. EQUAL ACCESS**

11 Comspan acknowledges that it must provide equal access in its service area. It
12 further acknowledges that should all other ETCs in its service area relinquish their
13 designations, it 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 Comspan has eight-hour battery back-up at each location where its equipment
22 requires power. It also has generators with automatic transfer switches where required.¹⁸

23

24

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

26

1 **B. Network redundancy**

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

6 Comspan has excess capacity on all its routes. As an example, Comspan has four
7 DS1 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 Comspan 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 Comspan currently has two voice switches in its network with one tandem switch
12 serving the Comspan networks.

13 **C. Status of E911.**

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

16 **XI. CONSUMER PROTECTION**

17 Comspan is subject to the Oregon consumer protection laws. It also submits service
18 quality reports to the Commission. Attached as Exhibit C 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 Comspan. Comspan 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, Comspan respectfully requests that the Commission grant its Application.

DATED: January 8, 2008

McDOWELL & RACKNER PC



Lisa F. Rackner

Attorneys for Comspan Communications

REVISED EXHIBIT A

Wire Center

Veneta
Reedsport
Myrtle Point

CLLI Code

VENTOR
RDPTOR
MYPNOR

ILEC Study Area

Qwest
Verizon
Verizon

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

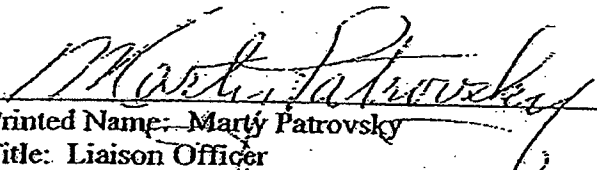
Re: CC Docket No. 96-45
Interstate Access Support - IAS
Annual Certification Filing

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,


 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

Date: MAY 12TH 2005

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 CLI 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 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 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 CLI 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



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.

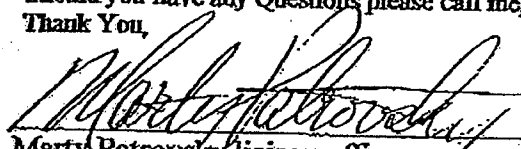
7. Access to Representatives Business Office Call Center.

- 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. (b/a ComspanUSA)



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 C



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 H

	B	C	D	E	F	G	H
1	Advertised Public Description	Number of local minutes included	Calling area included	Rates / Charges			
2	ECONOMY #1	Unlimited Local Calling	Mirrors the EAS and local service of the ILEC in each area	\$16.03	Includes basic line charge & EAS	Does not include LD, taxes, fees or custom features	
3	BASIC BUSINESS	Unlimited Local Calling	Mirrors the EAS and local service of the ILEC in each area	\$27.95	Includes basic line charge & EAS	Does not include LD, taxes, fees or custom features	
4	Residential OTAP w/ Options	Unlimited Local Calling	Mirrors the EAS and local service of the ILEC in each area	\$16.03	Includes basic line charge & EAS	Does not include LD, taxes, fees or custom features	
5	DSL SERVICE			\$29.99		"	
6	DSL Equip. rental			\$3.00		"	
7	Anon Call Reject			\$2.95		"	
8	Caller ID			\$2.95		"	
9	OTAP Credit			-\$13.50		"	
10	Total Example #1			\$41.42		"	
11							

1 BEFORE THE PUBLIC UTILITY COMMISSION
2 OF OREGON

3 UM _____

4 Application of Comspan Communications
5 Inc. for Approval of Eligibility to Participate
6 in the Oregon Universal Service Fund.

**AFFIDAVIT OF
JAN SUMMARELL**

6 I Jan Summarell do hereby affirm as follows:

- 7
- 8 1. I am Senior Vice President and Chief Operating Officer (“COO”) of Comspan
9 Communications Inc. (“Comspan”) and I make this affidavit in support of
10 Comspan Communications Inc.’s Application for Approval of Eligibility to
11 Participate in the Oregon Universal Service Fund (“OUSF”) in the Veneta,
12 Reedsport, and Myrtle Point wire centers (“Application”).
- 13 2. I am familiar with the eligibility criteria for authorization to receive funds from
14 the OUSF and the requirements imposed by the Public Utility Commission of
15 Oregon (the “Commission”) upon eligible telecommunications carriers
16 (“ETC”).
- 17 3. As detailed below, in my role as COO of the Company, I affirm Comspan’s
18 commitment to carrying out the commitments made in its Application, and
19 fulfilling all other requirements for ETC status as may be imposed by the
20 Commission.
- 21 4. Comspan agrees to fulfill all requirements for providing Oregon Telephone
22 Assistance Program (“OTAP”) service, including the requirement not to deny
23 or disconnect local exchange service for failure to pay toll charges.
- 24 5. Comspan agrees to fulfill all requirements for providing OTAP service
25 including the requirement not to demand a deposit from customers who
26 voluntarily elect to receive toll-blocking service.

- 1 6. Comspan accepts the duty to interconnect directly or indirectly and commits
2 to interconnecting with the facilities and equipment of other
3 telecommunications carriers.
- 4 7. Comspan accepts the duty not to install network features, functions, or
5 capabilities that do not comply with the Telecommunications Act's
6 requirements for access by persons with disabilities and coordination for
7 interconnectivity and commits to fulfilling this requirement.
- 8 8. Comspan will not prohibit or impose unreasonable or discriminatory
9 conditions or limitations on the resale of telecommunications services.
- 10 9. Comspan will provide, to the extent technically feasible, number portability in
11 compliance with FCC rules.
- 12 10. Comspan will provide dialing parity to other telecommunications providers.
- 13 11. Comspan will provide access to rights-of-way to other telecommunications
14 carriers.
- 15 12. Comspan will establish reciprocal compensation arrangements for the
16 transport and termination of telecommunications.
- 17 13. Comspan will provide supported services on a standalone basis under the
18 general terms outlined in the Application.
- 19 14. Comspan will build its own loop facilities to serve a customer where no
20 facilities currently exist.
- 21 15. Comspan agrees that it will share per-line support amounts with Qwest and
22 Verizon calculated based on current percentages, with no true-ups or
23 disbursements if percentages are revised.

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16. In addition, Comspan agrees to abide by all rules related to OUSF participation, including maintaining its state certification and federal eligibility telecommunication carrier status.

DATED: February __, 2008.

JAN SUMMARELL

Sr. Vice President and COO
Comspan Communications Inc.

SUBSCRIBED AND SWORN TO before me this ____ day of January, 2008.

Notary Public for Oregon
My commission expires: _____