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June 17, 2004

**VIA OVERNIGHT MAIL**

Ms. Carol Hulse  
Oregon Public Utility Commission  
Administrative Hearings Division  
550 Capitol Street N.E., Suite 215  
Salem, Oregon 97301

Subject: UM 1083

Dear Ms. Hulse:

In response to an informal inquiry from Staff, RCC Minnesota, Inc. ("RCC"), will take this opportunity to explain the difference between the FCC-licensed Cellular Geographic Service Area ("CGSA") shown on the enclosed map and the requested ETC service area boundary shown on the map provided as Exhibit A to RCC's Application dated May 9, 2003. Staff noted that the southwestern portion of the requested ETC service area shown on the May 2003 map is characterized by cloud-like curves, whereas the corresponding boundaries shown on the enclosed map are largely comprised of straight lines.

The straight lines on the enclosed map reflect the fact that, while RCC's predicted 32 dBu contour extends across its market boundary in some areas, RCC's CGSA extends only as far as its cellular market boundary in the areas in question. The May 2003 map erroneously included areas beyond the market boundary within its predicted 32 dBu contour. The FCC's rules provide certain enumerated conditions under which a cellular provider's CGSA can extend into a neighboring licensee's market, and none of those conditions are present here. Accordingly, the CGSA boundaries shown on the enclosed map are correct and should supersede the information provided on the May 2003 map.





Very truly yours,

Hong N. Huynh

## RCC Minnesota, Inc. Proposed ETC Service Area in Oregon

### Wire Center Boundaries in Oregon

Asotin Telephone Company	(1)
CenturyTel	(56)
Eagle Telephone System, Inc.	(1)
Helix Telephone Company	(2)
Home Telephone Company	(1)
Humboldt Telephone Company	(1)
Malheur Home Telephone Company	(4)
Midvale Telephone Exchange, Inc.	(2)
North-State Telephone Co.	(1)
Oregon Telephone Corporation	(5)
Oregon-Idaho Utilities, Inc.	(3)
Pine Telephone System, Inc.	(3)
Trans-Cascades Telephone Company	(1)
United Telephone Company of the Northwest	(18)

	Proposed ETC Service Area
	CGSA Boundary
	County Boundary
	Wire Center Boundary

Prepared By: LNGS Engineering 06.17.04

