

Public Utility Commission of Oregon
550 Capitol St. NE
Salem, Oregon 97301

By: Mail and E-Mail

Attn: Ms. Kay Marinos
Senior Telecom Analyst

August 9th 2006

Dear Kay;

Enclosed is our amended recertification request with supporting documentation, signed again and notarized.

Exhibits 2D, 2E, 7A, 7B, and 7C contain confidential information subject to the protective order issued in Docket UM 1217.

Hopefully this will come closer to meeting the objectives of continuing our ETC status in Oregon.

If, for any reason, you have questions or need more information in order to meet the Federal and State requirements, please feel free to contact me.

Thank you,

Marty Patrovsky
Liaison Officer
Wantel, Inc. d/b/a ComspanUSA

Annual Recertification Reports for ETCs in Oregon

Report Formats to Satisfy Requirements of Order No. 06-292 for 2006

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- 4.1. Number of Lifeline Customers
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- 9.3. Certification of Emergency Functionality and Compliance with Service Quality/Consumer Protection Measures – *All ETCs*

Report #1 – Supported Services Offerings

1.1. Basic Local Usage Service Offerings – All ETCs

Choose either A. or B. below, as applicable:

Basic local usage service offerings are **not** filed under tariff with the Oregon PUC. Submit the following information for each basic service offering that includes local usage allowances (unlimited or limited): 1) plan's name, 2) advertised public description, 3) number of local minutes included, 4) calling area included, and 5) rates and charges. Include basic offerings for both residence and business services.

Wantel currently offers and will continue to offer the federally-designated services required by 47 C.F.R. Section 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. Wantel provides voice grade access to the public switched telephone network in accordance with the FCC's definition.

i. Residential

Basic service is voice grade, unlimited local calling, DTMF, EAS matching ILEC EAS areas, provides E-911, Operator Services, Directory Assistance, choice of any available Interexchange carrier by choosing PIC/LPIC or electing not to have any long distance at all.

ii. **Business**

Basic business service is voice grade, unlimited local calling, DTMF, EAS matching ILEC EAS areas, provides E-911, Operator Services, Directory Assistance, choice of any available Interexchange carrier by choosing PIC/LPIC or electing not to have any long distance at all.

B. Local Usage.

C.

All Wantel Plans, both Basic and upgraded plans for packages are without LD unless a LD plan is selected (or specifically noted as including LD). Wantel 2005 Plan Documents contained in Exhibit 1). In addition, all Plans may be purchased without EAS if “No Long Distance” plan is selected and no EAS is required by the customer. Finally, Wantel at customer request will block all toll services for customers without LD Plan and/or EAS at with no activation or reoccurring charge for this service. EAS is \$1.95 per line/month throughout Wantel Service area 2005.

D. Dual-Tone, Multi-Frequency Signaling or Its Functional Equivalent.

An ETC must provide dual tone multi-frequency signaling (“DTMF”) to facilitate the transportation of signaling throughout its network. [Wantel provides DTMF signaling throughout its network, consistent with FCC rules.](#)

E. Single-Party Service or Its Functional Equivalent.

FCC regulations also require ETCs to provide single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. [Wantel provides single party service.](#)

F. Access to Emergency Services.

The ability to reach a public emergency service provided by dialing 911 is a required service in any universal service offering. [Wantel provides all of its customers with access to emergency service by dialing 911. Wantel provides E911 throughout its calling area.](#)

G. Access to Operator Services.

Access to operator services is a required service for ETCs and is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. [Wantel provides customer access to operator services on 24/7 basis.](#)

H. Access to Interexchange Service.

An ETC must offer consumers access to interexchange service to make and receive toll or interexchange calls. [Wantel meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through interconnection arrangements it has with several interexchange carriers \(“IXCs”\). Wantel is an equal access provider.](#)

I. Access to Directory Assistance.

The ability to place a call to directory assistance is a required ETC service offering. [Wantel customers are able to obtain directory assistance from live operators 24/7.](#)

J. Toll Limitation for Qualifying Low Income Consumers.

An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. In particular, an ETC must provide toll blocking, which allows customers to block the completion of outgoing calls. [Wantel provides this service to any and all customers and at no charge to Lifeline, Link-Up and OTAP customers.](#)

K. Link Up and Lifeline Services.

Wantel offers Link Up and Lifeline services in all areas where it is allowed to do so. These services are available in accordance with the guidelines as published and amended from time to time by the federal agency or agencies that administer such programs.

1.2. Comparable Local Usage Plan – CETCs only

The carrier certifies that it offers at least one basic local usage plan that is comparable to those offered by the ILECs in its designated service area: yes no

A. If yes, what are the monthly rates for such a plan for:

1. Residence customers? \$25.40 for all of 2005. Without EAS same monthly plan but without \$1.95 EAS line item charge (as well as associated taxes, surcharges & franchise fees on that line item). See document #CMSPPL010105 in Exhibit 1
2. Business customers? \$39.45 for all of 2005. Without EAS same monthly plan but without \$1.95 EAS line item charge (as well as associated taxes, surcharges & franchise fees on that line item). See document #CMSPPL010105 in Exhibit 1

B. If yes, where and how does Wantel advertise these rate plans?

See Report #3 below

1.3. Supported Services Not Provided – CETCs only

Identify any supported services that were not available at designation, but were to be provided as a condition of ETC designation (e.g., toll restriction for qualifying low-income consumers, E911):

None

Are these services provided currently? NA

If no, explain why not: _____

1.4. Equal Access Acknowledgement – CETCs only

The carrier acknowledges that it may be required to provide equal access if it is the only remaining ETC in an area: yes no

Report #2 – Unfulfilled Service Requests

2.1. Unfulfilled Service Requests/Held Orders – All ETCs

Choose either A. or B. below, as applicable:

- A. Service quality reports for “primary held orders over 30 days” were filed with the Oregon PUC for calendar year 2005. No additional submission is required for recertification purposes.
- B. Service quality reports for “primary held orders over 30 days” were **not** filed with the Oregon PUC for calendar year 2005. In this case, choose **one** of the following alternatives for reporting:
1. The number of customer requests for supported services that were not fulfilled during calendar year 2005: _____.
If greater than zero, include an attachment noting for each such request, the location (address) of the request and a description of attempts to provide service.
 2. The number of “primary held orders over 30 days” (as defined in Section 860-034-0390 of the Oregon Commission rules) for calendar year 2005: _____.
If greater than zero, include attachment noting for each such held order, the reason the order was held and the original commitment date.

2.2. Service Request Processing - CETCs only

Submit a description of how the carrier ensures that every request for service that cannot be immediately fulfilled is recorded and processed under the 6-step process set forth in 47 CFR Section 54.202(a)(1)(i).

Wantel NOC (Network Operating Center) opens a ticket for every new service application. When that order “goes held” for any reason the NOC immediately broadcasts an alert to all managers and implements an LSR to place an immediate resale order under item number (5) below. If for any reason the resale order is not an immediate solution the NOC orders delivery of a working Cell phone to the customer and forwards the customer telephone number to that cell phone. Please note, Wantel is not a wireless service provider and some of the six remedies of 47CFR 54 202 are not applicable to Wantel: specifically, we refer to items 2, 3 and 6 itemized below as excerpted from the aforementioned 47CFR.

- (1) Modifying or replacing the requesting customer's equipment;
- (2) Deploying a roof-mounted antenna or other equipment;
- (3) Adjusting the nearest cell tower;
- (4) Adjusting network or customer facilities;
- (5) Reselling services from another carrier's facilities to provide service
- (6) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

Report #3 – Evidence of Advertising for Basic Supported Services (excluding low-income/lifeline) – All ETCs

Describe how basic supported services were advertised during calendar year 2005 throughout the designated service area. List the types of media used, advertising frequencies and geographic coverage. Attach examples of actual advertisements, noting dates, specific distribution methods, and target geographical populations, sufficient to demonstrate that basic supported services and rates were advertised **throughout** the designated service area in 2005.

Wantel Basic Phone Service Plan specifically was advertised with pricing:

1. “The Welcome Book” Advantage Marketing (See Exhibit 2A for Run Rate and 2B for Copy)
2. Residential ComSpan Package & Price List
 - a. Posted at both retail locations, all service desks, all Laundromats in Roseburg, Winston & Sutherlin and all Public Activities ComSpan participated in 2005.

- i. Listing of some of the Laundromats:

The laundry Mats we have PUC/Telephone Assistance Flyers on display are the following:

Aunt Ems Laundry Room:

Sutherlin: 205 E Central
Roseburg: 882 W Harvard Ave

Foxy's Suds:

Sutherlin: 1021 E Central Ave

Let it be Laundry: 1820 NE Stephens St Roseburg

Roseburg Laundromat: 2428 W Harvard Ave
Roseburg

Value Clean Laundromat: 4850 NE Stephens St
Roseburg

We get to these facilities about once a month to review they are still up, add specials or additional service offerings information or to replace for decay...

- b. Distributed door to door during direct canvass activities throughout our service area. Specific Area where every door was visited and materials left include The Grand Hotel in Roseburg converted Low income housing (customer list see Exhibit 2 D), SKP Mobile Home Park in Sutherlin and Atkinson Development (Exhibit 2E), The Rose Apartments low income housing & multiple neighborhoods in Sutherlin, Winston, Roseburg & Green areas see maps in exhibits 2C1 through 2C6 inclusive.

- c. The price lists for both Residential and Business Plan services were distributed door to door by Wantel Sales Team through the business communities throughout Wantel service area.
 - d. All price lists were displayed for reference, or referred to over the phone, for all customer sign ups in 2005. Customers were free to take copies for review, distribution to friends family or posting without restriction.
- 3. Wantel Basic Phone Service is our entry level no long distance included service offered to customers. All Advertising communicating phone service, basic phone service or your local phone company (etc.) with a number to call for details are a direct path to the specific information on the 2005 price lists (exhibit 1A & 1B). Advertising for this level in detail include:
 - a. DEX, Phone Source & Yellow Book Advertising (Run Rate Detail Exhibit 2A, copy exhibit 2F).
 - b. Roseburg Chamber of Commerce Business Perspectives Publication (Run Detail 2A, copy Exhibit 2F).
- 4. In addition, Wantel displayed, distributed publicly, or had available for reference documented information on the availability of telephone assistance from the PUC recommended copy (Exhibit 2G) in the following areas:
 - a. Throughout all public areas within ComSpan Facilities including on the wall of our retail space and at the desks of our public facing service personnel as well at our US Cellular sales office.
 - b. During all campaigns door to door, for both Residential and Business service introductions. For businesses who signed up with ComSpan, employees & their families were offered all printed material for review.
- 5. Finally, all Wantel Advertising was designed to get customers to call ComSpan to review service offerings (all detailed above) including:
 - a. Billboards (Lamar Advertising run rate 2A, copy 2H).
 - b. Radio & Television Ads (run rates on 2A, no copy but neither specific plans nor pricing just call to action – encouraging customer to call ComSpan 229-7777 sales number for pricing. Note: copy is not in exhibit and does not have specific plan or price detail.

Report #4 – Low-income Services – All ETCs

4.1. Number of Lifeline Customers

The total number of customers receiving lifeline discounts during the month of December 2005 in the designated service area: 13 .

CETCs only: also list counts by ILEC service area:

<u>ILEC Svc Area</u>	<u>No. of Lifeline customers</u>
Roseburg	<u>13</u>
_____	_____
_____	_____
_____	_____
_____	_____

4.2. Advertising of Low-Income Program Service Offerings

Submit copies of all advertisements (for all media) for Lifeline, LinkUp, and OTAP service offerings that were run during calendar year 2005, noting media (newspaper name, radio station, bill inserts, internet postings, etc.), run/distribution dates, and geographic coverage area.

We have OTAP posters in the sales office, in English and Spanish, bring those with us to community events, like the County Fair, and in Bandon where we were expecting to receive ETC status our most run ad 6x in the Coffee Break in three months in Bandon, with one run of these in the Western World Newspaper, and we sent out a copy through the Bandon School District home with every child in Bandon to reach out to those families direct. In addition we have flyers on the ETC programs displayed in the front of our offices. We also have low income support as a button on our home page, a page on the assistance available as well as a link to the online filing page. Finally, we are adding copy in our yellow pages ad to promote these services for Roseburg where we have the status and will happily add copy in Bandon when we receive the status for Bandon.

Also see <http://www.comspanusa.net/otap.html>

Report #5 – Outage Report – All ETCs

Choose either A. or B. below, as applicable:

A. X The number of service outages, as defined in Oregon PUC Rules at Sections 860-034-0390(9) for small telecom utilities, 860-023-0055(9) for large telecom utilities, and 860-032-0012(9) for competitive telecom providers, that occurred during calendar year 2005: 0.

If the number was greater than zero, attach a report that lists for each such outage the following: the date and time of onset, a brief description of the outage and its resolution, the particular services affected, the geographic areas affected, steps taken to prevent a similar future occurrence, and the number of customers affected.

B. _____ The number of service outages, as defined in FCC rules at 47 CFR Section 54.209(a)(2), that occurred during calendar year 2005: _____.

If the number was greater than zero, attach a report that lists for each such outage the following: the date and time of onset, a brief description of the outage and its resolution, the particular services affected, the geographic areas affected, steps taken to prevent a similar future occurrence, and the number of customers affected.

Report #6 – Trouble Report – All ETCs

Choose either A. or B. below, as appropriate:

A. X Trouble reports were filed with the Oregon PUC for calendar year 2005 per Oregon PUC service quality rules. No additional submission is required for recertification purposes.

B. _____ Trouble reports were **not** filed with the Oregon PUC during calendar year 2005. In this case, choose **one** of the following alternatives for reporting:

1. _____ The number of customer trouble reports received per 100 wireless handsets for supported services during calendar year 2005, for each company switch.

<u>Trouble Type</u>	<u>Switch A (location)</u>	<u>Switch B (location)</u>
No service	_____	_____
Network busy	_____	_____
Interruption of service	_____	_____
Poor reception	_____	_____

2. _____ The number of customer trouble reports, as defined in Section 860-034-0390 (5) of the Oregon PUC rules, received during calendar year 2005: _____ per 100 working access lines.

Report #7 – Network Improvement Plan – CETCs Only

The following detailed information must be included in each network improvement plan. Only CETCs must file these plans for recertification purposes. CETCs that receive *only* low-income program support (no high-cost or access-related support), do not have to file network improvement plans. CETCs are strongly encouraged to use the format laid out in the attached Excel worksheets to provide information required in the outline below (taken from the UM 1217 order), rather than use some other format developed by the CETC.

Wantel received only low income support in 2005.

Wantel did not achieve ETC status fully until 2006 and elected not to request IAS funding until the objective was reached. Reporting requirements, new accounting practices and additional staffing to handle these items were not authorized by management unless and until Wantel achieved full ETC status which did not occur until the second quarter of 2006. We did offer OTAP, LIFE LINE and LINK UP even before achieving full ETC status. Our sales department took it upon themselves to offer these discounts even before we were granted the Federal ETC status as we were the only available telephone service provider to some residential users.

7.1. Demonstration of use of support funds (other than low-income funds) received during 2005, including:

Wantel received only low-income funds in 2005

- 7.3.1.1. The amount of support funds, by type, received during the year.
- 7.3.1.2. Year-end counts of eligible lines/handsets in service for each ILEC service area as they were reported to USAC for the past December.
- 7.3.1.2. Identification of each project for which the support was used, the actual support expenditures (by amount and type) for each project, and status of project (completed or still in progress).
- 7.3.1.3. The resulting benefits to consumers (qualitative and quantitative) from each project and updates to coverage and signal strength maps.
- 7.3.1.4. Explanation of how and why actual spending of support funds differed from spending proposed in the previous network improvement plan.

7.3.2. Updates to network improvement plan for the current calendar year and the following year:

For all of these please see appendix attachments 7A, map of proposed expansion area, 7B, Engineering data for the area in 7A, 7C proposed income and expenditures, 7D ICLS certification 7E IAS certification and 7F low income certification.

7.3.2.1. Forecast of support amount, by type (LSS, HCL, ICLS, IAS), that the applicant expects to receive during each of the next 2 years, as well as an explanation of how the forecast was derived.

See 7.3.2

7.3.2.2. Detailed information for each project that will use support funds:

7.3.2.2.1. Description and purpose of the project, its physical location and the ILEC serving that area.

This project will construct new fiber-optic routes to the residential and business areas depicted on exhibit 7A delivering advanced telephone services through the use of Hitachi GPON deployment (the second in the United States after our deployment of this system in Bandon, Oregon). This will enable a significant improvement in service quality to the residents of the area with more reliable telephone service, more features and benefits with no increase in cost either to the end users or to the state and federal funds.

7.3.2.2.2. The start date and completion data (by quarter).

Engineering has been ongoing at Wantels' expense since March 2006 and will continue with surveying and permitting with environmental impact studies etc. throughout the rest of 2006.

7.3.2.2.3. Amount of support money allocated to the project, in total and broken down by investment and expense types.

Please refer to exhibit 7C

7.3.2.2.4. The amount of company's own funds that will be used for each supported project.

Please refer to exhibit 7C

7.3.2.2.5. Brief explanation of why the carrier would not make these improvements without the availability of support funding.

Without ETC status and funding made possible by that status the investment would never “pay out” in a time frame that would justify the investment.

7.3.2.2.6. Quantification of resulting service improvements by type (increased coverage, signal strength, capacity, etc.), population benefited, and geographic area benefited (shown on map).

Fiber-optic service to the home is more robust, reliable and of far greater capacity and flexibility than old copper infrastructure presently deployed in this area. Many advanced telecom features will be made available by this deployment and the end user will also benefit with the availability of high speed access to the internet for business and personal use via broadband over fiber. Finally, the end user will have available fiber-optic delivery of television programming including HDTV, interactive and pay per view.

Report #8 – Special Commitments/Requirements – CETCs only

Did the Oregon PUC impose any special commitments or requirements at initial designation or during the previous annual recertification process? yes no .

If yes, identify the commitments or requirements and explain if, and how, they have been met.

Wentel was required to file all appropriate reports in a timely manner. We believe we have done so.

Report #9 – Certifications - All ETCs

9.1. IAS or ICLS Certification Copy – All ETCs Receiving IAS/ICLS

All ETCs receiving interstate access-related support (IAS or ICLS) must submit a copy of the certification for the use of IAS or ICLS support that was sent to USAC and the FCC in June 2006.

Please refer to exhibits 7D and 7E which are the ICLS and IAS certification letters as well as exhibit 7F the low income proof from USAC.

9.2. Certification of Use of Universal Service Funds – All ETCs receiving HCL/LSS (Rural ILECs and CETCs Designated in Rural ILEC Areas)

To continue receiving traditional high cost support (HCL, LSS), ETCs must submit a notarized affidavit signed by a responsible company official certifying that the carrier will use the high cost support funds only for the intended purposes. Use of the sample affidavit form displayed on the following page is recommended.

9.3. Certification of Emergency Functionality and Compliance with Service Quality and Consumer Protection Measures – All ETCs

Each ETC must submit a notarized affidavit signed by a responsible company official certifying that the carrier: 1) is able to remain functional in an emergency, and 2) is complying with all service quality and consumer protection measures in either the applicable Oregon Commission rules (for wireline carriers), the CTIA Consumer Code (for wireless carriers), or some other specific set of standards. All ETCs must submit this affidavit. A copy of an acceptable affidavit form follows the affidavit for high cost support.

AFFIDAVIT CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, Marty Patrovsky _____, being of lawful age and duly sworn, on my oath, state that I am the

Liaison Officer _____ [an officer] of _Wantel, Inc. d/b/a Comspanusa_ (“Company”) and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

Pursuant to the rules of the Federal Communications Commission, 47 C.F.R. § 54.314, there must be annual certification that funds received under the federal Universal Service Fund programs will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended. The Company hereby certifies to the Public Utility Commission of Oregon that pursuant to 47 C.F.R. § 54.7, and for purposes of the certification required under 47 C.F.R. § 54.314, the company will use all federal high-cost support provided to it only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with the principles of universal service set forth in 47 U.S.C. 254. This includes, but is not limited to, trying to meet the goal of the provision of services that are properly supported by the high-cost funds at rates that are reasonably comparable to rates charged for similar services in urban areas.

DATED this __14th__ day of _July_____, 2006.

Wantel, Inc. d/b/a Comspanusa (Company)

By: _____ (Name)

Its: Liaison Officer (Title)

SUBSCRIBED AND SWORN to before me this ____ day of _____, 2006.

Notary public in and for the State of Oregon

My Commission Expires: _____

AFFIDAVIT CERTIFYING EMERGENCY FUNCTIONALITY AND COMPLIANCE
WITH SERVICE QUALITY AND CONSUMER PROTECTION MEASURES

I, Marty Patrovsky _____, being of lawful age and duly sworn, on my oath, state that I am the Liaison Officer _____ [an officer] of _Wantel, Inc. d/b/a Comspanusa__ (“Company”) and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

The Company hereby certifies to the Public Utility Commission of Oregon, pursuant to the requirements of Commission Order No. 06-292, that it:

- 1) is able to remain functional in emergencies, and,
- 2) complies with service quality and consumer protection measures in (check one):

applicable Oregon Commission rules, or
 the CTIA Consumer Code for Wireless Carriers, or
 other (describe and explain conformance with requirements of Order No. 06-292): _____

DATED this __14h__ day of __July_____, 2006.

Wantel, Inc. d/b/a Comspanusa _____ (Company)

By: _____ (Name)

Its: Liaison Officer _____ (Title)

SUBSCRIBED AND SWORN to before me this ____ day of _____, 2006.

Notary public in and for the State of Oregon

My Commission Expires: _____