

June 30, 2006

VIA ELECTRONIC MAIL AND US MAIL

Filing Center
Oregon Public Utility Commission
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308-2148

Re: UM 1255 – WANTEL, INC.'s AMENDED APPLICATION FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

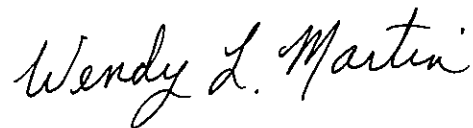
Dear Sir or Madam:

Enclosed for filing in the above-referenced docket is an original and 1 copy of Wantel's Amended Application for Designation as an Eligible Telecommunications Carrier. Please note that Exhibit A is being filed via paper service only due to the large size of the document.

Wantel will be submitting two additional items in support of its Application: its Five Year Plan and pricing information. This information is proprietary and confidential, and public disclosure of this information could result in financial harm to Wantel. Accordingly, Wantel respectfully requests that the Commission issue a standard protective order in this docket prior to Wantel's submission of this information. Wantel appreciates the assistance it has received from Commission Staff during the preparation of this Application and looks forward to working with Staff as Wantel continues with the ETC designation process for Bandon.

Please contact me with any questions.

Very truly yours,



Wendy L. Martin

Enclosures

cc: UM 1255 Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UM 1255**

4 APPLICATION OF WANTEL, INC. d/b/a
5 COMSPANUSA FOR DESIGNATION AS AN
6 ELIGIBLE TELECOMMUNICATIONS CARRIER
7 PURSUANT TO THE TELECOMMUNICATIONS
8 ACT OF 1996 – NON-RURAL AREAS

AMENDED APPLICATION

8 Wantel, Inc. d/b/a ComspanUSA (“Wantel”) respectfully submits this Amended
9 Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to
10 Sections 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended (“Act”),¹ and
11 Section 54.201 of the Federal Communications Commission’s (“FCC”) rules.² Wantel first
12 received designation as an ETC earlier this year in the Roseburg, Sutherlin, and Winston wire
13 centers.³ Since that time Wantel has served customers in all three wire centers and has timely
14 filed all required documents. In this most recent application, Wantel requests that the
15 Commission extend its designation as an ETC in the Bandon wire center.

16 Wantel seeks an extension of its ETC status to assist it in financing a state-of-the-art fiber
17 optic network in the City of Bandon. When the network is completed, Wantel will offer
18 customers located in Bandon access to broadband telecommunications, data, and video services.
19 *No other carrier is currently providing these services to Bandon’s citizens, and to date, no other*
20 *carrier has announced an intention to do so.* Because Bandon is currently designated as a “high
21 cost area,” Wantel requests that it be designated as an ETC in the Bandon wire center, and that it
22 be designated as eligible to receive all available support from the federal Universal Service Fund

23
24 ¹ 47 U.S.C. § 214(e)(1)-(2).

25 ² 47 C.F.R. § 54.201.

26 ³ Order 05-926, Docket UM 1212 (Aug. 18, 2005).

1 (“USF”) including, but not limited to, interstate access support for high cost areas and support
2 for low income customers. Wantel is requesting ETC status primarily to allow customers it will
3 serve in the Bandon area to be eligible to receive Oregon Telephone Assistance Program
4 (“OTAP”) and Lifeline/Link-Up assistance, and because designation as a federal ETC is
5 effectively a prerequisite for participating in the Oregon Universal Service Fund (“OUSF”).

6 **I. APPLICANT**

7 Wantel is a competitive local exchange company (“CLEC”) and obtained its competitive
8 registration from the Public Utility Commission of Oregon (“OPUC” or “Commission”) on
9 August 20, 1999 under Order No. 99-507. Wantel provides all types of telephone services,
10 including, for example, long distance, OS/DA, E911, EAS, OTAP, Link-Up, and Lifeline.
11 Wantel provides these services in Roseburg, Green, Winston, most areas of Sutherlin and
12 Oakland, and Bandon.

13 **II. 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 Sections 214(e) and 254 of the Act, the OPUC is
17 authorized to designate Wantel as an ETC.

18 Wantel submits a map of the Bandon service area with its service area boundary
19 highlighted in yellow as Exhibit A and a map showing the projected service area with fiber
20 locations as Exhibit B. Wantel’s service area will mirror that of the incumbent local exchange
21 carrier (“ILEC”) for Bandon, Verizon Northwest Inc. (“Verizon”). In addition, Wantel attaches
22 Exhibit C, which identifies the wire center that constitutes the proposed service area with the
23
24
25

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

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

4 Wantel currently uses fiber to the home with a switch in Bandon linked to its long
5 distance access tandem in Roseburg, Oregon. Wantel has implemented Hitachi GPON to
6 provide enhanced and expanded services. The interconnection agreement relevant to the Bandon
7 wire center is the Interconnection Agreement between AT&T Communications of the Pacific
8 Northwest, LLC and Verizon Northwest, Inc. that was approved by the Commission in Order
9 No. 99-028, Docket No. ARB 5. Wantel adopted the Interconnection Agreement in Docket ARB
10 490 on May 27, 2003.

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

12 In order to obtain ETC designation, an applicant must demonstrate the following: (1) a
13 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 protection
15 standards and service quality standards; (4) that local usage offered is comparable to that offered
16 by the ILEC; and (5) that the applicant understands that it may be required to provide equal
17 access if all other ETCs in the designated service area relinquish their designations.⁴

18 As part of the commitment to provide services to all customers in the proposed area to be
19 served, the applicant must submit a five-year plan describing with specificity, on a wire center-
20 by-wire center basis, proposed improvements and upgrades to the applicant's network.⁵

21 **III. SERVICES PROVIDED BY PETITIONER**

22 In order to be designated an ETC, a common carrier must demonstrate pursuant to
23 Section 214(e)(2) that it offers services and agrees to offer and advertise the supported services

24 _____
25 ⁴ *Id.* § 54.202(1).

26 ⁵ *Id.* § 54.202(a)(1)(ii).

1 throughout the proposed ETC service area. In addition, the common carrier must meet the public
2 interest standard.

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

9 Wantel currently offers and will continue to offer the federally-designated services
10 required by 47 C.F.R. Section 54.101(a): (1) voice grade access to the public switched network;
11 (2) local usage; (3) dual tone multi-frequency signaling or its functional equivalent; (4) single-
12 party service or its functional equivalent; (5) access to emergency services; (6) access to operator
13 services; (7) access to interexchange service; (8) access to directory assistance; and (9) toll
14 limitation for qualifying low-income consumers.

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

16 An ETC must offer voice grade access to the public switched telephone network.⁶
17 Wantel provides voice grade access to the public switched telephone network in accordance with
18 the FCC's definition.

19 **B. Local Usage.**

20 FCC regulations require ETCs to provide unlimited local usage.⁷ Wantel provides
21 unlimited local usage. Wantel's basic local usage plans are comparable to those of the ILEC,
22 Verizon. Wantel will mirror Verizon in defining the local calling areas and extended area
23 service ("EAS"). Wantel plans to submit to the Commission its the residential and business
24

25 ⁶ *Id.* § 54.101(a)(1).

⁷ *Id.* § 54.101(a)(2).

1 basic local service prices, basic feature package prices, and other service prices when a
2 protective order is signed in this docket. Comparison with Verizon’s basic service prices will
3 demonstrate that Wantel’s prices are comparable.

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

5 An ETC must provide dual tone multi-frequency signaling (“DTMF”) to facilitate the
6 transportation of signaling throughout its network.⁸ Wantel provides DTMF signaling
7 throughout its network, consistent with FCC rules.

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

9 FCC regulations also require ETCs to provide single-party service or its functional
10 equivalent.⁹ “Single-party service” means that only one party will be served by a subscriber loop
11 or access line in contrast to a multi-party line.¹⁰ Wantel will provide single party service.

12 **E. Access to Emergency Services.**

13 The ability to reach a public emergency service provided by dialing 911 is a required
14 service in any universal service offering.¹¹ Wantel provides all of its customers with access to
15 emergency service by dialing 911. Wantel offers E-911 throughout its calling area.

16 **F. Access to Operator Services.**

17 Access to operator services is a required service for ETCs and is defined as any automatic
18 or live assistance provided to a consumer to arrange for the billing or completion, or both, of a
19 telephone call.¹² Wantel provides customer access to operator services on 24/7 basis.

23 ⁸ *Id.* § 54.101(a)(3).

24 ⁹ *Id.* § 54.101(a)(4).

25 ¹⁰ *Id.*

26 ¹¹ *Id.* § 54.101(a)(5).

¹² *Id.* § 54.101(a)(6).

1 and OUSF support will be used for service improvements that would not occur absent receipt of
2 such support. Wantel will use the OUS funds to pay for the build out and improvements required
3 to serve the Bandon area.

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

13 **V. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

14 As required by 47 C.F.R. Section 54.201, Wantel plans to advertise the availability of
15 each of the supported services detailed above throughout its licensed service area by media of
16 general distribution. The methods of advertising utilized may include newspaper, magazine,
17 radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory
18 advertising. This information is currently advertised by Wantel in its service area. Wantel will
19 distribute literature offering Lifeline and Link-Up services to senior services, hospitals, clinics,
20 hospices, senior centers, welfare offices, and other locations where those likely to be eligible for
21 the program(s) would encounter the brochures.

22 **VI. PUBLIC INTEREST FACTORS**

23 Granting Wantel's application to become an ETC in the Bandon area is in the public's
24 interest. As stated above, Wantel will use the monies it receives from both the state and federal
25

1 universal service funds to help finance it's plan is to offer high speed broadband voice, data and
2 video services over a state-of-the-art IP-enabled network. Wantel is committed to provide
3 service throughout its designated service area to all customers who make a reasonable request for
4 services. Wantel is currently able to serve most customers in the Bandon wire center via
5 Wantel's own facilities. Wantel is also prepared to serve customers outside its existing network
6 coverage within a reasonable period of time and at a reasonable cost, using UNEs leased from
7 Verizon. In the longer term, Wantel plans to use the high cost support prudently, and to extend
8 reach of its own facilities to virtually all of the customers in the wire center areas.

9 Wantel will offer Bandon customers all of the same services that are currently offered by
10 Verizon. Specifically, Wantel will provide all Bandon customers with a minimum of the
11 following services:

- 12 i. Basic telephone service including
- 13 ii. EAS
- 14 iii. E911 (included in all areas)
- 15 iv. Caller ID
- 16 v. Call Waiting w/Caller ID
- 17 vi. Call Forward
- 18 vii. Call Forward No Answer
- 19 viii. Call Rejection
- 20 ix. Call Transfer
- 21 x. Caller ID Block/Unblock
- 22 xi. Continuous Redial
- 23 xii. Call Forward Remote Access w/ Pin#
- 24 xiii. Last Call Return
- 25 xiv. Priority Call
- 26 xv. Selective Call Forwarding
- xvi. Selective Call Acceptance
- xvii. Speed call 8 and 30
- xviii. Three Way Calling
- xix. Anonymous Call Rejection
- xx. Voice Mail, basic, expanded and premium
- xxi. Inside Wire Protection
- xxii. Custom Ring
- xxiii. Dial-up Internet

- xxiv. BROADBAND INTERNET ACCESS UP TO 3MB
- xxv. Pro-Pel dial-Up Accelerator
- xxvi. Open Access to long distance 1 + dialing and choice of any PIC/LPCI

In addition, through the deployment of its fiber optic network, Wantel will be able to provide improved basic and advanced services to its customers, including those in traditional high cost areas. These improvements include high speed data services, voice and video, and access to several different ISPs in the area—services that have not been available to customers in the Bandon wire center to date.

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

In addition, designation of Wantel as an ETC is in the public interest because it will promote competition. Competition promotes consumer benefits in the form of lower prices, increased service quality, and innovation. Also, by designating Wantel as an ETC it will make

1 available Lifeline and Link-Up, including OTAP, services to customers of Wantel in the Bandon
2 area. For these reasons designation of Wantel as an ETC is in the public interest.

3 **VII. COMMITMENT TO SERVE REQUESTING CUSTOMERS**

4 Wantel agrees to provide its services to all customers for a reasonable cost within a
5 reasonable time frame.

6 **VIII. EQUAL ACCESS**

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

10 **IX. ABILITY TO REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS**

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

16 **A. Back-up power**

17 Wantel has eight hour battery back-up at each location where its equipment requires
18 power. It also has LNP/LPG powered generators with automatic transfer switches where it is
19 required.¹⁷

20 **B. Network redundancy**

21 Wantel has its own fiber routes in certain areas and leases fiber from others to obtain
22 redundancy in its network. Wantel operates diverse interconnect trunking on physically
23 redundant paths to multiple diverse switches in the Verizon network.

24
25 ¹⁷ Referring to Wantel's confidentially submitted Plan will demonstrate the redundancy in the network to provide a
reroute of traffic and how the network can address traffic spikes during an emergency.

1 consumers to the Commission and has designated Marty Patrovsky as the contact person who
2 will work with the Commission's Consumer Services Complain Division for complaint
3 resolution.

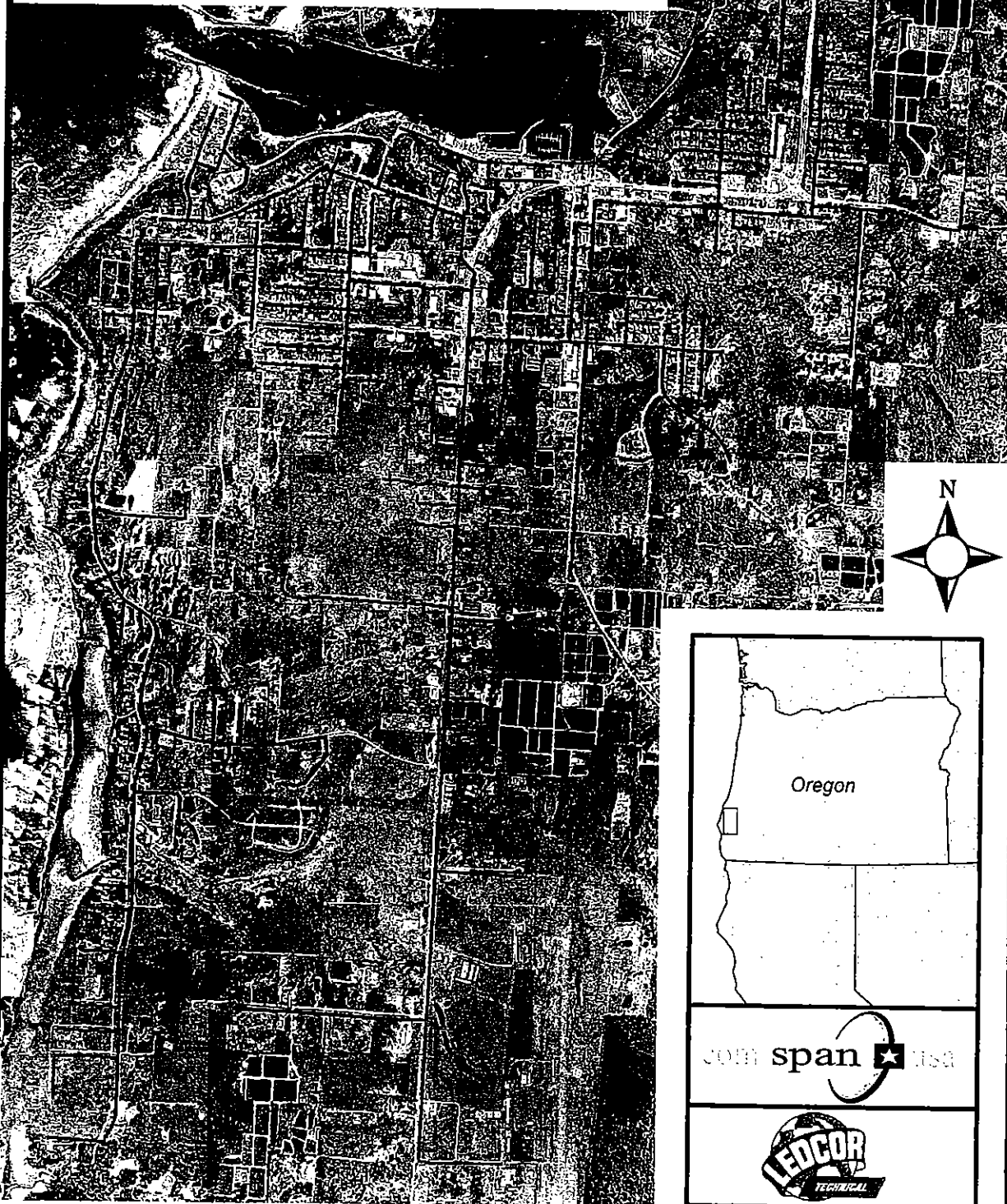
4
5 Respectfully submitted this 30th day of June, 2006.

6
7 ATER WYNNE, LLP

8
9 By: /s/Amie Jamieson
10 Lisa F. Rackner
11 Amie Jamieson
12 Ater Wynne, LLP
13 222 SW Columbia, Suite 1800
14 Portland, OR 97201
15 Telephone: (503) 226-8693
16 E-mail: lfr@aterwynne.com
17 alj@aterwynne.com
18 Of Attorneys for Wantel d/b/a ComspanUSA

19
20 WANTEL, INC. d/b/a COMSPAN USA
21 Marty Patrovsky
22 1012 SE Oak Avenue
23 Suite 200
24 Roseburg, OR 97470

Bandon FTTH Projected Service Area





Legend

Fiber —

Urban Growth Outside City Boundary

Oregon

com span  usa



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

Wire Center
Bandon, OR

CLLI Codes
Wantel: BNDNOR02DS0
Verizon: BNDNORXXDS0

ILEC Study Area
Verizon - Bandon

**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

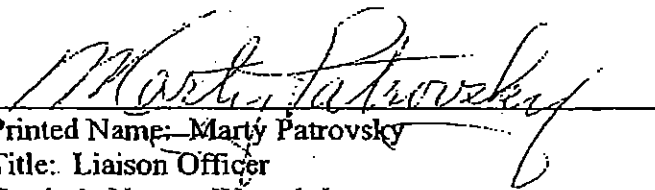
Re: CC Docket No. 96-45
Interstate Access Support – IAS
Annual Certification Filing

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



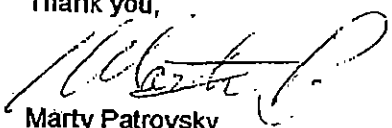
Community Headquarters
1012 SE Oak Avenue, Suite 200
Roseburg, OR 97470

541-672-9895
www.comspanusa.net

For October 2005

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 5797 Access Lines and 14 Trouble Reports a ratio of 0.24/100 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 48hr clearance rate is 100% 14 of 14
3. Commitments Met/ Provisioning (OAR Standard: 90%)
 1. Wantel met or beat October '05 provisioning commitments 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 orders and the number of access line in each wire center.
 1. We have had no held orders of our own. We did have 2 held for Qwest facilities.
5. Held Order over 30 Days (OAR Standard : 10% of the monthly Held Order Standard from #4).
 1. We have had no held orders of our own. We 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, (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).
 1. See 6.1 above
8. Call Blocking, (OAR Standard: Final Trunk Groups shall be maintained to allow for 99% completion of all dialed calls during the average busy hour).
 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 541-229-2101

For November 2005

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 6325 Access Lines and 14 Trouble Reports a ratio of $< 0.2/100$ 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 48hr clearance rate is 100% 14 of 14
3. Commitments Met/ Provisioning (OAR Standard: 90%)
 1. Wantel met or beat November '05 provisioning commitments 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 orders and the number of access line in each wire center.
 1. We have had no held orders of our own. We did have 2 held for Qwest facilities.
5. Held Order over 30 Days (OAR Standard : 10% of the monthly Held Order Standard from #4).
 1. We have had no held orders of our own. We 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, (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).
 1. See 6.1 above
8. Call Blocking, (OAR Standard: Final Trunk Groups shall be maintained to allow for 99% completion of all dialed calls during the average busy hour).
 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 541-229-2101



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

541-672-9895
www.comspanusa.net

For December 2005

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 6120 Access Lines and 41 Trouble Reports a ratio of 0.66/100 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 48hr clearance rate is 97.5% 40 of 41
3. Commitments Met/ Provisioning (OAR Standard: 90%)
 1. Wantel met or beat December '05 provisioning commitments 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 orders and the number of access line in each wire center.
 1. We have had no held orders of our own. We did have 1 held for Qwest resale accounts.
5. Held Order over 30 Days (OAR Standard : 10% of the monthly Held Order Standard from #4).
 1. We have had no held orders of our own. We 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, (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).
 1. See 6.1 above
8. Call Blocking, (OAR Standard: Final Trunk Groups shall be maintained to allow for 99% completion of all dialed calls during the average busy hour).
 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

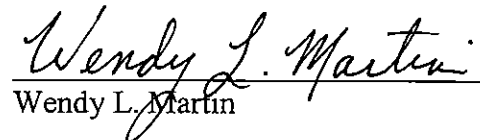
**CERTIFICATE OF SERVICE
UM 1255**

I hereby certify that a true and correct copy of **WANTEL'S AMENDED APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER** was served via U.S. Mail on the following parties on June 30, 2006:

Ms. Amie Jamieson
Ater Wynne LLP
222 SW Columbia, Suite 1800
Portland OR 97201-6618

Marty Patrovsky
Wantel, Inc.
1016 SE Oak Avenue
Roseburg OR 97470-4917

ATER WYNNE LLP


Wendy L. Martin