

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

UM 1509

In the Matter of

i-wireless LLC

Application for Designation as an Eligible
Telecommunications Carrier in Oregon for
the Purpose of Offering Lifeline Service to
Qualified Households

**FIRST AMENDED SUPPLEMENTAL
APPLICATION TO EXPAND
DESIGNATED SERVICE AREA**

**EXPEDITED CONSIDERATION
REQUESTED**

**FIRST AMENDED SUPPLEMENTAL APPLICATION
TO EXPAND DESIGNATED SERVICE AREA**

**I. I-WIRELESS ASKS THE COMMISSION TO EXPAND ITS ETC/ETP
DESIGNATED SERVICE AREA**

i-wireless, LLC d/b/a Access Wireless (the “Company” or “i-wireless”) hereby requests that the Oregon Public Utility Commission (“Commission”) expand i-wireless’ designated service area as an Eligible Telecommunications Carrier (“ETC”) and Eligible Telecommunications Provider (“ETP”) to include the additional Zip codes listed in revised **Exhibit A** to this Supplemental Application, excluding any areas within Tribal Lands. The list of additional Zip codes in **Exhibit A** will allow i-wireless to serve additional areas within the Sprint coverage area, including areas currently served by Virgin Mobile USA, LP d/b/a Assurance Wireless (“Virgin Mobile”), which was designated as an ETC in Docket UM 1522.¹ This First Amended Supplemental Application to Expand Designated Service Area

¹ See *In the Matter of VIRGIN MOBILE USA, L.P., Petition for Limited Designation as an Eligible Telecommunications Carrier*, Docket UM 1522, Order No. 12-01 (January 23, 2012) (adopting stipulation filed Dec. 14, 2011); *In the Matter of VIRGIN MOBILE USA, L.P., Petition for Limited Designation as an Eligible Telecommunications Carrier*, OPUC Docket UM 1522, Stipulation (Dec. 14, 2011), *In the Matter of VIRGIN MOBILE USA, L.P., Petition for Limited Designation as an Eligible Telecommunications Carrier*, OPUC Docket UM 1522, First Amended Application for Designation as an Eligible Telecommunications Carrier and Eligible Telecommunications Provider and Request for Waivers of Certain RSPF Rules, Exhibit G (October 25, 2011).

(“Application”) replaces the Company’s Application to Expand Designated Service Area filed in this docket on September 12, 2016.

The revised **Exhibit A** attached hereto identifies the Zip codes that i-wireless proposes to add. The additional Zip codes correspond to areas where Virgin Mobile has been designated to offer Oregon Lifeline service to potential customers. However, because Virgin Mobile was designated based on wire centers, rather than Zip codes, the requested service area expansion for i-wireless does not perfectly mirror Virgin Mobile’s existing ETC territory. **Exhibit A** also identifies the Zip codes already in i-wireless’ Commission-approved ETC designated service area, such that the attached revised **Exhibit A** is intended to replace the Exhibit A to the stipulation filed in this docket on August 28, 2015 and approved by the Commission on September 29, 2015 (the “Stipulation”).

A. Background on Expansion of the Designated Service Area

i-wireless and Virgin Mobile are both ETCs in Oregon,² and both carriers use the same network, that of Sprint, to serve Lifeline customers in Oregon. As a consequence, the coverage area for both carriers is identical; i-wireless has coverage wherever Virgin Mobile does, and vice-versa. However, the current designated service areas of the two ETCs are not identical. Virgin Mobile’s wire center-based designated service area is considerably larger than i-wireless’ designated service area. Because i-wireless desires to offer service to as many low-income Oregonians as it can, it seeks to expand its service area to reach these additional areas where Sprint coverage allows for service.

² See *In the Matter of i-wireless, LLC Application for Designation as an Eligible Telecommunications Carrier*, Docket UM 1509, Order No. 15-300 (September 29, 2015) (granting i-wireless ETC designation); *In the Matter of VIRGIN MOBILE USA, L.P., Petition for Limited Designation as an Eligible Telecommunications Carrier*, Docket UM 1522, Order No. 12-01 (January 23, 2012) (granting Virgin Mobile ETC designation).

Moreover, as i-wireless has already informed the Commission,³ i-wireless will soon complete a transaction involving Sprint Corporation (“Sprint”) and Virgin Mobile USA, L.P. (“Virgin Mobile”) in which majority control of i-wireless will be transferred to Sprint. That transaction is currently expected to close imminently. By adding the Zip codes requested herein, i-wireless’s designated service area will be better aligned with Virgin Mobile’s, and i-wireless would be positioned to offer Lifeline service to all customers in Virgin Mobile’s current Assurance Wireless customers.⁴ This would facilitate the smooth transition to i-wireless’ Lifeline service for a number of Virgin Mobile’s Assurance Wireless customers, including approximately 1540 customers who currently receive Oregon Lifeline service over the Sprint network from Assurance Wireless, but are outside i-wireless’ current designated service area.

B. The Expanded Service Area is in the Public Interest

Expanding i-wireless’ service area is clearly in the public interest. First, the requested expansion will support competitive choice in the Lifeline market. Granting the expansion would mean that Oregonians that live in areas where Sprint-network Lifeline service has been offered by Virgin Mobile will be able to choose i-wireless’ Lifeline service offerings. The opportunity for customers in additional areas to select and benefit from i-wireless’ Oregon Lifeline service directly advances the primary goal of universal service, and therefore promotes the public interest. The benefits of wireless Lifeline service also include access to emergency services, the ability to contact friends, family, prospective employers, and social service agencies, and the

³ See *In the Matter of i-wireless, LLC Application for Designation as an Eligible Telecommunications Carrier*, Docket UM 1509, Sprint Corporation, Virgin Mobile USA, L.P. (Assurance Wireless) and i-wireless, LLC (Access Wireless)’s Notification Regarding Their Proposed Wireless Lifeline Services Partnership and Related Transaction (September 2, 2016).

⁴ Even after approval of the expansion proposed herein, however, the service territories will continue to have some differences in scope, because Zip codes simply do not align perfectly with wire center boundaries.

convenience, portability, and security afforded by mobile telephone service. Oregonians that become i-wireless customers will also benefit from i-wireless' service plan improvements, which include additional customer minutes.⁵

In addition, in conjunction with the anticipated transaction, the expansion would help eliminate potential logistical issues involved in the planned transition to i-wireless for Virgin Mobile's Assurance Wireless customers (including those outside of i-wireless current designated service area), and would facilitate the development of plans to address those issues by i-wireless, Virgin Mobile, and the Commission staff. Thus, the expansion would minimize the potential for disruption and help ensure that these low-income customers can continue to receive the benefits of Lifeline service. However, regardless of whether the planned Sprint and i-wireless transaction occurs, expansion of i-wireless' designated service area will serve the public interest by making the company's Lifeline services available to more low-income Oregonians. Although i-wireless fully expects that transaction with Sprint to close imminently, i-wireless' request for expansion is not dependent upon when or whether the transfer of majority control of i-wireless to Sprint actually occurs.

II. UPDATES TO OREGON SERVICE AREA MAP AND COVERAGE MAP

As Exhibit B to the Stipulation, i-wireless provided a map of its designated service area in Oregon. Attached hereto as **Exhibit B**, is a revised map, depicting i-wireless' proposed new designated service area territory, which depicts both the existing Zip codes and the Zip codes that i-wireless proposes to add in order to serve customers in Virgin Mobile areas.

⁵ See *In the Matter of i-wireless, LLC Application for Designation as an Eligible Telecommunications Carrier*, Docket UM 1509, Letter regarding Improvements to i-wireless, LLC's Oregon Lifeline service offerings (October 12, 2016) (describing concerning i-wireless' service plan improvements).

As Exhibit C to the Stipulation, i-wireless provided a map of its Sprint coverage in Oregon. Attached hereto as **Exhibit C**, i-wireless submits a revised version of that map generally depicting the coverage of i-wireless' underlying carrier Sprint. The signal strength for the coverage depicted is at least -99 dBm. The map provides a high-level approximation of wireless coverage; actual coverage at a more detailed level will vary depending on network and transmission limitations and other factors.

III. I-WIRELESS WILL CONTINUE TO SATISFY ALL REQUIREMENTS IN ORDER NO. 15-300 AND ITS STIPULATION, AND ALL OTHER REQUIREMENTS APPLICABLE TO ELIGIBLE TELECOMMUNICATIONS CARRIERS AND ELIGIBLE TELECOMMUNICATIONS PROVIDERS

Following the addition of the requested wire centers to i-wireless' designated service area as an ETC in Oregon, i-wireless remains committed to abiding by the terms of the Stipulation, which aside from the proposed expansion of the designated service area shall remain unchanged. In addition, i-wireless will continue to follow applicable state and federal requirements as an ETC and as an ETP in Oregon. In particular, i-wireless remains committed to complying with the applicable annual certification requirements adopted by the Commission in Order No. 15-169 in docket UM 1648.⁶

IV. LEGAL AUTHORITY

The Commission has the legal authority to grant the relief requested by the Applicant pursuant to 47 U.S.C. §214(e)(2); 47 C.F.R. § 54.201.

⁶ *In the Matter of Public Utility Commission of Oregon, Staff Investigation into Eligible Communication Carriers' Requirements*, Order No. 15-169; Docket UM 1648 (entered June 4, 2015), modifying *In the matter of Public Utility Commission of Oregon Staff Investigation to Establish Requirements for Initial designation and Recertification of Telecommunications Carriers Eligible to Receive Federal Universal Service Support*, Order No. 06-292, Docket UM 1217 (entered June 13, 2006) (setting forth requirements).

V. RELIEF REQUESTED

For the reasons set forth above, and pursuant to 47 U.S.C. § 214(e)(2), i-wireless respectfully requests that the Commission issue an Order expanding i-wireless' designated service area to include all of the Zip codes identified in revised **Exhibit A**. Moreover, to avoid any potential disruption for customers, i-wireless requests that the Commission consider this First Amended Supplemental Application on an expedited basis, and grant the relief sought at the earliest possible date, so that i-wireless' expanded designated service area can be in place as of the close of the transaction, which is expected to close imminently, as soon as regulatory approvals are obtained.

Dated this 31st day of October, 2016.

Respectfully submitted,

By:  _____

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List of Exhibits

Exhibit A – i-wireless Designated Service Area – Zip Code List (Excluding Tribal Lands)

Exhibit B – Revised Map of Designated Service Area (Zip Codes)

Exhibit C – Revised Coverage Map, with Designated Service Area

UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Additional Zip Codes

Zip Code*	City	County
97003	Beaverton	Washington
97004	Beavercreek	Clackamas
97016	Clatskanie	Columbia
97017	Colton	Clackamas
97021	Dufur	Wasco
97038	Molalla	Clackamas
97042	Mulino	Clackamas
97048	Rainier	Columbia
97049	Rhododendron	Clackamas
97064	Vernonia	Columbia
97067	Welches	Clackamas
97075	Beaverton	Washington
97122	Hebo	Tillamook
97228	Portland	Multnomah
97310	Salem	Marion
97324	Alea	Benton
97335	Crabtree	Linn
97344	Falls City	Polk
97345	Foster	Linn
97346	Gates	Marion
97347	Grand Ronde	Polk
97358	Lyons	Linn
97360	Mill City	Linn
97378	Sheridan	Yamhill
97380	Siletz	Lincoln
97396	Willamina	Yamhill
97412	Blachly	Lane
97413	Blue River	Lane
97415	Brookings	Curry
97417	Canyonville	Douglas
97429	Days Creek	Douglas
97434	Dorena	Lane
97440	Eugene	Lane
97442	Glendale	Douglas
97443	Glide	Douglas
97449	Lakeside	Coos
97453	Mapleton	Lane

* Note: Wireless coverage in some zip codes may be incomplete due to network and transmission limitations and other factors. See Exhibit C for a coverage map generally depicting Sprint coverage in Oregon.

UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Additional Zip Codes

Zip Code*	City	County
97454	Marcola	Lane
97457	Myrtle Creek	Douglas
97467	Reedsport	Douglas
97469	Riddle	Douglas
97476	Sixes	Curry
97481	Tenmile	Douglas
97486	Umpqua	Douglas
97490	Walton	Lane
97492	Westfir	Lane
97496	Winston	Douglas
97498	Yachats	Lincoln
97503	White City	Jackson
97520	Ashland	Jackson
97524	Eagle Point	Jackson
97530	Jacksonville	Jackson
97537	Rogue River	Jackson
97541	Trail	Jackson
97543	Wilderville	Josephine
97544	Williams	Josephine
97601	Klamath Falls	Klamath
97603	Klamath Falls	Klamath
97624	Chiloquin	Klamath
97627	Keno	Klamath
97703	Bend	Deschutes
97730	Camp Sherman	Jefferson
97737	Gilchrist	Klamath
97741	Madras	Jefferson
97759	Sisters	Deschutes
97801	Pendleton	Umatilla
97824	Cove	Union
97868	Pilot Rock	Umatilla
97918	Vale	Malheur

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UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97002	Aurora	Marion
97005	Beaverton	Washington
97006	Aloha	Washington
97007	Beaverton	Washington
97008	Beaverton	Washington
97009	Boring	Clackamas
97010	Bridal Veil	Multnomah
97011	Brightwood	Clackamas
97013	Canby	Clackamas
97014	Cascade Locks	Hood River
97015	Clackamas	Clackamas
97018	Columbia City	Columbia
97019	Corbett	Multnomah
97020	Donald	Marion
97022	Eagle Creek	Clackamas
97023	Estacada	Clackamas
97024	Fairview	Multnomah
97026	Gervais	Marion
97027	Gladstone	Clackamas
97030	Gresham	Multnomah
97031	Hood River	Hood River
97032	Hubbard	Clackamas
97034	Lake Oswego	Clackamas
97035	Lake Oswego	Clackamas
97036	Marylhurst	Clackamas
97039	Moro	Sherman
97040	Mosier	Wasco
97045	Oregon City	Clackamas
97050	Rufus	Sherman
97051	Saint Helens	Columbia
97053	Warren	Columbia
97054	Deer Island	Columbia
97055	Sandy	Clackamas
97056	Scappoose	Columbia
97058	The Dalles	Wasco

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UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97060	Troutdale	Multnomah
97062	Tualatin	Washington
97065	Wasco	Sherman
97068	Gladstone	Clackamas
97070	Wilsonville	Clackamas
97071	Woodburn	Marion
97078	Aloha	Washington
97080	Gresham	Multnomah
97086	Happy Valley	Clackamas
97089	Damascus	Clackamas
97101	Amity	Yamhill
97102	Arch Cape	Clatsop
97103	Astoria	Clatsop
97106	Banks	Washington
97107	Bay City	Tillamook
97110	Cannon Beach	Clatsop
97111	Carlton	Yamhill
97112	Cloverdale	Tillamook
97113	Cornelius	Washington
97114	Dayton	Yamhill
97115	Dundee	Yamhill
97116	Forest Grove	Washington
97117	Gales Creek	Washington
97118	Garibaldi	Tillamook
97119	Gaston	Washington
97121	Hammond	Clatsop
97123	Hillsboro	Washington
97124	Hillsboro	Washington
97127	Lafayette	Yamhill
97128	McMinnville	Yamhill
97130	Manzanita	Tillamook
97131	Nehalem	Tillamook
97132	Newberg	Yamhill
97133	North Plains	Washington
97135	Pacific City	Tillamook

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i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97136	Rockaway Beach	Tillamook
97137	Saint Paul	Marion
97138	Seaside	Clatsop
97140	Sherwood	Washington
97141	Tillamook	Tillamook
97143	Netarts	Tillamook
97145	Tolovana Park	Clatsop
97146	Warrenton	Clatsop
97147	Wheeler	Tillamook
97148	Yamhill	Yamhill
97149	Neskowin	Tillamook
97200	Portland	Multnomah
97201	Portland	Multnomah
97202	Portland	Multnomah
97203	Portland	Multnomah
97204	Portland	Multnomah
97205	Portland	Multnomah
97206	Portland	Multnomah
97208	Portland	Multnomah
97209	Portland	Multnomah
97210	Portland	Multnomah
97211	Portland	Multnomah
97212	Portland	Multnomah
97213	Portland	Multnomah
97214	Portland	Multnomah
97215	Portland	Multnomah
97216	Portland	Multnomah
97217	Portland	Multnomah
97218	Portland	Multnomah
97219	Portland	Multnomah
97220	Portland	Multnomah
97221	Portland	Multnomah
97222	Portland	Clackamas
97223	Tigard	Washington
97224	Tigard	Washington

* Note: Wireless coverage in some zip codes may be incomplete due to network and transmission limitations and other factors. See Exhibit C for a coverage map generally depicting Sprint coverage in Oregon.

UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97225	Portland	Washington
97227	Portland	Multnomah
97229	Portland	Washington
97230	Portland	Multnomah
97231	Portland	Multnomah
97232	Portland	Multnomah
97233	Portland	Multnomah
97236	Portland	Multnomah
97238	Portland	Multnomah
97239	Portland	Multnomah
97240	Portland	Multnomah
97266	Portland	Multnomah
97267	Portland	Clackamas
97301	Salem	Marion
97302	Salem	Marion
97303	Keizer	Marion
97304	Salem	Polk
97305	Salem	Marion
97306	Salem	Marion
97317	Salem	Marion
97321	Albany	Linn
97322	Albany	Linn
97325	Aumsville	Marion
97327	Brownsville	Linn
97330	Corvallis	Benton
97331	Corvallis	Benton
97333	Corvallis	Benton
97336	Crawfordsville	Linn
97338	Dallas	Polk
97341	Depoe Bay	Lincoln
97348	Halsey	Linn
97351	Independence	Polk
97352	Jefferson	Marion
97355	Lebanon	Linn
97361	Monmouth	Polk

* Note: Wireless coverage in some zip codes may be incomplete due to network and transmission limitations and other factors. See Exhibit C for a coverage map generally depicting Sprint coverage in Oregon.

UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97362	Mount Angel	Marion
97364	Neotsu	Lincoln
97365	Newport	Lincoln
97366	South Beach	Lincoln
97367	Lincoln City	Lincoln
97368	Otis	Lincoln
97369	Otter Rock	Lincoln
97370	Philomath	Benton
97371	Rickreall	Polk
97373	Saint Benedict	Marion
97374	Scio	Linn .
97375	Scotts Mills	Marion
97376	Seal Rock	Lincoln
97377	Shedd	Linn
97381	Silverton	Marion
97383	Stayton	Marion
97385	Sublimity	Marion
97386	Sweet Home	Linn
97388	Gleneden Beach	Lincoln
97389	Tangent	Linn
97391	Toledo	Lincoln
97392	Turner	Marion
97394	Waldport	Lincoln
97401	Eugene	Lane
97402	Eugene	Lane
97403	Eugene	Lane
97404	Eugene	Lane
97405	Eugene	Lane
97408	Eugene	Lane
97409	Alvadore	Lane
97411	Bandon	Coos
97419	Cheshire	Lane
97420	Coos Bay	Coos
97423	Coquille	Coos
97424	Cottage Grove	Lane

* Note: Wireless coverage in some zip codes may be incomplete due to network and transmission limitations and other factors. See Exhibit C for a coverage map generally depicting Sprint coverage in Oregon.

UM 1509 – Exhibit A
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(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97426	Creswell	Lane
97431	Dexter	Lane
97432	Dillard	Douglas
97435	Drain	Douglas
97437	Elmira	Lane
97438	Fall Creek	Lane
97439	Florence	Lane
97441	Gardiner	Douglas
97444	Gold Beach	Curry
97446	Harrisburg	Linn
97448	Junction City	Lane
97450	Langlois	Curry
97452	Lowell	Lane
97455	Pleasant Hill	Lane
97456	Monroe	Benton
97458	Myrtle Point	Coos
97459	North Bend	Coos
97461	Noti	Lane
97462	Oakland	Douglas
97465	Port Orford	Curry
97470	Roseburg	Douglas
97471	Roseburg	Douglas
97475	Gateway Postal-Springfield	Lane
97477	Springfield	Lane
97478	Springfield	Lane
97479	Sutherlin	Douglas
97487	Veneta	Lane
97494	Wilbur	Douglas
97495	Winchester	Douglas
97497	Wolf Creek	Josephine
97499	Yoncalla	Douglas
97501	Medford	Jackson
97502	Central Point	Jackson
97504	Medford	Jackson
97525	Gold Hill	Jackson

* Note: Wireless coverage in some zip codes may be incomplete due to network and transmission limitations and other factors. See Exhibit C for a coverage map generally depicting Sprint coverage in Oregon.

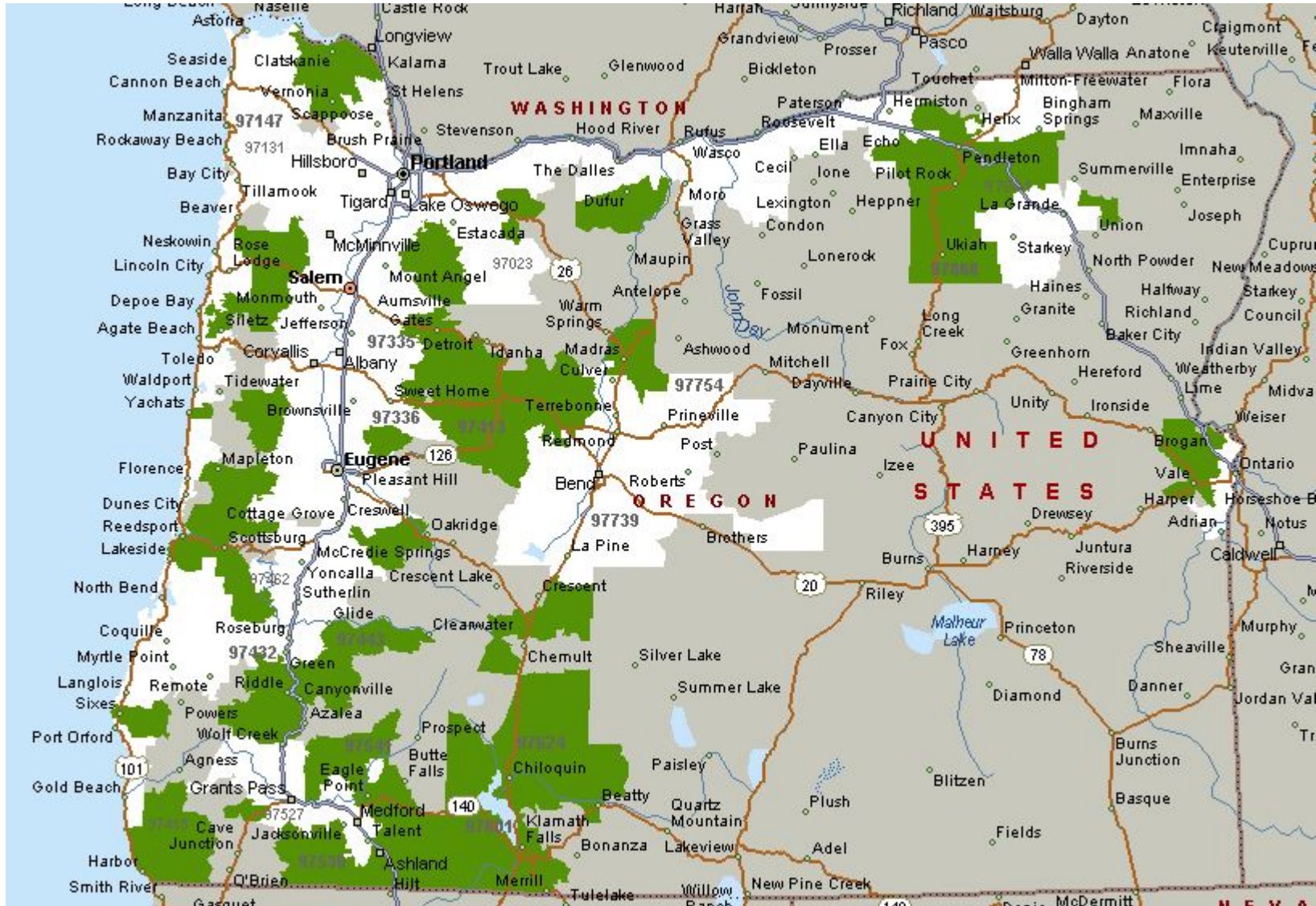
UM 1509 – Exhibit A
i-wireless Designated Service Area - Zip Code List
(Excluding Tribal Lands)

Existing Zip Codes

Zip Code*	City	County
97526	Grants Pass	Josephine
97527	Grants Pass	Josephine
97532	Merlin	Josephine
97533	Murphy	Josephine
97535	Phoenix	Jackson
97539	Shady Cove	Jackson
97540	Talent	Jackson
97701	Bend	Deschutes
97702	Bend	Deschutes
97707	Bend	Deschutes
97734	Culver	Jefferson
97739	La Pine	Deschutes
97753	Powell Butte	Crook
97754	Prineville	Crook
97756	Redmond	Deschutes
97760	Terrebonne	Deschutes
97810	Adams	Umatilla
97812	Arlington	Gilliam
97813	Athena	Umatilla
97818	Boardman	Morrow
97826	Echo	Umatilla
97838	Hermiston	Umatilla
97844	Irrigon	Morrow
97850	La Grande	Union
97862	Milton Freewater	Umatilla
97875	Stanfield	Umatilla
97882	Umatilla	Umatilla
97886	Weston	Umatilla
97913	Nyssa	Malheur
97914	Ontario	Malheur

* Note: Wireless coverage in some zip codes may be incomplete due to network and transmission limitations and other factors. See Exhibit C for a coverage map generally depicting Sprint coverage in Oregon.

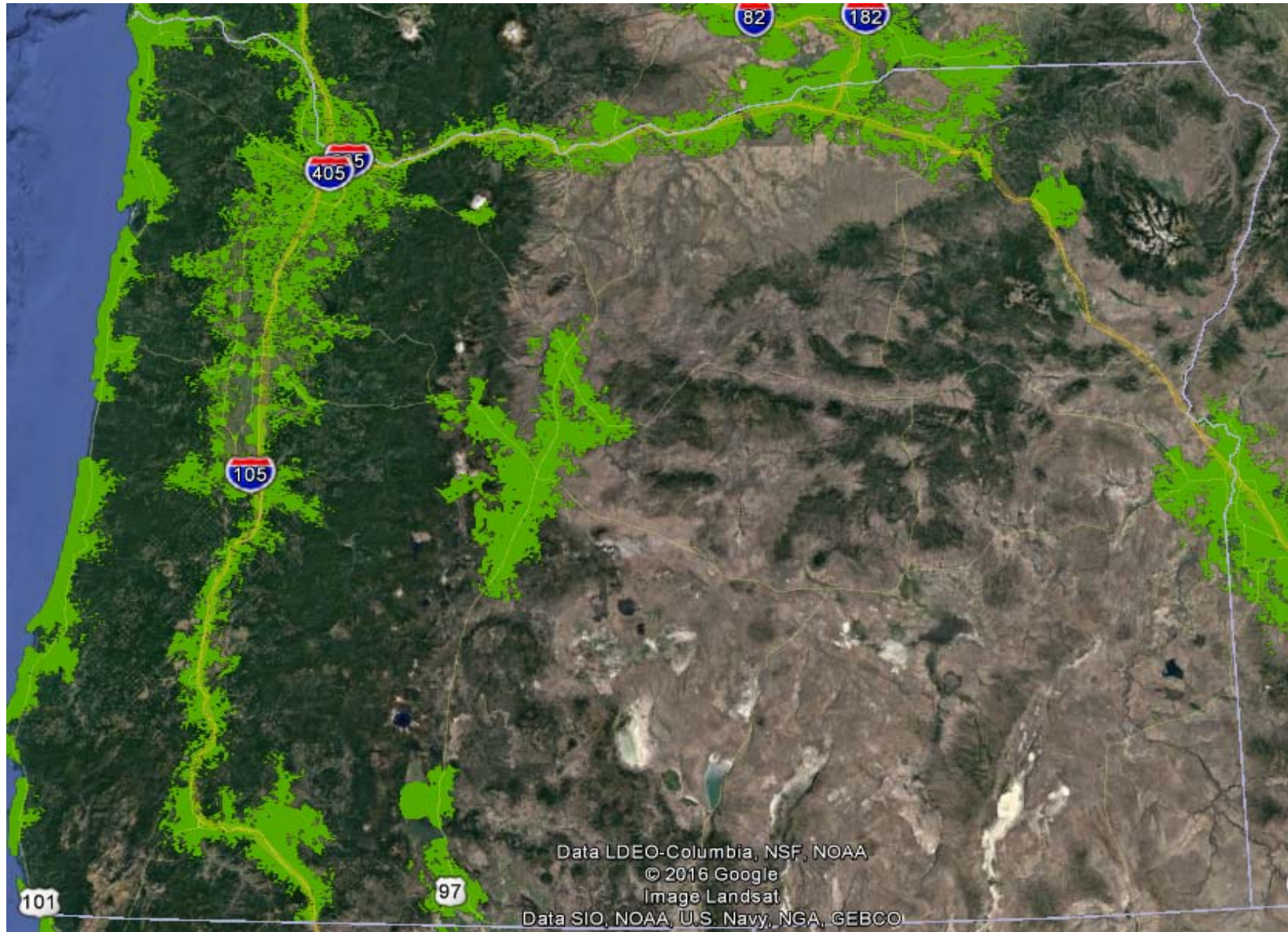
UM 1509 – Exhibit B – Map of Designated Service Area



□ Current Designated Service Area ■ Expanded Designated Service Area Request

UM 1509 - 1st Amended Supplemental Application To Expand Designated Service Area - Exhibit B

UM 1509 – Exhibit C – Coverage Map (Signal Strength is at least -99 dBm)



UM 1509 - 1st Amended Supplemental Application To Expand Designated Service Area - Exhibit C