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September 12, 2016

**VIA E-FILING AND BY**  
**UPS OVERNIGHT MAIL**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301

Re: Docket UM 1509

Dear Filing Clerk:


On behalf of i-wireless, LLC, enclosed for filing and service in the above-referenced docket please find a Supplemental Application to Expand Designated Service Area. For the reasons explained in the application, i-wireless respectfully requests expedited treatment for this filing.

Please let me know if you have any questions.

Thank you for your assistance.

Very truly yours,

Davis Wright Tremaine LLP

  
Alan J. Galloway  
Of Attorneys for i-wireless, LLC

Enclosures

DWT 30328530v1 0093367-000001

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Bellevue  
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**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

**SUPPLEMENTAL APPLICATION TO  
EXPAND DESIGNATED SERVICE  
AREA**

**EXPEDITED CONSIDERATION  
REQUESTED**

**SUPPLEMENTAL APPLICATION TO EXPAND DESIGNATED SERVICE AREA**

**I. FOR CUSTOMER CONTINUITY, I-WIRELESS ASKS THE COMMISSION TO  
EXPAND ITS ETC DESIGNATED SERVICE AREA TO INCLUDE ALL WIRE  
CENTERS IN WHICH VIRGIN MOBILE USA, LP IS DESIGNATED AS AN ETC**

i-wireless, LLC d/b/a Access Wireless (“i-wireless”) hereby requests that the Oregon Public Utility Commission (“Commission”) expand i-wireless’ designation area as an Eligible Telecommunications Carrier (“ETC”) to include the wire centers listed in revised **Exhibit A** to this Supplemental Application, excluding any areas within Tribal Lands. The list of wire centers in **Exhibit A** consists of the same wire centers in which Virgin Mobile USA, LP d/b/a Assurance Wireless (“Virgin Mobile”), was designated as an ETC in Docket UM 1522.<sup>1</sup> The revised **Exhibit A** attached hereto 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”). Therefore, the revised exhibit also includes the Zip codes in which i-wireless was previously designated.

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<sup>1</sup> 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).

### **A. Background on the Need to Expand the Designated Service Area**

As i-wireless has already informed the Commission,<sup>2</sup> on October 3, 2016, or as soon as regulatory approval is obtained, i-wireless will complete a transaction involving Sprint Corporation (“Sprint”) and Virgin Mobile USA, L.P. (“Virgin Mobile”) in which (1) majority control of i-wireless will be transferred to Sprint; and (2) the Lifeline customer accounts currently served by Sprint’s ETC subsidiary, Virgin Mobile, will be transferred to i-wireless.

i-wireless and Virgin Mobile are both ETCs in Oregon,<sup>3</sup> 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. Despite the identical coverage, i-wireless’ designated service area and that of Virgin Mobile are not identical, although there is a high degree of overlap between them. The differences in the designated service area exist primarily because i-wireless’ designated service area is defined in terms of Zip codes, whereas Virgin Mobile’s designated service territory is defined in terms of wire centers. Wire center boundaries do not perfectly overlap with Zip codes, and the designated service areas therefore differ.

Unfortunately, the aforementioned difference in designation could impede the smooth transition to i-wireless’ Lifeline service for a number of Virgin Mobile’s Assurance Wireless customers. Specifically, there are approximately 1540 customers who currently receive Oregon Lifeline service over the Sprint network from Assurance Wireless, but are outside i-wireless’

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<sup>2</sup> See *In the Matter of the Application of I-WIRELESS, LLC For a Certificate of Authority to Provide Telecommunications Service in Oregon and Classification as a Competitive Telecommunications Provider*, 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).

<sup>3</sup> See *In the Matter of i-wireless, LLC Application for Designation as an Eligible Telecommunications Carrier*, Docket UM 1522, 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).

current designated service area. Unless i-wireless' designated service area is expanded, then i-wireless will be unable to serve these low-income Oregonians – even though i-wireless uses the very same Sprint network over which these customers are served today by Virgin Mobile. Any potential disruption to those customers, however, can be avoided by expanding i-wireless' designated service area, as requested herein.

**B. The Expanded Service Area is in the Public Interest**

Allowing the 1540 Sprint-network customers that are outside i-wireless' current designated service area to continue receiving Lifeline service using the same network is clearly in the public interest. Expanding i-wireless' service area will let these customers enjoy a seamless transition to i-wireless, using the same network and their existing handsets, minimizing the potential for disruption and ensuring that these low-income customers can continue to receive the benefits of Lifeline service. The benefits of wireless Lifeline service include access to emergency services, the ability to contact friends, family, prospective employers, and social service agencies, and the convenience, portability, and security afforded by mobile telephone service. Moreover, as a result of the transition to i-wireless, the affected customers will benefit from i-wireless' planned service plan improvements, which include additional customer minutes.<sup>4</sup> The requested expansion of i-wireless designated service area will also support competitive choice in the Lifeline market, because all low-income Oregonians that previously were able to select Sprint-network service through Virgin Mobile will now be able to choose this service through i-wireless. The opportunity for customers in additional areas to enjoy i-wireless' Oregon Lifeline service, directly advances the primary goal of universal service, and therefore undoubtedly promotes the public interest.

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<sup>4</sup> The details of i-wireless forthcoming service plan improvements will be addressed in a subsequent filing, in accordance with the terms of the Stipulation.

## **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 encompasses both the Zip codes in which i-wireless is currently designated in Oregon and the wire centers that i-wireless proposes to add.

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 an additional revision to Exhibit C of the Stipulation, generally depicting i-wireless coverage in Oregon – all of which is at least -99 dBm – reflecting the coverage of i-wireless underlying carrier Sprint. 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 Eligible Telecommunications Provider (“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.<sup>5</sup>

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<sup>5</sup> *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).

#### 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.

#### 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 areas identified in Revised Exhibit A, including the wire centers in which it previously designated Virgin Mobile as an ETC. Moreover, to avoid any potential disruption for customers, i-wireless requests that the Commission consider this 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 be October 3, 2016, subject to regulatory approval.

Dated this 12th day of September, 2016.

Respectfully submitted,

By: 

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*Counsel to i-wireless, LLC*

## **List of Exhibits**

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

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

Exhibit C – Revised Coverage Map, with Designated Service Area

**i-wireless Designated Service Area – Wire Center List  
(Excluding Tribal Lands)**

**EXHIBIT A  
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| <b>Wc Code</b> | <b>ILEC Name</b>                        | <b>Wire Center Name</b> |
|----------------|---|-------------------------|
| BVCKORXA       | BEAVER CREEK COOPERATIVE TELEPHONE CO   | BEAVER CREEK            |
| CNBYORXA       | CANBY TELEPHONE ASSOCIATION             | CANBY                   |
| NEDYORXA       | CANBY TELEPHONE ASSOCIATION             | NEEDY                   |
| CRBTORXC       | CASCADE UTILITIES, INC.                 | CORBETT                 |
| EGCKORXX       | CASCADE UTILITIES, INC.                 | EAGLE CREEK             |
| ESCDORXX       | CASCADE UTILITIES, INC.                 | ESTACADA                |
| RPBKORXX       | CASCADE UTILITIES, INC.                 | RIPPLEBROOK             |
| SCBGORXA       | CASCADE UTILITIES, INC.                 | SCOTTSBURG              |
| BDMNORXA       | CENTURYTEL OF EASTERN OREGON            | BOARDMAN                |
| CHLQORXA       | CENTURYTEL OF EASTERN OREGON            | CHILOQUIN               |
| DRANORXA       | CENTURYTEL OF EASTERN OREGON            | DRAIN                   |
| ECHOORXA       | CENTURYTEL OF EASTERN OREGON            | ECHO                    |
| FTKLORXX       | CENTURYTEL OF EASTERN OREGON            | FT KLAMATH              |
| GLCHORXA       | CENTURYTEL OF EASTERN OREGON            | GILCHRIST               |
| GVC MORXA      | CENTURYTEL OF EASTERN OREGON            | GOVERNMENT CAMP         |
| HPNRORXA       | CENTURYTEL OF EASTERN OREGON            | HEPPNER                 |
| IONEORXA       | CENTURYTEL OF EASTERN OREGON            | IONE                    |
| LXTNORXA       | CENTURYTEL OF EASTERN OREGON            | LEXINGTON               |
| MRRLORXA       | CENTURYTEL OF EASTERN OREGON            | MERRILL                 |
| PLRKORXX       | CENTURYTEL OF EASTERN OREGON            | PILOT ROCK              |
| RCPNORXA       | CENTURYTEL OF EASTERN OREGON            | ROCKY POINT             |
| SHDDORXA       | CENTURYTEL OF EASTERN OREGON            | SHEDD                   |
| AURRORXA       | CENTURYTEL OF OREGON, INC.              | AURORA                  |
| BWVLORXX       | CENTURYTEL OF OREGON, INC.              | BROWNSVILLE             |
| CHBUORXA       | CENTURYTEL OF OREGON, INC.              | CHARBONNEAU             |
| CRWLORXA       | CENTURYTEL OF OREGON, INC.              | CRESWELL                |
| DPBYORXX       | CENTURYTEL OF OREGON, INC.              | DEPOE BAY               |
| GLNNORXA       | CENTURYTEL OF OREGON, INC.              | GLENEDEN BEACH          |
| KNPPORXA       | CENTURYTEL OF OREGON, INC.              | KNAPPA                  |
| LBNNORXB       | CENTURYTEL OF OREGON, INC.              | LEBANON                 |
| SCPPORXA       | CENTURYTEL OF OREGON, INC.              | SCAPPOOSE               |
| SWTHORXX       | CENTURYTEL OF OREGON, INC.              | SWEET HOME              |
| YNCLORXA       | CENTURYTEL OF OREGON, INC.              | YONCALLA                |
| RDL DORXX      | CLEAR CREEK MUTUAL TELEPHONE CO.        | REDLAND                 |
| COTNORXA       | COLTON TELEPHONE CO.                    | COLTON                  |
| ALOHARXX       | FRONTIER COMMUNICATIONS NORTHWEST, INC. | ALOHA                   |
| AMTYORXX       | FRONTIER COMMUNICATIONS NORTHWEST, INC. | AMITY                   |
| AMVLORXX       | FRONTIER COMMUNICATIONS NORTHWEST, INC. | AUMSVILLE               |
| BKNGORXX       | FRONTIER COMMUNICATIONS NORTHWEST, INC. | BROOKINGS               |
| BNDNORXX       | FRONTIER COMMUNICATIONS NORTHWEST, INC. | BANDON                  |
| BNKSORXX       | FRONTIER COMMUNICATIONS NORTHWEST, INC. | BANKS                   |



**i-wireless Designated Service Area – Wire Center List  
(Excluding Tribal Lands)**

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|          |  |               |
|----------|--|---------------|
| BVTNORXB | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | BEAVERTON     |
| CLTSORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | CLATSKANIE    |
| COVEORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | COVE          |
| CQLLORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | COQUILLE      |
| CSBYORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | COOS BAY      |
| DYTNORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | DAYTON        |
| EMPRORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | EMPIRE        |
| FRGVORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | FOREST GROVE  |
| GDISORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | GRAND ISLAND  |
| GLBHORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | GOLD BEACH    |
| GRHMORXB | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | GRESHAM       |
| GSTNORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | GASTON        |
| HDLTORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | HOOD LAND     |
| HLBOORXB | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | HILLSBORO     |
| LAGRORXB | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | LA GRANDE     |
| LKSDORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | LAKESIDE      |
| LNGLORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | LANGLOIS      |
| MMVLORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | MCMINNVILLE   |
| MRPHORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | MURPHY        |
| MYPNORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | MYRTLE POINT  |
| NBNDORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | NORTH BEND    |
| NWBRORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | NEWBERG       |
| ORNTORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | ORIENT        |
| PTORORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | PORT ORFORD   |
| RDPTORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | REEDSPORT     |
| SCHLORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | SCHOLLS       |
| SHWDORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | SHERWOOD      |
| SLTNORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | SILVERTON     |
| SMRWORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | SOMERSET WEST |
| SNDYORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | SANDY         |
| SNSDORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | SUNNYSIDE     |
| STFRORXX | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | STAFFORD      |
| TGRDORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | TIGARD        |
| TGRDORXC | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | BULL MOUNTAIN |
| TRNRORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | TURNER        |
| TULTORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | TUALATIN      |
| UNINORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | UNION         |
| VYVWORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | VALLEY VIEW   |
| WIVLORXA | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | WILSONVILLE   |
| YMHORXA  | FRONTIER COMMUNICATIONS NORTHWEST, INC.  | YAMHILL       |
| GRVSORXX | GERVAIS TELEPHONE CO. DBA DATAVISION COM | GERVAIS       |
| HELXORXA | HELIX TELEPHONE CO.                      | HELIX         |

**i-wireless Designated Service Area – Wire Center List  
(Excluding Tribal Lands)**

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|          |   |                                  |
|----------|---|----------------------------------|
| MCHMORXB | HELIX TELEPHONE CO.                     | MEACHAM                          |
| CNDNORXB | HOME TELEPHONE CO. OR                   | CONDON                           |
| MLLLORXA | MOLALLA TELEPHONE CO.                   | MOLALLA                          |
| MNTRORXA | MONITOR COOPERATIVE TELEPHONE CO.       | MONITOR                          |
| MONRORXB | MONROE TELEPHONE CO.                    | MONROE                           |
| MTANORXA | MT. ANGEL TELEPHONE CO.                 | MT ANGEL                         |
| NHLMORXA | NEHALEM TELECOMMS, INC. DVA NEHALEM TEL | NEHALEM                          |
| DUFUORXA | NORTH – STATE TELEPHONE CO              | DUFUR                            |
| LYNSORXA | PEOPLES TEL CO                          | LYONS                            |
| ADAROR21 | QWEST CORPORATION                       | ADAIR                            |
| ALBYOR63 | QWEST CORPORATION                       | ALBANY                           |
| ASLDOR   | QWEST CORPORATION                       | ASHLAND                          |
| ASTROR64 | QWEST CORPORATION                       | ASTORIA                          |
| ATHNOR56 | QWEST CORPORATION                       | ATHENA-WESTON                    |
| BENDOR24 | QWEST CORPORATION                       | BEND                             |
| BLBTOR01 | QWEST CORPORATION                       | BLACK BUTTE                      |
| BURLOR62 | QWEST CORPORATION                       | BURLINGTON                       |
| CLVROR01 | QWEST CORPORATION                       | CULVER                           |
| CNBHOR64 | QWEST CORPORATION                       | CANNON BEACH                     |
| CNPNOR29 | QWEST CORPORATION                       | CENTRAL POINT                    |
| CRVSOR   | QWEST CORPORATION                       | CORVALLIS                        |
| CTGVOR53 | QWEST CORPORATION                       | COTTAGE GROVE                    |
| DLLSOR58 | QWEST CORPORATION                       | DALLAS                           |
| EUGNOR28 | QWEST CORPORATION                       | EUGENE – RIVER ROAD              |
| EUGNOR53 | QWEST CORPORATION                       | EUGENE – 10 <sup>TH</sup> AVENUE |
| FLCYOR58 | QWEST CORPORATION                       | FALLS CITY                       |
| FLRNOR53 | QWEST CORPORATION                       | FLORENCE                         |
| GLHLOR55 | QWEST CORPORATION                       | GOLD HILL                        |
| GRPSOR29 | QWEST CORPORATION                       | GRANTS PASS                      |
| HMTNOR56 | QWEST CORPORATION                       | HERMISTON                        |
| INDPOR58 | QWEST CORPORATION                       | INDEPENDENCE                     |
| JCVLOR56 | QWEST CORPORATION                       | JACKSONVILLE                     |
| JFSNOR63 | QWEST CORPORATION                       | JEFFERSON                        |
| JNCYOR51 | QWEST CORPORATION                       | JUNCTION CITY                    |
| KLFLOR54 | QWEST CORPORATION                       | KLAMATH FALLS                    |
| LAPIOR52 | QWEST CORPORATION                       | LAPINE                           |
| LKOSOR62 | QWEST CORPORATION                       | LAKE OSWEGO                      |
| LWLLOR53 | QWEST CORPORATION                       | LOWELL                           |
| MDFDOR33 | QWEST CORPORATION                       | MEDFORD                          |
| MDRSOR52 | QWEST CORPORATION                       | MADRAS                           |
| MLTNOR56 | QWEST CORPORATION                       | MILTON-FREEWATER                 |
| MLWKOR17 | QWEST CORPORATION                       | MILWAUKIE                        |

**i-wireless Designated Service Area – Wire Center List  
(Excluding Tribal Lands)**

**EXHIBIT A  
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|          |                   |                                 |
|----------|-------------------|---------------------------------|
| NPLNOR62 | QWEST CORPORATION | NORTH PLAINS                    |
| NWPTOR35 | QWEST CORPORATION | NEWPORT                         |
| NYSSORXC | QWEST CORPORATION | NYSSA                           |
| ONTRORXC | QWEST CORPORATION | ONTARIO                         |
| ORCYOR18 | QWEST CORPORATION | OREGON CITY                     |
| ORSLORXC | QWEST CORPORATION | OREGON SLOPE                    |
| PHNXOR55 | QWEST CORPORATION | PHOENIX                         |
| PNTNOR   | QWEST CORPORATION | PENDLETON                       |
| PRVLOR53 | QWEST CORPORATION | PRINEVILLE                      |
| PTLDOR02 | QWEST CORPORATION | PORTLAND – CYPRESS              |
| PTLDOR08 | QWEST CORPORATION | PORTLAND – HAROLD               |
| PTLDOR11 | QWEST CORPORATION | PORTLAND – ALPINE               |
| PTLDOR12 | QWEST CORPORATION | PORTLAND – ATLANTIC             |
| PTLDOR13 | QWEST CORPORATION | PORTLAND – BELMONT              |
| PTLDOR14 | QWEST CORPORATION | PORTLAND – BUTLER               |
| PTLDOR17 | QWEST CORPORATION | PORTLAND – CHERRY               |
| PTLDOR18 | QWEST CORPORATION | PORTLAND – PROSPECT             |
| PTLDOR69 | QWEST CORPORATION | PORTLAND – CAPITOL              |
| RANROR01 | QWEST CORPORATION | RAINIER                         |
| RDMDOR01 | QWEST CORPORATION | REDMOND                         |
| RGRVOR55 | QWEST CORPORATION | ROGUE RIVER                     |
| RSBGOR57 | QWEST CORPORATION | ROSEBURG                        |
| SALMOR58 | QWEST CORPORATION | SALEM                           |
| SALMOR59 | QWEST CORPORATION | KEIZER                          |
| SESDOR64 | QWEST CORPORATION | SEASIDE                         |
| SLTZOR66 | QWEST CORPORATION | SILETZ                          |
| SPFDOR01 | QWEST CORPORATION | SPRINGFIELD                     |
| SPRVOR02 | QWEST CORPORATION | SPRING RIVER                    |
| SSTROR01 | QWEST CORPORATION | SISTERS                         |
| STFDOR56 | QWEST CORPORATION | STANFIELD                       |
| STHNOR40 | QWEST CORPORATION | SAINT HELENS                    |
| STHROR58 | QWEST CORPORATION | SUTHERLIN                       |
| TOLDOR66 | QWEST CORPORATION | TOLEDO                          |
| UMTLOR57 | QWEST CORPORATION | UMATILLA                        |
| VALEORXC | QWEST CORPORATION | VALE                            |
| VENTOR54 | QWEST CORPORATION | VENETA                          |
| WDBNOR59 | QWEST CORPORATION | WOODBURN                        |
| WLWLWA   | QWEST CORPORATION | WALLA WALLA<br>(OREGON PORTION) |
| WNTNOR57 | QWEST CORPORATION | WINSTON                         |
| WRTNOR64 | QWEST CORPORATION | WARRENTON                       |

**i-wireless Designated Service Area – Wire Center List  
(Excluding Tribal Lands)**

**EXHIBIT A  
DOCKET UM 1509**

|          |   |               |
|----------|---|---------------|
| WSPTOR64 | QWEST CORPORATION                         | WESTPORT      |
| HLSYORXB | ROOME TELECOMMUNICATIONS, INC.            | HALSEY        |
| SCIOORXA | SCIO MUTUAL TELEPHONE ASSOCIATION         | SCIO          |
| STPLORXX | ST PAUL COOPERATIVE TELEPHONE ASSOCIATION | ST PAUL       |
| STTNORXA | STAYTON COOPERATIVE                       | STAYTON       |
| ARTNORXA | UNITED TELEPHONE – NORTHWEST              | ARLINGTON     |
| BEVRORXA | UNITED TELEPHONE – NORTHWEST              | BEAVER        |
| BYCYORXA | UNITED TELEPHONE – NORTHWEST              | BAY CITY      |
| CODLORXA | UNITED TELEPHONE – NORTHWEST              | CLOVERDALE    |
| CRTOORXA | UNITED TELEPHONE – NORTHWEST              | CARLTON       |
| CSLCORXA | UNITED TELEPHONE – NORTHWEST              | CASCADE LOCKS |
| GRBLORXA | UNITED TELEPHONE – NORTHWEST              | GARIBALDI     |
| GRRNORXA | UNITED TELEPHONE – NORTHWEST              | GRANDE RONDE  |
| HDRVORXA | UNITED TELEPHONE – NORTHWEST              | HOOD RIVER    |
| LNCYORXX | UNITED TELEPHONE – NORTHWEST              | LINCOLN CITY  |
| MOROORXA | UNITED TELEPHONE – NORTHWEST              | MORO          |
| MOSRORXX | UNITED TELEPHONE – NORTHWEST              | MOSIER        |
| ODLLORXX | UNITED TELEPHONE – NORTHWEST              | ODELL         |
| PCCYORXX | UNITED TELEPHONE – NORTHWEST              | PACIFIC CITY  |
| RKWYORXA | UNITED TELEPHONE – NORTHWEST              | ROCKAWAY      |
| RUFSORXA | UNITED TELEPHONE – NORTHWEST              | RUFUS         |
| SHCVORXX | UNITED TELEPHONE – NORTHWEST              | SHADY COVE    |
| SHRDOR   | UNITED TELEPHONE – NORTHWEST              | SHERIDAN      |
| THDLOR   | UNITED TELEPHONE – NORTHWEST              | THE DALLES    |
| TLMKORXA | UNITED TELEPHONE – NORTHWEST              | TILLAMOOK     |
| WASCORXA | UNITED TELEPHONE – NORTHWEST              | WASCO         |
| WLMNORXB | UNITED TELEPHONE – NORTHWEST              | WILLAMINA     |
| WHCYOR   | UNITED TELEPHONE – NORTHWEST              | WHITE CITY    |

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

**EXHIBIT A  
DOCKET UM 1509**

| <b>Zip Code</b> | <b>City</b>   | <b>County</b> |
|-----------------|---------------|---------------|
| 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         |
| 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       |

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

**EXHIBIT A  
DOCKET UM 1509**

| <b>Zip Code</b> | <b>City</b>    | <b>County</b> |
|-----------------|----------------|---------------|
| 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     |
| 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     |

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

**EXHIBIT A  
DOCKET UM 1509**

| <b>Zip Code</b> | <b>City</b>    | <b>County</b> |
|-----------------|----------------|---------------|
| 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    |
| 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          |

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

**EXHIBIT A  
DOCKET UM 1509**

| <b>Zip Code</b> | <b>City</b>    | <b>County</b> |
|-----------------|----------------|---------------|
| 97361           | MONMOUTH       | POLK          |
| 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          |
| 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          |



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

**EXHIBIT A  
DOCKET UM 1509**

| <b>Zip Code</b> | <b>City</b>                | <b>County</b> |
|-----------------|----------------------------|---------------|
| 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       |
| 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      |

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

EXHIBIT A  
DOCKET UM 1509

| Zip Code | City             | County   |
|----------|------------------|----------|
| 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  |

Exhibit B – Revised Map of Designated Service Area  
Wire Centers and Zip Codes

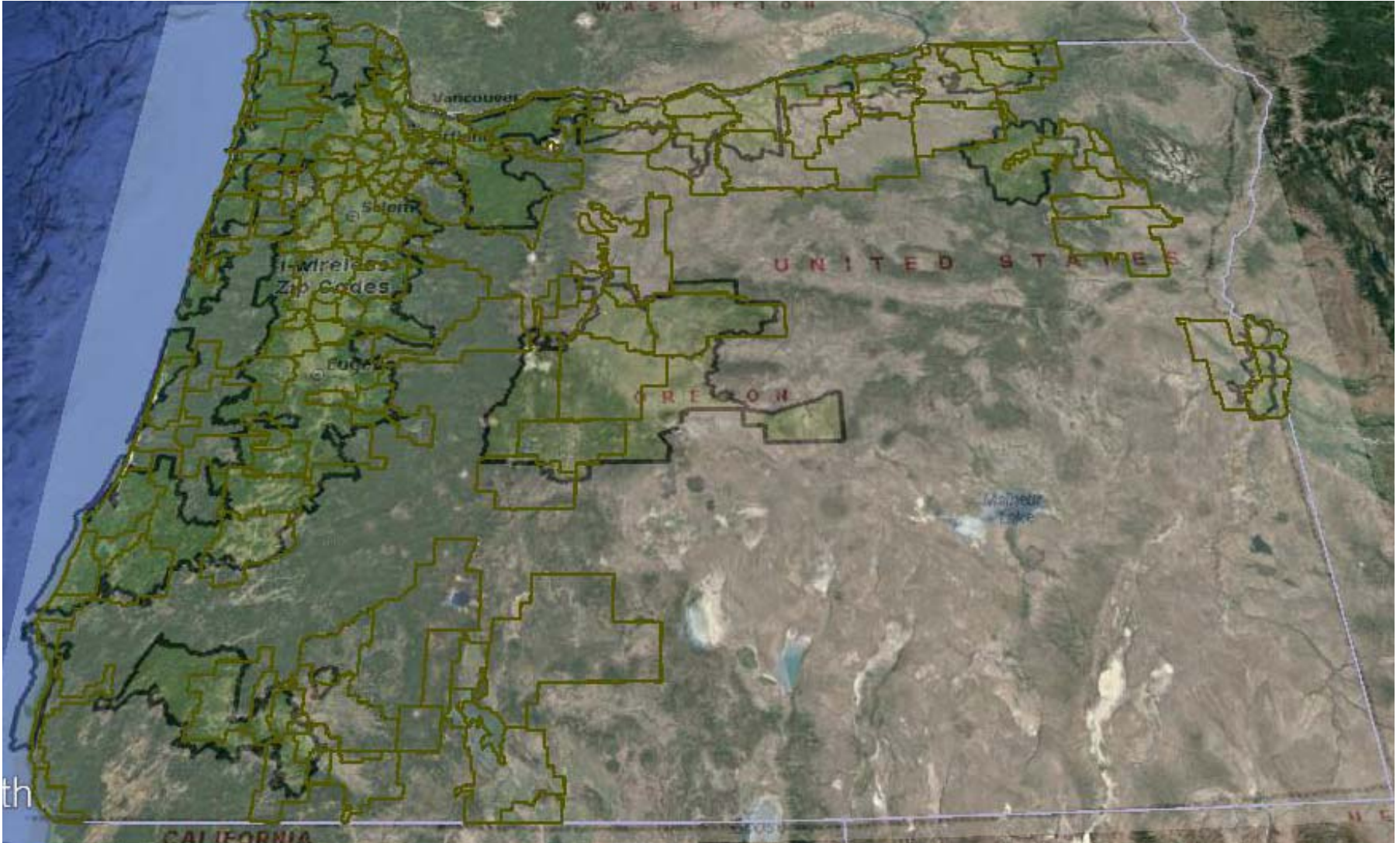


Exhibit C – Revised Coverage Map, with Designated Service Area  
Wireless signal strength for depicted coverage is at least 099 dBm

