

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM _____**

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

9 Wantel, Inc. d/b/a ComspanUSA (“Wantel”) respectfully submits this Application for
10 Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Sections 214(e)(1)-
11 (2) of the Telecommunications Act of 1934, as amended (“Act”),¹ and Section 54.201 of the
12 Federal Communications Commission’s (“FCC”) rules.² Wantel plans to build and operate a
13 state-of-the-art fiber optic network in the City of Bandon, Oregon, in order to offer customers
14 located in Bandon access to broadband telecommunications, data and video services. Because
15 Bandon is currently designated as a “high cost area,” Wantel requests that it be designated as an
16 ETC in the Bandon wire center, and that it be designated as eligible to receive all available
17 support from the federal Universal Service Fund (“USF”) including, but not limited to, interstate
18 access support for high cost areas and support for low income customers. Wantel is requesting
19 ETC status primarily to allow customers it will serve in the Bandon area to be eligible to receive
20 Oregon Telephone Assistance Program (“OTAP”) and Lifeline/Link Up assistance and because
21 designation as a federal ETC is effectively a prerequisite for participating in the Oregon
22 Universal Service Fund (“OUSF”).

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26 ¹ 47 U.S.C. § 214(e)(1)-(2).

² 47 C.F.R. § 54.201.

1 **I. APPLICANT**

2 Wantel is a competitive local exchange company (“CLEC”) and obtained its competitive
3 registration from the Public Utility Commission of Oregon (“OPUC” or “Commission”) on
4 August 20, 1999 under Order No. 99-507.

5 **II. ALLEGATION OF FACTS**

6 **A. Eligibility and Identification of the Service Area.**

7 Section 214(e)(2) of the Act provides that state commissions have the primary
8 responsibility for designating ETCs. Under Sections 214(e) and 254 of the Act, the OPUC is
9 authorized to designate Wantel as an ETC.

10 Attached as Exhibit A to Wantel’s application is a copy of an executed letter from Wantel
11 certifying that all federal universal service support it receives will be used only for the provision,
12 maintenance, and upgrading of facilities and services for which such support is intended. Wantel
13 submits a map of the general geographic area of its service territory as Exhibit B. Wantel’s
14 service area will mirror that of the incumbent local exchange carrier (“ILEC”) for Bandon,
15 Verizon Northwest Inc. (“Verizon”). In addition, Wantel attaches Exhibit C, which identifies the
16 wire center that constitutes the proposed service area with the following information: wire center
17 name, wire center CLLI code, and the corresponding ILEC study area name.

18 **B. The Legal Standard for Granting ETC Status.**

19 In order to obtain ETC designation, an applicant must demonstrate the following: (1) a
20 commitment and ability to provide the services to all customers in the area proposed to be
21 served; (2) emergency back up functionality; (3) that it meets applicable consumer protection
22 standards and service quality standards; (4) that local usage offered is comparable to that offered
23 by the ILEC; and (5) that the applicant understands that it may be required to provide equal
24 access if all other ETCs in the designated service area relinquish their designations.³

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³ *Id.* § 54.202(1).

1 As part of the commitment to provide services to all customers in the proposed area to be
2 served, the applicant must submit a five-year plan describing with specificity, on a wire center-
3 by-wire center basis, proposed improvements and upgrades to the applicant's network.⁴

4 III. SERVICES PROVIDED BY PETITIONER

5 In order to be designated an ETC, a common carrier must demonstrate pursuant to
6 Section 214(e)(2) that it offers services and agrees to offer and advertise the supported services
7 throughout the proposed ETC service area. In addition, the common carrier must meet the public
8 interest standard.

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

15 Wantel will offer the federally-designated services required by 47 C.F.R. Section
16 54.101(a): (1) voice grade access to the public switched network; (2) local usage; (3) dual tone
17 multi-frequency signaling or its functional equivalent; (4) single-party service or its functional
18 equivalent; (5) access to emergency services; (6) access to operator services; (7) access to
19 interexchange service; (8) access to directory assistance; and (9) toll limitation for qualifying
20 low-income consumers.

21 A. Voice Grade Access to the Public Switched Telephone Network.

22 An ETC must offer voice grade access to the public switched telephone network.⁵
23 Wantel will provide voice grade access to the public switched telephone network in accordance
24 with the FCC's definition.

26 ⁴ *Id.* § 54.202(a)(1)(ii).

⁵ *Id.* § 54.101(a)(1).

1 **B. Local Usage.**

2 FCC regulations require ETCs to provide unlimited local usage.⁶ Wantel provides
3 unlimited local usage. Wantel’s basic local usage plans are comparable to those of the ILEC,
4 Verizon. Wantel will mirror Verizon in defining the local calling areas and extended area
5 service (“EAS”). Attached is Exhibit D, which shows the residential and business basic local
6 service prices, as well as the prices for basic feature packages and other service prices.
7 Comparison with Verizon’s basic service prices demonstrates that Wantel’s prices are
8 comparable.

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

10 An ETC must provide dual tone multi-frequency signaling (“DTMF”) to facilitate the
11 transportation of signaling throughout its network.⁷ Wantel will provide DTMF signaling
12 throughout its network, consistent with FCC rules.

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

14 FCC regulations also require ETCs to provide single-party service or its functional
15 equivalent.⁸ “Single-party service” means that only one party will be served by a subscriber loop
16 or access line in contrast to a multi-party line.⁹ Wantel will provide single party service.

17 **E. Access to Emergency Services.**

18 The ability to reach a public emergency service provided by dialing 911 is a required
19 service in any universal service offering.¹⁰ Wantel will provide all of its customers with access
20 to emergency service by dialing 911. Wantel will offer E-911 throughout its calling area.

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25 ⁶ *Id.* § 54.101(a)(2).

26 ⁷ *Id.* § 54.101(a)(3).

⁸ *Id.* § 54.101(a)(4).

⁹ *Id.*

¹⁰ *Id.* § 54.101(a)(5).

1 **F. Access to Operator Services.**

2 Access to operator services is a required service for ETCs and is defined as any automatic
3 or live assistance provided to a consumer to arrange for the billing or completion, or both, of a
4 telephone call.¹¹ Wantel will provide customer access to operator services on 24/7 basis.

5 **G. Access to Interexchange Service.**

6 An ETC must offer consumers access to interexchange service to make and receive toll or
7 interexchange calls.¹² Wantel will meet this requirement by providing all of its customers with
8 the ability to make and receive interexchange or toll calls through interconnection arrangements
9 it has with several interexchange carriers (“IXCs”). Wantel is an equal access provider.

10 **H. Access to Directory Assistance.**

11 The ability to place a call to directory assistance is a required ETC service offering.¹³
12 Wantel customers will be able to obtain directory assistance from live operators.

13 **I. Toll Limitation for Qualifying Low Income Consumers.**

14 An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline
15 customers at no charge.¹⁴ In particular, an ETC must provide toll blocking, which allows
16 customers to block the completion of outgoing calls.¹⁵ Wantel will provide this service.

17 **J. Link Up and Lifeline Services.**

18 Wantel will offer Link Up and Lifeline services throughout the Bandon exchange. These
19 services will be made available in accordance with the guidelines as published and amended
20 from time to time by the federal agency or agencies that administer such programs.

21 **IV. FIVE-YEAR PLAN**

22 Wantel has developed and will file a Five-Year Plan (“Plan”) for the Bandon project after
23 a protective order has been signed in this docket. The Plan will demonstrate in detail how
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25 ¹¹ *Id.* § 54.101(a)(6).

¹² *Id.* § 54.101(a)(7).

¹³ *Id.* § 54.101(a)(8).

¹⁴ *Id.* § 54.101(a)(9).

¹⁵ *Id.* § 54.400(b).

1 Interstate Access Support (“IAS”) and OUSF support will be used for service improvements that
2 would not occur absent receipt of such support. Wantel will use the OUS funds to pay for the
3 build out and improvements required 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. Wantel’s long-term plan is to build out its network and use its own plant to provide
25 service in lieu of using the facilities or reselling the services of the incumbent, Verizon.
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1 Wantel is committed to provide service throughout its designated service area to all
2 customers who make a reasonable request for services. Further, Wantel agrees to provide service
3 to requesting customers where its facilities already exist, as well as to those in its service area but
4 outside its existing network coverage within a reasonable period of time and at a reasonable
5 cost.¹⁶ Wantel seeks to use the high cost support prudently, in a manner that will extend the
6 provision of its services to customers in the high cost area.

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

- 10 i. Basic telephone service including
- 11 ii. EAS
- 12 iii. E911 (included in all areas)
- 13 iv. Caller ID
- 14 v. Call Waiting w/Caller ID
- 15 vi. Call Forward
- 16 vii. Call Forward No Answer
- 17 viii. Call Rejection
- 18 ix. Call Transfer
- 19 x. Caller ID Block/Unblock
- 20 xi. Continuous Redial
- 21 xii. Call Forward Remote Access w/ Pin#
- 22 xiii. Last Call Return
- 23 xiv. Priority Call
- 24 xv. Selective Call Forwarding
- 25 xvi. Selective Call Acceptance
- 26 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

¹⁶ See attached Exhibit E (Wantel's original Application for OUS Support). Wantel envisions three circumstances in which it would refuse service to a potential customer: (1) A customer, who does not qualify for any assistance program, has poor credit and refuses to make a deposit, even when interim partial deposit payments are offered; (2) A customer who uses the service or equipment of Wantel to commit a crime; and (3) A customer who resides beyond any present facilities and beyond Qwest's base rate area and refuses to pay or make arrangements to pay for the line extension charges as set forth in the Qwest tariff by which Wantel will abide.

1 xxiv. BROADBAND INTERNET ACCESS UP TO 3MB

2 xxv. Pro-Pel dial-Up Accelerator

3 xxvi. Open Access to long distance 1 + dialing and choice of any PIC/LPCI

4 In addition, through the deployment of its fiber optic network, Wantel will be able to
5 provide improved basic and advanced services to its customers, including those in traditional
6 high cost areas. These improvements include high speed data services, as well as facilities that
7 will allow the provision of “triple play” services: voice, video, and high speed data. Wantel will
8 also provide access to several different ISPs in the area. Wantel’s plan to extend its fiber
9 infrastructure in its service area will be in the public interest, as it will then be able to offer
10 advanced services and increased reliability and capacity to its customers.

11 This infrastructure will allow customers to obtain advanced services that were previously
12 unavailable in high cost areas. By extending these advanced services, customers will be
13 provided with increased choice as well. Granting ETC status to Wantel will further serve to
14 achieve the national policy of extending these advanced services to all regions of the nation.¹⁷
15 These new customers will have access to voicemail, call waiting, caller identification, three way
16 calling, and last call return. In addition, Wantel will be extending high speed broadband service
17 to these customers. Providing these services to customers in high cost areas meets the public
18 interest goals for an ETC provider.

19 Service quality will increase for customers of Wantel in high cost areas. A review of the
20 Plan shows how the network upgrades (including those funded by the company) will extend
21 Wantel’s fiber network further into the high cost area. By doing so, this new infrastructure will
22 increase call and service quality in these areas. The result will be improved local access via new
23 facilities with fiber-optic runs to the neighborhood enabling more customer connections, more
24 reliable service, and a broader choice of features and benefits. Improved service quality will
25 result from the new infrastructure, fiber-optic transport, SONET ring topology, and newer state
26 of the art equipment in the field, customer premises and wire centers. Improved service quality

¹⁷ 47 U.S.C. § 254(b).

1 will also result from local involvement by consumers in the service area, enabled by Wantel's
2 walk-in offices located in the service area where customers can interact with Wantel employees
3 on a person-to-person basis as well as having Wantel's core technical staff on hand locally for
4 instant response to technical problems. There will also be more reliable emergency services due
5 to diverse traffic routing and SONET ring technologies, as well as eight-hour battery back-up
6 and generators distributed throughout Wantel's network as required.

7 In addition, designation of Wantel as an ETC is in the public interest because it will
8 promote competition. Competition promotes consumer benefits in the form of lower prices,
9 increased service quality, and innovation. As a competitor to the incumbent, Wantel must offer
10 prices that equal or are less than the incumbent's. It must also offer good service quality or it
11 will lose customers. Also, by designating Wantel as an ETC it will make available Lifeline and
12 Link Up, including OTAP, services to customers of Wantel in the Bandon area. For these
13 reasons designation of Wantel as an ETC is in the public interest.

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

15 Wantel presents its original Application for OUS Support as Exhibit E. In it, Wantel
16 certifies and agrees to provide its services to all customers for a reasonable cost within a
17 reasonable time frame.

18 **VIII. EQUAL ACCESS**

19 Wantel acknowledges that it must provide equal access in its service area. It further
20 acknowledges that should all other ETCs in its service area relinquish their designations, it must
21 continue to provide equal access.¹⁸

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

23 In order to be designated an ETC, the applicant must be able to demonstrate a reasonable
24 ability to remain functional in an emergency situation. There are three areas for demonstration:
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¹⁸ See Exhibit F, Wantel's Equal Access Script; Exhibit E, Wantel's original Application for OUS Support.

1 back-up power to ensure a functioning network; network redundancy for re-routing; and how
2 traffic spikes are addressed.

3 1. Back-up power

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

7 2. Network redundancy

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

11 Wantel's SS7 network is dual-homed to Tigard and Hillsboro and also terminates in
12 physically diverse paths over the company's network.

13 3. Traffic spikes.

14 Wantel has excess capacity on all its routes. As an example, Wantel has four DS1 trunks
15 to the Eugene Access Tandem, as well as four more FG-D trunks to the EUGNOR53C9T tandem
16 switch. With respect to standard interconnect trunking to the ILEC, Wantel meets or exceeds all
17 required grades of service and reviews traffic distribution on these facilities on a monthly basis,
18 with changes occurring as needed.

19 Wantel currently has two voice switches in its network, one tandem switch serving the
20 Wantel networks, and two interconnect trunks serving traffic between Bandon and the Wantel
21 Access Tandem in Roseburg

22 Extension to nodal presences using GR-303 type subscriber concentration is maintained
23 to meet or exceed 4:1, with concentration currently better than 4:1 (e.g. 3.8:1) being achieved.
24 This is also monitored on a monthly basis and additional GR-303 trunks provisioned as needed
25 to ensure a consistent level of service.

26 ¹⁹ 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.

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X. CONSUMER PROTECTION

Wantel is subject to the Oregon consumer protection laws. It also submits service quality reports to the Commission. Attached as Exhibit G is a summary of Trouble Reports, Provisioning Commitments, Held Orders, Access to Representatives for Repair and Business Office, and Call Blocking. Each of these standards have been met or surpassed by Wantel.

Respectfully submitted this 8th day of March, 2006.

ATER WYNNE, LLP

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Attorneys for Wantel d/b/a ComspanUSA

**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

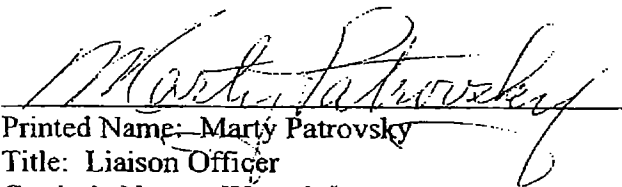
Re: CC Docket No. 96-45
Interstate Access Support – IAS
Annual Certification Filing

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

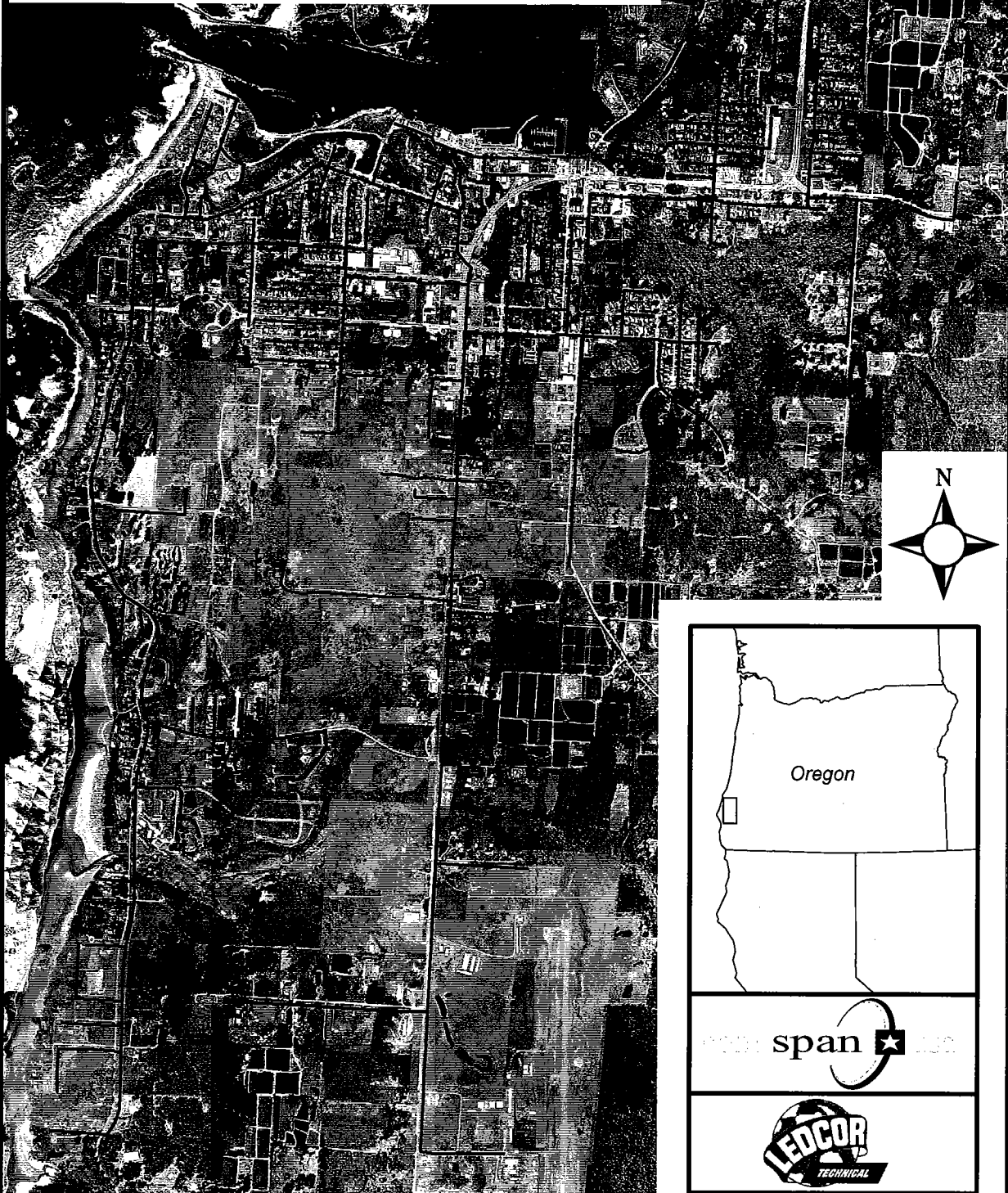
Signed,


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

Date: MAY 12TH 2005

Bandon FTTH Projected Service Area



Legend

Fiber —

Urban Growth Outside City Boundary

Oregon

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	CLLI Codes	ILEC Study Area
Bandon, OR	Wantel: BNDNOR02DS0 Verizon: BNDNORXXDS0	Verizon - Bandon

Annex G

Pricing & Packages Update From Feasibility Study

For Competitive reasons ComSpan believes it is inappropriate to reveal detailed pricing for all products nor go into great detail on every package or combination of services that we will be offering. Moreover, pricing continues to be competitive and we anticipate downward market pressure as we enter the market.

We have refined pricing from the original feasibility study and note that competitive offerings across the board make true comparisons nearly impossible. Features, speeds, channel line ups and etc. all vary from company to company. Based on a comparison of bills from potential customers and our current pricing model, customers will see base savings in the 4% to 15% range. In addition we will offer discounts for signing 1,2 or 3 year contracts that will add another 3% to 6% savings. Overall our analysis indicates that on average customers will realize savings in excess of 10%.

Voice Services:

Pricing for voice services continues to be complex and feature dependent. Our Residential Package #1 which includes 1 line, 3 features of your choice, extended area service plus 150 minutes of long distance service is \$46.09 including all taxes, fees and surcharges.

Add another feature plus increase long distance to 500 free minutes and still only pay \$58.52 per month.

On the business side a line with PBX trunking, call hunting and extended area service is only \$47.07 which when priced for one customer netted a greater than 12% savings and that is before any term discounts. With a term discount savings would be approaching 20%

Long distance service is now targeted to be at 5 cents per minute with none of the hidden fees that other companies charge. This represents as much as a 50% savings for many customers.

Data Services:

Data pricing has changed the most since the feasibility study. Not only has the amount of bandwidth increased and the prices dropped but pricing has become more complex. Competitive offerings now exist with or without static IP addresses, with varying numbers of email addresses, hosting options, support options and price points. Dedicated and VPN circuits for security have become important. Thus, while basic pricing has dropped, complexity is adding to the costs.

ComSpan will offer a symmetrical 256k service at \$19.95 which is a basic service priced at dial up prices. This price point will help proliferate broadband in the community and be one of, if not the lowest price in the nation for such service. Options will be available for service up to 7megs, which is anticipated to be priced with a static IP for business use at \$205. Pricing for dedicated service is anticipated to be at \$225 per meg.

All accounts will include 3 emails, 5 meg of personal web space and 7 x 24 support.

Video Services:

Pricing for video services appears to have remained fairly consistent since the feasibility study. Price increases come from the addition of new features such as DVR's. ComSpan anticipates offering a basic package at \$41.99, an intermediate package at \$63.99 and a Premium package at \$84.99.

Micro cast channels will be offered at no charge.

A typical channel line-up from one of the content aggregators with whom Comspan has had discussions is shown below (used with permission).

SEE NEXT PAGE

Exhibit A – Traditional Channel Line Up

BASIC	ENHANCED BASIC	ENHANCED BASIC (Cont.)	PREMIUM PACKAGES
Animal Planet	ABC Family Channel	Speed Channel	SHOWTIME & TMC
Arts & Entertainment (A&E)	American Movie Classics	Style	Showtime East
BET	BBC America	Tennis Channel	Showtime Extreme East
Biography Channel	BET on Jazz	TRIO	Showtime Extreme West
Bloomberg TV	Bravo	TV Land	Showtime Family East
Boomerang	CMT- Country Music TV	VH1 Classic Rock	Showtime Next East
Cartoon Network	CNBC World	VH1 Country	Showtime Showcase East
CNBC	CNN Headline News	VH1 Soul	Showtime Showcase West
CNN	CNN International	Wisdom TV	Showtime Too East
Comedy Central	Court TV		Showtime Too West
C-SPAN	C-SPAN 2		Showtime West
Discovery	C-SPAN 3 Extra		Showtime Women East
Discovery Travel Channel	Daystar Television Network		The Movie Channel East
Disney Channel	Discovery Health Network	SPECIAL INTEREST LATINO PACKAGE	The Movie Channel West
DMX 01 - 45 (45 Music Channels)	Discovery Home Channel		The Movie Channel XTRA East
E! Entertainment	Discovery Kids	CineLatino	The Movie Channel XTRA West
ESPN	Discovery Science Channel	CNN en Espanol	HBO & CINEMAX
ESPN 2	Discovery Times	Discovery en Espanol	HBO East
Food Network	Discovery Wings	ESPN Deportes	HBO West
Fox News Channel	ESPN Classic	Fox Sports en Espanol	HBO 2 East
Fox Sports Local	ESPN Now	Galavisión	HBO 2 West
Golf	ESPNews	HTV Musica	HBO Family East
History Channel	FitTV (Health Network)	MTV Espanol	HBO Family West
Home Shopping Network	FLIX	MUN2	HBO Signature East
INDEMAND PPV (4 Channels)	Fox College Sports Atlantic	Telemundo	HBO Signature West
Learning Channel (TLC)	Fox College Sports Central	Toon Disney en Espanol	HBO Comedy East
Lifetime	Fox College Sports Pacific	TVE Internacional	HBO Zone East
Local ABC Affiliate*	Fox Movie Channel	Univision	HBO Latino
Local CBS Affiliate*	Fox Sports World	Utilissima	Cinemax East
Local FOX Affiliate*	FUEL	VH Uno	Cinemax West
Local NBC Affiliate*	Fuse (Much Music)		More Max East
Local PBS Affiliate*	FX		More Max West
Local Programming (5 Channels)*	G4 Tech TV	ADULT	Action Max East
MSNBC	Gospel Music TV	Hot Choice	Thriller Max East
MTV	Great American Country	Playboy	STARZ & ENCORE
National Geographic	GSN - Game Show Network	Spice	Encore Action East
NewsWorld International	Hallmark Channel	Spice 2	Encore Action West
Nickelodeon	HGTV	The Hot Network	Encore East
Outdoor Channel	History Channel International		Encore Love East
Oxygen	Horse Racing TV		Encore Love West
PAX TV	-Lifetv (Inspirational Life)		Encore Mystery East
Sci-Fi Channel	Independent Film Channel		Encore Mystery West
Shop At Home	International Channel		Encore True Stories East
ShopNBC	Lifetime Movie Network		Encore True Stories West
Spike TV	Lifetime Real Women		Encore West
TBN - Trinity Broadcast Ntwk	MBC Ntwk (Black Family Chnl)		Encore Westerns East
TBS	MTV 2		Encore Westerns West
The Word Network	MTV HITS		Starz! Cinema East
TNT	NBTV		STARZ! East
Toon Disney	Nick Games & Sports		Starz! Family East
Turner Classic Movies	Nick Too		Black Starz!
USA Network	NickToons		Starz! Kids East
VH 1	Noggin		Starz! Theater East
WE (Women's Entertainment)	Outdoor Life		Starz! Theater West
Weather Channel	Ovation		STARZ! West
WGN Superstation	Soapnet		WAM!

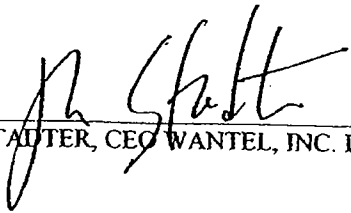
* Up to 10 local off-air (ABC, NBC, CBS, Fox, etc...) or locally generated channels are also included.

** HDTV programming is available.

Application for OUS Support Eligibility

1. The WANTEL, INC. DBA COMSPANUSA agrees to offer throughout each designated service area identified under Question 4, basic telephone service using the WANTEL, INC. DBA COMSPANUSA's own subscriber plant (i.e., loop facilities), leased UNE loop facilities, or resale of another carrier's retail service. Basic telephone services (as defined in OAR 860-0324) 190) shall be offered at least on a stand-alone basis without discrimination in regard to price, terms, conditions, service quality, service delays, and other actions designed to limit or selectively serve only certain customers or certain locations within the service area.
2. The WANTEL, INC. DBA COMSPANUSA agrees to advertise, not less than once per year, in a media of general distribution throughout the service area the availability and prices of the basic telephone services provided by the WANTEL, INC. DBA COMSPANUSA.
3. The WANTEL, INC. DBA COMSPANUSA agrees to offer reduced residential rates to eligible low-income customers pursuant to the Oregon Telephone Assistance Program (OTAP). See OAR 86()-334) 001 through 0046.
4. The WANTEL, INC. DBA COMSPANUSA agrees to not deny or disconnect basic service to an OTAP customer for failure to pay toll charges.
5. The WANTEL, INC. DBA COMSPANUSA agrees to not require a deposit from OTAP customers who voluntarily elect to receive toll-blocking service. See OAR 860-021-0200(5).
6. The WANTEL, INC. DBA COMSPANUSA accepts and agrees to be bound by all the obligations and duties for interconnection as set forth in the Federal Telecommunications Act of 1996, Sections 251(a) and (b).
7. The WANTEL, INC. DBA COMSPANUSA agrees to maintain accurate monthly basic service line count records in each of the service and support areas for which eligibility is sought. These records must indicate what basic service is provided and how (i.e. via resale leased UNE loops, or owned loop facility). The records must be available for review and audit by the PUC.
8. The WANTEL, INC. DBA COMSPANUSA understands that the PUC requires competitive ETCs to build their own loop facilities to serve customers if no loop facilities currently exist Pursuant to PUC Order No.00-312, page 32).

WANTEL, INC. DBA COMSPANUSA UNDERSTANDS ALL OF TITLE ABOVE CONDITIONS AND AGREES TO ABIDE BY ALL APPLICABLE COMMISSION RULES, State LAW, AND TITLE CONDITIONS OF CERTIFICATION AND LEC OUS FUND ELIGIBILITY



JOHN STAUTER, CEO WANTEL, INC. DBA COMSPANUSA

Date: 9/29/04

PUC Form OUS 4

Oregon Universal Service (OUS) Application for OUS Support Eligibility

Company ID #: 7439

Instructions: This application is to be completed and mailed to the Public Utility Commission of Oregon (PUC). A copy of this application and the service areas for which eligibility is requested are to be simultaneously mailed to the incumbent local exchange carrier (LEC). Attach additional sheets if needed to complete responses. OUS information and listing of qualifying service and support areas are available at: www.puc.state.or.us

Block 1: Applicant Identification and Service Plan

1.	Legal name of applicant (OUS 1 Worksheet, line 1): WANJEL, INC
2.	Name or names that the applicant is doing business as (OUS 1 Worksheet, line 2): COMSPANUSA

3. Do you have an Oregon Certificate of Authority to provide local exchange (i.e., intraexchange) switched service?

Yes. If Yes: Docket No. Order No.

No. If No: STOP—You must have a current Oregon Certificate of Authority to operate as a LEC and be eligible to receive OUS support. The certificate must include the service areas identified in Question 4.

4. List below or on a separate sheet all service areas (i.e., incumbent LEC exchange areas) for which you seek eligibility.

	Service (Exchange) Area	Incumbent LEC
1	ROSEBURG	QWEST
2	SUTHERLIN	QWEST
3	WINSTON	QWEST
4		

5. Describe on a separate sheet, in detail, the applicant's business plan. The plan should include what services the applicant will provide, how it will provide them, and the initial rates proposed for basic services. The plan must also provide some explanation as to the applicant's current or near-term capability to accomplish the eligibility conditions set forth in Block 2 (page 2 of this application).

(Because the business plan may contain confidential information, it need not be mailed to the incumbent LEC.)

6. Both the FCC and PUC require that all LECs provide dialing parity. See 47 CFR 51.209 and 51.213(b). See also FCC Order 99-054, and PUC Orders 97-107 and 97-238. Does the applicant currently provide dialing parity?

Yes. If Yes: Was your plan filed with and approved by the PUC? Yes. No.

* If no, then please file your dialing parity plan with this application omitting item (b) implementation schedule

No. If No: Please file your dialing parity plan and implementation schedule with this application.

Dialing parity plans must include the following:

- (a) An explanation of how the LEC will offer inter- and intraLATA dialing parity.
- ~~(b) Proposed implementation schedule by exchange.~~
- (c) Method of customer notification and business office practice. The notification and business practices must be competitively neutral.

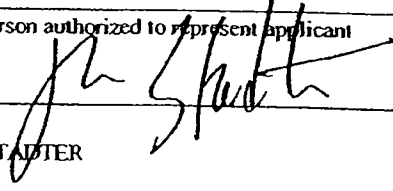
Oregon Universal Service (OUS) Application for OUS Support Eligibility

Block 2: Conditions for OUS Support Eligibility

These conditions apply in addition to the general conditions of certification. Violation of these conditions or misrepresentation of information provided to the PUC or OUS administrator in the course of administering the OUS Fund may result in cancellation of your certificate and refund with interest and penalties of any OUS support distributed under false information. See PUC Order 00-312.

1. The applicant agrees to offer throughout each designated service area identified under Question 4, basic telephone service using the applicant's own subscriber plant (i.e., loop facilities), leased UNE loop facilities, or resale of another carrier's retail service. Basic telephone services (as defined in OAR 860-032-0190) shall be offered at least on a stand-alone basis without discrimination in regard to price, terms, conditions, service quality, service delays, and other actions designed to limit or selectively serve only certain customers or certain locations within the service area.
2. The applicant agrees to advertise, not less than once per year, in a media of general distribution throughout the service area the availability and prices of the basic telephone services provided by the applicant.
3. The applicant agrees to offer reduced residential rates to eligible low-income customers pursuant to the Oregon Telephone Assistance Program (OTAP). See OAR 860-33-0001 through 0046.
Note: The grant of eligibility by the Commission for OUS support also grants eligibility for OTAP participation in the service areas identified in Question 4.
4. The applicant agrees to not deny or disconnect basic service to an OTAP customer for failure to pay toll charges. OAR 860-021-0335(4)(b).
5. The applicant agrees to not require a deposit from OTAP customers who voluntarily elect to receive toll-blocking service. See OAR 860-021-0200(5).
6. The applicant accepts and agrees to be bound by all the obligations and duties for interconnection as set forth in the Federal Telecommunications Act of 1996, Sections 251(a) and (b).
7. The applicant agrees to maintain accurate monthly basic service line-count records in each of the service and support areas for which eligibility is sought. These records must indicate what basic service is provided and how (i.e., via resale, leased UNE loops, or owned loop facility). The records must be available for review and audit by the PUC.
8. The applicant understands that the PUC requires competitive ETCs to build their own loop facilities to serve customers if no loop facilities currently exist (see PUC Order No. 00-312, page 32).

APPLICANT UNDERSTANDS ALL OF THE ABOVE CONDITIONS AND AGREES TO ABIDE BY ALL APPLICABLE COMMISSION RULES, STATE LAW, AND THE CONDITIONS OF CERTIFICATION AND LEC OUS FUND ELIGIBILITY (CHECK BOX AT LEFT).

Signature of person authorized to represent applicant 	Title CEO
Printed Name JOHN STAUDTER	Date AUGUST <u>31</u> 2004

EQUAL ACCESS SCRIPT

ms. Jones would you like to change your long distance provider?
Yes

Please let me take a moment to explain how State and Federal regulations require this to be done.
You have a choice of any long distance carrier you wish and can have two different carriers if you wish.
There are two different types of long distance, IntraLata and InterLata.

IntraLata long distance is when you call from Roseburg (insert local customer location) to Eugene or Grants Pass.
InterLata long distance is when you call from Roseburg (insert local customer location) to Seattle or Portland.

Note: in the above two examples substitute proper second locations for the customer such as if customer is in Coos Bay you would use examples of calling to Roseburg and Grants Pass and could still use Seattle and Portland for the InterLata destinations.

We have a list of available long distance companies for you to choose from, or you may keep the one(s) you have or use ComspanUSA long distance. Would you like me to send you a printed list?

At this point the transaction can be concluded if the customer stays with present carrier or comes to ComspanUSA.

If they want a list mailed to them do so and schedule a callback for their choice of carrier(s).



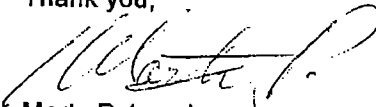
Community Headquarters
1012 SE Oak Avenue, Suite 200
Roseburg, OR 97470

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.
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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.

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Thank you,

Marty Patrovsky
Liaison Officer