

# McDowell & Rackner PC



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June 1, 2007

## VIA ELECTRONIC FILING

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: Docket UM \_\_\_\_\_**

Enclosed for filing, please find the following documents:

1. Application of Wantel, Inc. d/b/a ComspanUSA for Approval of Eligibility to Participate in the Oregon Universal Service Fund; and
2. Affidavit of Jan Summarell.

Please note that we are filing an unsigned copy of Mr. Summarell's affidavit and will file the original signed and notarized copy at a later date.

Very truly yours,

A handwritten signature in black ink that reads "Lisa Rackner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lisa F. Rackner

Enclosures

cc: Eugene Eng, Verizon Northwest, Inc.

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM \_\_\_\_\_

Application of WANTEL, INC., d/b/a  
ComspanUSA for Approval of Eligibility to  
Participate in the Oregon Universal Service  
Fund.

APPLICATION

I. INTRODUCTION

Wantel, Inc. d/b/a ComspanUSA ("Wantel") respectfully submits this Application for Approval of Eligibility to Participate in the Oregon Universal Service Fund ("OUSF") in the Coquille wire center ("Application"). The Public Utility Commission of Oregon (the "Commission") has already granted Wantel's federal Application for Designation as an Eligible Telecommunications Carrier for the Coquille wire center ("Federal ETC Application")<sup>1</sup> finding that it has satisfied all of the requirements for federal ETC status.<sup>2</sup> A copy of Wantel's Federal ETC Application is appended hereto as Exhibit A, and incorporated by reference. In addition, Wantel will be submitting its Application for Eligibility to receive OTAP funds in the Coquille Wire Center, and expects to receive approval of that Application prior to a decision on this Application.

Wantel seeks eligibility for participation in the OUSF to assist it in financing, operating and maintaining a state-of-the-art fiber optic network in the City of Coquille. When the network is completed, Wantel will offer customers located throughout the wire center access to voice, broadband, data, and video services. *No other carrier has built a fiber-to-*

<sup>1</sup> The Federal ETC Application was filed pursuant to the federal Telecommunications Act of 1996, 47 U.S.C. § 214(e)(1)-(2).

<sup>2</sup> See Order No. 06-681, issued May 29, 2007 in UM 1307.

1 *the-home network providing these services to Coquille's citizens, and to date, no other*  
2 *carrier has announced an intention to do so.*<sup>3</sup>

3 The Commission has already granted Wantel federal and state ETC status in the  
4 Winston, Sutherlin, Roseburg and Bandon wire centers.<sup>4</sup> The Commission has also granted  
5 Wantel both federal and state ETC status in Bandon.<sup>5</sup> Since that time the Company has  
6 invested monies received from OUSF funds to provide customers in Winston, Sutherlin,  
7 Roseburg and Bandon with its state-of-the-art fiber-based services. In making this  
8 Application, Wantel requests the opportunity to make similar investments in Coquille and  
9 thus to extend its cutting edge services throughout the wire center.<sup>6</sup>

10 Because it has satisfied all of the requirements for participation in the OUSF, and  
11 because the evidence shows that Wantel's investments will continue to serve the public  
12 interest, the Commission should grant Wantel's Application.

## 13 II. BACKGROUND

### 14 A. Applicant

15 Wantel is a competitive local exchange carrier ("CLEC") and obtained its certificate of  
16 authority to offer telecommunications services as a competitive provider from the  
17 Commission on August 20, 1999 under Order No. 99-507. Wantel provides various  
18 telephone services, including, for example, dial tone (POTS), long distance, OS/DA, E911,  
19 EAS, OTAP, Link-Up, and Lifeline.

20 <sup>3</sup> It is true that Wantel may use the OUSF monies it receives for basic local exchange  
21 services only, and Wantel has pledged to use the OUSF monies only to support basic local exchange  
22 services. See Affidavit of Jan Summarell, dated June \_\_, 2007 attached hereto as Exhibit B.  
However, the availability of Wantel's advanced services will result in additional consumer benefits.

23 <sup>4</sup> Order No. 5-856, entered July 14, 2005 in UM 1202 (Winston, Sutherlin and Roseburg  
federal ETC status); Order No. 06-681, issued December 21, 2006 in UM 1255 (Bandon federal ETC  
24 status); Order No. 07-116 issued April 2, 2007 (Bandon state ETC status); and Order No. 06-081,  
entered February 23, 2006 in UM 1190 (Sutherlin, Winston and Roseburg state ETC status).

25 <sup>5</sup> Order Nos. 06-681 (federal ETC status) and 07-116 (state ETC status).

26 <sup>6</sup> See Five Year Network Improvement Plan, filed in UM 1255 on Oct. 27, 2006.

1 **B. Eligibility and Identification of the Service Area.**

2 Wantel submitted a map of the Coquille service area with its service area boundary  
3 highlighted in yellow as Exhibit A to the Federal ETC Application. Wantel's service area will  
4 mirror that of the incumbent local exchange carrier ("ILEC") for Coquille, Verizon Northwest,  
5 Inc. ("Verizon"). In addition, Wantel attached Exhibit B to its Federal ETC Application, which  
6 identifies the wire center that constitutes the proposed service area with the following  
7 information: wire center name, wire center CLLI code, and the corresponding ILEC study  
8 area name. Wantel proposes to include the entire Coquille wire center in its service area.

9 **C. Facilities Used to Offer Supported Services**

10 Wantel currently uses fiber-to-the-home with a switch in Coquille linked to its long  
11 distance access tandem in Roseburg and uses the latest Hitachi GPON to provide federally-  
12 designated services. Wantel's interconnection agreement relevant to the Coquille wire  
13 center is the Interconnection Agreement between AT&T Communications of the Pacific  
14 Northwest, LLC and Verizon that was approved by the Commission in Order No. 99-028,  
15 Docket ARB 5. Wantel adopted the Interconnection Agreement in Docket ARB 490 on May  
16 27, 2003.

17 **III. CRITERIA FOR ELIGIBILITY**

18 In UM 731 the Commission first considered the eligibility requirements for  
19 participation in the OUSF. The Commission found that in order to participate in the Oregon  
20 fund, a carrier would be required to demonstrate that it satisfied all of the criteria established  
21 for participation in the federal Universal Service Fund ("USF"), as well as two additional  
22 criteria proposed by Commission Staff.<sup>7</sup> Through its application for federal ETC status, and  
23 this Application, Wantel clearly satisfies all fourteen requirements. A discussion of each

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26 <sup>7</sup> Order No. 00-312.

1 requirement, and the evidence produced by Wantel in satisfaction of each requirement,  
2 follows:

3 **Requirement No. 1 Wantel must offer, throughout the designated service area,**  
4 **services we have defined to be basic local exchange services,**  
5 **using the carrier's own facilities, leased UNE facilities, or a**  
6 **combination of its own or leased facilities and resale of another**  
7 **carrier's retail services.**

8 In its Federal ETC Application, Wantel established its commitment to provide basic  
9 local exchange services in a timely fashion to all customers in the Coquille wire center. In  
10 that application Wantel explained that, eventually, it plans to serve all customers in the wire  
11 center using its own facilities. However, its facilities are not yet built out to every household  
12 in the wire center. Thus, in the event Wantel receives a request for service from a customer  
13 whom it cannot immediately serve using its own facilities, Wantel will initially serve the  
14 customer using facilities leased or resold from Verizon.<sup>8</sup>

15 In its recommendation in support of Wantel's Federal ETC Application, Staff found  
16 that Wantel was committed to provide the requisite services to all customers in the Coquille  
17 wire center. Specifically Staff stated:

18 Wantel currently offers all required supported services  
19 including a local usage plan comparable to that of the  
20 incumbent's in its currently designated service area. Wantel  
21 commits to provide all supported services in Coquille.<sup>9</sup>

22 In addition Staff stated:

23 Wantel commits to provide timely service to all requesting  
24 customers, and will lease facilities or resell Verizon service if it  
25 cannot initially serve a customer using its own facilities.<sup>10</sup>

26 <sup>8</sup> Federal ETC Application at 8.

<sup>9</sup> Order No. 07-210, Appendix A at 3.

<sup>10</sup> *Id.* at 3.

1 Finally, in approving Wantel's Federal ETC Application, the Commission implicitly  
2 found that Wantel had fulfilled the two federal requirements analogous to this state OUSF  
3 Requirement No. 1—*i.e.*, "Commitment and ability to provide all supported services;" and  
4 "Commitment and ability to provide supported services throughout the designated service  
5 area." Thus, based on the confirmation provided herein and in the Federal ETC Application,  
6 the Commission should find that Wantel has fulfilled Requirement No. 1.

7 **Requirement No. 2 Advertise in media of general distribution through the**  
8 **designated service area the availability and prices of supported**  
9 **basic local exchange services;**

9 In its Federal ETC Application, Wantel explained that it plans to advertise the  
10 availability of each of the supported services throughout its licensed service area by media  
11 of general distribution. Wantel explained that such advertising might include newspaper,  
12 magazine, radio, direct mailings, etc. Wantel further explained that it would distribute  
13 literature offering Lifeline and Link-Up service to senior services, hospitals, clinics, etc.<sup>11</sup>

14 In its recommendation to the Commission, Staff confirmed Wantel's commitment to  
15 advertising the supported services—a view that was adopted by the Commission in  
16 approving Wantel's Federal ETC Application.<sup>12</sup> Therefore the Commission should find that  
17 Wantel has satisfied Requirement No. 2.

18 **Requirement No. 3 Offer Oregon Telephone Assistance (OTAP) in compliance with**  
19 **Oregon Administrative Rules 860-033-0046;**

20 Wantel has agreed to provide OTAP in compliance with Oregon law. Wantel already  
21 provides this service in the Winston, Sutherlin, Roseburg and Bandon wire centers,<sup>13</sup> and  
22 expects to receive authority to do so in Coquille as well.

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24 <sup>11</sup> See Federal ETC Application at 7.

25 <sup>12</sup> Order No. 07-210, Appendix A at 3.

26 <sup>13</sup> See Order No. 05-926 issued on August 18, 2005 in UM 1212.

1 In its recommendation to the Commission regarding Wantel's Federal ETC  
2 Application, Staff states: "Wantel commits to offer federal Lifeline and Link Up discounts, as  
3 well as state OTAP discounts, to qualifying low-income customers."<sup>14</sup> Therefore the  
4 Commission should find that Wantel has satisfied Requirement No. 3.

5 **Requirement No. 4 Not deny or disconnect basic local exchange service to an OTAP**  
6 **customer for failure to pay for toll charges;**

7 Wantel agrees to fulfill all requirements for providing OTAP service, including the  
8 requirement not to deny or disconnect local exchange service for failure to pay toll charges.  
9 Therefore the Commission should find that Wantel has satisfied Requirement No. 4.<sup>15</sup>

10 **Requirement No. 5 Not require a deposit from OTAP customers who voluntarily elect**  
11 **to receive toll-blocking service;**

12 Wantel agrees to fulfill all requirements for providing OTAP service including the  
13 requirement not to demand a deposit from customers who voluntarily elect to receive toll-  
14 blocking service.<sup>16</sup> Therefore the Commission should find that Wantel has satisfied  
15 Requirement No 5.

16 **Requirement No. 6 Accept the duty to interconnect directly or indirectly with the**  
17 **facilities and equipment of other telecommunications carriers;**

18 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
19 Act, and commits to doing so with this Application<sup>17</sup>. Therefore the Commission should find  
20 that Wantel has satisfied Requirement No. 6.

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23 <sup>14</sup> Order No. 07-210, Appendix A at 4.

24 <sup>15</sup> See Summarell Affidavit, ¶ 4.

25 <sup>16</sup> See Summarell Affidavit, ¶ 5.

26 <sup>17</sup> See Summarell Affidavit, ¶ 6.

1 **Requirement No. 7 Not install network features, functions or capabilities that do not**  
2 **comply with the Telco Act's requirements for access by persons**  
3 **with disabilities and coordination for interconnectivity;**

4 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
5 Act, and commits to doing so with this Application.<sup>18</sup> Therefore the Commission should find  
6 that Wantel has satisfied Requirement No. 7.

7 **Requirement No. 8 Not prohibit or impose unreasonable or discriminatory**  
8 **conditions or limitations on the resale of telecommunications**  
9 **services;**

10 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
11 Act, and commits to doing so with this Application.<sup>19</sup> Therefore the Commission should find  
12 that Wantel has satisfied Requirement No. 8.

13 **Requirement No. 9 Provide, to the extent technically feasible, number portability in**  
14 **compliance with FCC rules;**

15 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
16 Act, and commits to doing so with this Application.<sup>20</sup> Therefore the Commission should find  
17 that Wantel has satisfied Requirement No. 9.

18 **Requirement No. 10 Provide dialing parity to other telecommunications providers;**

19 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
20 Act and commits to doing so with this Application.<sup>21</sup> Therefore the Commission should find  
21 that Wantel has satisfied Requirement No. 10.  
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23 <sup>18</sup> See Summarell Affidavit, ¶ 7.

24 <sup>19</sup> See Summarell Affidavit, ¶ 8.

25 <sup>20</sup> See Summarell Affidavit, ¶ 9.

26 <sup>21</sup> See Summarell Affidavit, ¶ 10.



1 **Requirement No. 11 Provide access to rights-of-way to other telecommunications**  
2 **carriers;**

3 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
4 Act and commits to doing so with this Application.<sup>22</sup> Therefore the Commission should find  
5 that Wantel has satisfied Requirement No. 11.

6 **Requirement No. 12 Establish reciprocal compensation arrangements for the**  
7 **transport and termination of telecommunications.**

8 Wantel is obligated to fulfill this requirement under the federal Telecommunications  
9 Act, and commits to doing so with this Application.<sup>23</sup> Therefore the Commission should find  
10 that Wantel has satisfied Requirement No. 12.

11 **Requirement No. 13 Provide supported services on a standalone basis.**

12 Wantel does and will continue to provide all supported services on a standalone  
13 basis.<sup>24</sup> To fulfill this requirement Wantel offers residential single line, POTSS service with  
14 unlimited local calling at \$14.75 a month exclusive of all taxes, fees or surcharges.

15 **Requirement No. 14 Build its own loop facilities to serve a customer where no**  
16 **facilities currently exist.**

17 Wantel established in its Federal ETC Application that it plans to build out its network  
18 to reach all customers within the Coquille wire center,<sup>25</sup> and commits to doing so in this  
19 Application.<sup>26</sup> Wantel's Five Year Plan, filed with its Federal ETC Application, shows how  
20 Wantel will use the OUSF support it expects to receive to build out a fiber-based network  
21 that will enable existing and new customers to have access to high quality reliable and

22 \_\_\_\_\_  
23 <sup>22</sup> See Summarell Affidavit, ¶ 11.

24 <sup>23</sup> See Summarell Affidavit, ¶ 12.

25 <sup>24</sup> See Summarell Affidavit, ¶ 13.

26 <sup>25</sup> Order No. 00-312.

<sup>26</sup> See Summarell Affidavit, ¶ 14.

1 efficient advanced residential and business service.<sup>27</sup> Therefore the Commission should  
2 find that Wantel has satisfied Requirement No. 14.

3 **Additional Requirements Imposed in Order No. 06-081.**

4 Finally in its order granting Wantel state ETC status in the Sutherlin, Winston and  
5 Roseburg wire centers, the Commission imposed two additional requirements on Wantel.  
6 First, the Commission ordered that the sharing of per-line support amounts with Qwest must  
7 be calculated based on current percentages, with no true-ups or disbursements if  
8 percentages are revised.<sup>28</sup> In addition, Wantel was ordered to abide by all rules related to  
9 OUSF participation, including maintaining its state certification and federal eligibility  
10 telecommunication carrier status.<sup>29</sup>

11 In this application Wantel agrees to abide by these two conditions with respect to its  
12 participation in the OUSF in the Coquille wire center as well.<sup>30</sup>

13 **IV. CONCLUSION**

14 Wantel has demonstrated that it satisfies (or will satisfy) all of the criteria for eligibility  
15 to participate in the OUSF. Most importantly, as the Commission found in UM 1255,  
16 granting Wantel's petition is in the public interest. Wantel will use the monies it receives  
17 from both the state and federal universal service funds to help finance its plan to offer  
18 enhanced voice, high speed broadband, data, and video services over a state-of-the-art IP-  
19 enabled network. Wantel is committed to providing service throughout its designated  
20 service area to all customers who make a request for services. Wantel is currently able to  
21 serve most customers in the Coquille wire center via Wantel's own facilities, and is prepared  
22 to serve customers outside its existing network coverage within a reasonable period of time

23 <sup>27</sup> See *a/so* discussion of Requirement No. 1 above.

24 <sup>28</sup> See Order No. 06-081, issued Feb. 23, 2006 in UM 1190.

25 <sup>29</sup> *Id.* at 2.

26 <sup>30</sup> See Summarell Affidavit, ¶¶ 15 and 16.

1 and at a reasonable cost, using UNEs leased from Verizon, or resold Verizon services. In  
2 the longer term, Wantel plans to use the high-cost support prudently, and to extend reach of  
3 its own facilities to virtually all of the customers in the wire center areas.

4 Wantel will offer Coquille customers all of the same services that are currently  
5 offered by Verizon. In addition, through the deployment of its fiber-optic network, Wantel will  
6 be able to provide improved basic and advanced services to its customers, including those  
7 in traditional high cost areas. These improvements include voice, high-speed data services,  
8 video, and access to several different ISPs in the area—services that have not been  
9 available to customers in the Coquille wire center to-date.

10 In addition, service quality will increase for customers of Wantel in high cost areas.  
11 A review of the Wantel's Five Year Plan shows how the network upgrades will extend  
12 Wantel's fiber network further into the high-cost area. This new infrastructure will increase  
13 call and service quality in these areas. The result will be improved local access via new  
14 facilities with fiber-optic runs to the neighborhood enabling more customer connections,  
15 more reliable service, and a broader choice of features and benefits.

16 Finally, granting Wantel's petition will allow the company to compete on equal footing  
17 with the incumbent carrier. Competition promotes consumer benefits in the form of lower  
18 prices, increased service quality, and innovation. Also, if this Application is granted, Wantel  
19 will be authorized to make available Lifeline and Link-Up, including OTAP, services to  
20 customers of Wantel in the Coquille area. For these reasons the Commission should grant  
21 Wantel's Application.

22 DATED: June 1, 2007.

MCDOWELL & RACKNER PC

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Lisa F. Rackner

25 Of Attorneys for Wantel, Inc. d/b/a  
26 ComspanUSA

**EXHIBIT A**

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM \_\_\_\_\_

Application of Wantel, Inc. d/b/a  
ComspanUSA for Designation as an Eligible  
Telecommunications Carrier in the Coquille  
Wire Center Pursuant to the  
Telecommunications Act of 1996 – Non-  
Rural Areas

APPLICATION

I. INTRODUCTION

Wantel Inc, d/b/a ComspanUSA ("Wantel") respectfully submits this Application for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to §§ 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended (the "Act"),<sup>1</sup> and § 54.201 of the Federal Communications Commission's (the "FCC") rules.<sup>2</sup> Wantel first received designation as an ETC in 2005 in the Roseburg, Sutherlin, and Winston wire centers<sup>3</sup> and in 2006 in the Bandon wire center.<sup>4</sup> Since that time Wantel has served customers in all four wire centers. In this Application, Wantel requests that the Commission extend its designation as an ETC in the Coquille wire center.

Wantel seeks this extension of its ETC status to assist it in financing a state-of-the-art fiber optic network in the City of Coquille. When the network is completed, Wantel will offer customers located in Coquille access to broadband telecommunications, data, and video services. Because Coquille is currently designated as a "high cost area," Wantel requests that it be designated as an ETC eligible to receive all available support from the federal Universal Service Fund ("USF") including, but not limited to, interstate access

<sup>1</sup> 47 U.S.C. § 214(e)(1)-(2).  
<sup>2</sup> 47 CFR § 54.201.  
<sup>3</sup> Order 05-926, Docket UM 1212 (Aug. 18, 2005).  
<sup>4</sup> Order No. 06-681, Docket UM 1255 (Dec 21, 2006)

1 support for high cost areas and support for low income customers. Wantel is requesting  
2 ETC status primarily to allow customers it will serve in the Coquille area to be eligible to  
3 receive Oregon Telephone Assistance Program ("OTAP") and Lifeline/Link-Up assistance,  
4 and because designation as a federal ETC is effectively a prerequisite for participating in the  
5 Oregon Universal Service Fund ("OUSF").

6 In this Application Wantel will show that it satisfies all requirements for ETC status in  
7 Coquille, and in particular that its Application is in the public interest.

## 8 II. APPLICANT

9 Wantel is a competitive local exchange company ("CLEC") and obtained its  
10 competitive registration from the Public Utility Commission of Oregon ("OPUC" or the  
11 "Commission") on August 20, 1999 pursuant to Order No. 99-50. Wantel provides all types  
12 of telephone services, including, for example, long distance, OS/DA, E911, EAS, OTAP,  
13 Link-Up, and Lifeline. Wantel provides these services in Roseburg, Green, Winston, most  
14 areas of Sutherlin and Oakland, and Bandon.

## 15 III. ALLEGATION OF FACTS

### 16 A. Eligibility and Identification of the Service Area.

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

20 Wantel proposes to serve the entire Coquille wire center, shown in the map attached  
21 as Exhibit A. Wantel's Phase 1 fiber deployment will reach all business and residences  
22 shown in the colored areas of the map. Wantel will serve the remaining areas of the wire  
23 center via resold services through the incumbent local exchange carrier ("ILEC") for  
24 Coquille, Verizon Northwest Inc. ("Verizon").

25 Wantel's service area will mirror that of Verizon. In addition, Wantel attaches  
26 Exhibit B, which identifies the wire center that constitutes the proposed service area with the

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

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

5 Wantel intends to employ fiber-to-the-home throughout Coquille linked to its long  
6 distance access tandem. Wantel has implemented Hitachi GPON to provide enhanced and  
7 expanded services. Wantel's Phase 1 fiber deployment will reach most of the Coquille wire  
8 center. Wantel will serve all customers not initially reached by its fiber using Verizon resold  
9 services purchased under its interconnection agreement approved by the Commission in  
10 Docket ARB 490.

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

12 In order to obtain ETC designation, an applicant must demonstrate the following: (1)  
13 a commitment and ability to provide the services to all customers in the area proposed to be  
14 served; (2) emergency back-up functionality; (3) that it meets applicable consumer  
15 protection standards and service quality standards; (4) that local usage offered is  
16 comparable to that offered by the ILEC; and (5) that the applicant understands that it may be  
17 required to provide equal access if all other ETCs in the designated service area relinquish  
18 their designations.<sup>5</sup>

19 As part of the commitment to provide services to all customers in the proposed area  
20 to be served, the applicant must submit a five-year plan describing with specificity, on a wire  
21 center-by-wire center basis, proposed improvements and upgrades to the applicant's  
22 network.<sup>6</sup>

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25 <sup>5</sup> *Id.* § 54.202(1).

26 <sup>6</sup> *Id.* § 54.202(a)(1)(ii).

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**IV. SERVICES PROVIDED BY PETITIONER**

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

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

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

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

An ETC must offer voice grade access to the public switched telephone network.<sup>7</sup> Wantel will provide voice grade access to the public switched telephone network in accordance with the FCC's definition.

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<sup>7</sup> *Id.* § 54.101(a)(1).



1 **B. Local Usage.**

2 FCC regulations require ETCs to provide unlimited local usage.<sup>8</sup> Wantel will provide  
3 unlimited local usage. Wantel's basic local usage plans are comparable to those of the  
4 ILEC, Verizon. Wantel will mirror Verizon in defining the local calling areas and extended  
5 area service ("EAS"). Wantel plans to submit to the Commission its residential and business  
6 basic local service prices, basic feature package prices, and other service prices when a  
7 protective order is signed in this docket. Comparison with Verizon's basic service prices will  
8 demonstrate that Wantel's prices are 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.<sup>9</sup> 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.<sup>10</sup> "Single-party service" means that only one party will be served by a subscriber  
16 loop or access line in contrast to a multi-party line.<sup>11</sup> 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.<sup>12</sup> Wantel provides 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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<sup>8</sup> *Id.* § 54.101(a)(2).

23

<sup>9</sup> *Id.* § 54.101(a)(3).

24

<sup>10</sup> *Id.* § 54.101(a)(4).

25

<sup>11</sup> *Id.*

26

<sup>12</sup> *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  
3 automatic or live assistance provided to a consumer to arrange for the billing or completion,  
4 or both, of a telephone call.<sup>13</sup> Wantel will provide customer access to operator services on  
5 24/7 basis.

6 **G. Access to Interexchange Service.**

7 An ETC must offer consumers access to interexchange service to make and receive  
8 toll or interexchange calls.<sup>14</sup> Wantel will meet this requirement by providing all of its  
9 customers with the ability to make and receive interexchange or toll calls through  
10 interconnection arrangements it has with several interexchange carriers ("IXCs"). Wantel is  
11 an equal access provider.

12 **H. Access to Directory Assistance.**

13 The ability to place a call to directory assistance is a required ETC service offering.<sup>15</sup>  
14 Wantel customers will be able to obtain directory assistance from live operators.

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

16 An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline  
17 customers at no charge.<sup>16</sup> In particular, an ETC must provide toll blocking, which allows  
18 customers to block the completion of outgoing calls.<sup>17</sup> Wantel will provide this service.

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<sup>13</sup> *Id.* § 54.101(a)(6).

23

<sup>14</sup> *Id.* § 54.101(a)(7).

24

<sup>15</sup> *Id.* § 54.101(a)(8).

25

<sup>16</sup> *Id.* § 54.101(a)(9).

26

<sup>17</sup> *Id.* § 54.400(b).

1 **J. Link-Up and Lifeline Services.**

2 Wantel will offer Link-Up and Lifeline services throughout the Coquille exchange.  
3 These services are available in accordance with the guidelines as published and amended  
4 from time to time by the federal agency or agencies that administer such programs.

5 **V. FIVE-YEAR PLAN**

6 Wantel commits to use the support funds only for their intended purposes. In  
7 support of this commitment, Wantel submits as Exhibit C, a copy of the certification required  
8 by the FCC to receive Interstate Access Support ("IAS").

9 Wantel has developed and will file a Five-Year Plan (the "Plan") for the Coquille  
10 project after a protective order has been signed in this docket. The Plan will demonstrate in  
11 detail how IAS and OUSF support will be used for service improvements that would not  
12 occur absent receipt of such support. Wantel will use the OUS funds to pay for the build out  
13 and improvements required to serve the Coquille area.

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

23 **VI. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

24 As required by 47 C.F.R. § 54.201, Wantel plans to advertise the availability of each  
25 of the supported services detailed above throughout its licensed service area by media of  
26 general distribution. The methods of advertising utilized may include newspaper, magazine,

1 radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory  
2 advertising. Wantel will distribute literature offering Lifeline and Link-Up services to senior  
3 services, hospitals, clinics, hospices, senior centers, welfare offices, and other locations  
4 where those likely to be eligible for the program(s) would encounter the brochures.

5

#### VII. PUBLIC INTEREST FACTORS

6 Granting Wantel's application to become an ETC in the Coquille area is in the public  
7 interest. As stated above, Wantel will use the monies it receives from both the state and  
8 federal universal service funds to help finance its plan to offer high speed broadband voice,  
9 data and video services over a state-of-the-art IP-enabled network. Wantel is committed to  
10 providing service throughout its designated service area to all customers who make a  
11 reasonable request for services. Wantel plans to serve most customers in the Coquille wire  
12 center via Wantel's own facilities. Wantel is also prepared to serve customers outside its  
13 existing network coverage within a reasonable period of time and at a reasonable cost,  
14 using UNEs leased from Verizon. In the longer term, Wantel plans to use the high cost  
15 support prudently, and to extend the reach of its own facilities to virtually all of the customers  
16 in the wire center areas.

17 Wantel will offer Coquille customers all of the same services that are currently  
18 offered by Verizon. Specifically, Wantel will provide all Coquille customers with a minimum  
19 of the following services:

- |    |       |                                    |
|----|-------|------------------------------------|
| 20 | i.    | Basic telephone service including  |
|    | ii.   | EAS                                |
| 21 | iii.  | E911 (included in all areas)       |
|    | iv.   | Caller ID                          |
| 22 | v.    | Call Waiting w/Caller ID           |
|    | vi.   | Call Forward                       |
| 23 | vii.  | Call Forward No Answer             |
|    | viii. | Call Rejection                     |
| 24 | ix.   | Call Transfer                      |
|    | x.    | Caller ID Block/Unblock            |
| 25 | xi.   | Continuous Redial                  |
|    | xii.  | Call Forward Remote Access w/ Pin# |
| 26 | xiii. | Last Call Return                   |

- 1           xiv.    Priority Call
- 2           xv.    Selective Call Forwarding
- 3           xvi.    Selective Call Acceptance
- 4           xvii.   Speed call 8 and 30
- 5           xviii.   Three Way Calling
- 6           xix.    Anonymous Call Rejection
- 7           xx.     Voice Mail, basic, expanded and premium
- 8           xxi.    Inside Wire Protection
- 9           xxii.   Custom Ring
- 10          xxiii.   Dial-up Internet
- 11          xxiv.   BROADBAND INTERNET ACCESS UP TO 3MB
- 12          xxv.    Open Access to long distance 1 + dialing and choice of any PIC/LPCI

13           Through the deployment of its fiber optic network, Wantel will be able to provide  
14 improved basic and advanced services to its customers, including those in traditionally high  
15 cost areas. These improvements include high speed data services, voice and video, and  
16 access to several different ISPs in the area.

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

1 Finally, designation of Wantel as an ETC is in the public interest because it will  
2 promote competition. Competition promotes consumer benefits in the form of lower prices,  
3 increased service quality, and innovation. Also, by designating Wantel as an ETC it will  
4 make available Lifeline and Link-Up, including OTAP, services to customers of Wantel in the  
5 Coquille area. For these reasons designation of Wantel as an ETC is in the public interest.

6 **VIII. COMMITMENT TO SERVE REQUESTING CUSTOMERS**

7 Wantel agrees to provide its services to all customers for a reasonable cost within a  
8 reasonable timeframe.

9 **IX. EQUAL ACCESS**

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

13 **X. ABILITY TO REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS**

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

19 **A. Back-up power**

20 Wantel has eight-hour battery back-up at each location where its equipment requires  
21 power. It also has generators with automatic transfer switches where required.<sup>18</sup>

22

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25 <sup>18</sup> Referring to Wantel's confidentially submitted Plan will demonstrate the redundancy in the  
26 network to provide a reroute of traffic and how the network can address traffic spikes during an  
emergency.

26

1 **B. Network redundancy**

2 Wantel has its own fiber routes in certain areas and leases fiber from others to obtain  
3 redundancy in its network. Wantel operates diverse interconnect trunking on physically  
4 redundant paths to multiple diverse switches in the Verizon network. Wantel's SS7 network  
5 is dual-homed to Tigard and Hillsboro.

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

11 Wantel currently has two voice switches in its network with one tandem switch  
12 serving the Wantel networks.

13 **C. Status of E911.**

14 Wantel has achieved full deployment of E911 in its service area and is in full  
15 compliance with E911 requirements.

16 **XI. CONSUMER PROTECTION**

17 Wantel is subject to the Oregon consumer protection laws. It also submits service  
18 quality reports to the Commission. Attached as Exhibit D is a summary of Trouble Reports,  
19 Provisioning Commitments, Held Orders, Access to Representatives for Repair and  
20 Business Office, and Call Blocking. Each of the standards in the Oregon Administrative  
21 Rules have been met or surpassed by Wantel. Wantel has a commitment to resolve  
22 complaints made by consumers to the Commission and has designated Marty Patrovsky as  
23 the contact person who will work with the Commission's Consumer Services Complaint  
24 Division for complaint resolution.

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**XII. CONCLUSION**

For all of the above reasons, Wantel respectfully requests that the Commission grant its Application.

DATED: March 21, 2007.

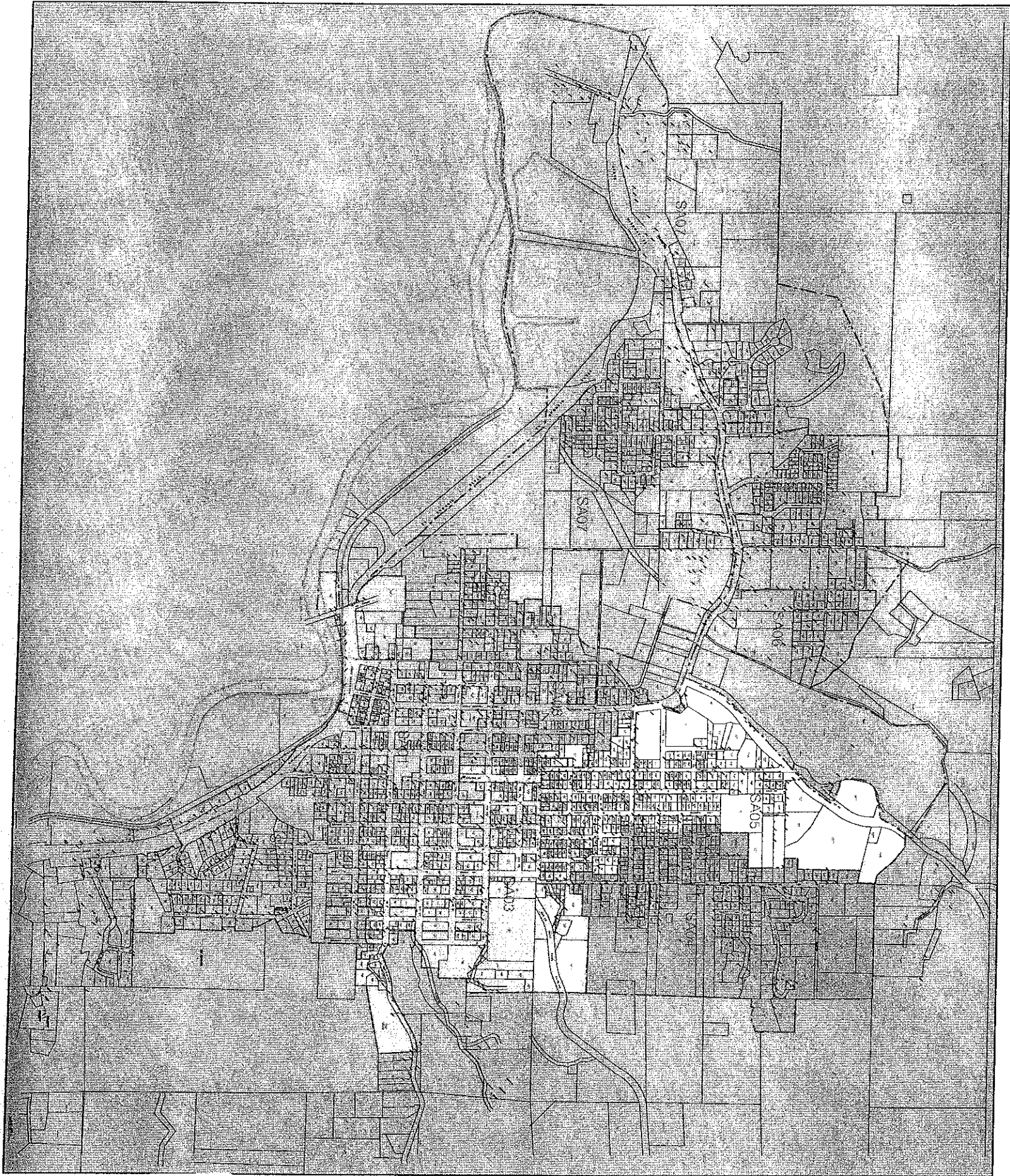
McDOWELL & RACKNER PC



Lisa F. Rackner

Attorneys for Wantel d/b/a ComspanUSA





SA 1-5  
Phase 1 Fiber Deployment

**Exhibit B**

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

Wire Center  
Coquille, OR

CLLI Codes  
Wantel: CQLLOR050MD  
Verizon: CQLLOR050MD

ILEC Study Area  
Verizon – Coquille

**Interstate Access Support (IAS)  
2005**

May 12, 2005

To: Marlene H. Dortch  
Office of Secretary  
Federal Communications Commission  
445 -12<sup>th</sup> 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

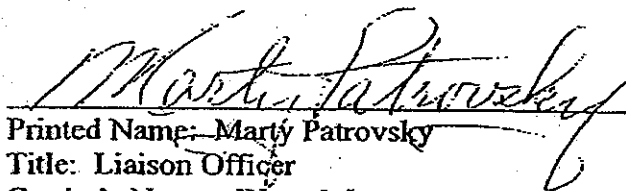
Re: CC Docket No. 96-45  
**Interstate Access Support – IAS**  
Annual Certification Filing

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 12<sup>TH</sup> 2005

For September 2006

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 7032 Access Lines and 5 Trouble Reports a ratio of 0.1/100 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 48 Hour clearance rate is 100% 5 of 5.

3. **Commitments met/ Provisioning (OAR Standard 90%)**

1. Wantel met or beat September 06 provisioning commitments on 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 our orders and the number of access line in each wire center.**

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. **Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).**

1. We have had no held orders of our own. We have 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.**

1. See 6.1 above

8. **Call Blocking**

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,  
Thank You,

Darrell Hicks  
Network Operations  
Manager-Network Operations Center  
541-229-2108

For October 2006

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 7054 Access Lines and 4 Trouble Reports a ratio of 0.1/100 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 48 Hour clearance rate is 100% 4 of 4.

3. Commitments met/ Provisioning (OAR Standard 90%)

- 1. Wantel met or beat September 06 provisioning commitments on 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 our orders and the number of access line in each wire center.

- 1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

- 1. We have had no held orders of our own. We have 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.

- 1. See 6.1 above

8. Call Blocking

- 1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,  
Thank You,

Darrell Hicks  
Network Operations  
Manager-Network Operations Center  
541-229-2108

**Exhibit D**



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

541-672-9895  
www.comspanusa.net

For January 2007

**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 6375 Access Lines and 2 Trouble Reports a ratio of 0.1/100 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 48 Hour clearance rate is 100% 2 of 2.

**3. Commitments met/ Provisioning (OAR Standard 90%)**

1. Wantel met or beat January 2007 provisioning commitments on 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 our orders and the number of access line in each wire center.**

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

**5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).**

1. We have had no held orders of our own. We have 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.**

1. See 6.1 above

**8. Call Blocking**

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  
Wantel, Inc.



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

541-672-9895

www.comspanusa.net

For December 2006

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 6363 Access Lines and 3 Trouble Reports a ratio of 0.1/100 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 48 Hour clearance rate is 100% 3 of 3.

3. Commitments met/ Provisioning (OAR Standard 90%)

- 1. Wantel met or beat December 06 provisioning commitments on 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 our orders and the number of access line in each wire center.

- 1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

- 1. We have had no held orders of our own. We have 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.

- 1. See 6.1 above

8. Call Blocking

- 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  
Wantel, Inc.



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

541-672-9895

www.comspanusa.net

For November 2006

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 6214 Access Lines and 63 Trouble Reports a ratio of 1.1/100 Access Lines
  - a. We had power related damage to two muxes in our collocation in Roseburg Qwest office one night in November resulting in a massive influx of trouble reports. All services were restored in less than six hours.

2. Trouble Reports cleared within 48 Hours. (OAR Standard all Trouble Reports cleared in 48 hours 95% of the time).

- a. Wantel 48 Hour clearance rate is 100% 63 of 63.

3. Commitments met/ Provisioning (OAR Standard 90%)

- a. Wantel met or beat November 06 provisioning commitments on 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 our orders and the number of access line in each wire center.

- a. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

- a. We have had no held orders of our own. We have 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).

- a. All our calls are answered 7/24 by live representatives. We do not use automated answering.

7. Access to Representatives Business Office Call Center.

- a. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,  
Thank You,

A handwritten signature in black ink, appearing to read "Marty Patrovsky", is written over a horizontal line.

Marty Patrovsky liaison officer  
Wantel, Inc. (d/b/a ComspanUSA)



For August 2006

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 7028 Access Lines and 3 Trouble Reports a ratio of 0.1/100 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 48 Hour clearance rate is 100% 3 of 3.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat August 06 provisioning commitments on 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 our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have 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.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,  
Thank You,

Darrell Hicks  
Network Operations  
Manager-Network Operations Center  
541-229-2108

For July 2006

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 6197 Access Lines and 4 Trouble Reports a ratio of 0.1/100 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 48 Hour clearance rate is 100% 4 of 4.

3. Commitments met/ Provisioning (OAR Standard 90%)

1. Wantel met or beat July 06 provisioning commitments on 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 our orders and the number of access line in each wire center.

1. We have had no held orders of our own. We had none held for Qwest resale accounts.

5. Held Orders over 30 days (OAR Standard : 10 % of the monthly Held Order Standard form from #4).

1. We have had no held orders of our own. We have 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.

1. See 6.1 above

8. Call Blocking

1. We have experienced no call blocking on any of our trunks.

Should you have any Questions please call me,  
Thank You,

Darrell Hicks  
Network Operations  
Manager-Network Operations Center  
541-229-2108

**EXHIBIT B**

1 BEFORE THE PUBLIC UTILITY COMMISSION  
2 OF OREGON

3 UM \_\_\_\_\_

4 Application of WANTEL, INC., d/b/a  
5 ComspanUSA for Approval of Eligibility to  
6 Participate in the Oregon Universal Service  
Fund.

**AFFIDAVIT OF  
JAN SUMMARELL**

7 I Jan Summarell do hereby affirm as follows:

- 8 1. I am Senior Vice President and Chief Operating Officer ("COO") of Wantel,  
9 Inc. d/b/a ComspanUSA and I make this affidavit in support of Wantel's  
10 Application for Approval of Eligibility to Participate in the Oregon Universal  
11 Service Fund ("OUSF") in the Coquille wire center ("Application").
- 12 2. I am familiar with the eligibility criteria for authorization to receive funds from  
13 the OUSF and the requirements imposed by the Public Utility Commission of  
14 Oregon (the "Commission") upon eligible telecommunications carriers  
15 ("ETC").
- 16 3. As detailed below, in my role as COO of the Company, I affirm Wantel's  
17 commitment to carrying out the commitments made in its Application, and  
18 fulfilling all other requirements for ETC status as may be imposed by the  
19 Commission.
- 20 4. Wantel agrees to fulfill all requirements for providing OTAP service, including  
21 the requirement not to deny or disconnect local exchange service for failure  
22 to pay toll charges.
- 23 5. Wantel agrees to fulfill all requirements for providing OTAP service including  
24 the requirement not to demand a deposit from customers who voluntarily  
25 elect to receive toll-blocking service.
- 26

- 1        6.     Wantel accepts the duty to interconnect directly or indirectly and commits
- 2                    interconnecting with the facilities and equipment of other telecommunications
- 3                    carriers.
- 4        7.     Wantel accepts the duty not to install network features, functions or
- 5                    capabilities that do not comply with the Telecommunications Act's
- 6                    requirements for access by persons with disabilities and coordination for
- 7                    interconnectivity and commits to fulfilling this requirement.
- 8        8.     Wantel will not prohibit or impose unreasonable or discriminatory conditions
- 9                    or limitations on the resale of telecommunications services.
- 10       9.     Wantel will provide, to the extent technically feasible, number portability in
- 11                    compliance with FCC rules.
- 12       10.    Wantel will provide dialing parity to other telecommunications providers.
- 13       11.    Wantel will provide access to rights-of-way to other telecommunications
- 14                    carriers.
- 15       12.    Wantel will establish reciprocal compensation arrangements for the transport
- 16                    and termination of telecommunications.
- 17       13.    Wantel will provide supported services on a standalone basis under the
- 18                    general terms outlined in the Application.
- 19       14.    Wantel will build its own loop facilities to serve a customer where no facilities
- 20                    currently exist.
- 21       15.    Wantel agrees that it will share per-line support amounts with Qwest
- 22                    calculated based on current percentages, with no true-ups or disbursements
- 23                    if percentages are revised.

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16. In addition, Wantel agrees to abide by all rules related to OUSF participation, including maintaining its state certification and federal eligibility telecommunication carrier status.

DATED: June \_\_, 2007.

JAN SUMMARELL

\_\_\_\_\_  
Sr. Vice President and COO  
Wantel, Inc. d/b/a ComspanUSA

SUBSCRIBED AND SWORN TO before me this \_\_\_\_ day of June, 2007.

\_\_\_\_\_  
Notary Public for Oregon  
My commission expires: \_\_\_\_\_