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**VIA e-filing and**  
**UPS NEXT DAY MAIL**

Ms. Annette Taylor, Administrative Specialist  
Administrative Hearings Division  
**PUBLIC UTILITY COMMISSION OF OREGON**  
550 Capitol Street N.E., Suite 215  
Salem, Oregon 97301-2551

Re:    Dockets UM 1176/UM 1177

Dear Ms. Taylor:

Enclosed for filing are an original and five copies of the "Second Amended Combined Application of Edge Wireless, LLC for Designation as an Eligible Telecommunications Carrier (Rural and Non-Rural Areas)" in the above-referenced dockets.

Thank you for your assistance.

Very truly yours,

Davis Wright Tremaine LLP

Mark P. Trinchero

MPt:djr

Enclosures

cc w/encl: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**APPLICATION OF EDGE WIRELESS, LLC )  
FOR DESIGNATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER )  
PURSUANT TO THE )  
TELECOMMUNICATIONS ACT OF 1996 )  
(RURAL AND NON-RURAL AREAS) )**

**Consolidated Docket Nos.  
UM 1176 and UM 1177**

**SECOND AMENDED COMBINED APPLICATION OF EDGE WIRELESS, LLC FOR  
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER (RURAL  
AND NON-RURAL AREAS)**

Edge Wireless, LLC (“Edge”), by its attorneys, hereby submits this Second Amended Combined Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Sections 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended (“Act”), 47 U.S.C. §214(e)(1)-(2), and Section 54.201 of the Federal Communications Commission’s (“FCC”) rules, 47 C.F.R. § 54.201. Edge requests that it be designated as eligible to receive all available support from the federal Universal Service Fund (“USF”) including, but not limited to, support for rural, insular and high cost areas and low income customers in the geographic areas specified in this Application. In support of this Application, the following is respectfully shown:

**I. APPLICANT**

Edge is a Commercial Mobile Radio Service (“CMRS”) carrier providing “mobileservice” as defined in 47 U.S.C. § 153(27). Edge provides interstate telecommunications

services as defined in 47 U.S.C. § 254(d) and 47 C.F.R. § 54.703(a). Through its cellular authorizations, Edge is licensed to serve the following Basic Trading Areas (“BTAs”) in Oregon: Coos Bay 97, Roseburg 385, and the portion of Medford 288 encompassing Josephine County. Pursuant to these authorizations, Edge provides service to the following counties in Oregon: Coos, Curry, Douglas and Josephine. Edge’s authorized service area in Oregon is coextensive with the boundaries of Coos, Curry, Douglas and Josephine counties.

## **II. ALLEGATION OF FACTS**

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

Under Sections 214(e) and 254 of the Act, the Public Utility Commission of Oregon (“OPUC” or “Commission”) is authorized to designate Edge as an ETC. Section 214(e)(2) of the Act requires state commissions to designate as an ETC, throughout the service area for which ETC status is sought, any common carrier that: (i) offers services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services. In its First Report and Order implementing Sections 214(e) and 254, the FCC designated the specific features a carrier must provide or agree to provide to be designated as an ETC.<sup>1</sup> The FCC also recognized that wireless telecommunications providers are eligible to be designated as ETCs.<sup>2</sup>

Edge is a telecommunications carrier as defined in 47 U.S.C. § 153(44) and 47 C.F.R. § 51.5(a), and is a telecommunications carrier for the purposes of Part 54 of the FCC’s rules. 47 U.S.C. § 54.1 *et seq.* Edge is, therefore, considered a common carrier under the Act.

Section 214(e)(2) of the Act provides that ETC designations shall be made for a “service area” designated by the state commission. Section 214(e)(5) of the Act provides that the “service area” shall be a geographic area established by the state commission. In areas served by a rural telephone company, the FCC’s rules generally define a competitive ETC’s “service area”

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<sup>1</sup> *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8809-25 (1997) (“First Report and Order”).

<sup>2</sup> *Id.*, at 8858-59.

to mean the LEC study area.<sup>3</sup> Attached hereto as Exhibit A is a map depicting Edge's proposed ETC service area in Oregon superimposed over the rural incumbent local exchange carrier ("ILEC") wire centers falling within Edge's proposed ETC service area. Attached as Exhibit B is a list of non-rural ILEC and rural ILEC wire centers that fall either entirely or partially within Edge's basic trading area ("BTA").

**B. The Legal Standard for Granting ETC Status in Non-Rural and Rural Areas.**

Edge may be designated as an ETC in non-rural ILEC areas and rural ILEC areas upon a finding that: (1) Edge offers the supported services; (2) Edge will advertise the availability of such services using media of general distribution; and (3) such designation would serve the public interest.<sup>4</sup>

Edge originally filed two separate applications for ETC status with the Commission: one for specified areas within the service areas of non-rural ILECs and another for specified areas within the service areas of rural ILECs. The non-rural area application was filed on October 1, 2004 and docketed at UM 1176. The rural area application was filed on October 19, 2004 and docketed as UM 1177. Edge's decision to file separate applications was based on FCC precedent and conferences with Commission Staff indicating that the requirements for obtaining ETC status in non-rural ILEC territories were less stringent than the requirements for obtaining ETC status in rural ILEC territories.

On November 18, 2004, after Edge had filed its initial applications in UM 1176 and UM 1177, the FCC's Wireless Telecommunications Bureau released the *Sprint ETC Order*.<sup>5</sup> Commission Staff interprets the *Sprint ETC Order* as requiring the Commission to apply the public interest standard applicable to ETC applications in rural ILEC areas to Edge's application

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<sup>3</sup> See, 47 C.F.R. §54.207(b).

<sup>4</sup> See, 47 C.F.R. § 54.207(c).

<sup>5</sup> *In the Matter of the Application of SPRINT CORPORATION for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. 04-3617, CC Docket No. 96-45 (released November 18, 2004).

for ETC status in non-rural areas.<sup>6</sup> At that time Edge did not believe the Commission must or should conduct such an analysis. Nonetheless, Edge combined its non-rural and rural applications into a single, amended application submitted on February 11, 2005. The statements contained in Edge's first amended combined application regarding the public interest were revised so that they applied with equal vigor to the non-rural ILEC and rural ILEC territories for which Edge seeks ETC status.

On March 17, 2005 the FCC released Report and Order 05-46, which states that under section 214(e)(6) of the Act "an applicant should be designated as an ETC only where such designation serves the public interest, regardless of whether the area where designation is sought is served by a rural or non-rural carrier."<sup>7</sup> While the new FCC ETC designation criteria are not binding on State Commissions, the FCC has encouraged the states to adopt the new FCC ETC rules.<sup>8</sup> In light of FCC Order 05-46, Edge acknowledges that where a commission has determined it will follow the new FCC ETC designation guidelines, ETC designation in non-rural areas should be shown to be in the public interest. As with Edge's first amended combined application, the statements contained in this second amended combined application regarding the public interest apply with equal vigor to the non-rural ILEC and rural ILEC territories for which Edge seeks ETC status.

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<sup>6</sup> In the *Sprint ETC Order*, the FCC approved Sprint's non-rural area ETC application based on a finding that Sprint satisfied the public interest standard by making commitments similar to those made by ETCs in rural areas in the *VTC ETC Order*, *In the Matter of VIRGINIA CELLULAR, LLC for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. FCC 03-338, CC Docket No. 96-45 (released January 22, 2004), and the *HTC ETC Order*, *In the Matter of HIGHLAND CELLULAR, INC. for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. FCC 04-37, CC Docket No. 96-45 (released April 12, 2004).

<sup>7</sup> *In the Matter of FEDERAL-STATE JOINT BOARD ON UNIVERSAL SERVICE, Pursuant to the Telecommunications Act of 1996*, Order No. FCC 05-46, CC Docket No. 96-45 (released March 17, 2005) at ¶ 3.

<sup>8</sup> *Id.* at ¶ 1.

FCC Order 05-46 also adopted additional mandatory requirements for ETC designation. To comply with the additional requirements set forth in FCC Order 05-46, Edge has included in this second amended combined application the following:

- Demonstration of commitment and ability to provide supported services, including a five-year wire center-specific build-out plan.
- Demonstration of Edge's ability to remain functional in emergency situations.
- Commitment to cooperate with the Commission in its efforts to enforce the consumer protection provisions of the CTIA Consumer Code and the Oregon Department of Justice ("DOJ") settlement.<sup>9</sup>
- Information on Edge's local rate plans.
- Acknowledgment of Edge's potential equal access responsibilities should it ever become the only ETC within the service area.
- Commitment to abide by any new or additional ETC reporting requirements adopted by the Commission.

**C. Redefinition in Non-Rural Areas.**

Edge's BTA boundaries in Oregon follow county lines. While most of the Qwest and Verizon wire centers in Southwestern Oregon fall completely within Edge's BTA, two wire centers, Qwest's Grants Pass wire center and Verizon's Provolt wire center, straddle the county line and, therefore, extend beyond Edge's BTA.<sup>10</sup> Edge commits to provide service to requesting customers throughout the Qwest Grants Pass and Verizon Provolt wire centers consistent with its commitment to serve the entire rural ILEC wire centers of Azalea, Drain and Yoncalla, as described more fully in section VII. F. below.

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<sup>9</sup> *Id.* at ¶ 28. Pursuant to the DOJ settlement, DOJ entered into Assurances of Voluntary Compliance (AVCs) with Celco Partnership dba Verizon Wireless, Sprint Spectrum LP aka Sprint PCS and Cingular Wireless LLC ("The Companies"). Under the AVC's, the Companies are required to provide substantially accurate coverage maps to consumers; allow new customers to terminate wireless contracts for any reason within 14 days of activation without paying an early termination fee; return any activation or other "non-usage" based fee charged to consumers who cancel within 3 days; disclose material terms and conditions of the plans in the Companies' advertising; separately state the charge for each plan feature or service on consumers' bills; and not represent that discretionary cost recovery fees are taxes or other type of government required fee.

<sup>10</sup> *See* Exhibits O and P.

**D. No Redefinition Required in Rural Areas.**

Edge's revised proposed ETC area covers the non-rural and rural ILEC wire centers set forth in the Exhibits hereto in their entirety.<sup>11</sup> Edge's proposed ETC area covers the entire study area of Citizens Telecommunications Company of Oregon, Inc. ("Citizens"). No redefinition of the Citizens study area is required. Edge's proposed ETC area covers some but not all of the wire centers in the study areas of Cascade Utilities, Inc. ("Cascade"), CenturyTel of Oregon, Inc. ("CenturyTel") and United Telephone Company of the Northwest ("United"). The Commission has already found that the rural ILEC service areas of Cascade, CenturyTel and United should be redefined to the wire center level.<sup>12</sup> The FCC has concurred in the Commission's redefinition petition. Accordingly, no additional redefinition is required.

**III. SERVICES PROVIDED BY PETITIONER**

Edge will offer the federally designated services listed at 47 C.F.R. § 54.101(a). The services which are supported by the federal USF program are (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, (9) toll limitation for qualifying low-income consumers.<sup>13</sup> Edge is a full service wireless carrier that offers all of these services, as described in detail below, throughout its licensed service area utilizing its own facilities – including its own antennas, towers and mobile switching offices. In addition, consistent with FCC Order 05-46, ¶ 23, Edge submits Exhibit J, a five-year build-out plan describing Edge's anticipated improvements and upgrades to its network on a wire-center by wire-center basis throughout its designated service area.<sup>14</sup> Therefore, Edge satisfies the requirements of Section 254(c) of the Act.

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<sup>11</sup> See Exhibits A, B, C, D and E.

<sup>12</sup> See the *RCC ETC Order* at 16 and *USCC ETC Order* at 15.

<sup>13</sup> 47 C.F.R. §54.101(a).

<sup>14</sup> The attached five-year plan is a good faith projection of Edge's expected improvements and upgrades. It is not possible to project out five years with complete accuracy. It is also not

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

FCC Rule Section 54.101(a)(1) requires voice grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Megahertz within the 300 to 3000 Megahertz frequency range.<sup>15</sup> Edge provides voice grade access to the public switched network through interconnection arrangements with local telephone companies. Edge offers its subscribers this service at a bandwidth between 1850 and 1990 Megahertz, thereby providing voice grade access pursuant to the FCC's definition.

**B. Local Usage.**

Edge's rate plans provide local usage consistent with Section 54.101(a)(2) of the FCC's Rules. In the First Report and Order, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide.<sup>16</sup> Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs. Edge meets the local usage requirements by including local usage in its rate plans and Edge will comply with any and all minimum local usage requirements adopted by the FCC. Consistent with FCC Order 05-46, ¶ 32, Edge submits its local rate plans as Exhibit G in order to demonstrate that it offers a local usage plan that is comparable to the rate plans offered by the ILEC in the service areas for which Edge seeks designation. To ensure that each ETC provides a local usage component in its universal service offerings that is comparable to the plan offered by the ILEC in the area, FCC Order 05-46 recommends that the Commission review an ETC applicant's local usage plans on a case by case basis.<sup>17</sup> As examples of ETC applicants whose rate plans would be comparable to the local ILEC, FCC Order 05-46 specifically mentions ETC applicants that offer "a local calling plan that has a different calling area than the local exchange area provided by the ILECs in the same region," "an unlimited calling plan that bundles local minutes with long distance minutes"

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possible to separate ETC funded expansion from non-ETC funded expansion with complete accuracy.

<sup>15</sup> *First Report and Order*, at 8810-11.

<sup>16</sup> *Id.* at 8814.

<sup>17</sup> FCC Order 05-46 at ¶ 33.



and plans that “provide unlimited free calls to government, social service, health facilities, educational institutions and emergency numbers.”<sup>18</sup>

Edge’s rate plans are comparable to the rate plans offered by the local ILEC in the service area for which Edge seeks designation for all of the above reasons. First, Edge will provide wider local calling areas. Whereas the relevant ILEC local calling areas are primarily limited to their local exchange boundaries and extended service area boundaries, Edge’s local calling area includes most of Northern California and Southwestern Oregon. Second, Edge’s service plans include an “Edge Plus Infinity Plan,” which allows for unlimited local and long distance calling from the local Edge wireless network. Third, Edge provides unlimited, toll-free service for 911 emergency calls and for 611 customer care. Edge also provides toll-free 511 road reports to the Oregon Department of Transportation and 711 calls to TRS/TTY operators and will, within the next year, also provide 211 calls to social service agencies.

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

Pursuant to Section 54.101(a)(3) of the FCC’s Rules, an ETC must provide dual tone multi-frequency (“DTMF”) signaling to facilitate the transportation of signaling throughout its network. Edge currently provides DTMF signaling consistent with the FCC’s Rules.

**D. Single-Party Service or its Functional Equivalent.**

“Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.<sup>19</sup> Edge provides single party service, as required by 47 C.F.R. §54.101(a)(4).

**E. Access to Emergency Services and Ability to Remain Functional in Emergency Situations.**

The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Edge currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement. Phase I

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<sup>18</sup> *Id.*

<sup>19</sup> *First Report and Order* at 8810.

E911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information.<sup>20</sup> To date, Edge has received no requests for Phase I or Phase II E911 from any Public Safety Answering Points (“PSAPs”) in Oregon.

Edge has a demonstrated history of working cooperatively with Oregon Emergency Services to provide E911 service to rural Oregon. In 2002, Edge and OES commenced a joint trial of the Airbiquity hand-set based E911 solution making Douglas County the first Oregon county to have such service. Edge is now working with OES to implement a network-based solution to allow 911 operators to locate a wireless caller on the Edge network without the need for a special handset or accessory.

Consistent with FCC Order 05-46, ¶ 25, Edge also has the ability to remain functional in emergency situations. Edge has designed a fault tolerant network that employs the following features:

- Mobile Switching Center
  - Nortel DMS 100 switches with fully redundant fault tolerant processors.
  - 12 hours of back up battery
  - 300 KW generator with 7days fuel supply
  - complete complement of spare circuit boards
  - Self-Healing Alternate Route Protection Service for Fiber Facilities interconnection
  - Multiple alternate trunk routes for PSTN interconnection trunks.
  - Redundant Microwave radio links
  - Automated 7x24 network monitoring.
  
- Cell sites
  - Overlapping cell site coverage with directed retry for blocked calls.
  - Back haul network engineered with surplus back bone capacity. Field technicians are equipped with growth radio stock. In the event of a capacity spike that can not be absorbed by directed retry additional radios can be installed quickly.
  - All major hub sites have 8 hours battery back up and standby generators.

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<sup>20</sup> See *Id.*, at 8815-17.

- 95% of sites have minimum of 8 hours back up battery, remaining 5% have 1 hour.
  - All sites have quick connect plugs for portable generator. All field technicians are equipped with 20 kw trailer mounted generators. Additional generators are stored at the Medford facility.
  - Compact generator system with 4 day fuel supply stored in Medford for use with Snow Cat only accessible sites.
  - Major hub sites access back bone using Redundant Microwave or buried fiber service.
  - All sites remotely monitored 7x24.
- Additional equipment
    - 2 cells on wheels (COWs) complete with temporary microwave systems stored at Medford facility. Can and have been used for emergency coverage, capacity or back bone recovery.
    - Complete inventory of alternate access equipment. All field staff are equipped with 4 wheel drive pickups, (1) Tucker Terra Snow Cat stored at Medford Facility, (2) snow mobiles stored at Medford facility, (1) Polaris Mule all terrain vehicle stored at Medford facility (2) Polaris 4 wheelers located in Oregon. All field staff trained in operation for all alternative site access equipment.
    - Tower crews on standby for emergency tower and antenna repairs
    - Technicians are equipped with complete complement of spares for Cell site, Microwave and DACs equipment to insure quick recovery.
    - Field technicians strategically located with average drive time of less than 1 hour to cell sites.

Edge Wireless has proven its ability to respond quickly during emergency situations:

- Installed operational COW for Tiller Oregon Fire within 24 hours of request. This COW supported fire operation for approximately 6 weeks.
- January 2, 2004 when all major power transmission lines were destroyed by a severe winter storm to Western Coos County, Edge Wireless maintained wireless phone service throughout our Coos County coverage area by means of battery back up, permanent generators at hub sites and using portable generators. Many of these areas had no land line service due to trees falling on overhead phone lines. The commercial power outage lasted for 2 days. During this time Edge Wireless was the only form of telephone communication to many people who lived in the communities of Coos Bay, North Bend, Charleston, Coquille, Myrtle Point and Bandon.
- Edge Wireless has increased network capacity on sites serving county fairs annually for the past 4 years. We typically add enough network capacity to handle a 100% increase in busy hour traffic for sites serving the fair grounds.
- On numerous occasions Edge Wireless has installed temporary Microwave hops when LEC provided circuits have sustained extended outages or due dates of new circuits have not been achieved.

**F. Access to Operator Services.**

Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.<sup>21</sup> Edge provides customer access to operator services. Customers can reach operator services in the traditional manner by dialing “0”, in compliance with Section 54.101(a)(6) of the Federal Rules.

**G. Access to Interexchange Service.**

A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.”<sup>22</sup> Edge presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXCs.

**H. Access to Directory Assistance.**

The ability to place a call to directory assistance is a required service offering.<sup>23</sup> Subscribers to Edge’s services are able to dial “411” or “555-1212” to reach directory assistance from their mobile phones.

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

An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9).<sup>24</sup> In particular, all ETCs must provide toll blocking which allows customers to block the completion of outgoing toll calls.<sup>25</sup> Edge currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. See 47 C.F.R. §§ 54.400-415. Once designated as an ETC, Edge will

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<sup>21</sup> *Id.*, ad 8817-18.

<sup>22</sup> *Id.*, at 8819.

<sup>23</sup> *Id.*, at 8821.

<sup>24</sup> See *Universal Service Fourth Order on Reconsideration in CC Docket No. 96-45, Report and Order in CC Docket Nos. 96-45, 96-262, 94-1, 91-213, 95-72*, 13 FCC Rcd 5318 (1997).

<sup>25</sup> *First Report and Order*, at 8821-22.

participate in Lifeline, as required, and will provide toll blocking capability in satisfaction of the FCC's requirement.

#### **IV. ADVERTISING AVAILABILITY OF UNIVERSAL SERVICE**

Pursuant to Section 54.201 of the FCC's rules, 47 C.F.R. Section 54.201, Edge plans to advertise the availability of each of the supported services detailed above, throughout its licensed service area, by media of general distribution. The methods of advertising utilized may include newspaper, magazine, radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory advertising.<sup>26</sup> Edge intends to offer advertising similar to USCC's advertising in Oregon to promote Lifeline service, primarily through print advertising and direct outreach by Edge's direct and indirect sales staff to community health, welfare and employment offices as well as Indian tribes. Edge will not be promoting Linkup service because Edge does not charge for activation of wireless services. Edge will advertise the fact that it does not charge activation fees as a functional equivalent of advertising Linkup.

#### **V. COMMITMENT TO CONSUMER PROTECTION**

Consistent with FCC Order 05-46 ¶ 28, Edge will abide by the consumer protection standards established by the CTIA Consumer Code. In addition, Edge will cooperate with the Commission in its enforcement efforts relating to the Oregon Department of Justice ("DOJ") settlement, as described more fully in the Interagency Agreement attached hereto at Exhibit M.

#### **VI. ACKNOWLEDGMENT OF POTENTIAL EQUAL ACCESS RESPONSIBILITIES**

Consistent with FCC Order 05-46 ¶ 35, if required to do so, Edge acknowledges that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

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<sup>26</sup> See Confidential Exhibit H which provides data regarding Edge's advertising expenditures in 2004. Edge expects to engage in similar, if not greater, levels of advertising in 2005.

## VII. PUBLIC INTEREST FACTORS

In addition to finding that the company meets the nine-point checklist and that it agrees to offer and advertise the supported services throughout the proposed ETC service area, the Commission must also determine whether such designation otherwise serves the public interest. The public interest discussion in this second amended combined application applies with equal vigor to the non-rural and rural ILEC areas within Edge's BTA.

The public interest must be determined by following guidance provided by Congress in adopting the Act and the FCC in its enabling orders.<sup>27</sup> The overarching principles embodied in the Act are to "promote competition and reduce regulation . . . secure lower prices and higher quality services . . . and encourage the rapid deployment of new technologies."<sup>28</sup> In its implementing orders, the FCC ruled that the pro-competitive and deregulatory directives from Congress required universal service support mechanisms to be competitively neutral and portable among eligible carriers.<sup>29</sup>

As shown herein, the public interest objectives set forth in the Act, the FCC's Orders, and precedent established in Oregon and across the country will be furthered by the designation of Edge as an ETC in the rural ILEC wire centers listed in Exhibit B.

### A. Increased Consumer Choice and Service Quality.

Designation of Edge as an ETC is in the public interest because such designation will promote competition and thereby facilitate the provision of advanced communications

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<sup>27</sup> Pub. L. No. 104-104, 110 Stat. 56 (1996); *See also*, *First Report and Order*, *supra*; *Federal-State Joint Board on Universal Service, Ninth Report and Order and Eighteenth Order on Reconsideration*, 14 FCC Rcd 20432 ("Ninth Report and Order"); *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 16 FCC Rcd 11244 (2001) ("Fourteenth Report and Order"); *See also* *NAACP v. FCC*, 425 U.S. 662, 669 (1976); *accord*, e.g., *Office of Communication of the United Church of Christ v. FCC*, 707 F. 2d 1413, 1427 (D.C. Cir. 1983); *Bilingual Bicultural Coalition on Mass Media, Inc. v. FCC*, 595 F. 2d 621, 628 & n. 22 (D.C. Cir. 1978).

<sup>28</sup> *See* Act (preamble).

<sup>29</sup> *First Report and Order*, at 8861-62; *Ninth Report and Order*, at 20480.

services and higher quality services to the residents of rural Oregon. A central tenet of federal universal service policy is that consumers in rural areas are entitled to the same kind of choices of telecommunications services as those in urban areas.<sup>30</sup> In many rural areas, no meaningful choice of local exchange carriers exists. Designation of Edge as an ETC will provide rural consumers with a choice among carriers and service features. Edge will provide wider local calling areas,<sup>31</sup> mobile communications, a variety of service offerings, high-quality service<sup>32</sup> and competitive rates. Consumers will be able to choose those service features that best meet their needs.

Upon receipt of ETC designation in Oregon, Edge will use the high-cost support it receives to improve its infrastructure in rural areas. Edge has evaluated the projected levels of support, along with identifying areas where poor coverage and demand for service coincide.<sup>33</sup> Included as Confidential Exhibit J is Edge's comprehensive five (5) year plan, showing anticipated new cell sites and improvements to existing sites.<sup>34</sup> The improved service quality, reliability and increased choices to rural Oregon will be significant.

As Edge constructs additional cell sites in high-cost areas to improve the quality of its radio frequency ("RF") signal, its customers will have a greater choice among service providers and will receive more reliable service. Some will have the option to receive Edge's service for the first time. Others will see service quality and reliability improvement such that they may choose Edge's service instead of the ILECs, as opposed to confining their use of wireless service to an ancillary communications tool. The company has every incentive to meet

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<sup>30</sup> See 47 U.S.C. § 254(b)(3).

<sup>31</sup> Edge's local calling area includes most of Northern California and Southwestern Oregon. ILEC local calling areas are primarily limited to their local exchange boundaries and extended area service boundaries.

<sup>32</sup> See Confidential Exhibit I, describing service quality metrics to which Edge adheres.

<sup>33</sup> See Confidential Exhibit J, five-year build-out plan designating proposed infrastructure investment in Edge's BTA should Edge receive ETC status. See also, Exhibit F, showing projected line counts and USF support; and Exhibit N, showing estimation of populations covered.

<sup>34</sup> A narrative description of the five year plan, including sample cost calculations and a detailed discussion of the planning process is included in Confidential Exhibit J.

its commitment because use of such funds in this manner will improve its competitive position in the marketplace. Moreover, it has every incentive to maintain or improve reliability and to lower its prices over time because it can only receive high-cost support when it has a customer.<sup>35</sup>

In most rural areas, wireless telephone service is today a convenience, but it will not emerge as a potential alternative to wireline service unless high-cost loop support is made available to drive infrastructure investment. Indeed, without the high-cost program, it is doubtful that many rural areas would have wireline telephone service, even today. Edge has been successful in competing for second lines. However, the rural ILECs serving the proposed ETC service area retain close to 100% of the local exchange market primarily because it is impossible for any company to compete with a monopoly that receives explicit subsidies from the government as well as substantial implicit subsidies that are unavailable to competitors (even those designated as ETCs). Designation of Edge as an ETC will begin to level the playing field among carriers competing in the local exchange market – to the benefit of consumers.<sup>36</sup>

In addition, consumers will benefit from access to advanced wireless data communications. Historically, Edge has been on the forefront in offering advanced wireless communications to rural areas. Edge was the first carrier to bring wireless data applications to many rural areas in Southwestern Oregon by launching its GPRS wireless packet data system in 2003. This system offered wireless data rates of up to 40 kilobytes per second (“kbs”). In 2004, Edge upgraded its GPRS packet data system to “EDGE” technology, which increased the data rates up to 150kbs. Edge can now offer internet access in rural areas with very good data rates. Moving forward the service will be advanced by:

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<sup>35</sup> Lowering of prices has never been an issue in the wireless industry, not to mention that if a carrier does not use funding as required, ETC status may be revoked.

<sup>36</sup> See United States Cellular, Third Supplemental Order Granting petition for Designation as Eligible Telecommunications Carrier, Docket No. UT-970345 (Jan. 27, 2000), at ¶43 (“The fact that its competitors receive universal service support puts USCC at a disadvantage in its ability to make cellular technology more widely available at competitive prices. Allowing USCC to receive universal service support increases the likelihood that cellular technology will become available to more rural consumers at an affordable price.”)



- Upgrading EDGE packet data core software and hardware to increase data through put.
- Improving access to the network by adding additional rural Base Transceiver Systems (BTS).
- Making antenna systems available for rural residences that boost signals between wireless modems and BTS.
- Providing access to upgraded wireless modems as they become available for rural users that enhance data rates.
- Improving wireless feature sets by improving applications such as: Picture messaging, video messaging, text messaging, wireless internet access, wireless security systems and wireless email.

**B. Health and Safety Benefits.**

Designation of Edge will advance important health and safety goals. Edge’s mobile offering will allow rural consumers the flexibility to communicate while on the go and still retain access to emergency services. In addition to being able to reach emergency services while in their homes, wireless subscribers are able to reach emergency services while they are in route to their homes, workplaces and commercial centers. In designating *USCC* as an ETC in the State of Oregon, the Commission concluded that “the ‘unique advantages’ of wireless telephones, which allow mobile communications beneficial to safety, health and commerce, weigh in favor of the application.”<sup>37</sup> Similarly, in designating the wireless carrier Smith Bagley, Inc. as an ETC in Arizona, the Arizona Corporation Commission found that carrier’s designation would provide a potential solution to “health and safety risks associated with geographic isolation.”<sup>38</sup> Designation of Edge as an ETC in Oregon will provide similar benefits.

Citizens in rural areas depend on mobile phones more and more to provide critical communications needs. The provision of USF funding to Edge will enable it to improve signal strength, thereby improving the reliability of service for health and safety purposes. All wireless carriers are required to implement over the next several years Phase II E-911 service, which permits a caller to be located and tracked. For every cell site Edge constructs, the reliability and performance of its E-911 service will improve. It would be difficult to overstate the important

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<sup>37</sup> *USCC ETC Order* at 8; *see also RCC ETC Order* at 9.

<sup>38</sup> *Smith Bagley, Inc., Order, Decision No. 63269, Docket No. T-02556A-99-0207, at p. 12 (Dec. 15, 2000).*

public interest benefit that will be realized by supporting improvement to critical wireless infrastructure.

**C. Competitive Response.**

By designating Edge as an ETC, competition will be increased in the proposed service area. As a result, both Edge and the other carriers serving that area will be motivated to implement advanced communications services and continually improve service quality levels in order to attract customers for their respective services. The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural telephone companies emphasizes competition and consumer benefit, not incumbent protection. There is no question that, if Edge is designated as an ETC and is able to compete for local exchange customers, it will spur a competitive response from affected ILECs: service quality and customer service will improve; new investments in plant will be made; high speed data (DSL) may be deployed more quickly to retain and attract customers; and wider local calling areas, bundled service offerings, and lower prices overall will be introduced to compete with Edge to retain and attract customers.

Another response will be increased investment in areas that are the ILEC's strengths. For example, many ILECs advertise the advantage that wireline facilities offer in the area of high-speed data or Internet access. The affected ILEC can be expected to use its advantage in this area to cement and expand its customer base by investing in facilities needed to bring DSL and other high-speed connectivity to a greater percentage of people living in rural areas. Those that have constructed DS1-ready facilities may lower prices to attract customers. Rural consumers will benefit from these types of investment and price competition, and Edge believes that the use of high-cost support to develop competitive services in rural areas can be a powerful driver of broadband development by ILECs, who will be forced to respond.

Edge's entry will also help economic development in rural areas. One of the key components in a decision to locate a new business, or to move an existing business, is the quality of overall telecommunications infrastructure in a particular area. More and more, wireless connectivity is an indispensable part of that equation. If telecommunications infrastructure is

substandard in a particular area, businesses that serve the community's needs and create jobs may be compelled to leave. Preserving and expanding economic development in rural areas is in the public interest and a grant of Edge's petition will further that objective.

**D. State and Federal Precedent.**

Designation of Edge as an ETC is consistent with ETC decisions across the country, including the decisions of the Commission.<sup>39</sup> There are now at least twenty cases at the state and federal level where designation of a wireless carrier as an ETC in a rural area was found to be in the public interest. Numerous state commissions and the FCC have repeatedly found that designating wireless carriers as ETCs will promote competition, advance universal service, and further the deployment of advanced services. For example, in its decision to designate *RCC* as an ETC, the Washington Utilities and Transportation Commission stated: "Granting ETC designation to *RCC* . . . will facilitate the telecommunications choices available to rural citizens, support the growth of new technologies and services, preserve and advance universal service, and promote competition and the benefits it brings."<sup>40</sup> More recently, in designating *Midwest Wireless Communications, LLC* as an ETC in Minnesota, the Minnesota Public Utilities Commission held that, "[c]ompetition would benefit consumers in southern Minnesota by increasing customer choice (from no choice in most areas to more than one) and providing new services made possible by wireless technologies . . . ."<sup>41</sup> Similarly, in its decision designating *Western Wireless* as an ETC in the State of Wyoming, the FCC held: "Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services and new technologies."<sup>42</sup>

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<sup>39</sup> See generally the *USCC ETC Order* and the *RCC ETC Order*.

<sup>40</sup> *RCC Minnesota, Inc., d/b/a Cellular One, Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-023033 (Aug. 14, 2002), ¶68.

<sup>41</sup> *Midwest Wireless Communications, LLC, OAH Docket No. 3-2500-14980-2, PUC Docket No. PT6153/AM-02-686*, adopted Feb. 13, 2003 (order pending), adopting ALJ's Findings of Fact, Conclusions of Law, and Recommendation (ALJ Dec. 31, 2002), ¶37.

<sup>42</sup> *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

This Commission recently concluded that designating wireless carriers as ETCs in rural ILEC territories in Oregon is in the public interest.<sup>43</sup> In coming to this conclusion, the Commission stated:

Ultimately, each of the [public interest] factors discussed above are calculated in a cost-benefit analysis. OTA cites the cost-benefit analysis of *Virginia Cellular* at ¶4, which weighs competitive choice, impact of designation on the USF, the advantages and disadvantages of the service offering, quality of service commitments, and the applicant's ability to provide the supported services throughout the designated service area within a reasonable amount of time. As we have discussed, USCC's application would bring competition, spurring innovation; provide advantages through increased mobile wireless offerings; and offer the supported services to customers who request service in the designated area. We acknowledge the costs of the application – a growing burden on the USF and no service quality guarantees – but believe that to the extent that those factors are an issue, they are more than outweighed by the benefits of granting the application. Therefore, we find that USCC's application for designation as an ETC in its designated area is in the public interest.<sup>44</sup>

As in the case of the USCC and RCC applications, the public interest benefits of designating Edge as an ETC far outweigh any costs associated with doing so.

For all of the above reasons, the public interest would be served by the designation of Edge as a competitive ETC throughout its requested service area.

#### **E. Cream-Skimming**

In two recent ETC designation orders,<sup>45</sup> the FCC has addressed concerns relating to perceived cream-skimming in rural areas. According to the FCC, cream-skimming occurs when competitors seek to serve only the low-cost, high revenue customers in a rural telephone company's study area. Neither the *VC ETC Order* nor the *HC ETC Order* is binding on this

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<sup>43</sup> See *RCC ETC Order* at 16; see also *USCC ETC Order* at 15.

<sup>44</sup> *USCC ETC Order* at 13-14; see also *RCC ETC Order* at 13.

<sup>45</sup> *In re Federal-State Joint Board on Universal Service, Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, FCC 03-338, 19 FCC Rcd 1563 (released January 22, 2004) ("*Virginia Cellular*"); *In re Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, FCC 04-37, 19 FCC Rcd 6422 (released April 12, 2004) ("*Highland Cellular*").

Commission, and the Commission is free to ignore the FCC's analysis should it so choose. The Commission, however, applied the *VC ETC/HC ETC* cream-skimming analysis in its recent wireless ETC designation decisions.<sup>46</sup> In those orders, the Commission applied this test where the applicants proposed to serve some but not all of the wire centers in a given rural ILEC's study area. In both instances, cost of service and population density evidence in the record showed that the applicants were not proposing to serve only the low-cost wire centers in the rural ILECs' study areas and the Commission found that the applicants passed the cream-skimming test.<sup>47</sup>

A review of the cost and population density data upon which the Commission relied in the *USCC ETC Order* and the *RCC ETC Order* shows that granting Edge's Application will similarly create no cream-skimming, intended or unintended. Exhibit K sets forth a comparison of CenturyTel's average cost of serving customers in wire centers served by Edge with CenturyTel's average cost of serving customers in wire centers not served by Edge. This data, which is taken from Appendix C to the Commission's *USCC ETC Order* and Exhibit C to "Supplemental Filing of United States Cellular Corporation Regarding List of Wire Centers and Cost and Population Data" filed in Docket UM 1084 shows that CenturyTel's average cost of serving customers in the wire centers that Edge will serve is \$71.75, while CenturyTel's average cost of serving customers in the wire centers that Edge will not serve is \$53.27. Thus, Edge is actually serving higher cost wire centers and no cream-skimming will occur.

Exhibit L sets forth a comparison of persons per square mile in Cascade's wire centers served by Edge with persons per square mile in Cascade's wire centers not served by Edge.<sup>48</sup> This data, which is also taken from Appendix C to the Commission's *USCC ETC Order* and Attachment F to "Supplemental Filing of United States Cellular Corporation Regarding List

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<sup>46</sup> *USCC ETC Order* at 10-12; *RCC ETC Order* at 11-12.

<sup>47</sup> *Id.*

<sup>48</sup> In the absence of cost of service data, both the FCC and this Commission have used population density data as a surrogate for cost of service data in applying the *VTC ETC/HTC ETC* cream-skimming analysis.

of Wire Centers and Cost and Population Data” filed in Docket UM 1084, shows that the average persons per square mile in Cascade wire centers served by Edge is 5.18, while the average persons per square mile in Cascade wire centers that Edge will not serve is 11.55. Thus, Edge is actually serving less densely populated and higher cost wire centers and no cream-skimming will occur.<sup>49</sup>

**F. Commitment to Serve Requesting Customers**

Edge is committed to answering all reasonable requests for service within its proposed ETC service area. Edge wants to use high-cost support prudently, to improve service to as many people as possible, while also extending service to as many requesting customers as possible. There are five ILEC wire centers – Azalea, Drain, Grants Pass, Porvult and Yoncalla – with boundaries that extend beyond Edge’s BTA. *See* Exhibits B, C, D, E, O and P. Edge commits to provide service to requesting customers throughout the entirety of these wire centers through: (1) incursion agreements with neighboring wireless carriers, (2) resale of wireless service provided by other carriers or (3) resale of wireline service.

Edge will use the following, six-point checklist in answering requests from residents within its proposed ETC area, but outside its existing network coverage: (1) determine whether the customer’s equipment can be modified or replaced to provide acceptable service; (2) determine whether a roof-mounted antenna or other network equipment can be deployed at the premises to provide service; (3) determine whether adjustments at the nearest cell site can be made to provide service; (4) determine whether there are any other adjustments to network or customer facilities that can be made to provide service; (5) explore the possibility of offering resold service; and (6) determine whether an additional cell site, a cell-extender, or repeater can be employed or constructed to provide service. If there is no possibility of providing service, Edge will notify the customer and provide Commission with an annual report of how many

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<sup>49</sup> Edge’s proposed ETC area covers one United wire center, Diamond Lake. The United study area stretches across the State and covers numerous wire centers that are far more densely populated and therefore lower cost than Diamond Lake. Accordingly, no cream-skimming will occur.

requests for service it could not fill.

Whether a consumer's request for service is reasonable is determined on a case-by-case basis. This is the same for all ETCs. For example, if Edge determines that the cost of providing service to the consumer is \$300,000 (and no other consumers would be served by the construction), Edge would advise the consumer that service can be provisioned for that amount. If the consumer requests that the service be provisioned for the standard connection fee, Edge would determine whether its available high-cost support would be wisely spent on the construction. If Edge believed that support would be better spent on other consumers, it would view the request as unreasonable, advise the consumer, provide the consumer with the Commission's contact information, and include the occurrence in Edge's annual report of how many requests for service it could not fill.

**G. Annual Recertification Process**

In addition to the above public interest test, Edge also agrees that on or before July 15 of each year beginning in 2006, Edge will file extensive reports as part of the annual recertification process, including reports on the following items:

1. Line counts for federal USF supported services, itemized by rural ILEC wire center, as of December 31 of the precedent year;
2. The amount of federal USF support Edge received for operations in Oregon during the period January 1 through December 31 of the preceding year;
3. A description of how the federal USF support was used in the previous year. For expenses such as maintenance and provisioning, the information should be segregated by asset type and the rural ILEC wire center where the investment was made;
4. An estimate of the federal USF support to be received during the current year and a detailed budget of how such support is expected to be used, as described in 3 above;
5. Documentation establishing that Edge advertised the supported services throughout the entire designated area;

6. As to requests for service coming from areas within Edge's designated area, but outside its BTA, a report listing the number of requests and, for requests where service was not provided, the reason(s) service was not provided;
7. A description of actions taken to enhance wireless internet service throughout the ETC area in the past year and plans to enhance such service in the future;
8. A description of how many service quality complaints were received, by wire center, and how those complaints were resolved;
9. An affidavit from an Edge official stating that either:
  - a. Edge has resale agreements in place that cover the portions of wire centers that are within its ETC boundary but outside its BTA; or
  - b. Edge has not received any requests for service in portions of wire centers that are within its ETC boundary but outside its BTA that are not covered by resale agreements.
10. If Edge has received requests for service in portions of wire centers that are within its ETC boundary but outside its BTA, Edge shall provide:
  - a. A description of the steps taken by Edge to obtain a resale agreement with other telecommunications service to the requesting parties;
  - b. Whether each party requesting service eventually received such service via Edge acting in the capacity of a reseller; and
  - c. Edge's estimated timeframe for negotiating resale agreements in each wire center where it was unable to accommodate a request for service because Edge has no existing resale agreement in place.
11. If certification of a resale agreement is made and someone challenges the existence of an agreement, Edge will provide documents needed for Staff to conduct an *in camera* review pursuant to a nondisclosure agreement or use of Commission subpoena and protective order to preserve the confidentiality of the resale agreement.

Edge also agrees to fulfill any new or additional reporting requirements adopted by the Commission pursuant to FCC Order 05-46, ¶¶ 68-69. In particular, Edge agrees to include in its annual recertification filing, the following additional information:

1. Progress reports on the ETC's five-year service quality improvement plan, including maps detailing progress towards meeting its plan targets, an explanation of how much universal service support was received and how the support was



used to improve signal quality, coverage, or capacity; and an explanation regarding any network improvement targets that have not been fulfilled. The information should be submitted at the wire center level;

2. Detailed information on an outage lasting at least 30 minutes, for any service area in which an ETC is designated for any facilities it owns, operates, leases or otherwise utilizes that potentially affect at least ten percent of the end users served in a designated service area, or that potentially affect a 911 special facilities (as defined in subsection (e) of section 4.5 of the *Outage Reporting Order*.) An outage is defined as significant degradation in the ability of an end user to establish and maintain a channel of communications as a result of failure or degradation in the performance of a communications provider's network. Specifically, the ETC's annual report must include: (1) the date and time of onset of the outage; (2) a brief description of the outage and its resolution; (3) the particular services affected; (4) the geographic areas affected by the outage; (5) steps taken to prevent a similar situation in the future; and (6) the number of customers affected;
3. The number of requests for service from potential customers within its service areas that were unfulfilled for the past year. The ETC must also detail how it attempted to provide service to those potential customers;
4. The number of complaints per 1,000 handsets or lines;
5. Certification that the ETC is complying with applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Services;
6. Certification that the ETC is able to function in emergency situations;
7. Certification that the ETC is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas; and
8. Certification that the carrier acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

## **VIII. HIGH-COST CERTIFICATION**

Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administrative Corporation ("USAC") their compliance with Section 254(e) of the Telecom Act. Edge submits its high-cost certification herewith at Exhibit Q. Edge respectfully

requests that the Commission issue a finding that Edge has met the high-cost certification requirement and that Edge is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status.

**IX. LEGAL AUTHORITY**

The Commission has the legal authority to grant the relief requested by Applicant pursuant to 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201; *see also, In the Matter of Applications to be Designated Eligible Telecommunications Carriers in the State of Oregon*, Commission Order No. 97-481, Docket UM 873, entered December 16, 1997; *see also RCC ETC Order*; *see also USCC ETC Order*.

**X. RELIEF REQUESTED**

For the reasons set forth above, and pursuant to Section 214(e)(2) of the Act, Edge requests that the Commission enter an Order designating Edge as an ETC for the areas described herein and that the Commission enter its Order at the earliest possible date.

Dated the 20<sup>th</sup> day of June, 2005.

Respectfully submitted,

EDGE WIRELESS, LLC

By:   
Mark P. Trincherro, OSB #88322  
DAVIS WRIGHT TREMAINE, LLP  
1300 S.W. 5<sup>th</sup> Avenue, Suite 2300  
Portland, Oregon 97201  
(503) 778-5318

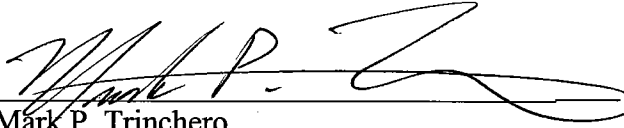
CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **“SECOND AMENDED COMBINED APPLICATION OF EDGE WIRELESS, LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER (RURAL AND NON-RURAL AREAS)”** upon the parties named on the attachment.

I further certify that said copies were placed in sealed envelopes addressed to said partys’/attorneys’ last known addresses as shown and deposited in the United States Mail at Portland, Oregon, and that the postage thereon was prepaid.

DATED this 20<sup>th</sup> day of June, 2005.

DAVIS WRIGHT TREMAINE LLP

By:   
Mark P. Trincherro  
Attorney for Edge Wireless LLC

**SERVICE LIST  
UM 1176**

OREGON TELECOMMUNICATIONS ASSN  
707 13TH ST SE STE 280  
SALEM OR 97301-4036

STEPHANIE S ANDRUS  
DEPARTMENT OF JUSTICE  
REGULATED UTILITY & BUSINESS SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096

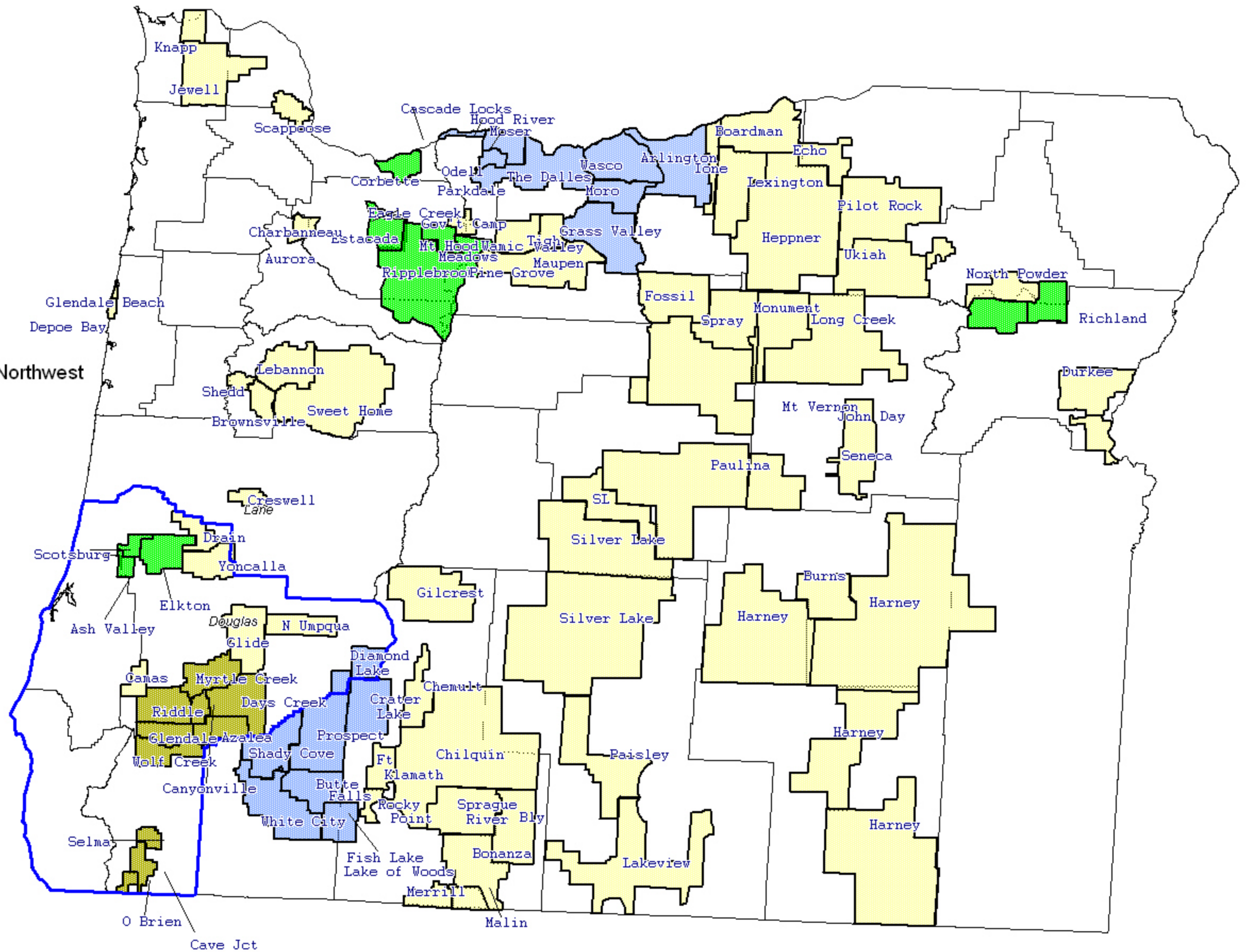
DAVE BOOTH  
PUBLIC UTILITY COMMISSION  
PO BOX 2148  
SALEM OR 97308-2148

RICHARD A FINNIGAN  
LAW OFFICE OF RICHARD A FINNIGAN  
2122 Black Lake Blvd. SW  
Olympia, WA 98512

KAY MARINOS  
PUBLIC UTILITY COMMISSION OF OREGON  
PO BOX 2148  
SALEM OR 97308-2148

### Exhibit A

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- Citizens
- United Telephone Company of the Northwest



## Edge Wireless Proposed ETC Area and Rural ILEC Exchanges

**Exhibit B**  
**EDGE WIRELESS PROPOSED ETC AREA (NON-RURAL)**

**Verizon Northwest, Inc. Wire Centers  
in Coos, Curry, Douglas and Josephine Counties:**

RDPTORXX (Reedsport)  
LKSDORXX (Lakeside)  
NBNDORXX (North Bend)  
CSBYORXX (Coos Bay)  
CQLLORXX (Coquille)  
BNDNORXX (Bandon)  
MYPNORXX (Myrtle Point)  
LNGLORXX (Langlois)  
PTORORXX (Port Orford)  
PWRSORXX (Powers)  
GLBHORXX (Gold Beach)  
BKNGORXX (Brookings)  
MRPHORXX (Murphy)  
PRVTORXX (Provolt) \*  
EMPRORXX (Empire)

**Qwest Corporation Wire Centers  
in Coos, Curry, Douglas and Josephine Counties:**

STHROR58 (Sutherlin)  
RSBGOR57 (Roseburg)  
WNTNOR57 (Winston)  
GRPSOR29 (Grants Pass) \*

\*Although Edge's BTA boundaries do not completely encompass the entire wire center, Edge will offer service throughout the entire wire center area.

**Exhibit B**  
**List of Rural ILEC Wire Centers in Edge's Proposed ETC Area**

**Citizens Wire Centers  
in Coos, Curry, Douglas and Josephine Counties:**

AZALORXA (Azalea) \*  
CNVLORXA (Canyonville)  
CVJTORXA (Cave Junction)  
DYCKORXX (Days Creek)  
GLDORXA (Glendale)  
MYCKORXA (Myrtle Creek)  
OBRNORXX (O'Brien)  
RDDLORXA (Riddle)  
SELMORXA (Selma)  
WLCKORXA (Wolf Creek)

**Cascade Wire Centers  
in Coos, Curry, Douglas and Josephine Counties:**

EKTNORXB (Elkton)  
SCBGORXA (Scottsburg)

**CenturyTel Wire Centers  
in Coos, Curry, Douglas and Josephine Counties:**

CMVLORXA (Camas Valley)  
DRANORXA (Drain) \*  
GLIDORXA (Glide)  
NRUPORXA (North Umpqua)  
YNCLORXA (Yoncalla) \*

**United Wire Centers  
in Coos, Curry, Douglas and Josephine Counties:**

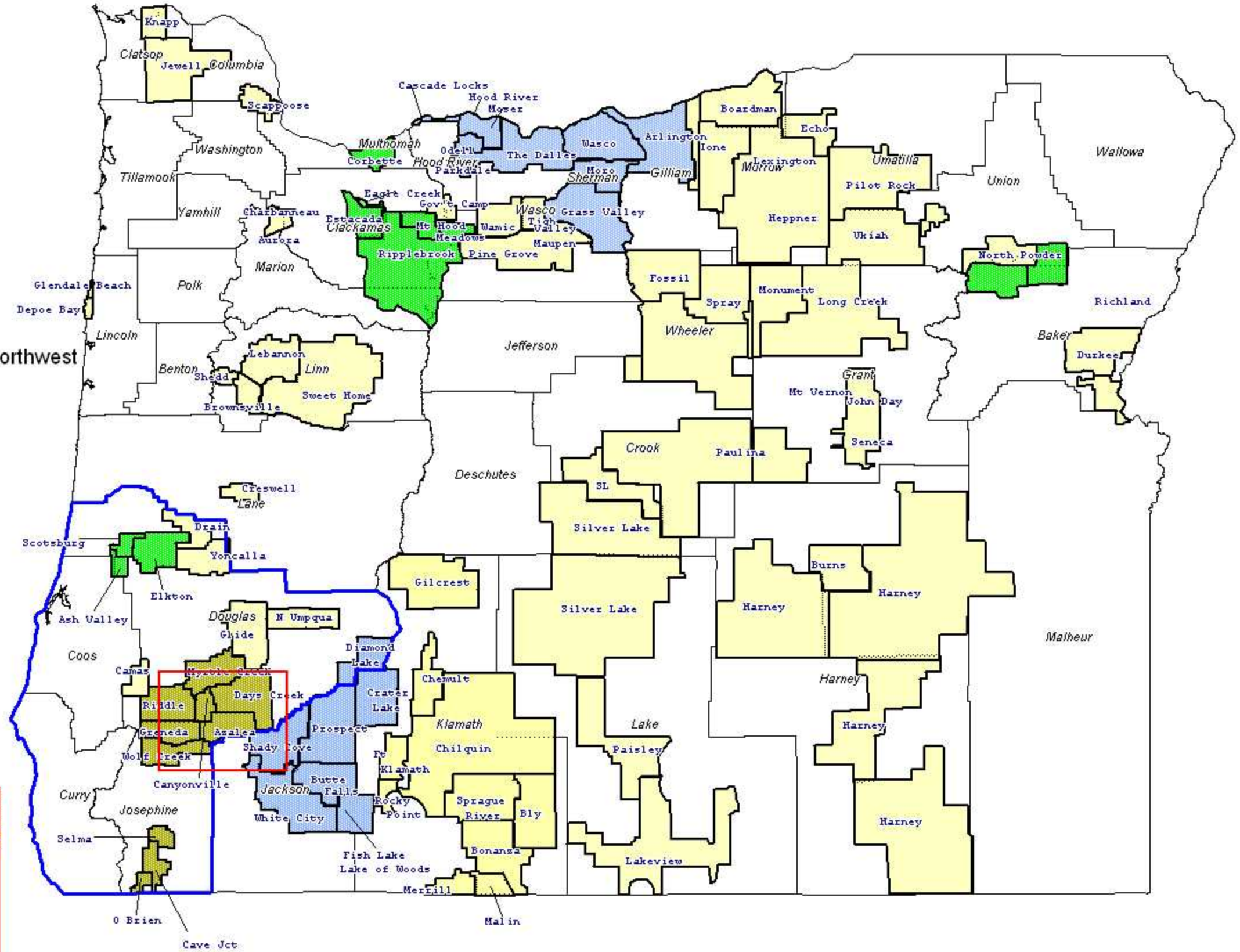
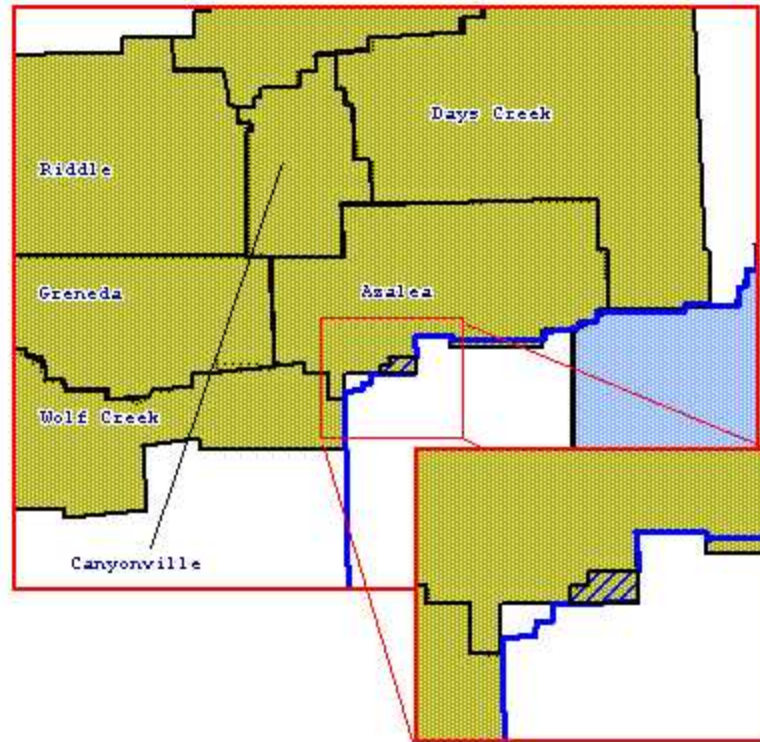
DMLKORXX (Diamond Lake)

\*Although Edge's BTA boundaries do not completely encompass the entire wire center, Edge will offer service throughout the entire wire center area.

Exhibit

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- Citizens
- United Telephone Company of the Northwest

Inset: Azalea Wire Center  
Jackson County T33S, R4W, Section 3  
& three fourths of Section 4



Edge Wireless Proposed ETC Area and Rural ILEC Exchanges

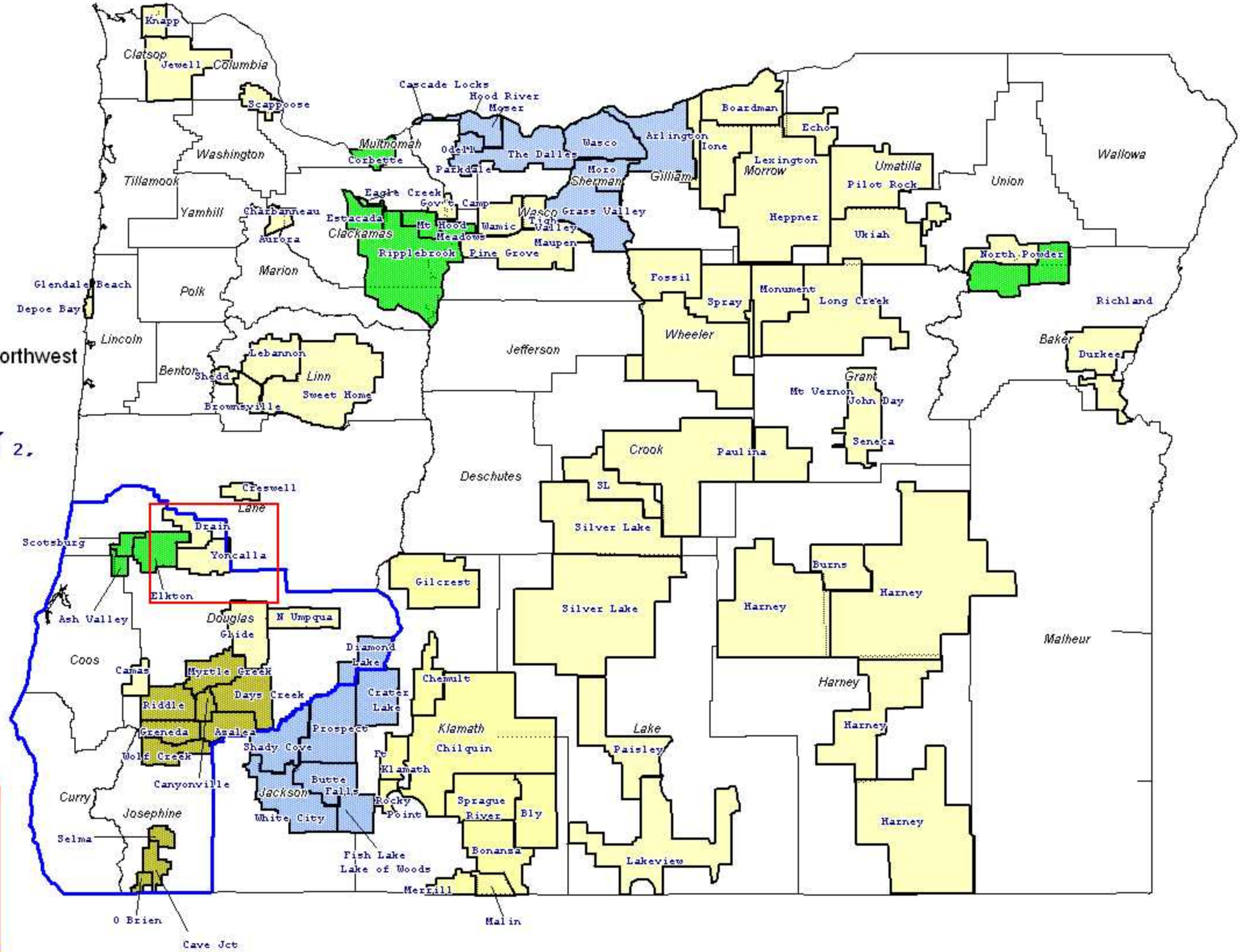
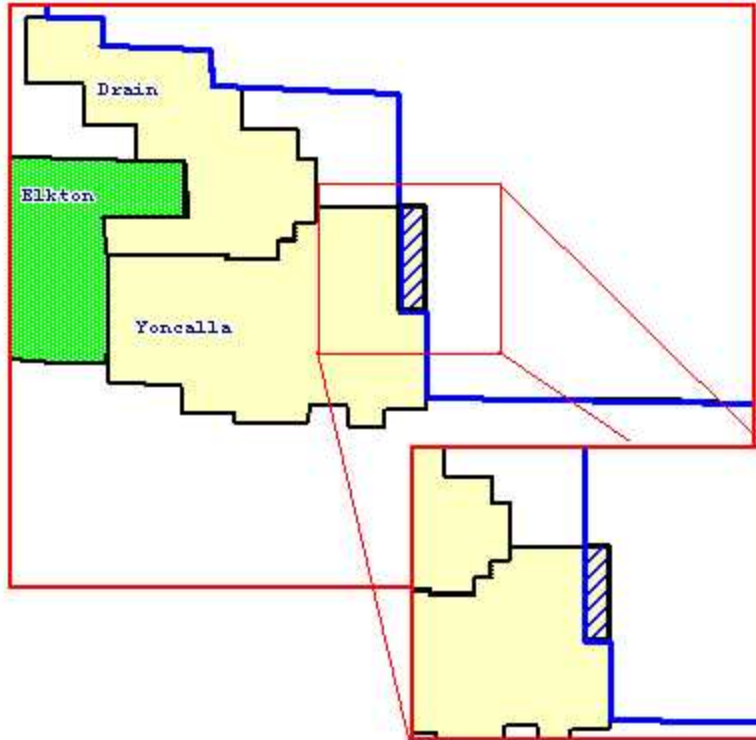




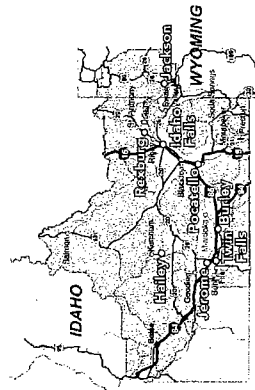
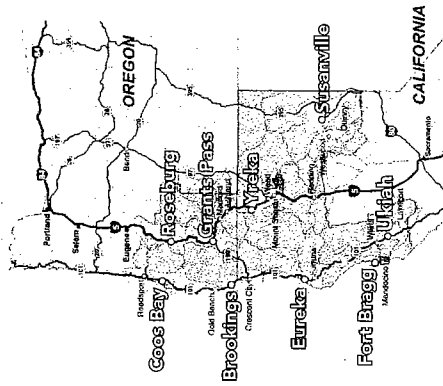
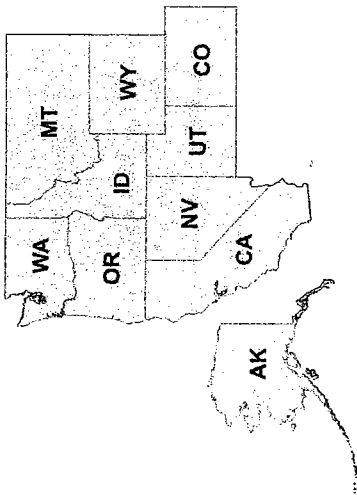
**Exhibit**

- County Boundary
- Wire Center Boundary
- Edge License Area
- Cascade
- Century Tel
- Citizens
- United Telephone Company of the Northwest

**Inset: Yoncalla Wire Center**  
 Lane County T22S, R4W, Sections 1,  
 12,13,24,36 and one half of Sections 2,  
 11,14,23,26, and 35



**Edge Wireless Proposed ETC Area and Rural ILEC Exchanges**



Rate Plan Area\*  
 Edge Wireless Network  
 Edge Future Coverage\*

Western SharedEdge+

OR/CA Local SharedEdge+

ID/WY Local SharedEdge+

**Explanation of Maps, Rates, and Charges:**

\* These maps depict the rate plan calling areas and are not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions. Future Coverage areas are based on current build-out plans and are subject to change.

Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Picture and SMS Messaging and Web Access will incur additional data charges when outside the Edge Wireless Network. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime, kilobytes or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

**Fees:** Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates may not be available when using your phone outside the United States; international wireless long distance not included. May not be combined with certain wireless offers and promotions.



1-866-221-EDGE  
www.edgewireless.com



#149 Rev 8/11/04

SharedEdge+<sup>SM</sup>



Something  
this good  
should be shared  
with others.

edge+PLUS<sup>SM</sup>



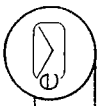
# SharedEdge+<sup>SM</sup>

Edge+ plans bring you additional features such as hi-tech games, polyphonic ringtones, music, and more. Add a +Data plan for picture messaging and wireless internet access. Edge+ takes wireless to a whole new level!



## Included Features\*:

- 2-Way SMS
- Caller ID
- Call Waiting
- Call Forwarding
- Enhanced Voice Mail
- Detailed Billing
- Conference Calling
- Message Waiting Indicator



## + messaging

2-Way SMS 250 <sup>†</sup>	\$4.99 / Month
2-Way SMS 1000 <sup>††</sup>	\$9.99 / Month
2-Way SMS 1500 <sup>††</sup>	\$14.99 / Month
2-Way SMS 2000 <sup>††</sup>	\$19.99 / Month
2-Way SMS ∞	\$24.99 / Month

<sup>†</sup> 10¢ per additional message.

<sup>††</sup> 5¢ per additional message.



## LocalSharedEdge+<sup>SM</sup>

A roaming fee of 30¢ per minute is assessed on all calls made from outside of your Rate Plan Area.

## WesternSharedEdge+<sup>SM</sup>

10-state Rate Plan Area includes Oregon, Washington, California, Utah, Idaho, Nevada, Colorado, Montana, Alaska, and Wyoming. Calls placed outside the Rate Plan Area are subject to a 30¢ per minute roaming fee.

## SharedEdge+ Plans

Plan	MONTHLY ACCESS	INCL'D ANYTIME MINUTES*	NIGHT / WEEKEND MINUTES*	MOBILE-TO-MOBILE MINUTES*	NATIONWIDE LONG DISTANCE	ADD'TL / ROAMING MINUTES
LocalSharedEdge+ 1100	\$44.99	1100	Unlimited	Unlimited	N/C	30¢
LocalSharedEdge+ 1500	\$64.99	1500	Unlimited	Unlimited	N/C	30¢
LocalSharedEdge+ 2000	\$79.99	2000	Unlimited	Unlimited	N/C	30¢
LocalSharedEdge+ 3500	\$149.99	3500	Unlimited	Unlimited	N/C	30¢
LocalSharedEdge+ 6000	\$299.99	6000	Unlimited	Unlimited	N/C	30¢
LocalSharedEdge+ 10000	\$499.99	10000	Unlimited	Unlimited	N/C	30¢
LocalSharedEdge+ Share	\$14.99	0	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 300	\$34.99	300	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 800	\$49.99	800	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 1000	\$59.99	1000	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 1200	\$69.99	1200	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 1500	\$99.99	1500	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 2500	\$149.99	2500	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 3000	\$179.99	3000	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ 3500	\$199.99	3500	Unlimited	Unlimited	N/C	30¢
WesternSharedEdge+ Share	\$19.99	0	Unlimited	Unlimited	N/C	30¢

## SharedEdge+<sup>SM</sup>

\* For WesternSharedEdge+ plans, at least 50% of your included Anytime Minutes and Unlimited Night / Weekend Minutes must be on the Edge Wireless Network in each billing cycle or we may terminate your service. Included Anytime Minutes and Night / Weekend Minutes are valid for voice calls made from or received in your Rate Plan Area. All other usage is roaming. Night / Weekend is 7:00 p.m. - 6:59 a.m. M-F, all day Saturday and Sunday. Unlimited Mobile-to-Mobile Minutes apply only to voice calls between Edge Wireless phones that are placed, received and completed entirely on your local Edge Wireless Network. With Nationwide Long Distance feature, long distance charges will not apply when calling from your Rate Plan Area to anywhere in the U.S. 2-way SMS includes 50 incoming or outgoing messages per month. 10¢ per additional message.



# to the Latest Digital Features of Wireless.

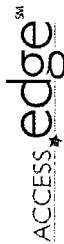


## Cash Plans (\$10.00 Minimum Purchase)



Airtime Purchase	Airtime Rate: 25¢ / Minute	No Bonus Credit
\$10 Airtime Purchase	Airtime Rate: 25¢ / Minute	No Bonus Credit
\$25 Airtime Purchase	Airtime Rate: 25¢ / Minute	\$5 Bonus Airtime Credit
\$50 Airtime Purchase	Airtime Rate: 25¢ / Minute	\$10 Bonus Airtime Credit
\$75 Airtime Purchase	Airtime Rate: 25¢ / Minute	\$30 Bonus Airtime Credit
\$100 Airtime Purchase	Airtime Rate: 25¢ / Minute	\$65 Bonus Airtime Credit

## Bucket Plans (Credit/Debit Card Required)



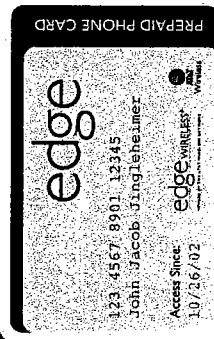
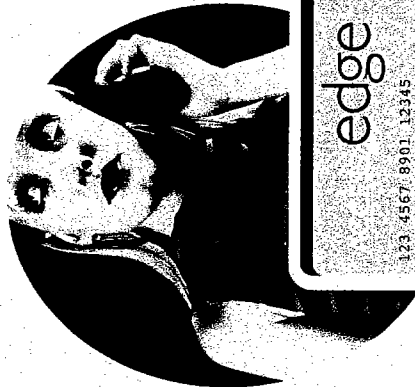
\$19.99	50 Peak / 100 Off-Peak Minutes	Peak Coverage: 25¢ / Minute	Off-Peak Coverage: 10¢ / Minute
\$39.99	160 Peak / 500 Off-Peak Minutes	Peak Coverage: 25¢ / Minute	Off-Peak Coverage: 10¢ / Minute
\$99.99	600 Peak / 1000 Off-Peak Minutes	Peak Coverage: 25¢ / Minute	Off-Peak Coverage: 10¢ / Minute

Bucket accounts require a minimum \$5.00 positive cash balance at all times.

All Plans Include:	Basic Voice Mail
Options:	1-Way Short Messaging Service (SMS) 2-Way SMS \$4.99 for 250 Msgs. ↳ 10¢ per message after 250 messages

Misc. Rates:	Off-Peak Rate <sup>1</sup>
	10¢ per minute
	Long Distance Rate <sup>2</sup>
	17¢ per minute
	Roaming Rate <sup>3</sup>
	60¢ per minute
	No separate LD charge applies when roaming.

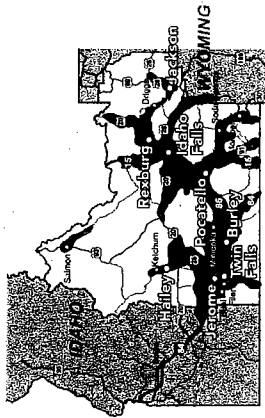
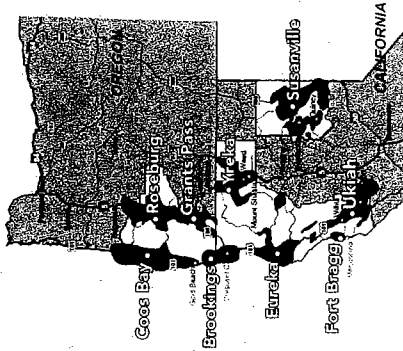
- 1 Calls made between 7:01 PM and 6:59 AM will be charged at the Off-Peak rate. Calls made outside of Off-Peak hours will be charged at the Peak Rate.
- 2 LD calls made from your Rate Plan Area are charged an additional 17¢ per minute.
- 3 When calling from outside your Rate Plan Area, an additional 60¢ per-minute roaming charge is incurred. LD is included in the 60¢ roaming charge.



Ex G

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## ACCESS EDGE RATE PLAN AREAS



AccessEdge Rate Plan Area  
AccessEdge Roaming Area

The maps above depict the rate plan calling areas and are not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on your system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.

## MORE BONUSES WITH ACCESS EDGE!

- New phone purchases receive:
- OR ○ \$5 Bonus Credit & 100 Bonus Minutes
  - \$5 Bonus Credit & 200 Bonus Minutes if you sign up for Automatic Renewal. (See store for details)

## MORE INFO:

### Does the credit in my account ever expire?

All credits to your account are valid for 90 days from the date of purchase. Credits to your account that are unused after 90 days from the date of purchase will expire if no new credits to your account are purchased within that 90 day period. If you purchase new credits within 45 days of balance expiration, any lost credits will be added back to your account, and your entire balance will be valid for 90 more days from the new date of purchase.

### Will I lose my phone number after 90 days?

No. Upon expiration after 90 days of account inactivity, your account will be frozen for a period of 45 days. If no new credits are purchased after the 45 day grace period, your account and phone number will be terminated.

### Are there any activation fees?

No.

### How do I dial while roaming?

Normally, you must do nothing different to make a call while roaming. Yet, while roaming on other carrier's systems, compatibility issues may require you to take additional steps when dialing. In these cases, after you dial a number you will hear a recorded message that will ask you to enter your wireless phone's number before being connected. In some areas, you may be required to re-enter the number you are trying to reach.

### Do I have to buy a phone with AccessEdge+?

No. If it meets our criteria for activation, you may use any pre-existing phone of your own. If you do purchase a new phone, you will receive a \$10 credit to your account!

## Explanation of Rates and Charges:

Upon activation, a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Picture and SMS Messaging and Web Access will incur additional data charges when outside the Edge Wireless Network. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime, kilobytes or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates may not be available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.



1-866-221-EDGE

[www.edgewireless.com](http://www.edgewireless.com)

edge WIRELESS®  
MEMBER OF THE AT&T WIRELESS NETWORK



#158 Rev A 12/04

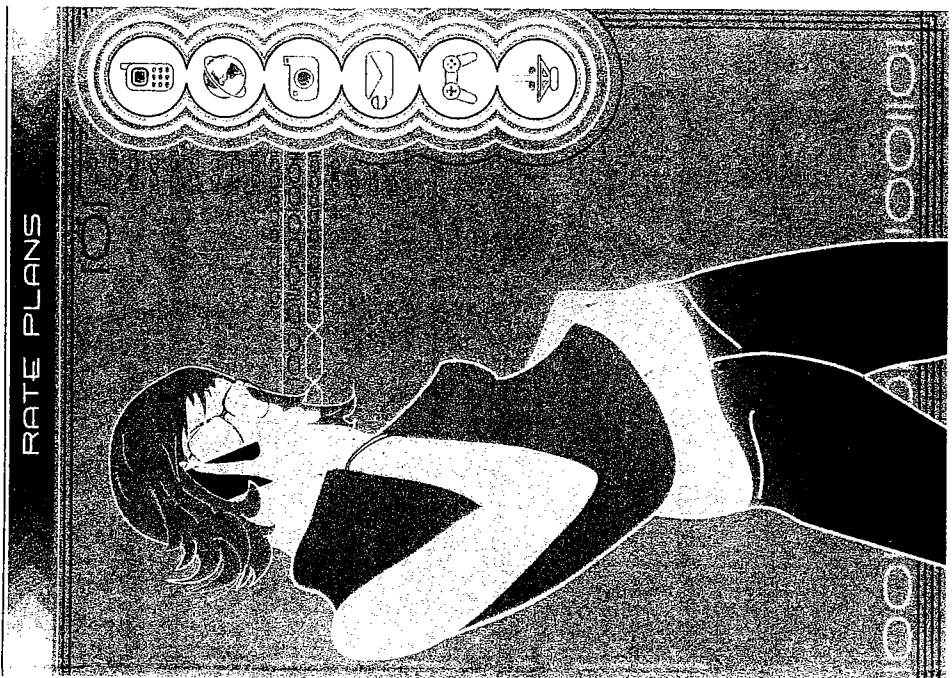
AccessEdge+<sup>SM</sup>

Ex G

Page 5 of 25

# AccessEdge+<sup>SM</sup>

RATE PLANS



edge WIRELESS®  
MEMBER OF THE AT&T WIRELESS NETWORK

# AccessEdge+<sup>SM</sup>

AccessEdge+ gives you all the advantages of the Edge Wireless GSM network, all with no annual contracts, monthly bills, or credit checks. You decide how much you want to spend, and you never have to worry about coverage charges and extra fees.

Voice Rate	Minimum Initial Account Balance	Roaming Charge	Data Charge	SMS Charge	Nationwide Long Distance
25¢/min	\$10.00	25¢/min	1¢/KB	5¢	N/C
20¢/min	\$25.00	25¢/min	1¢/KB	5¢	N/C
17¢/min	\$50.00	25¢/min	1¢/KB	5¢	N/C

<sup>1</sup> The voice rate at which your account will be charged is based on one of these minimum initial account balances at setup. Additional future account replenishments of any denomination will not affect your account's airtime voice rate. Your voice rate is valid for voice calls made from or received in your Rate Plan Area. All other usage is roaming.

<sup>2</sup> All non-voice/non-SMS usage is considered as data usage. Please see the data chart for typical sizes of various wireless data activities. <sup>3</sup> Your account will be charged this rate for every incoming or outgoing SMS message.

### Unlimited Features

- Caller ID
- Call Waiting
- Call Forwarding
- Basic Voice Mail
- 3-Way Calling

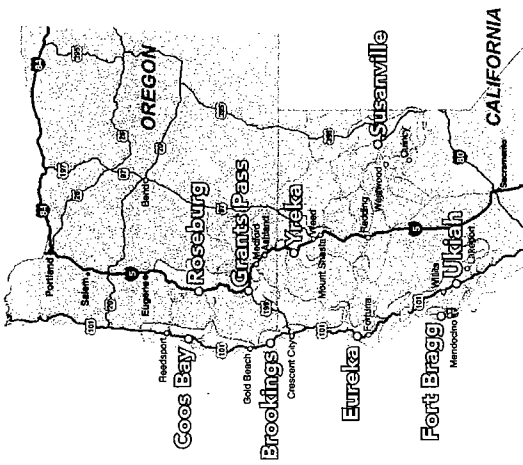
5-Sentence E-Mail	1 Kilobyte
WAP Web Page	5-30 Kilobytes
HTML Web Page	100-500 Kilobytes
Ringtone*	1-15 Kilobytes
Game*	50-500 Kilobytes
Picture Message	30-80 Kilobytes
Graphic/Screensaver*	1-10 Kilobytes

1,024 Kilobytes (KB) = 1 MB

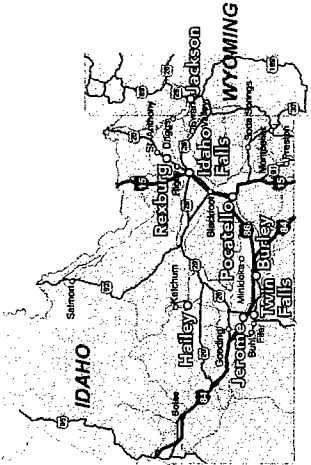
\* Additional charges may apply when downloading ringtones, graphics, music, etc.

\*\* Based on assumptions for the amount of data these activities consume. Actual usage may vary.

## Rate Plan Areas



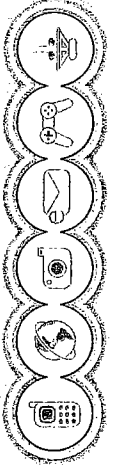
### OR/CA AccessEdge+



### ID/WY AccessEdge+



\* These maps depict the rate plan calling areas and are not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.



Dial #555 for Info Edge informational services. (\$0.75 per call + airtime)

Check Your Account Balance

Dial \*369 (free call) to check your account balance at any time.

Customer Service

Dial 611 (free call) from your wireless phone, or 866-221-EDGE (3343) from any landline phone. Calls to all Edge Wireless retail stores are free.

Info Edge

Ex G



**Explanation of Maps, Rates, and Charges:**

\* This map depicts the rate plan calling area and is not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions. Future Home Coverage areas are based on current build-out plans and are subject to change.

Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, 3-way Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates are not available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.



1-866-221-EDGE  
www.edgewireless.com



#04 Rev B 10/04

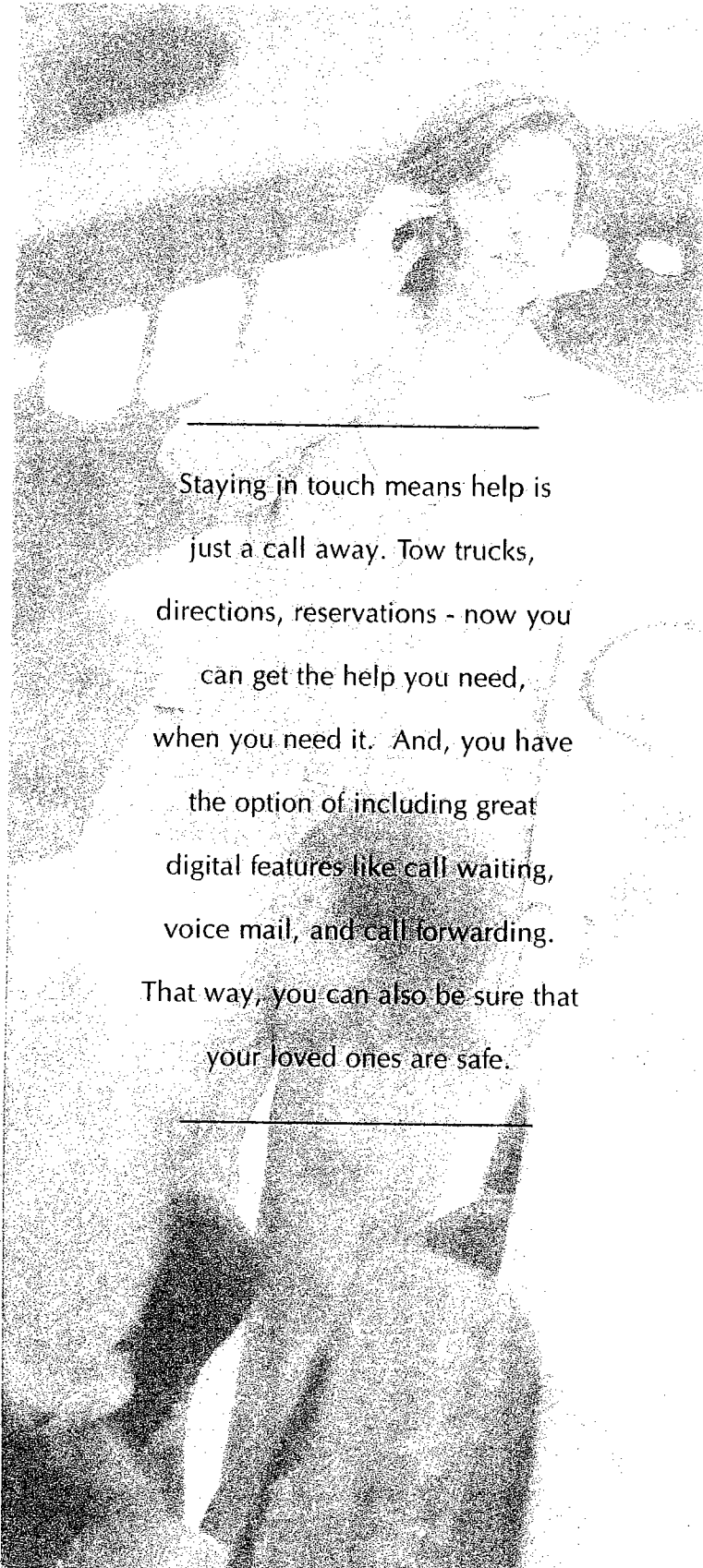
# SafetyPlan<sup>SM</sup>



## RATE PLANS

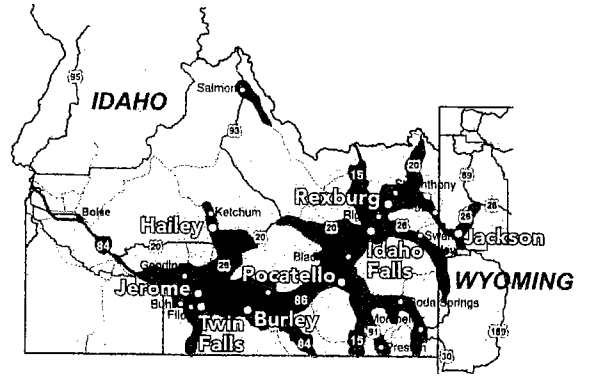
Nothing  
makes you  
feel safer  
than being  
able to reach  
the ones  
you love.





Staying in touch means help is just a call away. Tow trucks, directions, reservations - now you can get the help you need, when you need it. And, you have the option of including great digital features like call waiting, voice mail, and call forwarding. That way, you can also be sure that your loved ones are safe.

## RATE PLAN AREA



- Edge Wireless Network\*
  - Rate Plan Area
  - Edge Future Coverage\*
- (\*See reverse for limitations)

# SafetyPlan<sup>SM</sup>

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MONTHLY ACCESS .....	\$14.99
INCLUDED MINUTES .....	30
ADDITIONAL MINUTES .....	50¢ /min.
ROAMING .....	75¢ /min.
LONG DISTANCE .....	No Charge within Rate Plan Aea**

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\*\* Long Distance charges will not apply when calling from within your Rate Plan Area to anywhere within your Rate Plan Area. When calling outside your Rate Plan Area, domestic Long Distance will be billed at 17¢ per minute.

**Explanation of Rates and Charges:**

Activation is subject to credit approval, a deposit or valid major credit card may be required. Usage limitations may apply. A GSM Hiptop® device is required. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Picture and SMS Messaging and Web Access will incur additional data charges when outside the Edge Wireless Network. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

While in the 50-state calling area, you will not be billed for nationwide roaming or long distance.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime, kilobytes or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line, Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Your service is subject to the Terms and Conditions contained in your Service Agreement, the Danger Service and End User License Agreement, and the Instant Messaging Sublicense Agreement.

Plan rates may not be available when using your phone outside the United States; international wireless long distance not included. May not be combined with certain wireless offers and promotions.

1-866-221-EDGE  
www.edgewireless.com



TALK EMAIL CHAT SURF PLAY



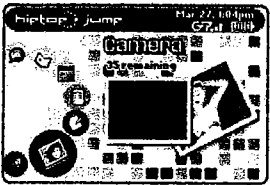
# hiptop®

The future is here. The new color Hiptop brings you all the great functions of a mobile phone, plus a whole lot more. Take photos from wherever you are, send and receive e-mails and instant messages, browse the web, or play games - all in full color. There's so much to do with the new Hiptop, you'll need the built-in calendar to keep yourself on schedule.



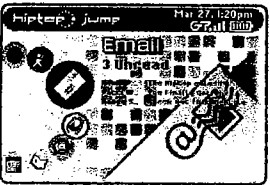
## MOBILE PHONE

With all the high-tech features of the Hiptop, you might forget that it is a fully-featured digital phone. Customizable ringtones and caller ID pics can notify you if your boss or client is calling. feds are calling.



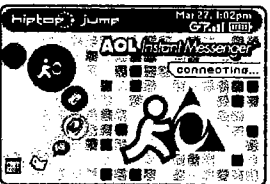
## CAMERA

With the optional camera attachment accessory, you can take pictures from anywhere and send them to anyone via e-mail.



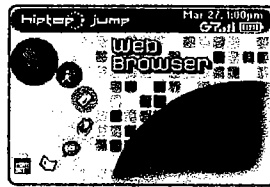
## E-MAIL

Create up to 3 internal e-mail accounts, or access unlimited web-based e-mail accounts. Send and receive e-mails including Word, PDF, and picture attachments.



## AOL® IM

Take your contact list with you while traveling on business or when working from home. Using Instant Messenger™ from AOL®, chat real-time with colleagues, associates, and family & friends.



## INTERNET

The Hiptop uses a full HTML browser, which means you can access all the same websites you rely on at work and at home.



## GAMES

Arrived early for your meeting? With the Hiptop signature game, Rock & Rocket, you'll enjoy having a little time on your hands. Or, you can download new games right to your Hiptop (charges may apply).

## WEB SYNCH / DATA BACKUP

Your Hiptop automatically synchs with a personal web page dedicated to you. All of your Hiptop's information is automatically backed-up on your web page - no downloading or manual transferring required. Changes made to your web page are also synched up with your Hiptop. You can access your own personal web page from any internet computer or device - even from your Hiptop's browser!

**hiptop®**

**RATE PLANS**

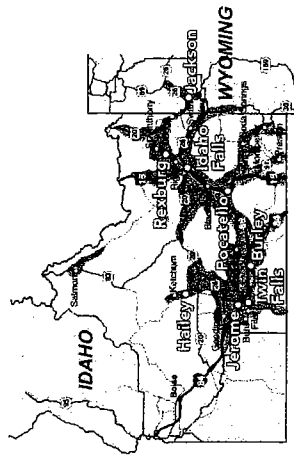
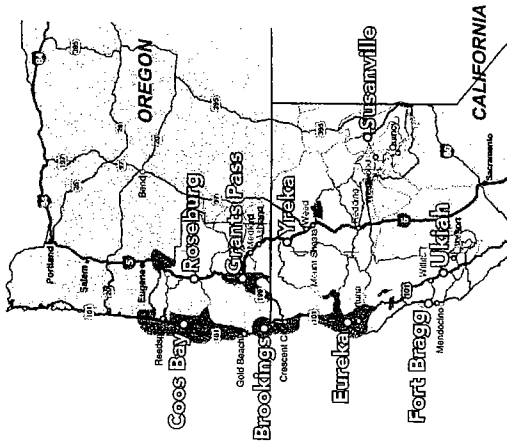
<b>\$24.99</b>	<b>Voice</b>	<b>Data</b>
Per Month	35¢ per minute	Unlimited

35¢ / minute 50-state voice calling area. Unlimited data usage on Edge Wireless Network only. Data usage outside these areas subject to \$0.008/KB roaming charge.

**OR** Add a Hiptop to any Edge+ rate plan for lower per-minute voice rates!



R A T E P L A N A R E A



- Rate Plan Area\*
- Edge Wireless Network
- Edge Future Coverage\*

\* These maps depict the rate plan calling area and are not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions. Future Coverage areas are based on current build-out plans and are subject to change.

OR/CA LocalEdge<sup>SM</sup>

ID/WY LocalEdge<sup>SM</sup>

**Explanation of Rates, and Charges:**

Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, 3-way Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates are not available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.

LocalEdge<sup>SM</sup>



R A T E P L A N S

Locals  
always get a  
great deal.



edge<sup>SM</sup>

MEMBER OF THE AT&T WIRELESS NETWORK

1-866-221-EDGE  
www.edgewireless.com



edge WIRELESS<sup>SM</sup>  
MEMBER OF THE AT&T WIRELESS NETWORK

# LocalEdge<sup>SM</sup>



The LocalEdge Plan is one of the most economical ways to enjoy all the convenience and utility of digital wireless. You won't have to pay any long distance charges as long as you're calling within your Rate Plan Area. All plans also offer great digital features like call waiting, voice mail, and call forwarding. Take advantage of digital wireless with our LocalEdge Plan.

LocalEdge Plans	MONTHLY ACCESS	INCL'D ANYTIME MINUTES	MOBILE-TO-MOBILE MINUTES	NIGHT / WEEKEND MINUTES	NATIONWIDE LONG DISTANCE	ADD'T'L MINUTES
LocalEdge 150	\$24.99	150	0	0	17¢	30¢
LocalEdge 250	\$29.99	250	0	0	17¢	30¢
LocalEdge 800	\$34.99	800	0	1500	17¢	30¢
LocalEdge 1100	\$44.99	1100	UNLIMITED	UNLIMITED	n/c	30¢
LocalEdge 1500	\$64.99	1500	UNLIMITED	UNLIMITED	n/c	30¢
LocalEdge 2000	\$79.99	2000	UNLIMITED	UNLIMITED	n/c	30¢
LocalEdge 3500	\$149.99	3500	UNLIMITED	UNLIMITED	n/c	30¢
LocalEdge 6000	\$299.99	6000	UNLIMITED	UNLIMITED	n/c	30¢
LocalEdge 10000	\$499.99	10000	UNLIMITED	UNLIMITED	n/c	30¢
LocalEdge Share	\$14.99	0	UNLIMITED	UNLIMITED	n/c	30¢

↳ Multiple share lines may be added to any LocalEdge plan \$44.99 and higher and share minutes with the host plan.

## LocalEdge<sup>SM</sup>

Included Anytime Minutes and Night / Weekend Minutes are valid for voice calls made from or received in your Rate Plan Area. All other usage is roaming. A roaming fee of 35¢ per minute is assessed on calls made from outside your Rate Plan Area, but within Oregon, Washington, California, Utah, Idaho, Nevada, Wyoming, Colorado, Montana, & Alaska. Calls placed from outside those states are subject to a 60¢ per minute roaming fee. Night / Weekend is 7:00 p.m. - 6:59 a.m. M-F, all day Saturday and Sunday. Unlimited Mobile-to-Mobile Minutes apply only to voice calls between Edge Wireless devices that are placed, received and completed entirely on your local Edge Wireless Network. With Nationwide Long Distance feature, long distance charges will not apply to LocalEdge plans when calling from your Rate Plan Area to anywhere within the United States. When calling outside your Rate Plan Area, Nationwide Long Distance will be billed at 17¢ per minute.

### INCLUDED FEATURES

- 2-Way Short Messaging Service (SMS)\*
- Enhanced Voice Mail
- Conference Calling
- Call Waiting
- Call Forwarding
- Detailed Billing
- Caller ID (where available)

\* Includes 50 incoming or outgoing messages per month, 10¢ per message after that.

### OPTIONAL FEATURES

- 2-Way SMS 250 ..... \$4.99/mo.\*\*
- Combo Voice Mail/ Short Messaging ..... \$6.99/mo.
- 2-Way SMS 1000 ..... \$9.99/mo.†
- 2-Way SMS 1500 ..... \$14.99/mo.†
- 2-Way SMS 2000 ..... \$19.99/mo.†
- 2-Way SMS Unlimited ..... \$24.99/mo.
- Nationwide Long Distance ... \$4.99/mo.
- Unlimited Mobile-to-Mobile .. \$9.99/mo.
- "InfoEdge" #555 ..... 75¢ plus
- Handset Insurance Available anytime

\*\* Additional messages are 10¢ each.

† Additional messages are 5¢ each.

# NationalEdge<sup>SM</sup>



## RATE PLANS

No long distance,  
no roaming,  
nationwide,  
anytime.

It's just that simple.



edge WIRELESS<sup>®</sup>  
MEMBER OF THE AT&T WIRELESS NETWORK

### Explanation of Rates and Charges:

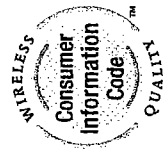
Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, 3-way Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates are not available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.

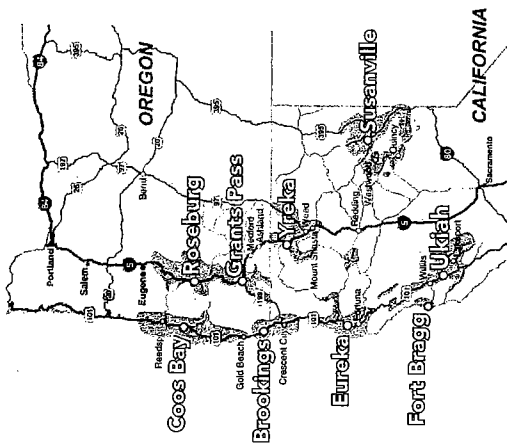


1-866-221-EDGE  
[www.edgewireless.com](http://www.edgewireless.com)

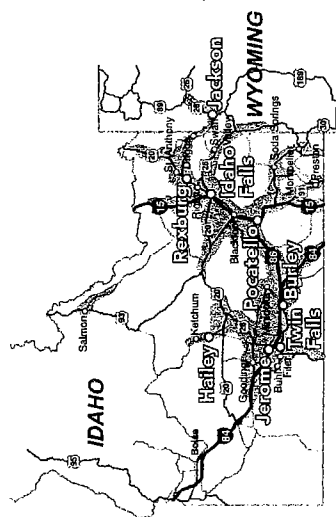


edge WIRELESS<sup>®</sup>  
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Rev. E 10-04



OR/CA Detail

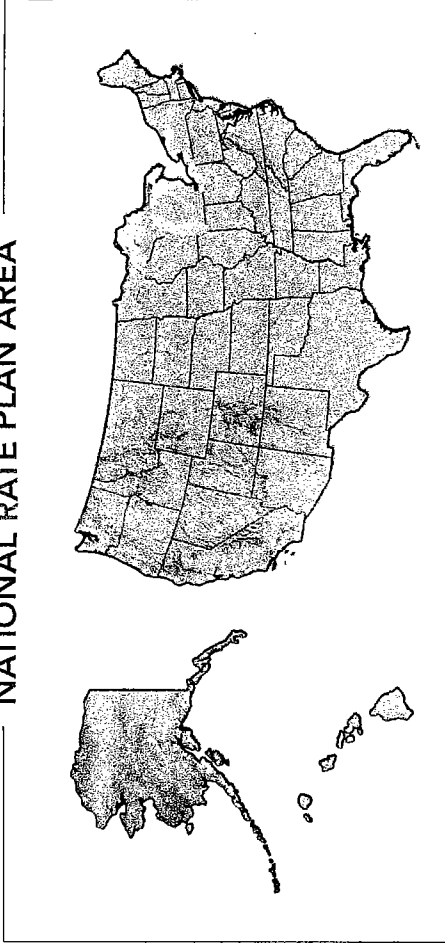


ID/WY Detail

Edge Wireless Network

This map depicts the Edge Wireless Network, although actual coverage may vary. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.

**NATIONAL RATE PLAN AREA\***



From California to Maine, you won't have to pay long distance charges. From Alaska to Florida, you'll never be roaming. From coast to coast, it's nationwide flexibility. All plans include great digital features like call waiting, voice mail, call forwarding, and short messaging service. Feel free to travel throughout the country with National Edge Plans.

NationalEdge Plans	MONTHLY ACCESS	INCL'D ANYTIME MINUTES	ADDT'L MINUTES	NATIONWIDE ROAMING / LONG DISTANCE
NationalEdge 250	\$49.99	250	35¢	n/c
NationalEdge 450	\$59.99	450	35¢	n/c
NationalEdge 650	\$79.99	650	25¢	n/c
NationalEdge 900	\$99.99	900	25¢	n/c
NationalEdge 1100	\$119.99	1100	25¢	n/c
NationalEdge 1500	\$149.99	1500	25¢	n/c
NationalEdge 2000	\$199.99	2000	25¢	n/c

INCLUDED FEATURES
<ul style="list-style-type: none"> <li>• Short Messaging Service (SMS)*</li> <li>• Basic Voice Mail</li> <li>• Conference Calling</li> <li>• Call Waiting</li> <li>• Call Forwarding</li> <li>• Detailed Billing</li> <li>• Caller ID (where available)</li> <li>• Message Waiting Indicator (where available)</li> </ul>

OPTIONAL FEATURES
Enhanced Voice Mail..... \$2.99/mo.
2-Way SMS ..... \$4.99/mo.*
2-Way SMS 1000 ..... \$9.99/mo.**
Combo Voice Mail/Short Messaging ..... \$6.99/mo.
Nationwide Long Distance..... \$4.99/mo.
Unlimited Mobile-to-Mobile... \$9.99/mo.
"InfoEdge" #555 ..... 75¢ plus airtime
Handset Insurance Available

* Up to 250 messages/month 10¢ per additional message.
** Up to 1000 messages/month 5¢ per additional message.

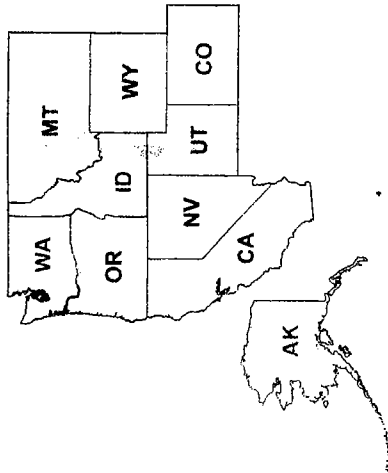
  

**NationalEdge<sup>SM</sup>**  
 At least 50% of your included Anytime Minutes must be on the Edge Wireless Network in each billing cycle or we may terminate your service. Nationwide long distance and roaming charges will not apply when calling from anywhere in the United States.

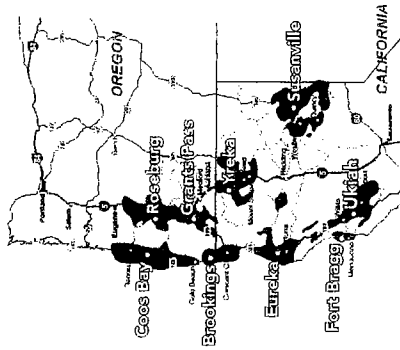
\* This map depicts the rate plan calling area and is not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.



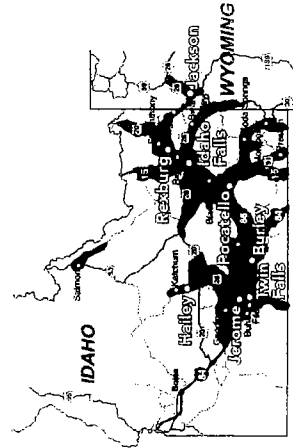
RATE PLAN AREA



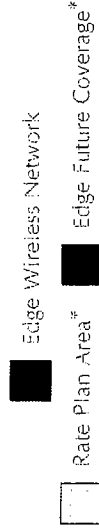
Western Edge



OR/CA



ID/WY



**Explanation of Coverage Maps, Rates, and Charges:**

\* These maps depict the rate plan calling area and are not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions. Future Coverage areas are based on current build-out plans and are subject to change.

Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, 3-way Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

**Fees:** Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates are not available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.



1-866-221-EDGE

[www.edgewireless.com](http://www.edgewireless.com)



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Western Edge™



RATE PLANS

Travel all over the West without leaving home.



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# Western Edge<sup>SM</sup>

Oregon, Washington, California, Utah, Nevada, Idaho, Wyoming, Montana, Colorado, & Alaska - all 10 states are included in the WesternEdge plan. When calling within those states, you won't have to pay for domestic long distance or roaming. And all plans also include great digital features like call waiting, voice mail, and call forwarding.



Western Edge Plans	MONTHLY ACCESS	INCL'D ANYTIME MINUTES	MOBILE-TO-MOBILE MINUTES	NIGHT / WEEKEND MINUTES	NATIONWIDE LONG DISTANCE	ADDT'L MINUTES
Western Edge 200	\$29.99	200	0	0	17¢	30¢
Western Edge 600	\$39.99	600	UNLIMITED	500	n/c	30¢
Western Edge 800	\$49.99	800	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge 1000	\$59.99	1000	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge 1200	\$69.99	1200	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge 1500	\$99.99	1500	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge 2500	\$149.99	2500	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge 3000	\$179.99	3000	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge 3500	\$199.99	3500	UNLIMITED	UNLIMITED	n/c	30¢
Western Edge Share	\$19.99	0	UNLIMITED	UNLIMITED	n/c	30¢

↳ Multiple share lines may be added to any WesternEdge plan \$49.99 and above and share minutes with the host plan.

## Western Edge<sup>SM</sup>

At least 50% of your included Anytime Minutes and Night/Weekend Minutes must be on the Edge Wireless Network in each billing cycle or we may terminate your service. Included Anytime Minutes and Night/Weekend Minutes are valid for voice calls made from or received in your 10-state Rate Plan Area (which includes Oregon, Washington, California, Utah, Idaho, Nevada, Colorado, Montana, Alaska, & Wyoming). All other usage is roaming and will be assessed a roaming fee of 80¢ per minute. Nights/Weekends is 7:00 PM - 6:59 AM M-F, all day Saturday & Sunday. Domestic long distance charges will not apply to WesternEdge plans when calling from within your 10-state Rate Plan Area to anywhere within those 10 states. When the Nationwide Long Distance feature, long distance charges will not apply when calling from your Rate Plan Area to anywhere in the United States. When calling from outside your Rate Plan Area, Nationwide Long Distance will be billed at 17¢ per minute. Unlimited Mobile-to-Mobile minutes apply only to calls between Edge Wireless devices that are placed, received, and completed entirely on your local Edge Wireless Network.

### INCLUDED FEATURES

- 2-Way Short Messaging Service (SMS)\*
- Enhanced Voice Mail
- Conference Calling
- Call Waiting
- Call Forwarding
- Detailed Billing
- Caller ID (where)

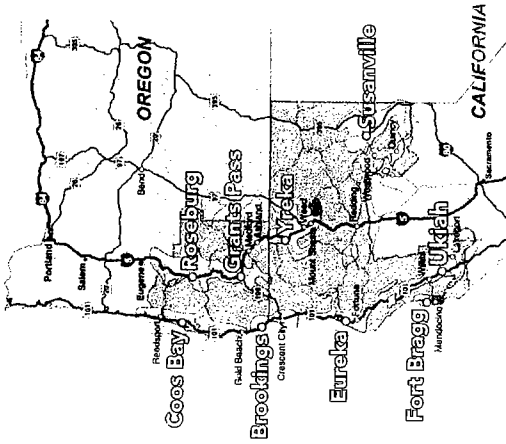
\* Includes 50 incoming/outgoing messages per month, 10¢ per additional message.

### OPTIONAL FEATURES

- 2-Way SMS 250 ..... \$4.99/mo.†
- Combo Voice Mail/Short Messaging ..... \$6.99/mo.
- 2-Way SMS 1000 ..... \$9.99/mo.††
- 2-Way SMS 1500 ..... \$14.99/mo.††
- 2-Way SMS 2000 ..... \$19.99/mo.††
- 2-Way SMS Unlimited ..... \$24.99/mo.
- Nationwide Long Distance ... \$4.99/mo.
- Unlimited Mobile-to-Mobile... \$9.99/mo.

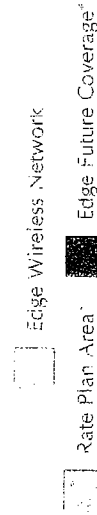
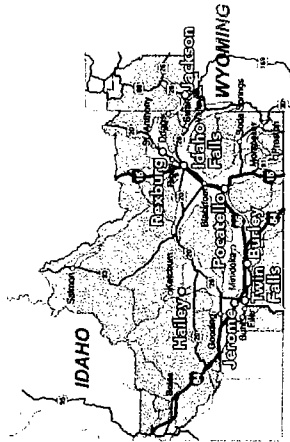
"InfoEdge" #555 ..... 75¢ plus  
Handset Insurance Available Airtime

† 10¢ per additional message.  
†† 5¢ per additional message.



OR/CA LocalEdge+

ID/WY LocalEdge+



\* These maps depict the rate plan calling areas and are not a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions. Future Coverage areas are based on current build-out plans and are subject to change.

**Explanation of Rates and Charges:**

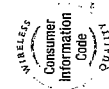
Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Picture and SMS Messaging and Web Access will incur additional data charges when outside the Edge Wireless Network. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime, kilobytes or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates may not be available when using your phone outside the United States; international wireless long distance not included. May not be combined with certain wireless offers and promotions.

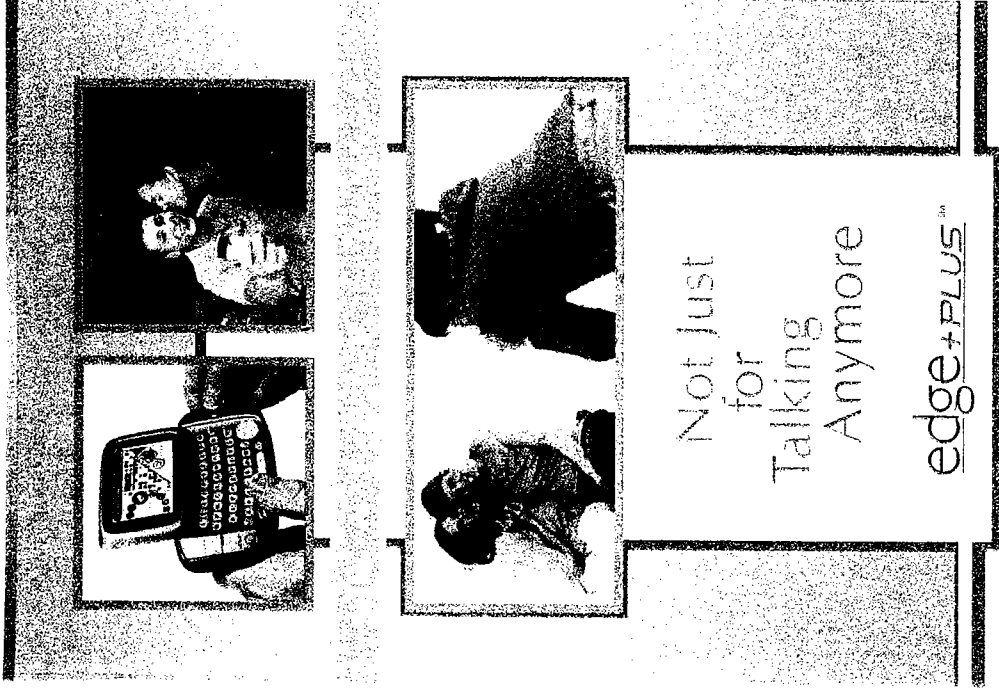


1-866-221-EDGE  
www.edgewireless.com

edge WIRELESS<sup>®</sup>  
MEMBER OF THE AT&T WIRELESS NETWORK



LocalEdge+<sup>SM</sup>



edge WIRELESS<sup>®</sup>  
MEMBER OF THE AT&T WIRELESS NETWORK



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# LocalEdge+<sup>SM</sup>

Edge+ plans bring you additional features such as hi-tech games, polyphonic ringtones, music, and more. Add a +Data plan for picture messaging and wireless internet access. Edge+ takes wireless to a whole new level!



## LocalEdge+ Plans

	MONTHLY ACCESS	INCL'D ANYTIME MINUTES*	NIGHT / WEEKEND MINUTES*	MOBILE-TO-MOBILE MINUTES*	NATIONWIDE LONG DISTANCE	ADD'L / ROAMING MINUTES
LocalEdge+ 800	\$34.99	800	1500	0	N/C	30¢
LocalEdge+ 1200	\$49.99	1200	Unlimited	Unlimited	N/C	25¢
LocalEdge+ 3000	\$99.99	3000	Unlimited	Unlimited	N/C	25¢
LocalEdge+ Share	\$19.99	0	Unlimited	Unlimited	N/C	25¢

↳ Add multiple share lines to any LocalEdge+ plan \$49.99 and above and share minutes with the host plan.

Infinity+ Plan ∞ \$99.99 ∞ ∞ ∞ ∞ N/C 25¢

↳ Unlimited minutes good only while on your local Edge Wireless Network. Usage of your device outside of your local Edge Wireless Network is roaming.

# edge+PLUS<sup>SM</sup>

+PIX +WEB +messaging +GAMES +MUSIC

## LocalEdge+<sup>SM</sup>

\* Included Anytime Minutes and Night / Weekend Minutes are valid for voice calls made from or received in your Rate Plan Area. All other usage is roaming. Night / Weekend is 7:00 p.m. - 6:59 a.m. M-F all day Saturday and Sunday. Unlimited Mobile-to-Mobile Minutes apply only to voice calls between Edge Wireless phones that are placed, received and completed entirely on your local Edge Wireless Network. With Nationwide Long Distance feature, long distance charges will not apply when calling from your Rate Plan Area to anywhere in the U.S. 2-Way SMS includes 50 incoming or outgoing messages per month, 10¢ per additional message.

## Included Features:

- 2-Way SMS
- Enhanced Voice Mail
- Caller ID
- Detailed Billing
- Call Waiting
- Conference Calling
- Call Forwarding
- Message Waiting Indicator

## Additional Options:

- "InfoEdge" #555 .....75¢ plus airtime
- Wireless 101 Classes .....Free!
- SpeedBills Online Bill Pay .....Free!
- Handset Insurance Available

## +messaging

2-Way SMS 250 <sup>†</sup>	\$4.99 / Month
2-Way SMS 1000 <sup>††</sup>	\$9.99 / Month
2-Way SMS 1500 <sup>††</sup>	\$14.99 / Month
2-Way SMS 2000 <sup>††</sup>	\$19.99 / Month
2-Way SMS ∞	\$24.99 / Month

† 10¢ per additional message.  
†† 5¢ per additional message.

## +GAMES

Get some time to kill? Download games and graphics to your compatible phone from [edgewireless.com](http://edgewireless.com).<sup>\*\*</sup>

## +MUSIC

Want to dance to a different tune? Download polyphonic ringtones and music to your compatible phone from [edgewireless.com](http://edgewireless.com).<sup>\*\*</sup>

<sup>\*\*</sup> Additional charges may apply.

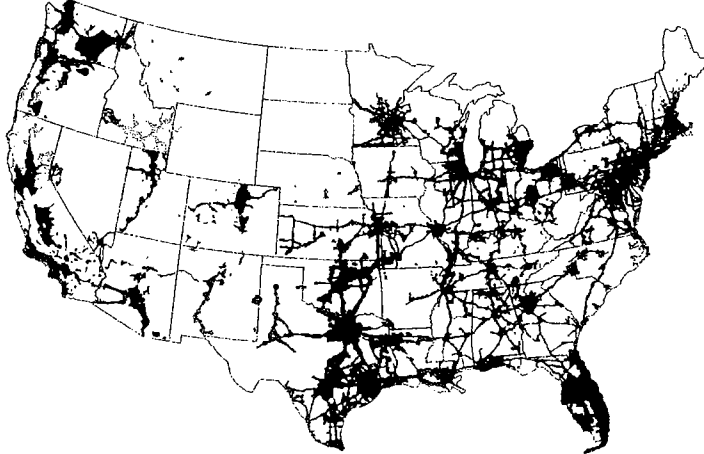
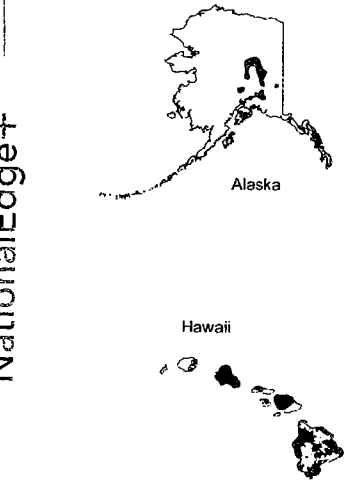
**Explanation of Rates and Charges:**  
 Activation is subject to credit approval; a deposit or valid major credit card may be required. Usage limitations may apply. If Service Limit Monitoring is required for activation you will be limited to a maximum of two wireless calling plans on your account.

Call Waiting, Conference Calling, Call Forwarding and Voice Mail will incur applicable airtime, roaming and wireless long distance charges. Picture and SMS Messaging and Web Access will incur additional data charges when outside the Edge Wireless Network. Due to delayed reporting between carriers, wireless usage may be billed in a subsequent month; this usage will be charged as if used in the month billed. If a calling card or credit card is required to complete a call, different rates apply.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime, kilobytes or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle. When using your device outside the Edge Wireless Network, some features may not work. Coverage is not available in all areas of the United States.

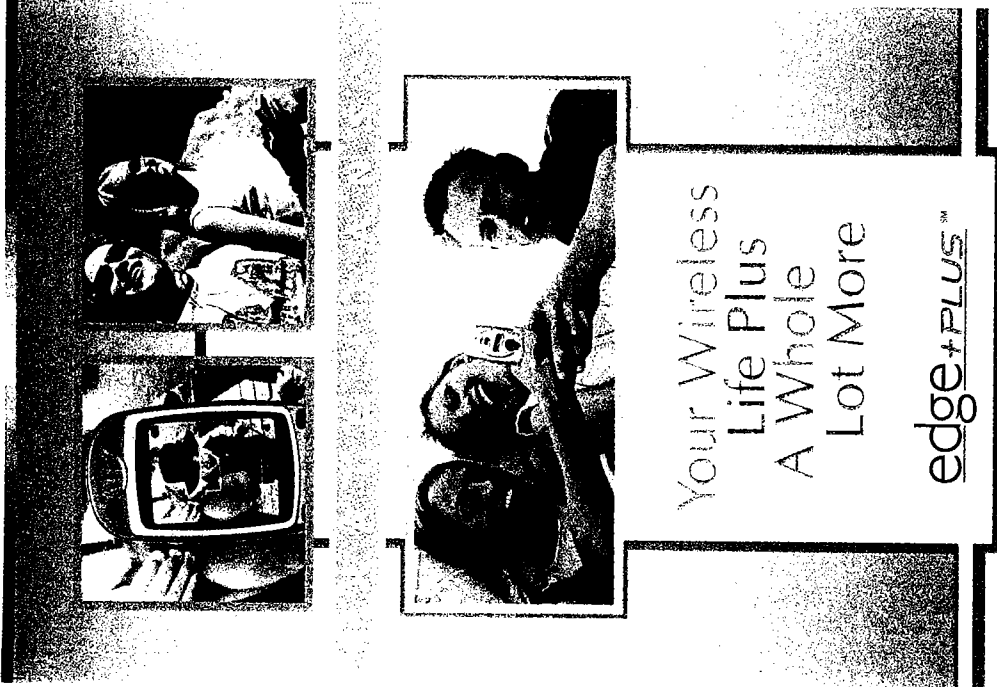
**Fees:** Reconnection - \$25 per line; Returned Check Charge - \$25; InfoEdge - 75¢ per call plus airtime, roaming and wireless long distance. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates may not be available when using your phone outside the United States; International wireless long distance not included. May not be combined with certain wireless offers and promotions.



Edge Partner Coverage\*  
 Rate Plan Area  
 Edge Wireless Network\*

\* This map depicts the rate plan calling area and are is a representation of actual wireless coverage. See your Edge Wireless representative for coverage detail. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions. Edge Partner Coverage areas subject to change without notice.



1-866-221-EDGE  
[www.edgewireless.com](http://www.edgewireless.com)



# NationalEdge+

Edge+ plans bring you additional features such as hi-tech games, polyphonic ringtones, music, and more. Add a +Data plan for picture messaging and wireless internet access. Edge+ takes wireless to a whole new level!



## NationalEdge+ Plans

	MONTHLY ACCESS	INCLD ANYTIME MINUTES	NIGHT / WEEKEND MINUTES†	MOBILE-TO-MOBILE MINUTES†	NATIONWIDE LONG DISTANCE	ADDTL / ROAMING MINUTES
NationalEdge+ 500	\$49.99	500	Unlimited	Unlimited	N/C	25¢
NationalEdge+ 900	\$79.99	900	Unlimited	Unlimited	N/C	25¢
NationalEdge+ 1200	\$99.99	1200	Unlimited	Unlimited	N/C	25¢
NationalEdge+ Share	\$19.99	0	Unlimited	Unlimited	N/C	25¢

→ Add multiple lines to any NationalEdge+ 500, 900, or 1200 plan above and share minutes with the host plan.

→ At least 50% of your included Anytime Minutes and Night / Weekend Minutes must be on the Edge Wireless Network in each billing cycle or we may terminate your service.

## edge+PLUS™

+FIX +WEB +MESSAGING +GAMES +MUSIC

## NationalEdge+™

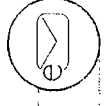
+ Included Anytime Minutes; Night/Weekend Minutes valid for calls conducted entirely in the United States. Phone usage outside of the United States will incur applicable international roaming charges and other applicable fees. Night / Weekend Minutes are valid from 7:00 p.m. - 6:59 a.m. Monday - Friday, all day Saturday and Sunday. Unlimited Mobile-to-Mobile Minutes apply only to voice calls between Edge Wireless Devices that are placed, received and completed entirely on your local Edge Wireless Network. With Nationwide Long Distance feature, long distance charges will not apply when calling from your Fate Plan Area to anywhere in the U.S.  
 \* 2-Way SMS includes 50 incoming or outgoing messages per month, 10¢ per additional message. \*\* Additional charges may apply to games and music downloads.

### Included Features:

- \* 2-Way SMS\*
- \* Caller ID
- \* Call Waiting
- \* Call Forwarding
- \* Enhanced Voice Mail
- \* Detailed Billing
- \* Conference Calling
- \* Message Waiting Indicator

### Additional Options:

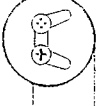
- \* "InfoEdge" #555 ..... 75¢ plus airtime
- \* Wireless 101 Classes ..... Free!
- \* SpeedBills Online Bill Pay ..... Free!
- \* Handset Insurance Available



### + MESSAGING

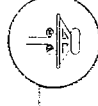
- 2-Way SMS 250\* \$4.99 / Month
- 2-Way SMS 1000\*\* \$9.99 / Month
- 2-Way SMS 1500\*\* \$14.99 / Month
- 2-Way SMS 2000\*\* \$19.99 / Month
- 2-Way SMS ∞ \$24.99 / Month

\* 10¢ per additional message.  
 \*\* 5¢ per additional message.



### + GAMES

Got some time to kill? Download games and graphics to your compatible phone from [edgewireless.com](http://edgewireless.com)\*\*



### + MUSIC

Want to dance to a different tune? Download polyphonic ringtones and music to your compatible phone from [edgewireless.com](http://edgewireless.com)\*\*

**Explanation of Rates and Charges:**

All data plans require activation on an Edge+ GSM rate plan or purchase of an air card. Activation is subject to credit approval; a deposit or valid major credit card may be required.

Picture and SMS Messaging and Web Access will incur additional data charges when outside the Edge Wireless Data Network. Due to delayed reporting between carriers, data usage may be billed in a subsequent month; this usage will be charged as if used in the month billed.

If your Rate Plan includes a predetermined allotment of services (for example, a predetermined amount of airtime, kilobytes or text messages), any unused allotment of services from one billing cycle will not carry over to any other billing cycle.

See the Edge Wireless Data Network map for coverage detail. When using your Device outside the Edge Wireless Data Network, some features may not work. Coverage is not available in all areas of the United States.

Fees: Reconnection - \$25 per line; Returned Check Charge - \$25. If you have any questions, please call 611, free of charge, from your wireless device, or call 1-866-221-EDGE (3343).

Plan rates may not be available when using your device outside the United States. May not be combined with certain wireless offers and promotions.



# +DATA PLANS



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edge WIRELESS®

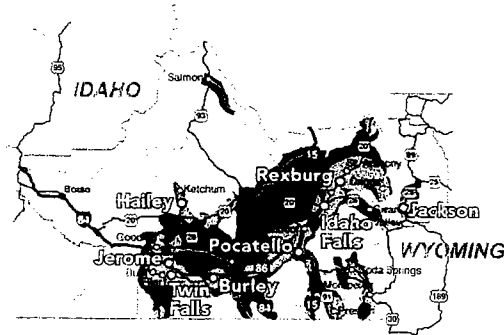
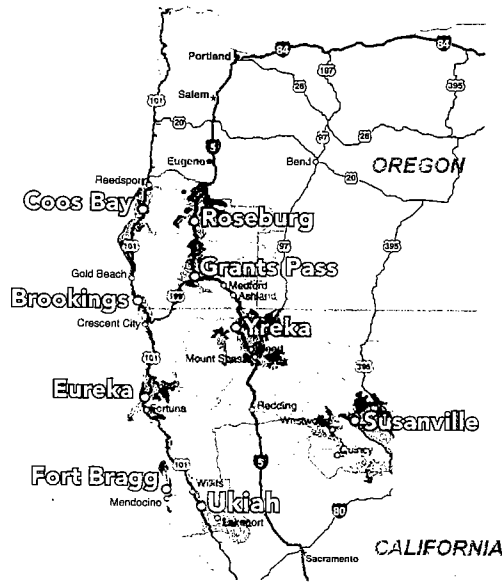
MEMBER OF THE AT&T WIRELESS NETWORK



edge+PLUS

# Edge Wireless Data Network

## Enhanced Data & GPRS Coverage



<b>Enhanced Data Coverage</b>	<b>GPRS Coverage Only</b>
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These maps depict the Edge Wireless Data Network, but actual coverage may vary. Actual coverage depends on system availability and system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.

#154 11/04



# +DATA PLANS

Surf the web from your phone, or surf from your computer - on the go! Send and receive picture messages. Take your e-mail with you wherever you go. Download games to play. Download music to hear. Or, download ringtones and graphics to make your phone yours. Whatever you do, Edge+ data rate plans give your GSM devices the ability to be all they can be.

## +LOCAL DATA

Local Data 1 MB	\$4.99/ Month <sup>1</sup>
Local Data 5 MB	\$9.99/ Month <sup>2</sup>
Local Data 10 MB	\$19.99/ Month <sup>3</sup>
Local Data 20 MB	\$29.99/ Month <sup>4</sup>
Local Data ∞	\$59.99/ Month

<sup>1</sup> 1 MB monthly local data usage only. \$0.008 per KB after 1,024 KB (1 MB).

<sup>2</sup> 5 MB monthly local data usage only. \$0.008 per KB after 5,120 KB (5 MB).

<sup>3</sup> 10 MB monthly local data usage only. \$0.008 per KB after 10,240 KB (10 MB).

<sup>4</sup> 20 MB monthly local data usage only. \$0.008 per KB after 20,480 KB (20 MB).

All data usage on Local Data Plans will incur an additional \$0.008/KB charge while outside the Edge Wireless Data Network.

## +NATIONAL DATA

National Data 5 MB	\$19.99/ Month <sup>a</sup>
National Data 10 MB	\$29.99/ Month <sup>b</sup>
National Data 20 MB	\$39.99/ Month <sup>c</sup>
National Data ∞	\$79.99/ Month

<sup>a</sup> 5 MB monthly nationwide data usage only. \$0.008 per KB after 5,120 KB (5 MB).

<sup>b</sup> 10 MB monthly nationwide data usage only. \$0.008 per KB after 10,240 KB (10 MB).

<sup>c</sup> 20 MB monthly nationwide data usage only. \$0.008 per KB after 20,480 KB (20 MB).

For National Data Plans, at least 50% of your included data usage must be on the Edge Wireless Data Network in each billing cycle or we may terminate your data service.

# How Much Data Do I Need?

**1 MB**

### Just Getting Started.

I just want to access my personal e-mail, check sports scores, look up movie times, and download new ringtones.

**5 MB**

### Light User

I am past the experimental stage. I only occasionally send picture messages, but download web content daily.

**10 MB**

### An Everyday Thing

I send and receive lots of picture messages, and I like to download a new game and ringtone every few days.

**20 MB**

### My Lifeline.

I need to stay connected to my work on a daily, sometimes hourly, basis through e-mail and the web.

**∞ MB**

### All Day. All Night.

I need to access the web all throughout the day - at home on my computer, and on the go with my phone.

## Typical Size of Images, E-mail, Activities

5-Sentence E-Mail	1 Kilobyte
WAP Web Page	5-30 Kilobytes
HTML Web Page	100-500 Kilobytes
Ringtone*	1-15 Kilobytes
Game*	50-500 Kilobytes
Picture Message	30-80 Kilobytes
Graphic/Screensaver*	1-10 Kilobytes

1,024 Kilobytes (KB) = 1 MB

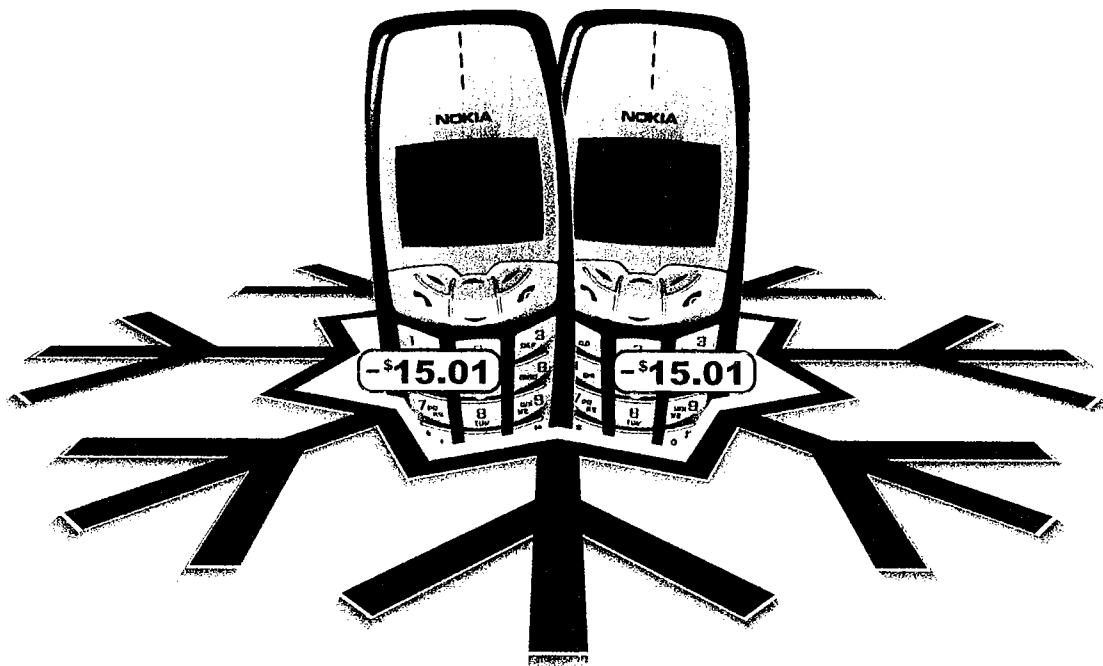
\* Additional charges may apply when downloading ringtones, graphics, music, etc.

\*\* Based on assumptions for the amount of data these activities consume. Actual usage may vary.

# UNLIMITED

## Incoming & Outgoing Calling

between Edge customers on the Edge Network



**+ It's Better Than Free:**

**NOKIA**

**-\$15.01**

**+ 1<sup>st</sup> Month Free Access:**

**▶ LocalEdge 1100**

**\$44.99**

THIS IS **NOT** A HOLIDAY PROMOTION.

BUT IT DOES END DEC. 31<sup>ST</sup>

- ☑ NO ACTIVATION FEES
- ☑ FREE ACCESS FOR 1<sup>ST</sup> FULL MONTH
- ☑ UNLIMITED MOBILE-TO-MOBILE
- ☑ UNLIMITED NIGHTS/WEEKENDS
- ☑ NATIONWIDE NO LONG DISTANCE

Get It All At Edge Wireless.

▶ LocalEdge+ 1200

**\$49.99\***

1st Full Month Free Access!  
1200 Anytime Minutes  
Unlimited Nights/Weekends  
Nationwide No Long Distance  
Unlimited Mobile-to-Mobile Minutes

**\$19.99\***

 **LG 4050 Phone**

Cool color GSM flip-phone for only **\$49.99!**  
(after mail-in rebate)

**\$49.99\***

(after mail-in rebate)



## CenturyTel Cost by Wire Center

Not in Edge Application

Name of Wire Center	Monthly Cost	Access Lines	Total Monthly Cost by W/C
Aurora*	\$32.59	3,731	\$121,593.29
Bly	\$86.03	345	\$29,681.45
Boardman	\$40.85	2,045	\$83,543.77
Bonanza	\$108.99	1,185	\$129,155.52
Brownsville	\$53.72	1,426	\$76,607.71
Burns	\$38.39	3,661	\$140,553.48
Charbonneau*	\$26.76	2,006	\$53,680.56
Chemult	\$99.65	268	\$26,706.87
Chiloquin	\$78.24	1,782	\$139,417.44
Creswell	\$33.04	3,669	\$121,223.76
Depoe Bay	\$42.93	1,439	\$61,771.23
Durkee	\$166.04	129	\$21,418.90
Echo	\$74.42	534	\$39,738.95
Fossil	\$93.40	467	\$43,615.75
Ft Klamath	\$147.04	166	\$24,407.98
Gilchrist	\$89.98	1,162	\$104,562.45
Gleneden Beach	\$42.23	2,351	\$99,293.31
Government Camp	\$156.80	614	\$96,275.20
Harney	\$155.45	846	\$131,514.08
Heppner	\$59.28	1,410	\$83,588.33
Huntington	\$62.57	382	\$23,901.74
lone	\$82.66	393	\$32,484.24
Jewell	\$131.14	816	\$107,008.61
John Day	\$35.45	2,554	\$90,535.72
Knappa	\$53.89	1,555	\$83,791.33
Lakeview	\$40.22	3,501	\$140,808.12
Lebanon	\$32.97	14,633	\$482,450.01
Lexington	\$95.27	289	\$27,533.38
Long Creek	\$114.26	359	\$41,017.55
Malin	\$59.36	688	\$40,837.34
Maupin	\$54.61	445	\$24,300.38
Merrill	\$45.57	965	\$43,974.95
Mitchell	\$138.14	327	\$45,172.11
Monument	\$112.83	320	\$36,106.56
North Powder	\$117.05	413	\$48,340.41
Paisley	\$96.27	349	\$33,598.51
Paulina	\$173.87	251	\$43,640.62
Pilot Rock	\$72.47	1,270	\$92,031.82
Pine Grove	\$109.68	161	\$17,657.84
Rocky Point	\$98.27	256	\$25,158.20
Scappoose	\$37.50	5,684	\$213,151.71
Seneca	\$109.12	161	\$17,567.52
Shedd	\$79.26	355	\$28,136.87
Silver Lake	\$144.88	918	\$133,002.59
Sprague River	\$138.27	628	\$86,834.19

## CenturyTel Cost by Wire Center

## Not in Edge Application

Spray	\$118.20	323	\$38,176.99
Starkey	0.00	0	0.00
Sweet Home	\$39.66	6,501	\$259,755.26
Tygh Valley	\$113.65	203	\$23,069.94
Ukiah	\$65.92	201	\$13,250.78
Wamic	\$94.95	667	\$63,333.45
<b>TOTAL UNSERVED:</b>	<b>\$4,293.79</b>	<b>74,804</b>	<b>\$3,984,977.40</b>

AVERAGE COST:

\$53.27
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\*Aurora/Charbonneau are combined for purposes of calculating access lines by area per Exhibit OTA/24

Information taken from Oregon Public Utility Commission Order No. 04-356, Appendix C, and Attachment C to "Supplemental Filing of United States Cellular Corporation Regarding Updated List of Wire Centers and Cost and Population Density Data" filed in Docket UM 1084.

**CenturyTel Cost by Wire Center**

Covered in Edge Application

<b>Name of Wire Center</b>	<b>Monthly Cost</b>	<b>Access Lines</b>	<b>Total Monthly Cost by W/C</b>
Camas Valley	\$91.97	394	\$36,237.68
Drain	\$69.56	1,265	\$87,998.46
Glide	\$60.87	1,724	\$104,936.60
North Umpqua	\$178.58	151	\$26,966.18
Yoncalla	\$69.58	1,177	\$81,895.19
<b>TOTAL SERVED:</b>	<b>\$470.56</b>	<b>4,711</b>	<b>\$338,034.11</b>
	<b>AVERAGE COST:</b>		<b>\$71.75</b>
<b>TOTAL CENTURYTEL</b>	<b>\$4,764</b>	<b>79,515</b>	<b>\$4,323,013</b>
<b>AVERAGE COST TOTAL CENTURYTEL:</b>			<b>\$54.37</b>

## Cascade Persons Per Sq. Mile

Not Covered in Edge Application

Name of Wire Center	Persons	Area	Average Persons/Sq. Mile
Corbett	3,657	116.18	31.48
Estacada	9,760	122.05	79.97
Eagle Creek	2,950	27.38	107.74
Haines	1,111	179.07	6.20
Mt. Hood	170	235.60	0.72
Medical Springs	130	114.39	1.14
Ripplebrook	330	773.42	0.43
<b>TOTAL UNSERVED</b>	<b>18,108</b>	<b>1568.09</b>	<b>11.55</b>

Information taken from Attachment F to "Supplemental Filing of United States Cellular Corporation Regarding Updated List of Wire Centers and Cost and Population Density Data" filed May 24, 2004 in Oregon Docket UM 1084.

## Cascade Persons Per Sq. Mile

Covered in Edge Application

<b>Name of Wire Center</b>	<b>Persons</b>	<b>Area</b>	<b>Average Persons/Sq. Mile</b>
Elkton*	1020	206.89	4.93
Scottsburg	304	48.80	6.23
<b>TOTAL SERVED</b>	1324	255.69	5.18
<b>TOTAL CASCADE</b>	19,432	1,823.78	10.65

Information taken from Attachment F to "Supplemental Filing of United States Cellular Corporation Regarding Updated List of Wire Centers and Cost and Population Density Data" filed May 24, 2004 in Oregon Docket UM 1084.

\*Includes both the Elkton and Ash Valley exchanges.



**INTERAGENCY AGREEMENT**  
**Between**  
**The Department of Justice and The Public Utilities Commission**

This Interagency Agreement (the "Agreement") is entered into between the Oregon Department of Justice ("DOJ") and the Oregon Public Utility Commission ("PUC"), collectively "the Agencies." The Agreement shall become effective on the date of the last signature or required approval. Unless extended by written agreement of PUC and DOJ, the Agreement shall expire on January 1, 2006.

**FINDINGS**

1. DOJ has entered into Assurances of Voluntary Compliance (AVCs) with the following companies: Celco Partnership dba Verizon Wireless, Sprint Spectrum LP aka Sprint PCS, and Cingular Wireless LLC ("The Companies").

2. Under the AVCs, The Companies are required to:

- a) Provide substantially accurate coverage maps to consumers;
- b) Allow new customers to terminate a wireless contract for any reason within 14 days of activation without paying an early termination fee;
- c) Return any activation or other "non-usage" based fee charged to consumers if consumers cancel within three days of activation;
- d) Disclose material terms and conditions of the plans in The Companies' advertising, when soliciting new consumers through telemarketing, and in writing, after a consumer purchases a new plan;
- e) Separately state the charge for each plan feature or service on consumers' bills; and
- f) Not represent that discretionary cost recovery fees are taxes or some other type of government required fee.

3. DOJ has an interest in insuring that The Companies comply with the terms of the AVCs. To give full effect to the terms of the AVCs, consumer complaints involving The Companies must be analyzed and resolved promptly and fully. DOJ currently processes all consumer complaints concerning The Companies, in addition to handling consumer complaints about other businesses and industries.

4. The PUC currently handles consumer complaints involving telephone services provided by the utilities it regulates. The PUC has dedicated staff and established an internal process for handling consumer complaints. This process includes an informal dispute resolution process to resolve individual complaints concerning long distance telephone services. Additionally, the PUC is currently administering Federal Communications Commission (FCC) slamming rules.

5. Some of The Companies are owned in whole or in part by utilities that fall within the regulatory authority of the PUC. The PUC has established relationships with The Companies for the purpose of ensuring compliance with the law and resolving

consumer complaints. The

PUC's existing complaint resolution program and its regulatory relationship with The Companies positions it to analyze and respond promptly and fully to initial consumer complaints.

6. The PUC has agreed to assist DOJ in monitoring The Companies' compliance with the AVCs by analyzing complaints and by insuring that The Companies respond promptly and fully to consumer complaints.

7. Utilizing the PUC's existing infrastructure to handle consumer complaints involving The Companies is an efficient allocation of state resources and benefits the public by enhancing DOJ's ability to monitor and insure The Companies compliance with the terms and conditions of the AVCs. .

**In consideration of the mutual promises and covenants contained herein, DOJ and the PUC AGREE as follows:**

1. PURPOSE:

The purpose of the Agreement is to establish the terms and conditions applicable to the PUC's and DOJ's collaboration in monitoring The Companies' compliance with the AVCs. In order to accomplish this, the PUC will analyze and cause The Companies to respond to all consumer complaints referred by DOJ. The PUC will keep DOJ apprised of the nature of the complaints it receives and will alert DOJ of any apparent complaint trends so that DOJ can take necessary action against The Companies to ensure compliance.

2. AGENCY CONTACTS:

2.1 Any communications to either Agency shall be made through that Agency's contact listed in this Section, unless the Agency contact directs otherwise in writing.

2.2 PUC's Agency contact for the Agreement is:

Clark Jackson  
PO Box 2148  
Salem, Oregon 97308-2148  
503-378-6600  
FAX: 503-378-5743

///

2.3 DOJ's Agency contact for the Agreement is:

Cheryl Pellegrini 1162 Court Street  
NE Salem, Oregon 97301  
503-947-4333  
FAX: 503-378-5017

3. OBLIGATIONS AND RESPONSIBILITIES:

3.1 Under the terms of this Agreement, DOJ agrees to do the following:

- (a) Upon receipt of a consumer complaints concerning any of The Companies, DOJ shall refer a copy of the complaint to the PUC and so inform the consumers. DOJ shall copy the PUC on the letters it sends to the consumer in order that the PUC may follow up with the consumers.

3.2 Under the terms of this Agreement, PUC agrees to do the following:

- (a) DOJ-Referred Complaints: Report monthly to DOJ on the status of each consumer complaint referred to it by DOJ over the course of the previous month, as well as any consumer complaints referred earlier and not reported as "resolved" in a previous report. In reporting complaints that have been "resolved," the PUC shall include a brief "Code Detail" synopsis, if available and any monetary amount refunded or credited to the consumer.
- (b) Non-DOJ Referred Complaints: Report monthly to DOJ on the status of each consumer complaint about The Companies received directly by PUC over the course of the previous month, as well as any consumer complaints not reported as "resolved" in a previous report. Monthly reports of non-DOJ referred consumer complaints shall include:
- Company/respondent name;
  - Consumer's name, address, and telephone number;
  - Code Detail, including usual PUC "Code Detail" synopsis and any information detailing the nature of the complaint (e.g., false or misleading representation of cost of basic service, failure to disclose details or costs, inaccurate billing, portability issues, general service quality including coverage, false or misleading representations of plan savings);
  - Final "resolved" report, including any monetary amount refunded or credited to the consumer.

Where possible, PUC will group non-DOJ referred consumer complaints by company/respondent name.

///

(c) Report to DOJ any company-specific or industry complaint trends.

3.3 This Interagency Agreement may be changed by mutual agreement of the Agencies. Any changes shall be reduced to writing in the form of an amendment to the Interagency Agreement, signed by the Agency Contacts.

**AGREED TO:**

**Public Utility Commission**

Signature \_\_\_\_\_  
Name     Rick Willis      
Title     Executive Director      
Date     12/8/04    

**Department of Justice**

Signature \_\_\_\_\_  
Signature \_\_\_\_\_  
Name     Cheryl Pellegrini      
Title     Attorney in Charge      
Date     6 December 04    

CEDJ0095

///

September 24, 2004

Mr. Phil Nyegaard  
Administrator  
Telecommunications Division  
Public Utility Commission of Oregon  
550 Capitol St. NE  
Salem, Oregon 97310-1380

Re: Edge Wireless, LLC  
Certification for High Cost Loop Support

Dear Mr. Nyegaard:

I am Donald Castleman, President and Chief Operations Officer for Edge Wireless, LLC ("Edge"). This certification is submitted on behalf of Edge in accordance with FCC rule Sections 54.313 and 54.314. On behalf of Edge, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

Edge Wireless, LLC

By: *Donald Castleman*

Title: President and Chief Operations Officer

Date: Sept. 30, 2004

SUBSCRIBED AND SWORN TO AND ACKNOWLEDGED before me this 30<sup>th</sup> day of Sept., 2004.

*Jane E Venable*  
NOTARY PUBLIC

My Commission Expires:

12/14/07

