

McDowell & Rackner PC



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January 8, 2008

VIA ELECTRONIC FILING

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

Re: Docket UM 1316

Enclosed for filing is a Second Amended Application of Comspan Communications (f/k/a Wantel) for Designation as an Eligible Telecommunications Carrier in the Veneta, Reedsport and Myrtle Point Wire Centers Pursuant to the Telecommunications Act of 1996 – Non-Rural Areas. This Second Amended Application is revised from the previously filed Amended Application as follows:

1. The CLLI Codes for Exhibit A have been revised.
2. The confidential maps for Exhibit D have been revised to include the entire wire center.
3. The calculations in Confidential Exhibits E and F have been revised.
4. Exhibit H, containing ComSpan's local service rate plan information, has been added.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa F. Rackner".

Lisa F. Rackner

Enclosures

cc: Kay Marinos
Alex Duarte
Eugene Eng

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1316

Application of Comspan Communications,
for Designation as an Eligible
Telecommunications Carrier in the Veneta,
Reedsport and Myrtle Point Wire Centers
Pursuant to the Telecommunications Act of
1996 – Non-Rural Areas

SECOND AMENDED APPLICATION

I. INTRODUCTION

Comspan Communications (fka Wantel, Inc.) (“Comspan”) respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to § 214(e)(1)-(2) of the Telecommunications Act of 1934, as amended (the “Act”),¹ and § 54.201 of the Federal Communications Commission’s (the “FCC”) rules.² Comspan first received designation as an ETC in 2005 in the Roseburg, Sutherlin, and Winston wire centers³ and in 2006 in the Bandon wire center.⁴ Since that time Comspan has served customers in all four wire centers. In this Application, Comspan requests that the Commission extend its designation as an ETC in the Veneta, Reedsport and Myrtle Point wire centers (collectively, the “Requested Wire Centers”).

Comspan seeks this extension of its ETC status to assist it in financing a state-of-the-art fiber optic network in the Requested Wire Centers. When the network is completed, Comspan will offer customers located in these cities access to broadband telecommunications, data, and video services. Because the Requested Wire Centers are currently designated as “high cost areas,” Comspan requests that it be designated as an

¹ 47 U.S.C. § 214(e)(1)-(2).

² 47 CFR § 54.201.

³ Order 05-926, Docket UM 1212 (Aug. 18, 2005).

⁴ Order No. 06-681, Docket UM 1255 (Dec 21, 2006).

1 ETC eligible to receive all available support in the Requested Wire Centers from the federal
2 Universal Service Fund ("USF") including, but not limited to, interstate access support for
3 high cost areas and support for low income customers.

4 In this Application Comspan will show that it satisfies all requirements for ETC status
5 in the Requested Wire Centers, and in particular that its Application is in the public interest.

6 **II. APPLICANT**

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

13 **III. ALLEGATION OF FACTS**

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

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

18 Comspan proposes to serve the entire areas of the Requested Wire Centers. Maps
19 for each of the Requested Wire Centers are attached as Confidential Exhibit D. These
20 maps show the wire center boundaries within which Comspan agrees to serve all customers
21 upon request.

22 Comspan's service areas will mirror that of the ILECs serving these wire centers,
23 Verizon and Qwest. Comspan attaches Exhibit A, which identifies the wire centers that
24 constitute the proposed service areas with the following information: wire center name, wire
25 center CLLI code, and the corresponding ILEC study area name. Comspan proposes to
26 include the entire areas of the Requested Wire Centers in its service area.

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

2 Comspan intends to employ fiber-to-the-home throughout the Requested Wire
3 Centers linked to its long distance access tandem. Comspan has implemented Hitachi
4 GPON to provide enhanced and expanded services. In each of the Requested Wire
5 Centers Comspan will initiate a Phase 1 fiber deployment that will reach most customers
6 within the wire center. Comspan will serve all customers not initially reached by its fiber by
7 reselling ILEC services. In addition, Comspan will continue to build out its networks to reach
8 additional customers in each wire center, where economically feasible. Comspan will
9 purchase services for resale in the Qwest wire centers from Qwest under its interconnection
10 agreement with Qwest; Comspan will purchase services for resale in the Verizon wire
11 centers under its interconnection agreement with Verizon.

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

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

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

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25 ⁵ *Id.* § 54.202(1).

26 ⁶ *Id.* § 54.202(a)(1)(ii).

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IV. SERVICES PROVIDED BY PETITIONER

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

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

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

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

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

⁷ *Id.* § 54.101(a)(1).

1 **B. Local Usage.**

2 FCC regulations require ETCs to provide unlimited local usage.⁸ Comspan will
3 provide unlimited local usage. Comspan's basic local usage plans are comparable to those
4 of the ILECs, Qwest and Verizon in their respective wire centers. Comspan will mirror
5 Qwest and Verizon in defining the local calling areas and extended area service ("EAS").
6 Comspan submits to the Commission its residential and business basic local service prices,
7 basic feature package prices, and other service prices as Exhibit H. Comparison with
8 Qwest's and Verizon's basic service prices will demonstrate that Comspan's prices are
9 comparable.

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

11 An ETC must provide dual tone multi-frequency signaling ("DTMF") to facilitate the
12 transportation of signaling throughout its network.⁹ Comspan will provide DTMF signaling
13 throughout its network, consistent with FCC rules.

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

15 FCC regulations also require ETCs to provide single-party service or its functional
16 equivalent.¹⁰ "Single-party service" means that only one party will be served by a subscriber
17 loop or access line in contrast to a multi-party line.¹¹ Comspan will provide single party
18 service.

19 **E. Access to Emergency Services.**

20 The ability to reach a public emergency service provided by dialing 911 is a required
21 service in any universal service offering.¹² Comspan provides all of its customers with

22 _____
⁸ *Id.* § 54.101(a)(2).

23 ⁹ *Id.* § 54.101(a)(3).

24 ¹⁰ *Id.* § 54.101(a)(4).

25 ¹¹ *Id.*

26 ¹² *Id.* § 54.101(a)(5).

1 access to emergency service by dialing 911. Comspan will offer E-911 throughout its calling
2 area.

3 **F. Access to Operator Services.**

4 Access to operator services is a required service for ETCs and is defined as any
5 automatic or live assistance provided to a consumer to arrange for the billing or completion,
6 or both, of a telephone call.¹³ Comspan will provide customer access to operator services
7 on a 24/7 basis.

8 **G. Access to Interexchange Service.**

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

14 **H. Access to Directory Assistance.**

15 The ability to place a call to directory assistance is a required ETC service offering.¹⁵
16 Comspan customers will be able to obtain directory assistance from live operators.

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

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

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¹³ *Id.* § 54.101(a)(6).

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¹⁴ *Id.* § 54.101(a)(7).

24

¹⁵ *Id.* § 54.101(a)(8).

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¹⁶ *Id.* § 54.101(a)(9).

26

¹⁷ *Id.* § 54.400(b).

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

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

6 **V. FIVE-YEAR PLANS**

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

10 Comspan has developed Five-Year Plans (the "Plans") for each of the Requested
11 Wire Centers. These Plans which are attached as Confidential Exhibits E, F and G,
12 demonstrate in detail how IAS and OUSF support will be used for service improvements that
13 would not occur absent receipt of such support. Comspan will use the OUSF funds to pay
14 for the build-out and improvements required to serve the Requested Wire Centers.

15 As noted above, Comspan's main objective is to become an ETC in the Requested
16 Wire Centers order to receive OUSF support. To achieve this objective, Comspan must first
17 obtain federal ETC status. As demonstrated in this Application, Comspan is willing to meet
18 ETC requirements. Comspan's Plan outlines its planned use of OUSF funds, demonstrating
19 Comspan's commitment to being an ETC.

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

21 As required by 47 CFR § 54.201, Comspan plans to advertise the availability of each
22 of the supported services detailed above throughout its licensed service area by media or
23 general distribution. The methods of advertising utilized may include newspaper, magazine,
24 radio, direct mailings, public exhibits and displays, bill inserts, and telephone directory
25 advertising. Comspan will distribute literature offering Lifeline and Link-Up services to
26

1 hospitals, clinics, hospices, senior centers, welfare offices, and other locations where those
2 likely to be eligible for the program(s) would encounter the brochures.

3 VII. PUBLIC INTEREST FACTORS

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

15 Comspan will offer customers in the Requested Wire Centers all of the same
16 services that are currently offered by Qwest and Verizon. Specifically, Comspan will provide
17 all customers in the Requested Wire Centers with a minimum of the following services:

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

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

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

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

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

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

8 Comspan agrees to provide its services to all customers for a reasonable cost within
9 a reasonable timeframe.

10 **IX. EQUAL ACCESS**

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

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

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

20 **A. Back-up power**

21 Comspan has eight-hour battery back-up at each location where its equipment
22 requires power. It also has generators with automatic transfer switches where required.¹⁸

23

24 _____
25 ¹⁸ Referring to Comspan's confidentially submitted Plan will demonstrate the redundancy in
26 the network to provide a reroute of traffic and how the network can address traffic spikes during an
emergency.

1 **B. Network redundancy**

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

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

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

13 **C. Status of E911.**

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

16 **XI. CONSUMER PROTECTION**

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

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XII. CONCLUSION

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

DATED: January 8, 2008

McDOWELL & RACKNER PC

Lisa F. Rackner

Attorneys for Comspan Communications

REVISED EXHIBIT A

Wire Center

Veneta
Reedspport
Myrtle Point

CLLI Code

VENTOR
RDPTOR
MYPNOR

ILEC Study Area

Qwest
Verizon
Verizon

Interstate Access Support (IAS)
2005

May 12, 2005

To: Marlene H. Dortch
Office of Secretary
Federal Communications Commission
445 -12th Street, SW
Washington, DC 20554

Irene Flannery
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

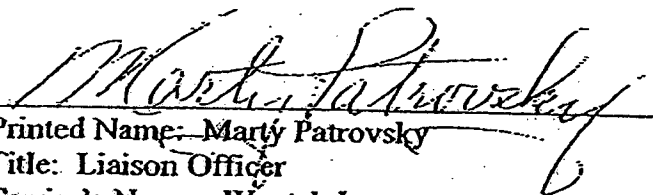
Re: CC Docket No. 96-45
Interstate Access Support – IAS
Annual Certification Filing

This is to certify that Wantel, Inc. d/b/a ComspanUSA will use its Universal Service INTERSTATE ACCESS SUPPORT - IAS only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
Wantel, Inc. d/b/a ComspanUSA	OR	Not Available

Signed,


Printed Name: Marty Patrovsky
Title: Liaison Officer

Date: MAY 12TH 2005

Carrier's Name: Wantel, Inc.
Carrier's Address: 1016 SE Oak Street
Roseburg, OR 97470
Carrier's Telephone Number: (541) 229-0229

For July 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 6197 Access Lines and 4 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

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

1. Wantel 48 Hour clearance rate is 100% 4 of 4.

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

1. Wantel met or beat July 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

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

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

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

For August 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 7028 Access Lines and 3 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

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

1. Wantel 48 Hour clearance rate is 100% 3 of 3.

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

1. Wantel met or beat August 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

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

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

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

For September 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 7032 Access Lines and 5 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

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

1. Wante1 48 Hour clearance rate is 100% 5 of 5.

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

1. Wante1 met or beat September 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

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

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

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

For October 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 7054 Access Lines and 4 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

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

1. Wantel 48 Hour clearance rate is 100% 4 of 4.

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

1. Wantel met or beat September 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

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

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

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



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

541-672-9895

www.comspanusa.net

For November 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

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

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

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

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

- a. Wantel met or beat November 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

- a. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

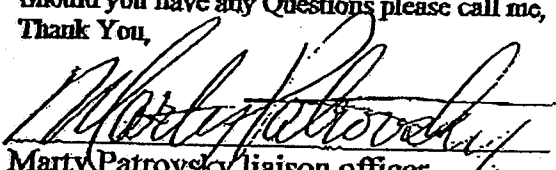
7. Access to Representatives Business Office Call Center.

- a. See 6.1 above

8. Call Blocking

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

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



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



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

541-672-9895

www.comspanusa.net

For December 2006

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 6363 Access Lines and 3 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

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

1. Wantel 48 Hour clearance rate is 100% 3 of 3.

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

1. Wantel met or beat December 06 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

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

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

Marty Patrovsky
Liaison Officer
Wantel, Inc.



Community Headquarters
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Roseburg, OR 97470

541-672-9895
www.comspanusa.net

For January 2007

1. Trouble Report Rate. Factored by the number of Trouble Reports (100)/The Number of Access Lines (OAR Standard: 2.0/100) Provide Staff with the number of Trouble Reports and the number of Access Lines each month.

1. We had 6375 Access Lines and 2 Trouble Reports a ratio of 0.1/100 Access Lines
2. This does not include 2118 DID lines we do not count for this purpose.

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

1. Wantel 48 Hour clearance rate is 100% 2 of 2.

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

1. Wantel met or beat January 2007 provisioning commitments on 100% of orders.

4. Held Orders for Facilities (OAR Standard 2 Held Orders/Wire Center or 5 Held Orders/1000 Inward Service Orders per Month. We have accepted using the 2 wire center factoring when the provider identifies the wire center by CLLI code, accompanied by the number of our orders and the number of access line in each wire center.

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

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

1. We have had no held orders of our own. We have had none over 30 days for Qwest.

6. Access to Representatives Repair-Call Center. (OAR Standard calls shall be answered by a live representative within 20 seconds 85% of the time).

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

7. Access to Representatives Business Office Call Center.

1. See 6.1 above

8. Call Blocking

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

Marty Patrovsky
Liaison Officer
Wantel, Inc.

Exhibit H

	B	C	D	E	F	G	H
1	Advertised Public Description	Number of local minutes included	Calling area included	Rates / Charges			
2	ECONOMY #1	Unlimited Local Calling	Mirrors the EAS and local service of the ILEC in each area	\$16.03	Includes basic line charge & EAS	Does not include LD, taxes, fees or custom features	
3	BASIC BUSINESS	Unlimited Local Calling	Mirrors the EAS and local service of the ILEC in each area	\$27.95	Includes basic line charge & EAS	Does not include LD, taxes, fees or custom features	
4	Residential OTAP w/ Options	Unlimited Local Calling	Mirrors the EAS and local service of the ILEC in each area	\$16.03	Includes basic line charge & EAS	Does not include LD, taxes, fees or custom features	
5	DSL SERVICE			\$29.99		”	
6	DSL Equip. rental			\$3.00		“	
7	Anon Call Reject			\$2.95		“	
8	Caller ID			\$2.95		“	
9	OTAP Credit			-\$13.50		“	
10	Total Example #1			\$41.42		“	
11							