

1.16 At page 19, paragraph 31, the Application states "grant of ETC designation would expand the competitive service offering in the proposed ETC service area." Please specifically identify the new competitive service offerings that will be made available as a result of USF support in the proposed ETC service area.

RESPONSE:

While NWMC believes that its wireless coverage in its licensed service area is among the best of that currently available from wireless carriers, NWMC does not believe that it currently approaches the level of service required to be truly competitive with the ILEC, especially in the more rural portions of its service area. Accordingly, as of this point in time, NWMC does not believe that competitive rivalry exists with respect to ILEC service areas.

The availability of state-of-the-art wireless service is extremely limited in a substantial portion of the proposed ETC service area which denies consumers access to these types of telecommunications services, innovative services and new wireless technologies. In many areas where service is provided, it is limited to mobile-type coverage lacking sufficient in-building penetration to enable the use of a wireless phone as a true replacement for a landline connection.

As detailed in its testimony, NWMC has proposed a detailed build-out plan which would expand its CDMA service into more of the most-rural portions of its market. With this proposed construction that is contingent on the ongoing availability of USF funding, NWMC believes that its level of service can be brought to one that would truly offer an alternative service that could rival fixed landline services.