

Exhibit No.	_____
Issue:	Application for ETC Designation
Witness:	Glenn H. Brown
Sponsoring Party:	Spectra Communications Group, LLC d/b/a CenturyTel and CenturyTel of Missouri, LLC
Type of Exhibit:	Supplemental Rebuttal Testimony
Case No:	TO-2005-0384
Date:	November 14, 2006

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of USCOC of)	
Greater Missouri, LLC for Designation as an)	
Eligible Telecommunications Carrier)	Case No. TO-2005-0384
Pursuant to the Telecommunications Act of)	
1996)	

**SUPPLEMENTAL REBUTTAL TESTIMONY OF GLENN H. BROWN
ON BEHALF OF SPECTRA COMMUNICATIONS GROUP, LLC, d/b/a CENTURYTEL
AND CENTURYTEL OF MISSOURI, LLC**

November 14, 2006

****Denotes Information Deemed to be Highly Confidential by Applicant USCOC****

NP

1 **Q. Please state your name and business address.**

2 A. My name is Glenn H. Brown, and my business address is P.O. Box 21173,
3 Sedona, AZ 86341.

4 **Q. Have you previously submitted testimony in this proceeding?**

5 A. Yes. On September 12, 2005 I presented Rebuttal Testimony, and on October 3,
6 2005 I presented Surrebuttal Testimony in this proceeding.

7 **Q. What is the purpose of your Supplemental Rebuttal testimony?**

8 A. On August 11, 2006, US Cellular filed what has been referred to as its
9 “Compliance Filing” in this proceeding. Attached to this filing was an Affidavit of Nick
10 Wright and a document titled. “Two-Year Network Improvement Plan of U.S. Cellular
11 Corp..” The purpose of my Supplemental Rebuttal testimony is to comment upon the
12 material presented in US Cellular’s two-year plan, as well as other developments that
13 have happened since the last phase of hearings in this case and offer my opinion on
14 whether US Cellular’s application for ETC status in the CenturyTel and Spectra study
15 areas for which it has requested ETC status is consistent with the Commission’s ETC rule
16 and whether the Commission’s approval of this application would be in the public
17 interest.

18 **Q. Could you please summarize the conclusions that you reached in your
19 testimony in the 2005 round of this proceeding?**

20 A. Based upon my examination of US Cellular’s application, and supported by the
21 facts and data that I presented in my earlier testimony, I did not at that time believe that
22 the application of US Cellular to receive federal universal service support for all of its

1 CMRS customers in portions of Spectra and CenturyTel's service areas for which it seeks
2 ETC designation was in the public interest. Specifically:

3 1. US Cellular had failed in its application and testimony to prove that its
4 application for ETC status was in the public interest.

5 2. The designation of US Cellular would create significant new public costs and
6 deliver relatively few incremental public benefits. As a result, this
7 designation does not pass the cost/benefit test outlined in the *Virginia Cellular*
8 Order, and thus cannot reasonably be found to be in the public interest.

9 3. US Cellular had provided none of the "fact-specific" data that is required by
10 the FCC's March 17, 2005 Order providing public interest guidelines for ETC
11 designation, and therefore the Commission could not find the application to
12 meet the standards of being in the public interest.

13 4. US Cellular provided high-quality wireless signal coverage predominantly in
14 the more densely populated and low-cost portions of the service area, and not
15 in the sparsely populated and high-cost areas. Major portions of the
16 population, service territory and highway network in the requested ETC
17 service area were uncovered by US Cellular's network. US Cellular made no
18 commitment or demonstration that it would add new facilities to provide high-
19 quality wireless signal coverage throughout the service area for which it had
20 requested ETC designation, as required by federal law and the new FCC
21 guidelines.

22 5. Designation of US Cellular as an ETC in the rural telephone service areas it
23 requests would cause significant harm to these companies and to the

1 customers that they serve, particularly in light of concerns and developments
2 resulting from significant growth in the federal universal service fund.

3 6. US Cellular sought to avoid public accountability for its use of scarce public
4 support funds.

5 **Q. What has happened since the conclusion of the 2005 round of hearings that**
6 **would have relevance to this proceeding?**

7 A. Three specific things have occurred which will have relevance to the
8 Commission's consideration of US Cellular's application in this proceeding:

9 1. On June 30, 2006, following its publication in the Missouri Register, the
10 Commission's new Rule for the designation of Eligible Telecommunications
11 Carriers for purposes of the receipt of federal high-cost universal service
12 funds became effective:

13 2. On August 11, 2006 US Cellular made its "Compliance Filing:" and

14 3. On September 1, 2006 the Commission issued an Order in Case No. TO-2006-
15 0172 granting Missouri RSA No. 5 Partnership (MO5) ETC status in the
16 Missouri study areas where it had so requested, and on September 21, 2006 in
17 Case No. TO-2005-0466 the Commission issued a similar Order granting ETC
18 status to Northwest Missouri Cellular Limited Partnership (NWMC).

19 **Q. Based upon these events, has your opinion changed regarding whether the**
20 **Commission should approve US Cellular's application in this proceeding?**

21 A. No. In the remainder of my Supplemental Rebuttal testimony I will describe why
22 I have reached the following additional conclusions:

- 1 1. Not only is US Cellular’s showing in this proceeding significantly weaker
2 than the showings made by MO5 and NWMC in their respective ETC
3 proceedings, but the fact that US Cellular’s application significantly overlaps
4 both of these companies’ ETC service areas raises significant issues regarding
5 whether the approval of multiple wireless ETCs in the same high-cost rural
6 service areas would be in the public interest.
- 7 2. Based upon the material contained in the “Compliance Filing,” it would
8 appear that US Cellular falls short of meeting several key portions of the
9 Commission’s new Rule for ETC designation.
- 10 3. The material in the two-year plan clearly reinforces my prior conclusion that
11 there are significant portions of the requested ETC service area that US
12 Cellular currently does not serve and that it has no plans to serve.
- 13 4. The vast majority of the CenturyTel and Spectra study areas for which US
14 Cellular seeks ETC status will experience no improvement in signal quality as
15 a result of the two-year plan, and US Cellular offers no explanation as to why,
16 as clearly is required by the Commission’s Rule.
- 17 5. There remain significant questions surrounding the signal coverage maps
18 provided by US Cellular that raise issues regarding the credibility of this data,
19 and whether it meets the required showings under the Rule.

20 **Q. What are the specific requirements for ETC designation under the**
21 **Commission’s new Rule?**

22 A. Following is a summary of the factual showings that an ETC applicant must make
23 in order to be approved for ETC status under the new Rule:

1 **Section 2(A)1** – Intended use of the high-cost support including detailed descriptions of
2 any construction plans with start and end dates, populations affected by
3 construction plans, existing tower site locations for CMRS cell towers, and
4 estimated budget amounts.

5
6 **Section 2(A)2**, - A two-year plan demonstrating, with specificity, that high-cost support
7 shall only be used for the provision, maintenance and upgrading of facilities and
8 services for which the support is intended. The concept of “support is intended”
9 is defined more specifically to mean:

- 10 • Quality services should be available at just, reasonable and affordable
11 rates;
- 12 • Access to advanced telecommunications and information services should
13 be provided in all regions of the state; and
- 14 • Consumers in all regions of Missouri, including those in rural, insular and
15 high cost areas will have access to telecommunications and information
16 services that area reasonably comparable to those services provided in
17 urban areas.

18
19 **Section 2(A)3**. – The two-year plan shall include a demonstration that universal service
20 support shall be used to improve coverage, service quality or capacity on a wire
21 center-by-wire center basis throughout the area where the carrier seeks ETC
22 designation including:

- 23 • A detailed map of coverage before and after the improvements;
- 24 • A map identifying existing tower site locations;
- 25 • The specific geographic area where improvements will be made;
- 26 • The projected start and completion dates of each improvement;
- 27 • The estimated amount of investment that is funded by high-cost support;
- 28 • The estimated population that will be served as a result of the
29 improvements;
- 30 • If an applicant believes improvements are not necessary, an explanation
31 for this determination and how funding will be used to further the
32 provision of supported services;
- 33 • A statement as to how the proposed plans would not otherwise occur
34 absent the receipt of high-cost support and that such support will be used
35 in addition to any expenses the ETC would normally incur.

36
37 **Section 2(A)4** – A demonstration of the carrier’s ability to remain functional in
38 emergency situations.

39
40 **Section 2(A)5** – A demonstration that the grant of the application would be consistent
41 with the public interest, convenience and necessity.

42
43 **Section 2(A)6** – A commitment to advertise the availability of services and charges
44 therefore using media of general distribution.

1 **Section 2(A)7** – A commitment to provide Lifeline and Link-Up discounts.

2
3 **Section 2(A)8** – A statement that the carrier will satisfy consumer privacy protection
4 standards.

5
6 **Section 2(A)9** – A statement that the carrier acknowledges that it shall provide equal
7 access to long distance if all other carriers relinquish their ETC designations.

8
9 **Section 2(A)10** – A commitment to offer a local usage plan comparable to those offered
10 by the ILEC in the areas for which the carrier seeks designation.

11
12 **Q. Before commenting on the specific portions of these rules with which US**
13 **Cellular’s filing does or does not comply, are there any general observations that**
14 **you would like to make regarding the new information contained in US Cellular’s**
15 **two-year study?**

16 A. Yes. There are four specific items that I would like to bring to the Commission’s
17 attention:

- 18 • Comparing the signal coverage maps submitted by US Cellular with its August,
19 2006 filing with the similar coverage maps previously submitted in August, 2005,
20 shows significant and unexplained changes in predicted service coverage, which
21 in turn, raise serious questions regarding the usefulness of US Cellular’s maps for
22 purposes of the Commission’s evaluation of the plan.
- 23 • An examination of the areas where US Cellular currently provides coverage, and
24 the areas where it proposes to build the **** __**** towers if granted ETC status,
25 indicates that these towers will, for the most part, be constructed in areas where
26 US Cellular currently serves and will not be used to expand service into currently
27 un-served, more rural areas.
- 28 • Substantial portions of the CenturyTel and Spectra study areas for which US
29 Cellular requests ETC status are neither currently served by US Cellular, nor does

1 US Cellular have any stated plans to serve those areas. Unless and until US
2 Cellular enters into an enforceable commitment to use high-cost funds to serve
3 these areas, the Commission should not grant ETC status for these areas.

4 • Information obtained during discovery indicates that over the past year, and
5 without USF support, US Cellular has constructed ****__**** towers in the out-state
6 (i.e., non-St. Louis) service areas where it seeks ETC designation. Should the
7 Commission choose to grant US Cellular ETC status, this number should serve as
8 the base-line above which new expenditures of USF funding is measured, since
9 the Commission's ETC Rule clearly states that funds must be used in addition to
10 any expenses the ETC would normally incur

11 **Q. You stated that you have concerns regarding the signal coverage maps**
12 **provided by US Cellular in its "Compliance Filing" as compared to similar maps**
13 **provided one year ago. What is the basis for this concern?**

14 A. Schedule GHB-3 (filed with my September 12, 2005 Rebuttal Testimony and
15 included, for convenience, in my Schedules attached to this testimony) shows a scan of
16 the propagation study map provided by US Cellular in August of 2005 in response to a
17 data request in the initial phase of this proceeding.¹ New Schedule GHB-10 shows the
18 propagation study provided as Appendix 4 to US Cellular's August 11, 2006

¹ The 2005 total state coverage map originally provided by US Cellular omitted towers in the Joplin, MO area in the southwest corner of the state. US Cellular provided a corrected study including these towers on August 30, 2005, however I did not have the opportunity to scan the full state map including these towers. These towers are shown on the combined coverage levels on Schedules GHB-11 and 12.

1 “Compliance Filing.” To better compare the two coverage predictions, new Schedule
2 GHB-11 shows the 2005 predicted coverage levels superimposed on the 2006 predicted
3 coverage data. The 2006 map clearly shows greater existing signal coverage than US
4 Cellular’s 2005 map. However, it also appears that this additional coverage results not
5 from the provision of new towers in currently un-served areas, but rather from a larger
6 radius of signal coverage from existing tower and service locations. In other words, the
7 circle of coverage around existing tower locations appears significantly larger on US
8 Cellular’s 2006 map than on US Cellular’s 2005 map.

9 **Q. How does US Cellular explain this difference?**

10 A. In response to a discovery request² to explain these differences US Cellular
11 stated:

12 Several factors may have contributed to the appearance of greater signal coverage
13 on the “existing coverage” map included in the August 11 compliance filing.
14 First, as noted in response to DRs 14 and 15 above, the company added numerous
15 cell sites in the time period between the production of the two maps. There may
16 be instances in which the coverage area for a site appearing on the 2005 map
17 appears significantly larger in the 2006 map, when in fact the greater coverage
18 area resulted from the addition of a nearby tower.

19
20 Second, US Cellular produces coverage maps based on the best information
21 available at the time. Furthermore, US Cellular continually strives to improve
22 engineering processes and uses the best and most current data available. In one
23 such example, US Cellular “tuned,” or adjusted, the propagation model it uses in
24 determining predicted signal coverage in late 2005. This tuning was performed
25 after the company conducted drive tests to verify signal strength in different
26 portions of its Missouri network. It is standard industry practice to confirm
27 coverage with drive tests and adjust or replace propagation models to improve
28 system design. This often results in significant changes in predicted coverage.

29
30 **Q. Does US Cellular’s answer explain the coverage differences shown on**
31 **Schedule GHB-11?**

² U.S. Cellular’s Responses to CenturyTel’s Second Set of Data Requests, DR 16.

1 A. Not exactly. As note in above response, US Cellular did add towers during the
2 2005-2006 time period. CenturyTel/Spectra had asked US Cellular in DR 14 if any
3 towers had been added, and in DR 15 to identify the location and performance
4 characteristics of each new tower. Schedule GHB-12 shows the location of the **__**
5 towers that US Cellular stated that it added during the 2005-2006 time frame
6 superimposed on the coverage profiles illustrated on Schedule GHB-11. While there are
7 a few parts of the map where the new towers can be seen to expand indicated signal
8 coverage, in many areas the expanded coverage cannot be traced to new towers, but
9 rather do appear to result from a significantly larger coverage prediction from existing
10 tower locations. Examples of this can be seen in the southwest and northwest corners of
11 the state. It could well be that this is the result of a lower level of minimal signal
12 coverage being displayed.

13 **Q. Why is the level of signal coverage received in an area important?**

14 A. As explained more fully in my earlier Rebuttal Testimony, consumers only
15 receive the benefits of mobility if they can receive a satisfactory signal receiving a
16 conventional handset. Section 2(A)2 of the Commission's ETC rule states that the
17 purpose of universal service funding is to provide rural consumers with service
18 reasonably comparable to that provided in urban areas. While customer's with high-
19 powered customer premise equipment or roof-mounted antennas may be able to utilize a
20 very weak signal, most consumers using conventional handsets may not. Thus the
21 quality of signal coverage becomes an important part of the cost-benefit equation that lies
22 at the heart of the public interest determination question.

1 **Q. Did you ask US Cellular to identify the level of signal coverage level shown**
2 **on Appendix 4 to the August 11, 2006 “Compliance Filing” in a data request?**

3 A. Yes we did. In response US Cellular stated:

4 The map submitted as Appendix 4 to US Cellular’s August 11 compliance filing
5 shows four colors corresponding to four levels of signal coverage. These levels
6 of coverage are provided on the map legend.³

7
8 I find this response of little or no use, since the map that was filed as Appendix 4 to the
9 August 11 “Compliance Filing” is an 8 ½ by 11 inch black and white PDF version of
10 what now appears to be a much larger color map. I cannot differentiate any colors on the
11 map that was filed with the Commission, nor can I even read the legend to determine the
12 levels of signal coverage. While I did finally receive a copy of the larger colored map on
13 the day that this testimony was due to be filed, I have not had an opportunity to examine
14 it in any detail. I can only observe that there are some dramatic and, as yet, unexplained
15 differences in predicted signal coverage that I am concerned about and I would suggest
16 that the Commission should be as well.

17 **Q. Have you had an opportunity to check US Cellular’s predicted minimum**
18 **signal coverage levels on this map by performing an independent propagation**
19 **analysis?**

20 A. Not at this time. Given the fact that I have just received access to this data, I
21 reserve the right to supplement my testimony regarding signal coverage at a later time
22 after I have had an opportunity to more fully analyze this information.

³ U.S. Cellular’s Responses to CenturyTel’s Second Set of Data Requests, DR 15.

1 **Q. Have you had an opportunity to examine the **__** new towers that US**
2 **Cellular proposes to build if granted ETC status, and how these new towers would**
3 **improve signal coverage in currently unserved areas?**

4 A. Appendix 5 to US Cellular's August 11, 2006 "Compliance Filing" shows the
5 new tower locations and predicted signal coverage from the **__** proposed towers.
6 Schedule GHB-13 shows the existing signal coverage as shown on Appendix 4, with the
7 CenturyTel and Spectra wire center boundaries superimposed on this coverage map.
8 Schedule GHB-14 shows the projected signal coverage from the **__** proposed towers
9 with the CenturyTel/Spectra boundaries. This Schedule shows that, while some small
10 number of CenturyTel wire centers will receive improved signal coverage from these
11 **__** towers, the vast majority of them will not.

12 Schedule GHB-15 tells a very significant story regarding the true impact of these
13 **__** new towers in expanding (or more appropriately not expanding) US Cellular's
14 signal coverage into currently un-served areas of its proposed ETC service area. While
15 US Cellular's Appendixes 4 and 5 show projected coverage for existing and new towers
16 separately, Schedule GHB-15 shows existing and new coverage superimposed on one
17 another. What becomes abundantly clear from this comparison is that most of the towers
18 that US Cellular proposes to build if granted ETC status will be built in areas where US
19 Cellular currently serves, rather than expanding its service out into areas that it currently
20 does not serve.

21 **Q. You mentioned earlier that information obtained during the discovery**
22 **process indicates that over the past year US Cellular has indicated that US Cellular**
23 **has added **__** towers to the out-state service areas for which it seeks ETC status.**

1 **What significance does this have to the Commission’s consideration of US Cellular’s**
2 **application in this proceeding?**

3 A. The Commission’s Rule makes it very clear that universal service funding is to be
4 used only for the construction of facilities that would not be constructed *but for* the
5 provision of high-cost support. Section 2(A)(3) of the Commission’s Rule clearly states
6 that the ETC applicant must provide:

7 A statement as to how the proposed plans would not otherwise occur absent the
8 receipt of high-cost support and that such support will be used in addition to any
9 expenses the ETC would normally incur.

10
11 Evidence obtained during discovery shows that in the past year, without the benefit of
12 high-cost universal service support, US Cellular constructed **** __**** towers in the out-
13 state service areas where it currently seeks high-cost universal service support. Thus, this
14 **** __**** towers per year construction schedule should form a *conservative* baseline for the
15 determination of the normal construction activity that could be expected *absent* high-cost
16 support.⁴ Should the Commission eventually decide to grant US Cellular ETC status in
17 the areas that it seeks, any commitment to use high-cost funds to construct facilities in
18 high-cost areas must be over and above this **** __**** towers per year business-as-usual
19 level. In other words, the **** __**** towers that US Cellular has committed to build over a
20 two-year period in this proceeding must be in addition to the **** __**** towers that US
21 Cellular can reasonably be concluded to have built in the absence of high cost support.

22 **Q. Why is it significant that US Cellular’s commitment to construct new tower**
23 **facilities with the funds that it seeks is predominantly within the areas that it**
24 **currently serves?**

1 A. Section 214(e) of the Communications Act, and the Commission’s ETC Rule both
2 stress that the purpose of USF funding is to provide service *throughout* the entire service
3 area. A cursory examination of the coverage maps filed by US Cellular, as well as those
4 in my attached Schedules, indicates that there is significant “white area” on the chart
5 indicating areas where US Cellular currently does not serve and has no committed plans
6 to serve. If US Cellular is not willing to enter into an enforceable commitment to
7 eventually provide service throughout the service territory, then the Commission cannot
8 find approval of its ETC status request to be in the public interest.

9 **Q. Does US Cellular’s Application, as supplemented by its August 11, 2006**
10 **“Compliance Filing,” meet the requirements of the Commission’s new Rule for ETC**
11 **designation?**

12 A. No. The Application still remains deficient in a number of specific respects.
13 Following are areas within the context of Sections 2(A)1 – 3 where I find US Cellular’s
14 application, as amended by the “Compliance Filing” to be defective:

15 **Section 2(A)1 – Intended use of the high-cost support including detailed descriptions**
16 **of any construction plans with start and end dates, populations affected by**
17 **construction plans, existing tower site locations for CMRS cell towers, and**
18 **estimated budget amounts.**

19
20 US Cellular provides very few details about their construction plans, and only
21 provides aggregate budget amounts for all towers, with no specific description of
22 equipment or services that the budget amounts are for. In both the MO5 and NWMC
23 cases, the review of the initial plan proposals by the Staff and intervenors revealed
24 significant areas where funds were proposed to be spent for inappropriate purposes that

⁴ This pace can be reasonably concluded to be conservative since in the same time frame US Cellular was rolling out service in the more populated St. Louis market.

1 were subsequently addressed in the Commission’s Orders. The limited showing made by
2 US Cellular precludes this type of review, and is clearly inconsistent with the plain
3 language of the Rule.

4 **Section 2(A)2, - A two-year plan demonstrating, with specificity, that high-cost**
5 **support shall only be used for the provision, maintenance and upgrading of**
6 **facilities and services for which the support is intended. The concept of**
7 **“support is intended” is defined more specifically to mean:**

- 8 • **Quality services should be available at just, reasonable and affordable**
9 **rates;**
- 10 • **Access to advanced telecommunications and information services**
11 **should be provided in all regions of the state; and**
- 12 • **Consumers in all regions of Missouri, including those in rural, insular**
13 **and high cost areas will have access to telecommunications and**
14 **information services that area reasonably comparable to those**
15 **services provided in urban areas.**

16
17 As discussed previously, the level of detail provided in US Cellular’s filing does
18 not allow a specific review of US Cellular’s build-out plans to assure that funds will only
19 be used for their intended purposes. Furthermore, US Cellular does not propose plans
20 that would result in service *throughout* the proposed ETC service area as required by the
21 Section 214(e) of the Communications Act and the Commission’s ETC designation Rule.

22 **Section 2(A)3. – The two-year plan shall include a demonstration that universal**
23 **service support shall be used to improve coverage, service quality or capacity**
24 **on a wire center-by-wire center basis throughout the area where the carrier**
25 **seeks ETC designation including:**

26
27 Numerous wire centers within the CenturyTel/Spectra study areas where US
28 Cellular has requested ETC status will receive no improvement in coverage, service
29 quality or capacity under US Cellular’s plan.

- 30 • **A detailed map of coverage before and after the improvements;**

31
32 As discussed previously, the “before” coverage map filed by US Cellular on
33 August 11, 2006 lacks necessary detail, and there remain unanswered questions as to why

1 the indicated coverage is significantly larger than similar maps filed in this proceeding in
2 August of 2005. The “after” map indicates only the coverage from the new towers, and
3 fails to show aggregate coverage after the improvements. As Schedule GHB-15 which
4 combines these maps to indicate aggregate coverage clearly shows, virtually all of the
5 “improvements” occur within areas that US Cellular currently serves, and there will be
6 very little expansion of signal coverage into currently unserved high-cost rural areas of
7 the requested ETC areas.

- 8 • **A map identifying existing tower site locations;**

9

10 US Cellular fails to indicate existing tower site locations.

- 11 • **The specific geographic area where improvements will be made;**
- 12 • **The projected start and completion dates of each improvement;**
- 13 • **The estimated amount of investment that is funded by high-cost**
- 14 **support;**
- 15 • **The estimated population that will be served as a result of the**
- 16 **improvements;**
- 17 • **If an applicant believes improvements are not necessary, an**
- 18 **explanation for this determination and how funding will be used to**
- 19 **further the provision of supported services;**

20

21 US Cellular fails to propose service improvements in many of the CenturyTel and
22 Spectra wire centers where ETC designation is sought, and fails to explain why such
23 improvements are not necessary, and why its designation as an ETC in these service
24 areas would be in the public interest.

- 25 • **A statement as to how the proposed plans would not otherwise occur**
- 26 **absent the receipt of high-cost support and that such support will be**
- 27 **used in addition to any expenses the ETC would normally incur.**

28

29 Not only does US Cellular fail to justify that these investments would not be
30 made absent high-cost support, but evidence obtained during the discovery process
31 indicates that US Cellular added **** __**** new towers in the proposed service area without

1 the benefit of high-cost support. Should the Commission choose to grant ETC status to
2 US Cellular, it is essential that support only be used for tower construction above this
3 benchmark level.

4 **Q. How should the Commission’s recent approval of the ETC applications of**
5 **MO5 and NWMC impact its evaluation of US Cellular’s Application?**

6 A. The application of US Cellular differs from the applications of MO5 and NWMC
7 in two significant respects. First, while the coverage maps of these carriers did indicate
8 some holes and “dead spots” within their proposed service area, for the most part their
9 present networks and the new tower construction plans indicated that they at least made a
10 reasonable attempt to serve *throughout* their respective proposed ETC service areas. As
11 noted throughout my testimony, US Cellular does not even come close, with a substantial
12 portions remaining “white areas.” Second, with MO5’s and NWMC’s applications now
13 approved, approval of US Cellular’s application would represent the second wireless
14 ETC in both of these service areas, as US Cellular’s proposed service area overlaps both
15 of these companies service areas. In my earlier Rebuttal Testimony I provided a
16 demonstration of how supporting multiple networks, wireline or wireless, in high cost
17 rural areas can result in inefficiencies and increase the likelihood that no carrier will have
18 sufficient resources to serve throughout the proposed ETC service area. Such concerns
19 are not only my own. In comments recently filed in the Federal-State Universal Service
20 Joint Board’s inquiry in the potential use of reverse auctions for the distribution of high
21 cost support, this Commission also expressed concern about supporting multiple carriers

1 with high-cost universal service support.⁵ The Commission must carefully consider
2 whether it is in the public interest to have multiple wireless carriers receiving support in
3 the same area.

4 **Q. Could you please summarize your Supplemental Rebuttal Testimony?**

5 A. US Cellular has failed to comply with the clear requirements of the Commission's
6 ETC Rule and has failed to demonstrate that its approval for ETC status in the requested
7 service areas would be in the public interest. Furthermore, US Cellular has requested
8 ETC designation in areas that overlap with the services areas where MO5 and NWMC
9 have recently been designated as wireless ETCs. Based upon the record in this
10 proceeding, US Cellular's request for ETC status in the CenturyTel and Spectra service
11 areas should be denied.

12 **Q. Does this conclude your testimony at this time?**

13 A. Yes.

⁵ Specifically, the Commission stated that "the USF is experiencing significant strain," and that "only one recipient should receive support at any given time and in any given study area if an auction process is implemented."