

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Application of )  
Missouri RSA No. 5 Partnership for )  
Designation as a Telecommunications Company )  
Carrier Eligible for Federal Universal Service ) Case No. TO-2006-\_\_\_\_\_  
Support Pursuant to § 254 of the )  
Telecommunications Act of 1996. )

**APPLICATION FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER  
PURSUANT TO § 254 OF THE TELECOMMUNICATIONS ACT OF 1996**

Comes Now MISSOURI RSA No. 5 PARTNERSHIP (“MO5”) pursuant to § 214(e)(2) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (“the Act”), as well as the Federal Communications Commission (the “FCC”) regulations found at Section 54.201, *et seq.*, of the FCC’s Rules, 47 C.F.R. § 54.201, *et seq.*, and hereby requests that the Missouri Public Service Commission (the “Commission”) designate MO5 as a telecommunications carrier eligible under the provisions of Section 54.201(d) to receive Federal universal service support.

In support of this Application, MO5 states as follows:

1. MO5 is a telecommunications carrier authorized by the FCC to provide Commercial Mobile Radio Services (“CMRS”) in Missouri<sup>1</sup> pursuant to a cellular radiotelephone license bearing Call Sign KNKN487. MO5 operates wireless network infrastructure facilities in

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<sup>1</sup> MO5 operates a CMRS network licensed by the Federal Communications Commission to serve Missouri RSA No. 5 (CMA-508). Appended hereto as Appendix A is a map which graphically depicts MO5’s FCC-licensed service are.

designated areas of Missouri and provides telecommunications services over its own facilities to provide voice-grade access to the public switched telephone network, local usage, dual tone multi-frequency signaling or its functional equivalent, access to 911 and E911 emergency service, access to operator services, interexchange service, and to directory assistance.

2. MO5's street address and principal place of business is 109 Butler Street, Macon, MO 63552. MO5's telephone number is (660) 395-9600, and it can be reached by facsimile at (660) 395-4403. MO5 is a Missouri partnership. Appended hereto as Appendix B is the current ownership of MO5.

3. All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Paul S. DeFord, Esq.  
Lathrop & Gage L.C.  
Suite 2800  
2345 Grand Boulevard  
Kansas City, MO 64108-2684  
(816) 292-2000/FAX: (816) 292-2001  
E-mail: [pdeford@lathropegage.com](mailto:pdeford@lathropegage.com)

and

James A. Simon, General Manager  
Missouri RSA No. 5 Partnership  
c/o Chariton Valley Wireless Services  
109 Butler Street  
Macon, MO 64552  
(660) 395-9600/FAX: (660) 395-4403  
E-mail: [jsimon@charitonvalley.com](mailto:jsimon@charitonvalley.com)

4. Under § 214(e)(1) of the Act, a telecommunications carrier may be designated as an eligible telecommunications carrier ("ETC") and thereby receive universal service support so long as the carrier, throughout its service areas: (a) offers the services that are supported by Federal universal service support mechanisms under § 254(c) of the Act, either using its own

facilities or a combination of its own facilities and resale of another carrier's services (including services offered by another ETC); and (b) advertises the availability of and charges for such services using media of general distribution. Section 54.201(b) of the FCC's rules states that the Commission shall, on its own motion or upon request, designate a common carrier an ETC so long as the carrier meets the requirements of Section 54.201(d), which restates the requirements found in § 214(e)(1) of the Act. Section 214(e)(2) of the Act and Section 54.201(c) of the FCC's rules state that the Commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area the Commission designates, provided each additional requesting carrier satisfies § 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules. Before designating an additional ETC for an area served by a rural telephone company, the Commission shall find that such designation is in the public interest.

**I. MO5 PROVIDES THE CORE SERVICES REQUIRED TO QUALIFY FOR UNIVERSAL SERVICE SUPPORT**

5. Pursuant to Section 54.101(a) of the FCC's rules, the following core services and functions are to be offered by an ETC and should be supported by Federal universal support mechanisms:

- (a) Voice grade access to the public switched network;
- (b) Local usage;
- (c) Dual tone multi-frequency signaling or its functional equivalent;
- (d) Single-party service or its functional equivalent;
- (e) Access to emergency services;
- (f) Access to operator services;

- (g) Access to interexchange service;
- (h) Access to directory assistance; and
- (i) Toll limitation for qualifying low-income consumers.<sup>2</sup>

These services and functions are described in greater detail below:

(a) Voice-Grade Access to the Public Switched Network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hertz, within the 300 to 3000 Hertz frequency range.<sup>3</sup> As an existing cellular service provider in Missouri, MO5 provides voice-grade access to the public switched network. Through interconnection with incumbent local exchange carriers, MO5 is able to originate and terminate telephone service for all of its subscribers. All customers of MO5 are able to make and receive calls on the public switched network within the specified bandwidth.

(b) Local Usage. MO5's service includes local usage that allows customers to originate and terminate calls within the local calling area without incurring toll charges. The service allows for a bundle of local calling minutes for a flat-rated monthly charge. MO5 currently offers several service options that include varying amounts of local usage in monthly service plans. To date, the FCC has not quantified any minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address

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<sup>2</sup> On December 30, 1997, the FCC changed its definition of toll-limitation services in its Fourth Order on Reconsideration of the Universal Service Report and Order, CC Docket Nos. 96-45 *et al.* The FCC stated, "we define toll-limitation services as either toll-blocking or toll control and require telecommunications carriers to offer only one, and not necessarily both, of those services at this time in order to be designated as eligible telecommunications carriers." *Id.* at 210.

<sup>3</sup> See Federal-State Board on Universal Service (First Report and Order in CC Docket No. 96-45) 12 FCC Rcd 8776, 8810-11 (1997) ("First Report and Order").

this issue.<sup>4</sup> Any minimum local usage requirement established by the FCC as a result of the above-mentioned proceeding will be applicable to all designated ETCs. MO5 will comply with any and all minimum local usage requirements adopted by the FCC. Thus, even though the FCC has yet to adopt any specific quantity of minimum local usage ETCs must provide for designation, MO5 satisfies the local usage criterion for ETC designation.

(c) Functional Equivalent of Touch-Tone (“DTMF”) Signaling. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement.<sup>5</sup> MO5 currently uses out-of-band digital signaling and in-band multi-frequency signaling that is functionally equivalent to DTMF signaling.<sup>6</sup> MO5, therefore, meets the requirements of providing DTMF signaling or its functional equivalent.

(d) Single Party Service. “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>7</sup> The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. MO5 meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.<sup>8</sup>

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<sup>4</sup> See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 13 FCC Rcd 21252 (1998).

<sup>5</sup> 47 C.F.R. § 54.101(a)(3).

<sup>6</sup> First Report and Order, 12 FCC Rcd at 8815, & 71 (1997).

<sup>7</sup> See, 12 FCC Rcd at 8810.

<sup>8</sup> *Id.*

(e) Access to Emergency Service. The ability to reach a public emergency service provider through dialing “911” is a required universal service offering. MO5 customers can reach an emergency dispatch, or a public safety answering point (“PSAP”), by dialing “911,” which will route the call to the appropriate PSAP. Enhanced 911 (“E911”), which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is required only if a public emergency service provider makes arrangements with the local provider for delivery of such information. A wireless carrier such as MO5 is not required to provide E911 services until a local emergency provider has made arrangements for delivery of ALI and ANI from carriers.<sup>9</sup> In the wireless context, provision of location information is broken down into two phases: Phase I involves providing the PSAP with the location of the cell from which the 911 call originated and Phase II provides the location of the originating subscriber phone to within an FCC-specified accuracy. MO5’s network is capable of providing Phase I E911 service as a function of the capabilities of each PSAP throughout the MO5 service area.<sup>10</sup> In addition, MO5’s CDMA network is capable of providing E911 Phase II service to a Phase II compatible PSAP. Accordingly, MO5 provides its subscribers with access to emergency services by dialing “911.”

(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. MO5 currently offers its subscribers access to operator services for the

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<sup>9</sup> See, 12 FCC Rcd at 8815-8817.

<sup>10</sup> MO5 and its affiliates currently provide Phase I E911 service (providing caller’s cellular telephone number and cell site from which the call originated) to the following PSAPs: Shelby County, Macon County, Randolph County, Chariton County and Linn County. MO5 is currently working with Macon County, Shelby County and Chariton County PSAPs with respect to Phase 2 deployments.

placement and billing of telephone calls, including collect calls, calling card calls, credit card calls, person-to-person calls, and third party calls, as well as obtaining related information, throughout its designated ETC service area. Therefore, MO5 meets this requirement by providing all of its customers with access to operator services.

(g) Access to Interexchange Service. An ETC providing universal service must offer consumers access to interexchange service to make or receive toll or interexchange calls. Interexchange service access entails access to live or automatic operator assistance for the placement and billing of telephone calls, including collect calls, calling card calls, credit card calls, person-to-person calls, and third party calls, as well as obtaining related information. MO5 has direct interconnection to multiple access tandems for delivering traffic to all offices subtending those tandems as well as direct interconnection to local exchange carrier end offices where traffic levels so justify. In addition, MO5 provides indirect access to one or more interexchange carriers (“IXC”) for access to any other exchanges. As a result, MO5 meets the requirement to provide all of its customers with the ability to make and receive interexchange or toll calls through the interconnection arrangements it has with its IXCs.

(h) Access to Directory Assistance. The ability to place a call to directory assistance is a required service offering of an ETC. MO5 meets this requirement by providing all of its customers with access to information contained in directory listings by dialing “411” or “555-1212.”

(i) Toll Limitation for Qualifying Low-Income Customers (Lifeline and Link-Up Services). Under Section 54.101(a)(9) of the FCC's rules,<sup>11</sup> ETCs must offer "Toll Limitation," a term that denotes *either* "Toll Control" *or* "Toll Blocking" for carriers incapable of providing both services<sup>12</sup> to qualifying Lifeline and Link-Up universal service customers at no charge. Toll Blocking allows customers to block the completion of outgoing toll calls. Toll Control allows the customer to limit the dollar amount of toll charges a subscriber can incur during a billing period. Once designated as an ETC, an MO5 customer enrolled in the Federal Lifeline or Link-Up programs could choose to have MO5 block all attempted toll calls originating from the customer's telephone. Currently, MO5 provides Toll Blocking services for international calls. MO5 will utilize the same Toll Blocking technology to provide toll limitation for qualifying low-income customers, at no charge, as part of its universal service offerings.

MO5 will provide the foregoing services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching and interconnection facilities used to provide CMRS to its existing subscribers, as well as through additional cell sites if ETC designation is granted (*See* Section 8, *infra*).

6. MO5 advertises the availability of and charges for its services using media of general distribution within its service area.

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<sup>11</sup> See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Fourth Order on Reconsideration, CC Docket Nos. 96-45, 96-262, 94-1, 91-213, 95-72, Report and Order, 13 FCC Rcd 5318 (1997).

<sup>12</sup> 47 C.F.R. § 54.400(d) For ETCs capable of providing both service, the term "Toll Limitation" includes "Toll Blocking" and "Toll Control."



## II. MO5's PROPOSED ETC SERVICE AREA

7. MO5 is not a “rural telephone company” as that term is defined by § 153(37) of the Act. Accordingly, MO5 is required to describe the geographic area in which it requests designation as an ETC.<sup>13</sup> MO5 requests designation for its entire FCC-licensed service area in Missouri, subject to the limitations and exclusions described in this Paragraph 7. A map of MO5’s proposed ETC service areas is appended hereto as Appendix C.

8. Under Section 54.207(a) of the FCC’s rules, a “service area” is a “geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms.” For non-rural service areas, there are no restrictions on how a state commission defines the “service area” for purposes of designating a competitive ETC. Therefore, the Commission may designate MO5 as an ETC in the entire non-rural Brookfield, Marceline and Moberly wire centers of Southwestern Bell Telephone Company as well as the portions of the Armstrong, Higbee and Glasgow wire centers depicted on the map in Appendix C. Additionally, MO5 proposes to include a portion of the Century Telephone of Missouri (Central) non-rural Clark wire center.

9. In an area served by a rural telephone company, FCC rules define “service area” to mean the LEC study area unless a different service area definition is established for such company.<sup>14</sup> As shown in Appendix C, MO5 serves the entire rural LEC study areas of Chariton

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<sup>13</sup> See 47 U.S.C. § 214(e)(5); 47 C.F.R. § 54.207(a).

<sup>14</sup> See 47 C.F.R. § 54.207(b); see also 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, 11299-309 (2001) (“*Fourteenth Report and Order*”). The Commission has defined “study area” as the geographical area that typically corresponds to a carrier’s entire service area within a state or territory. See, e.g., Micronesian Telecommunications Corp. Request for a Declaratory Ruling, 9 FCC Rcd 2032 (Com. Car. Bur. 1994); Petitions for Waivers filed by Golden Belt Telephone Association, Inc., 11 FCC Rcd 10165 (Accg. & Aud. Div. 1996).

Valley Telephone Company (“CVT”).<sup>15</sup> The Commission may designate MO5 as an ETC in the CVT service area upon finding that such designation will be in the public interest.<sup>16</sup>

10. MO5 is also licensed by the FCC to serve only a portion of the “study areas” of five additional rural telephone companies that provide service in Missouri. Specifically, MO5 serves portions of the wire centers that comprise the study areas of Alltel Missouri, Inc. (“Alltel”), Grand River Mutual Telephone Company (“Grand River”),<sup>17</sup> Mark Twain Rural Telephone Company (“Mark Twain”), Northeast Missouri Rural Telephone Company (“NEMO”), and Spectra Communications Group, LLC (“Spectra”).

11. With respect to the Alltel study area, MO5 serves the entire Laclede, Mendon, Rothville and Sumner wire centers. MO5 proposes to redefine the Alltel service area to allow MO5 to be designated as an ETC in only those Alltel wire centers.

12. With respect to the Grand River service area, MO5 serves and seeks to include in its proposed ETC service area the entire Linneus, Meadville and Purdin wire centers. MO5 also serves a substantial portion of the Grand River Browning wire center. The FCC has recently held that proposed ETC service areas may not specify area below the wire center level for a rural LEC.<sup>18</sup> Accordingly, MO5 is proposing to include the entire Browning wire center within its proposed ETC designated service area. As the FCC has expressly permitted, the provision of service to subscribers in the portion of an ETC service area that lies beyond a wireless ETC’s

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<sup>15</sup> CVT is an affiliate of MO5.

<sup>16</sup> 47 U.S.C. § 214(e)(2).

<sup>17</sup> Grand River is an affiliate of MO5.

<sup>18</sup> *In the matter of Federal State Joint Board on Universal Service, Highland Cellular Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, Memorandum Opinion and Order*, FCC Docket 96-45, FCC 04-37 (April 12, 2004) (“*Highland Cellular*”).

FCC licensed service may be provided by other carriers through roaming and/or resale agreements.

13. MO5 similarly seeks to include the entire Mark Twain Bethel and Leonard wire centers, the NEMO Winigan wire center as well as the following Spectra wire centers within its proposed ETC service area: Brunswick, Hunnewell, Keytesville, LaPlata, Macon, Shelbina and Shelbyville.

14. It is important to note that MO5 is *not* seeking to redefine the *study* area for any rural LEC. Rather, MO5 is seeking only to redefine the LEC *service* areas for purposes of designating a Competitive ETC (“CETC”). As the FCC fully explained in *Virginia Cellular*,<sup>19</sup> the proposed service area redefinition would have no impact on the rural LEC reporting or administrative obligations.<sup>20</sup> Specifically, the FCC found that redefining the rural telephone company *service* areas would not require rural telephone companies to determine their costs on any basis other than the *study* area level. The redefinition, therefore, only enables MO5, as an ETC, to serve an area that is smaller than the entire Incumbent LEC (“ILEC”) study area. Accordingly, MO5 respectfully requests the redefinition of the ILEC *service* areas, but not *study* areas, as described above.

### **III. MO5’s PROPOSED LEC SERVICE AREA DEFINITION WILL NOT RESULT IN “CREAM-SKIMMING”**

15. The level of support received by an ETC is based upon the level of support received by the ILEC in each part of the designated ETC service area. Where the rural carrier ILEC study areas used in determining the level of high cost support and the proposed ETC

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<sup>19</sup> *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, Memorandum Opinion and Order, CC Docket No. 96-45, FCC 03-338 (rel. January 22, 2004), (“Virginia Cellular”).*

service area is not wholly encompassed within the proposed ETC designated service area, a potential “cream skimming” issue arises. Cream skimming occurs when a CETC serves only the lower cost portions of the LEC study area but receives support based upon costs that have been averaged and include those associated with providing service to the higher-cost portions of the LEC study area. In the context of the rural LEC service areas involved here, since MO5 is proposing to include the entire study areas for CVT, the issue of potential “cream skimming” does not arise. However, this issue must be addressed with respect to the proposed service area re-definitions of Alltel, Grand River, Mark Twain, NEMO and Spectra.

16. In its *Virginia Cellular* and *Highland Cellular* orders, the FCC examined the relative population densities for the portions of the study areas for each LEC that lie within the proposed CETC service area as compared to the population densities of the entire LEC study area. The FCC held that where the population densities of the entire ILEC study area are significantly lower than the population density within the ETC service area, cream skimming has occurred. That is *not* the case with respect to the redefinition proposed herein.

17. Alltel has disaggregated its study area into three discrete zones for purposes of determining its level of high cost support. The Laclede and Sumner wire centers lie within Alltel’s Zone 1 while the Mendon and Rothville wire centers lie within Alltel’s Zone 2. In the case of the proposed redefinition of the Alltel service area in Zone 1, the population density in the proposed MO5 service area is 9.56 people per square mile as compared to Alltel’s Zone 1 study-wide average population density of 28.89 people per square mile.<sup>21</sup> Accordingly, any level

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<sup>20</sup> *Id.* at ¶ 42.

<sup>21</sup> MO5 used the MapInfo Exchange Plus software and Missouri population and wire center datasets to perform this analysis. Appendix D includes the population densities, on a wire center level, for each wire center included in the entire study area of each rural ILEC.

of support based upon the entire Alltel Zone 1 study area would have been determined on the average cost of providing service to a population density of 28.89. Since the population density within the portion of the Alltel Zone 1 study area that lies within MO5's proposed ETC service area is below the population density of the entire Alltel Zone 1 study area, the portion of the Alltel Zone 1 study area which MO5 seeks to include in its ETC designated service area would be expected to have a higher cost of service than the average upon which the level of USF support is based. Accordingly, since the proposed redefined service area represents a population density well below the average population density upon which the level of USF support for the ILEC was based, under established FCC precedent, there would be no cream skimming issue presented by the proposed redefinition of the Alltel Zone 1 service area.

18. Similarly, the two wire centers proposed for inclusion in MO5's ETC service area from Alltel's Zone 2 study area, is the most rural wire centers in that entire study area, having a population density of 6.98 and 7.14 persons per square mile, respectively (7.03 persons per square mile on a composite basis) as compared to the population density of 20.02 persons per square mile for the entire Zone 2 study area.

19. Grand River has also disaggregated its study area into two zones. All of the proposed Grand River wire centers included in the proposed MO5 ETC service area are located within Grand River's Zone 2. The average population density for the wire centers proposed for inclusion within the MO5 service area is 8.83 persons per square mile; nearly identical to the overall population density of the Grand River's Zone 2 which is 8.48 persons per square mile. Accordingly, the proposed MO5 redefined service area would be based on population density comparable to that upon which the level of support is based.

20. With respect to the Mark Twain wire centers, those included within the proposed MO5 ETC service area have an average population density of 7.64 persons per square mile as compared to a an overall study area population density of 9.57 persons per square mile.

21. NEMO has also disaggregated its study area. The wire center included in the proposed MO5 ETC service area is located within NEMO's Group 1, Zone 2. The average population density for the wire centers proposed for inclusion within the MO5 service area is 3.57 persons per square mile as compared to an overall population density of 4.84 for NEMO's Group 1, Zone 2.

22. Spectra has also disaggregated its study area into distinct zones. The Brunswick and Macon wire centers are in Zone 1 while the Clarence, Dalton, Elmer, Hunnewell, Keytesville, LaPlata, Shelbina and Shelbyville wire centers are in Zone 2. The average population density for the Zone 1 wire centers MO5 seeks to include is 50.83 persons per square mile, nearly identical to the composite Zone 1 population density of 49.50 persons per square mile. The Zone 2 wire centers MO5 seeks to include have an average population density of 13.37 as compared to an overall Zone 2 population density of 16.23 persons per square mile.

23. Accordingly, in each and every instance where MO5 seeks redefinition of the ILEC service area, the population densities within the portions of those study areas sought to be included in the MO5 ETC service area fall below or are virtually identical with the overall population densities upon which the level of support has been based.

24. Even if this were not the case, the FCC has considered this issue and formulated a procedure to virtually eliminate this concern even where the population density might not be as set forth herein.

[A]s the Commission concluded in *Universal Service Order*, the primary objective in retaining the rural telephone company's study area as the designated service area of a competitive ETC is to ensure that competitors will not be able to target only the customers that are the least expensive to serve and thus undercut the incumbent carrier's ability to provide service to the high-cost customers. Rural telephone companies now have the option of disaggregating and targeting high-cost support below the study area level so that support will be distributed in a manner that ensures that the per-line level of support is more closely associated with the cost of providing service. ***Therefore, any concern regarding "cream-skimming" of customers that may arise in designating a service area that does not encompass the entire study area of the rural telephone company has been substantially eliminated.***<sup>22</sup>

25. Finally, while there is clearly no cream skimming issues involved in the proposed redefinition, we note that the Commission has also recognized the principle of competitive neutrality controls in the designation of CETCs, holding that

Universal service support mechanisms and rules should be competitively neutral. In this context, competitive neutrality means that universal service support mechanism rules neither unfairly advantage nor disadvantage one provider over another and neither unfairly favor nor disfavor one technology over another.<sup>23</sup>

26. In the case of Spectra and Alltel, the various wire centers comprising their study areas are scattered in non-contiguous geographic clusters throughout the state. In cases such as MO5's, which is a Missouri-only regional CMRS carrier, the situation where the ILEC study area is scattered statewide warrants additional consideration. A CMRS ETC cannot effectively provide service to geographic areas far removed from its FCC-licensed service area. Accordingly, where, as here, the study area is comprised of numerous non-contiguous regions scattered throughout an expansive geographic area, the Commission should not apply a standard

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<sup>22</sup> *Petitions for Reconsideration of Western Wireless Corporation's Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 19144, 19149 (2001) (emphasis added, footnotes omitted). See also *Pine Ridge*, *supra*, 16 FCC Rcd at 18141, where the FCC used identical language in designating Western Wireless as an ETC for an area that is less than the ILEC's entire study area.

that would allow only one class of CMRS licensee (large nationwide licensees) to qualify for ETC status by being the only carriers that can cover an entire LEC study area.

27. As shown herein, the proposed MO5 ETC service area does not result in any possible cream skimming and would not impose any increased reporting obligation on any ILEC. Moreover, even looking beyond the FCC's population density standard, a denial of the proposed redefinition would be contrary to established FCC principals of competitive neutrality and ensuring that regulations are not applied in a manner that can act as a barrier to market entry.

#### **IV. ETC DESIGNATION FOR MO5 WOULD BE IN THE PUBLIC INTEREST**

28. Because MO5 is seeking ETC designation in areas served by rural telephone companies, the Commission is obligated under § 214(e)(6) of the Act to consider whether granting MO5's request will serve the public interest. The FCC has long recognized that promoting competition in specific telecommunications service markets has multiple public interest benefits (*e.g.*, cost-based pricing, higher quality and more innovative services, increased consumer choice and a decreased need for regulatory oversight). As a result, stimulating competition, whenever possible, is a paramount FCC policy objective.<sup>24</sup>

29. The FCC has ruled that designating competitive ETCs in areas served by rural telephone companies is consistent with its pro-competitive policies and has numerous public interest benefits.<sup>25</sup> The marketplace rivalry that follows designation of a competitive ETC "will result not only in the deployment of new facilities and technologies, but will also provide an incentive to the incumbent rural telephone companies to improve their existing network[s] to

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<sup>23</sup> Report and Order, CC Docket No. 96-45, FCC 97-157 (May 8, 1997) ¶ 47).

<sup>24</sup> *See, e.g.,* Amendment of Part 90 of the Commission's Rules to Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band (First Report and Order, Eighth Report and Order, and Second Further Notice of Proposed Rule Making) 1 CR 1017, 11 FCC Rcd 1463 (1995).



remain competitive. ...”<sup>26</sup> Those opposing designation of CETCs claim that rural telephone companies are incapable of competing with CMRS providers in the universal service market, and that the advent of additional ETCs in rural LEC areas will induce the incumbent to reduce investment, raise service rates or reduce service quality. The FCC, however, flatly rejected these assertions holding that, to the contrary, competition may prod existing carriers to increase operating efficiency, lower prices and offer better service.<sup>27</sup>

30. Based on the foregoing considerations, the FCC designated Western Wireless Corporation an ETC in the State of Wyoming. More recently, the FCC designated Guam Cellular and Paging, Inc. (“Guamcell”) as an ETC in a service area also served by the Guam Telephone Authority (“GTA”), the rural telephone company in Guam.<sup>28</sup> According to the FCC, Guamcell’s ETC operations in GTA’s service area will promote “competition and the provision of new technologies to consumers in high-cost and rural areas of Guam.”<sup>29</sup>

31. Granting MO5 ETC status in the service area depicted in Appendix C is fully consistent with FCC decisional precedent that holds that such designation meets the public interest criterion set forth in § 214(e)(2) of the Act. That statutory provision is concerned with maximizing consumer welfare, rather than protecting incumbent rural LECs from the rigors attending a competitive market. Designating MO5 as an ETC will enhance consumer welfare by bringing service choices, innovation, quality differentiation and rate competition to the local market. In a competitive market, rural consumers will be able to select the carrier that provides

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<sup>25</sup> Western Wireless Corporation, 16 FCC Rcd 48, 55 (2000).

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*, 16 FCC Rcd at 57.

<sup>28</sup> Guam Cellular and Paging, Inc., 17 FCC Rcd at 1502-03.

<sup>29</sup> *Id.*

the optimal service package based on cost, quality, customer service, etc. Without competition, by contrast, the consumer has no alternative from which to select, and the incumbent monopoly provider has little or no incentive to innovate with respect to any component of its service offering.

32. As required by the Act,<sup>30</sup> MO5 will use its Federal universal service support for construction, maintenance and upgrading of facilities serving rural areas for which such support is intended. While MO5 has been at the forefront of providing the greatest level of service throughout its FCC-licensed service area out of any FCC licensees, there are areas which MO5 cannot afford to serve absent USF support.

33. When originally deployed, the MO5 network provided analog wireless service to 3-watt subscriber mobile units typically installed in vehicles with external, high gain antennas. Since that time, CMRS has migrated to digital services and subscriber equipment has evolved from installed high-powered mobile units to hand-held portable units providing personal communications services, operating at a fraction of a watt, from inside cars and buildings. MO5 previously overbuilt its entire network with time division multiple access (“TDMA”) technology. That technology has been largely abandoned by the industry and MO5 has since overbuilt its network with a digital network operating with the Global System for Mobile Communications (“GSM”) technology. However, limitations in propagation characteristics of the GSM protocol, coupled with the migration to low-powered portable subscriber equipment, has resulted in the need for MO5 to look to further enhance its network with additional digital facilities in some of the rural-most portions of its FCC-licensed service

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<sup>30</sup> 47 U.S.C. § 254.

area. MO5 has developed a five (5) year network enhancement plan which would improve GSM coverage throughout significant portions of its proposed ETC service area. Appended hereto as Appendix E is a map depicting the areas within MO5's FCC-licensed service area where GSM coverage would benefit from enhancement. Appendix F is a listing of proposed cell sites which MO5 would deploy, and the timeline for their deployment, assuming grant of ETC designation. Appendix F also depicts the proposed timeline for implementation of each of these cell sites, referenced to the date of grant of ETC status, the population that would be served by each proposed cell site, as well as the wire centers where coverage would be enhanced. Appendix G depicts the approximate locations of the proposed cell sites and the underlying wire center boundaries. Appendix H graphically depicts the approximate locations of these additional cell sites and their proposed coverage area while Appendix I shows the composite GSM coverage from MO5's existing cell sites as well as the proposed additional cell sites. Significantly, none of the proposed additional cell sites would be deployed absent USF support.

34. The sites are identified by the geographic area near which MO5 anticipates that the cell site would be located. However, the precise locations for these sites have not yet been identified. Included for each proposed cell site is a listing of the wire centers that would receive enhanced GSM coverage from the proposed construction of that site as well as the population that would be covered by each proposed site's proposed service area.<sup>31</sup> The precise cell site locations, as well as the timing for each cell site could change as the MO5 build-out plans evolve in these areas in order to meet any changing customer needs over then next five years.

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<sup>31</sup> MO5 considers its construction plans to be highly confidential and proprietary information. For that reason, MO5 has excluded Appendix E, Appendix F, Appendix G, Appendix H and Appendix I from the public version of this Application, and a Motion for Protective Order pursuant to 4 CSR 240-2.085 is being filed simultaneously herewith.

35. Appended hereto as Appendix G is a map that graphically depicts the general area where MO5 envisions constructing each of the GSM cell sites identified in Appendix F. Appendix G also superimposes the underlying ILEC wire center boundaries on that same map. In addition, over that same period, MO5 envisions implementing capacity expansions that, in conjunction with the deployment of the additional GSM cell sites, would result in network enhancements in virtually all of the wire centers located in MO5's FCC-licensed service area, that are included in the proposed MO5 ETC service area. Accordingly grant of ETC designation would expand the competitive service offering in the proposed ETC service area. The specific steps MO5 has committed to undertake above, will assure consumers and the Commission that MO5 is committed to providing the supported services to its designated area.

36. In addition to the core services discussed above, designating MO5 as an ETC will allow customers in this part of rural Missouri to choose service based on pricing, service quality, customer service, and service availability. MO5 offers mobility, access to Phase I and, upon PSAP readiness, Phase II Enhanced 911 ("E911"), local number portability, expanded calling scopes and several calling plans to allow customers to purchase plans that best fit their telecommunications needs. Unlike traditional LEC services, the availability of mobility affords access to emergency calling wherever the customer is in need and not merely at the nearest location where the fixed landline telephone is located. The ability to enhance network coverage that ETC designation would allow, would greatly expand the places in which a subscriber handset would have adequate coverage to reach these emergency resources.

**A. MO5 is Committed to Providing Quality Service to Requesting Customers Throughout Its Designated Service Area**

37. MO5 will provide service to any requesting customer in the service area where it is designated as an ETC. When a potential customer requests service within an area presently served by MO5's existing network, MO5 will immediately provide service using its existing network. If a potential customer requests service within the area in which MO5 is designated as an ETC, but where the existing service area does not immediately allow MO5 to provide service, MO5 will take the following steps to provide service: (1) modify or replace the requesting customer's equipment to provide service; (2) install a roof-mounted antenna or other equipment to provide service; (3) adjust the nearest cell site to provide service; (4) identify and make any other adjustments that can reasonably be made to the network or customer facilities to provide service; and (5) determine the feasibility of installing an additional cell site, cell extender, or repeater to provide service where all other options fail.<sup>32</sup> If, after following these steps, MO5 still cannot provide the requested service, it will notify the requesting party and include that information in an annual report filed with the Commission detailing how many requests for service were unfulfilled for the past year. Finally, in the event that an existing LEC were to seek to drop its designation upon grant of the designation to MO5, MO5 stands ready to undertake carrier of last resort obligations in such areas, using the processes set forth above.

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<sup>32</sup> MO5 has made these additional commitments consistent with the holding in the *Virginia Cellular Order* at ¶ 15.

38. In addition to the foregoing, MO5 has adopted the Cellular Telecommunications and Internet Association (“CTIA”) Consumer Code for Wireless Service.<sup>33</sup> Adoption of this code should alleviate any concerns that might otherwise arise with respect to its commitment to meet quality of service standards.<sup>34</sup>

**B. MO5 Will Advertise Supported Services Throughout Its Designated Service Area**

39. MO5 will advertise the availability of the supported services and the availability of Lifeline and Link-Up services to qualifying customers. Consistent with the additional commitments made by *Virginia Cellular*,<sup>35</sup> MO5 will also make available additional consumer information regarding Lifeline and Link-Up service in locations where qualified, unserved consumers are likely to find such information useful, including unemployment and welfare offices within its service area.

**C. MO5 Will Comply with the Ongoing Reporting Conditions Recently Imposed on Virginia Cellular**

40. Significantly, MO5 is a regional CMRS carrier with licensed service areas limited to predominantly rural portions of Missouri. Accordingly, USF made available to MO5 can only be used in these areas and there is no concern that MO5 could use these funds for any purpose other than those expressly allowed under the FCC’s rules and within the area within the

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<sup>33</sup> Under the CTIA Consumer Code, wireless carriers agree to: (1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy. *See, CTIA Consumer Code for Wireless Service*, available at [http://files.ctia.org/pdf/The\\_Code.pdf](http://files.ctia.org/pdf/The_Code.pdf).

<sup>34</sup> The FCC has found that compliance with the CTIA code is sufficient to meet quality of service obligations. *Virginia Cellular* at ¶ 30.

state of Missouri in which it is designated as an ETC. Nevertheless, MO5 hereby commits to follow the annual reporting obligations specified in the *Virginia Cellular* Order to ensure that MO5 satisfies its obligations under Section 214 of the Act.<sup>36</sup> Specifically, MO5 hereby commits that upon grant of ETC status, it will: (1) annually submit information to the Commission regarding its progress toward meeting its build-out plans in areas where it is designated as an ETC; (2) annually provide information to the Commission with respect to the number of consumer complaints it receives per 1,000 mobile handsets; and (3) annually submit information regarding how many requests for service from potential customers in its designated area were unfulfilled for the past year. MO5 would provide this information in a separate schedule as part of the annual report it submits as a certificated carrier.

41. Upon designation, MO5 will make available several service offerings and rate plans that will compete with those of the incumbent rural telephone company. Moreover, MO5's designated local calling area will equal or exceed in size the calling areas of the incumbent rural telephone companies whose telephone exchanges are within the area for which MO5 is seeking ETC designation. As a result, MO5 subscribers should be able to avoid certain intra-LATA toll charges typically associated with wireline service. Additionally, MO5 has implemented local number portability and E-911 services in compliance with state and federal requirements, which will improve service to Missouri citizens.

42. MO5 will use available federal high-cost support to finance construction, maintenance and upgrading of facilities serving rural areas for which that support is intended.

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<sup>35</sup> *Virginia Cellular* at ¶ 22.

<sup>36</sup> *Id.* at ¶ 46.

High cost support is necessary if MO5 is to establish the infrastructure required to bring its wireless service to many remote and difficult-to-reach locales within its FCC-licensed service area. MO5 anticipates that infrastructure investment will be required if MO5 is to compete with the incumbent LECs throughout its proposed ETC area. Provision of high-cost support to MO5 will allow it to compete in providing primary telephone service in remote areas of Missouri.

V. **ETC DESIGNATION FOR MO5 WILL GREATLY ENHANCE LIFELINE AND LINK-UP SERVICE AVAILABLE IN RURAL MISSOURI**

43. MO5 acknowledges that Section 54.405 of the FCC's rules requires all ETCs to make Lifeline services (as defined in Section 54.401 of the FCC's rules) available to qualifying low-income consumers.

44. MO5 will offer discounts of 50% off of the \$50.00 activation fee to Link-Up eligible subscribers. With respect to Lifeline-eligible subscribers, in addition to allowing the Lifeline customer to apply the Lifeline discount to any MO5 service plan, MO5 intends to offer two distinct service plans to Lifeline-eligible subscribers only. The first plan is intended to provide a low-cost service option comparable in price to that offered by the ILEC but with the added advantage of limited mobility. This Plan offers unlimited local calling and mobility in the area served by the subscriber's home cell site at a fixed price of \$6.75 per month.<sup>37</sup> The subscriber's outbound local calling area would correspond to its traditional LEC calling area for that subscriber's address. With the advantage of limited mobility, calls could be originated by the MO5 Lifeline subscriber to any numbers within that ILEC exchange from any location within the subscriber's home cell site serving area, not just the subscriber's home. Similarly, the

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<sup>37</sup> The \$6.75 rate reflects the net monthly rate to a Lifeline customer after applying the local exchange service discount of \$1.75 and the federal line charge discount of \$6.50.



Lifeline customer would receive inbound calls, wherever they originate from, throughout the geographic area served by its home cell site. The area served by a home cell site or cells would be defined to include coverage from all MO5 cell sites necessary to encompass the callers entire corresponding LEC exchange area.

45. The second MO5 Lifeline Plan would allow for local calling and mobility throughout the entire service area for which MO5 is designated as an ETC for a flat \$11.75 per month charge.<sup>38</sup> Since the MO5 ETC designated service area would be the MO5 subscriber's local calling area, even toll restricted Lifeline subscribers would enjoy service area wide mobility and local calling, assuming grant of the MO5 ETC Application as filed. This would afford Lifeline customers a local calling scope extending to a geographic area encompassing multiple telephone exchanges served by all of the LEC wire centers for which ETC designation is being sought. While these Lifeline plans would not allow roaming into other cellular networks to place and receive routine calls, both plans would allow ubiquitous access to 911 for the MO5 Lifeline subscriber even in a roaming situation. MO5 is unable to provide either of these Lifeline plans without ETC support.

46. In addition, once the Commission allows inter-modal porting to proceed, the designation of ETC status to MO5 will enable Lifeline and Link-Up eligible members of the community to port their existing wireline telephone numbers to a wireless service provider. Denial of ETC designation to MO5 will essentially place these lower income members of the community in a separate class that would be effectively barred from porting their numbers to

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<sup>38</sup> The \$11.75 rate reflects the net monthly rate to a Lifeline customer after applying the local exchange service discount of \$1.75 and the federal line charge discount of \$6.50.

wireless service providers because they would be required to give up their Lifeline support to do so, since Lifeline is only available from an ETC.

47. Upon ETC designation, MO5 would also offer an “ILEC-equivalent” plan to compete directly with the LEC service offering. This plan is intended to provide a low-cost service option comparable in price to that offered by the ILEC but with the added advantage of limited mobility. This Plan would offer unlimited local calling and mobility in the area served by the subscriber’s home cell site at a fixed price of \$15.00 per month. The subscriber’s outbound local calling area would correspond to its traditional ILEC local calling area for that subscriber’s address. With the advantage of limited mobility, calls could be originated by the MO5 ILEC-equivalent subscriber to any numbers within that ILEC exchange from any location within the subscriber’s home cell site serving area, not just the subscriber’s home. Similarly, the ILEC-equivalent plan customer would receive inbound calls, wherever they originate from, regardless of where the customer is located throughout the geographic area served by its home cell site. The area served by a home cell site or cells would be defined to include coverage from all MO5 cell sites necessary to encompass the subscriber’s entire corresponding ILEC exchange area. This plan also includes several vertical features in this price including call waiting, call forwarding, 3-way calling, caller ID and voicemail. As with traditional ILEC calling plans, the ILEC-equivalent plan does not include bundled toll service.

48. As with any MO5 handset, there would be no geographical limitation on the ability of an ILEC-equivalent subscriber to use that handset for an emergency 911 call. That includes not only the entire MO5 service area but anywhere that the phone might be taken in the United States where compatible service is available from any carrier.

**VI. USF POLICY ARGUMENTS RELATING TO ETC DESIGNATION FOR WIRELESS CARRIERS ARE NOT AT ISSUE IN THIS APPLICATION**

49. MO5 is aware that the telecommunication industry has been involved in an ongoing policy argument underlying whether universal service support should be extended to wireless carriers in general. There has been ongoing speculation and argument that grant of ETC status to wireless carriers in general will jeopardize the stability of the universal service fund (“USF”). This speculation centers around the current practice that does *not* reduce the level or amount of ILEC USF support in connection with the addition of a CETC in the carriers service area unless a LEC subscriber actually disconnects its landline phone when subscribing to the wireless service provider. Instead, the wireless CETC subscriber is viewed the same as an additional line is viewed in the context of USF with additional USF support being available for that additional line.

50. These policy arguments have little to do with the MO5 Application. The current federal statutory requirements and regulatory processes allow CMRS carriers to obtain universal service support. Without taking any position as to merits of the arguments advanced in the ongoing policy debate, MO5 respectfully submits that it is not relevant to the consideration of MO5’s Application and that grant of the MO5 Application will neither prejudice those arguments when they are considered in the proper forum nor insulate MO5 from any subsequent changes in the rules regarding access to USF.

51. Without prejudice to the foregoing, there is ample evidence to suggest that wireless ETC designations have not had an adverse impact on the USF. While wireless ETC designations have been increasing, over the last two years, the level of carrier contribution to the USF (calculated as the percent of revenues needed to support the fund) has actually been

decreasing.<sup>39</sup> Indeed, there is no reasonable basis upon which to conclude that designation of MO5 as an ETC will have any adverse impact on the USF fund. The FCC recently dealt with these general policy arguments in its *Virginia Cellular* Order. While acknowledging that these issues are significant to the underlying USF policy, the Commission made it abundantly clear that any changes resulting from the current Federal-State Joint Board on Universal Service (“Joint Board”) review would apply to all ETCs, even those granted ETC status before that review is complete.<sup>40</sup> Indeed, the FCC has recently considered recommendations by the Joint Board which, as adopted, will apply on an ongoing basis to any and all previously designated ETCs.<sup>41</sup>

52. The FCC has long followed the holding in *Puerto Rico Sun Oil Co.*, which dictates that applications for ETC status must be evaluated based on the rules as they currently exist.<sup>42</sup> This Commission cannot base its ETC designation decisions on uncertainty with respect

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<sup>39</sup> Wireless carriers contribute to the USF and the FCC has modified its “safe harbor” rules to increase the percentage of wireless calls that are subject to USF. As a result, the actual level of carrier contribution to the USF actually declined during 2003. Specifically, the contribution factor has declined from 9.5% (third quarter 2003), to 9.2% (fourth quarter 2003), to 8.7% (first quarter 2004). The third and fourth quarter 2004 contribution factor was 8.9%, still well below the contribution factors for the prior year. While the contribution factors have increased for 2005 (10.7% for the first quarter and 11.1% for the second quarter), the majority of those increases relate to increased projected support for the Schools and Library Program and the Rural Health Care Program which portions of the fund are not at issue here. The contribution factor for the third quarter of 2005 has been reduced to 10.2%.

<sup>40</sup> *Id.* at ¶ 3. “The outcome of that proceeding could potentially impact, among other things, the support for which Virginia Cellular and other competitive ETCs *may receive in the future* and the criteria used *for continued eligibility* to receive universal support.” (Emphasis added.)

<sup>41</sup> The FCC has recently issued a Report and Order considering recommendations advanced by the Federal-State Joint Board on Universal Service in February of 2004. *In the Matter of Federal-State Joint Board on Universal Service*, FCC 05-46 (CC Docket No. 96-45) (rel March 17, 2005) (“*FCC Guidelines Order*”). To the extent that rule changes have been adopted as a result of that or any future proceeding, the FCC has made it abundantly clear that those changes apply to all FCC-designated ETCs, including those that had been previously designated.

<sup>42</sup> *Puerto Rico Sun Oil Co. v. EPA*, 8 F.3d 73, 79 (1st Cir. 1993) (citing *SEC v. Cheery Corp.*, 332 U.S. 194, 196 (1947)) (An agency’s decision cannot be supported based upon rules that the agency has not yet adopted.)

to possible future universal service harm based on *possible* rule changes. Instead, MO5's ETC application must be evaluated based on the rules as they exist today.<sup>43</sup>

53. The MO5 Application is before this Commission under an established set of rules and statutory requirements. Denial of MO5's Application will not affect the ability of wireless carriers in other states to draw upon the USF; it will only affect the ability of the citizens of rural Missouri to benefit from those federal funds. As demonstrated above, the grant of the MO5 Application will, in and of itself, place an insignificant burden on the USF. Accordingly, the Commission should avoid consideration of generalized policy which are presently being fully considered by the Joint Board, Congress and the FCC. Those ongoing deliberations have no bearing on the designation of MO5 as an ETC nor should this Commission weigh those arguments at all in ruling on the MO5 Application; knowing full well that any ETC designation will be subject to any changes ultimately adopted in those proceedings.

54. The Commission may choose to evaluate the MO5 Application using the guidance recently announced in the *FCC Guidelines Order*.<sup>44</sup> Those guidelines are wholly consistent with the precedent cited by MO5 and evaluation of the MO5 Application would result in a favorable action under those guidelines.

55. MO5 does not have any pending action, or final unsatisfied judgment or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the Application.

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<sup>43</sup> *Id.*

<sup>44</sup> The Commission should keep in mind that the FCC itself has yet to apply those guidelines and the order adopting those guidelines has not become final.

56. MO5 does not have any annual reports or assessment fees that are overdue.

**VII. CONCLUSION**

WHEREFORE, on the basis of the foregoing, MO5 respectfully requests that the Commission: (a) designate MO5 as a telecommunications carrier eligible under the provisions of Section 54.201(d) of the FCC's rules to receive Federal universal service support; and (2) issue such other orders as are deemed necessary or convenient in this matter.

Respectfully submitted,

LATHROP & GAGE L.C.

Dated: October 14, 2005

/s/ Paul S. DeFord

Paul S. DeFord Mo. #29509

Suite 2800

2345 Grand Boulevard

Kansas City, MO 64108-2612

Telephone: (816) 292-2000

Facsimile: (816) 292-2001

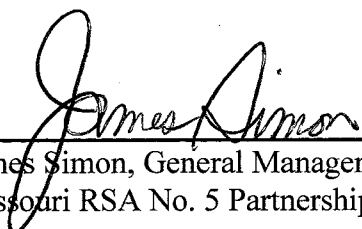
E-mail: [pdeford@lathropgage.com](mailto:pdeford@lathropgage.com)

*Attorneys for Missouri RSA No. 5 Partnership*

VERIFICATION

STATE OF MISSOURI            )  
                                          )  
                                          )        SS.  
                                          )  
COUNTY OF MACON            )

James Simon, having been duly sworn upon his oath, states that he is the General Manager of Missouri RSA No. 5 Partnership, the Applicant herein, and as such, is duly authorized by the Applicant to execute the foregoing Application and to make this Affidavit on its behalf, and that the matters and things stated in the foregoing Application and Appendices thereto are true, complete and correct to the best of his knowledge, information and belief.

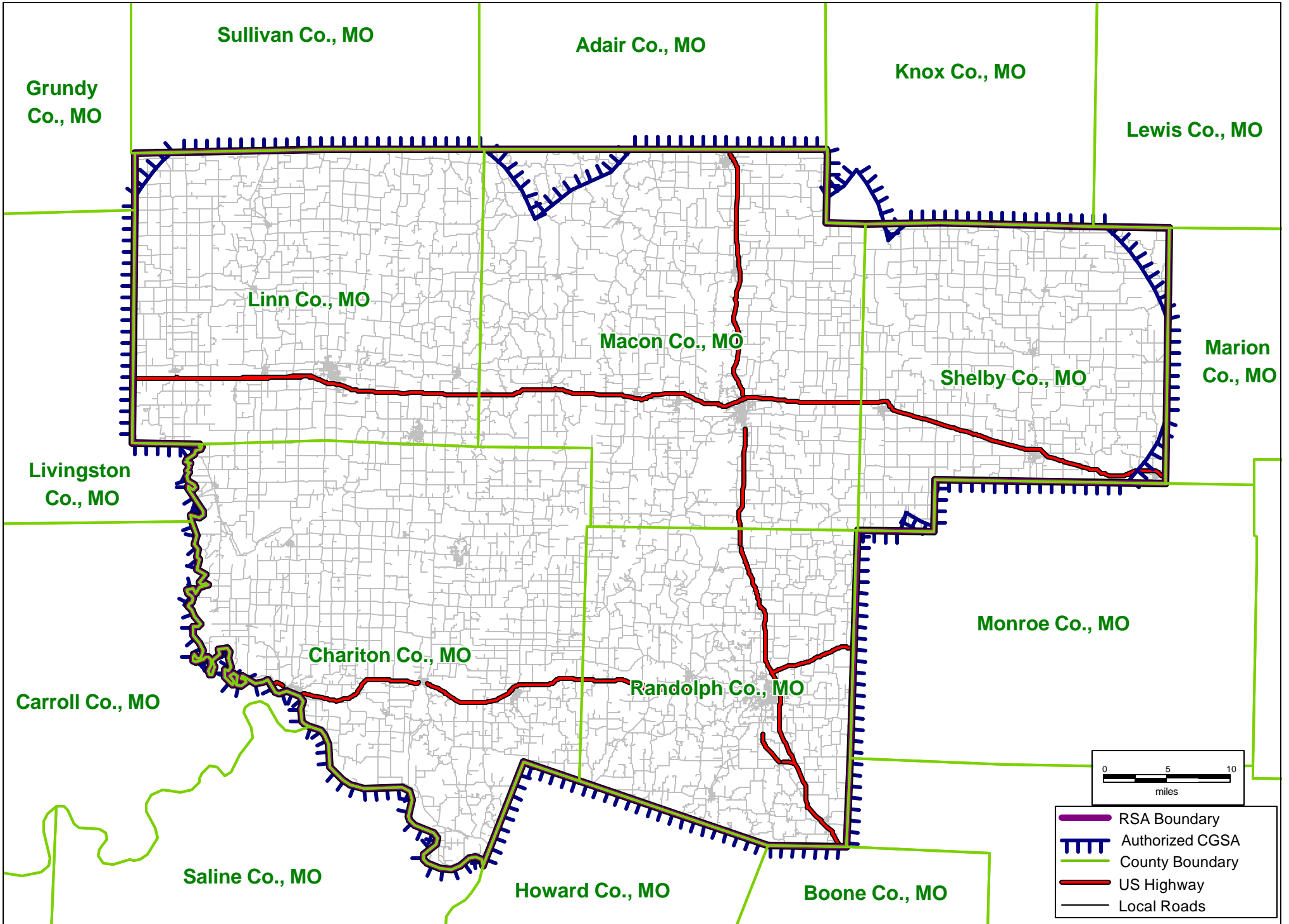
  
\_\_\_\_\_  
James Simon, General Manager  
Missouri RSA No. 5 Partnership

Subscribed and sworn to before me, a Notary Public, on this 13<sup>th</sup> day of October, 2005.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

*AUDRA E. LINEBAUGH*  
*Notary Public - Notary Seal*  
*STATE OF MISSOURI*  
*Chariton County*  
*My Commission Expires: May 27, 2006*



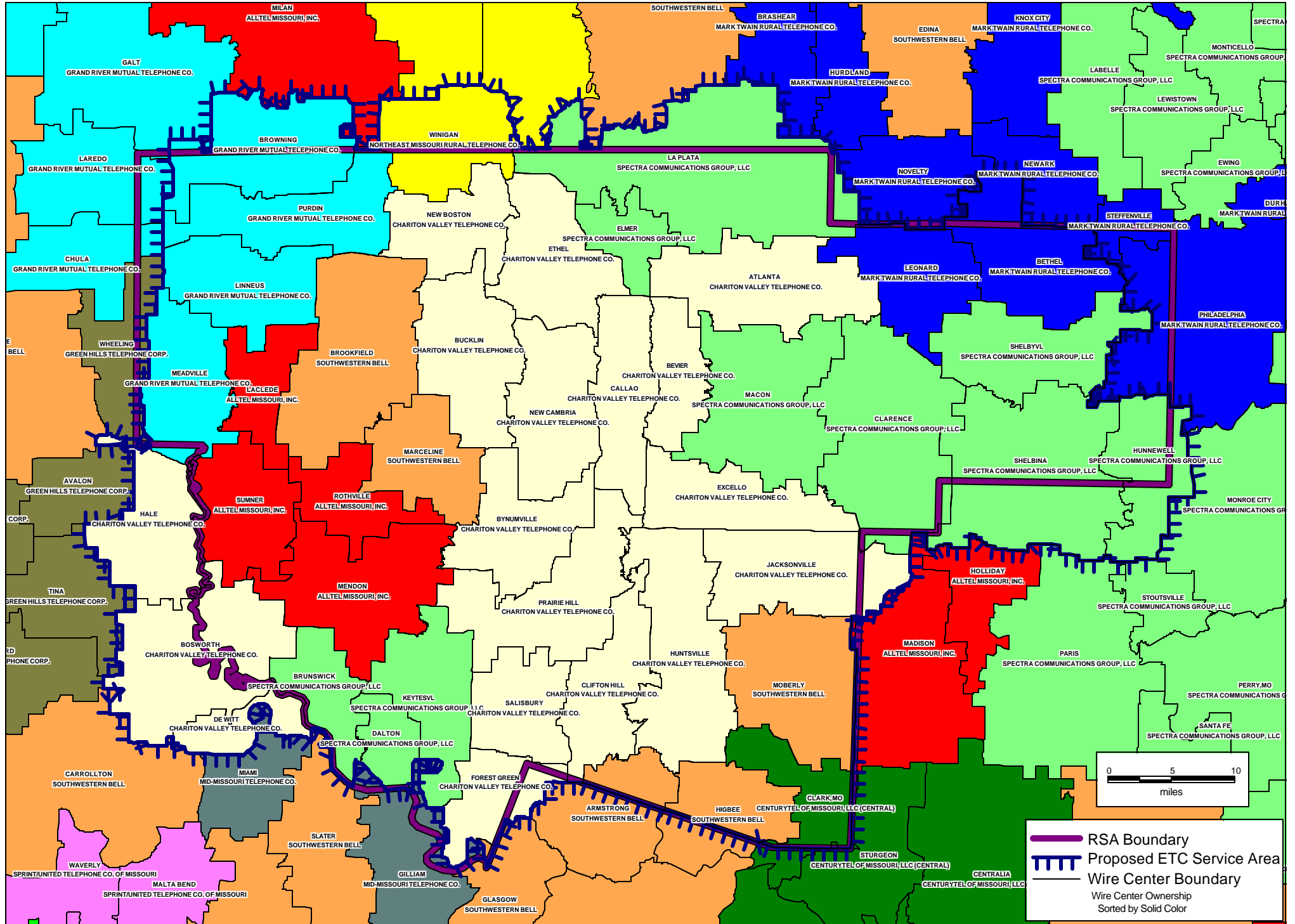


## Appendix B

### Missouri RSA No. 5 Partnership

#### Ownership

Chariton Valley Cellular RSA No. 2 Corporation	75%
Grand River Communications, Inc.	25%



**ALLTEL MISSOURI, INC.\***

**Zone 1**

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
ALBANY	2,322.00	72.72	31.93
BELLFLOWER	850.00	48.96	17.36
BOLIVAR	13,986.00	147.50	94.82
CROCKER	2,882.00	86.17	33.45
DIXON	7,266.00	189.48	38.35
DONIPHAN	7,261.00	336.88	21.55
EOLIA	1,318.00	74.06	17.80
FAIRDEALNG	3,225.00	101.96	31.63
GALLATIN	2,706.00	86.33	31.34
GRANT CITY	1,505.00	104.98	14.34
<b>LACLEDE</b>	605.00	45.06	13.43
LIBERAL	1,865.00	121.99	15.29
MADISON	1,805.00	120.74	14.95
MILAN	3,817.00	203.61	18.75
MORRISVL	2,097.00	60.85	34.46
OLNEY	1,058.00	59.98	17.64
PIEDMONT	4,680.00	138.30	33.84
PLEASAHOPE	2,828.00	62.35	45.36
PURDY	3,249.00	66.97	48.51
SILEX	1,909.00	74.33	25.68
STOTTSCITY	681.00	35.74	19.05
<b>SUMNER</b>	512.00	71.81	7.13
UNION STAR	583.00	42.34	13.77
WINSTON	628.00	57.67	10.89

Total Population Coverage by MO RSA 5 Partnership:	1,117.00		
Total Coverage Area by MO RSA 5 (square mile):		116.87	
MO RSA Total Density:			9.56
Full Zone:	69,638.00	2,410.78	28.89
MO RSA 5 - % Coverage:	1.60%	4.85%	

Zone 2

	Population	Square Miles	Density
ALDRICH	1,613.00	76.23	21.16
COFFEY	354.00	39.30	9.01
FAIRVIEW	703.00	28.06	25.05
GREENVILLE	1,910.00	142.31	13.42
HALF WAY	1,362.00	75.17	18.12
HOLLIDAY	605.00	51.48	11.75
IBERIA	3,631.00	157.90	23.00
JAMESON	283.00	41.12	6.88
MARTINSBG	996.00	58.09	17.15
<b>MENDON</b>	760.00	108.87	6.98
MINDENMINS	652.00	62.34	10.46
NAYLOR	1,171.00	44.19	26.50
NEELYVILLE	2,540.00	138.47	18.34
NEW HARTFD	682.00	74.46	9.16
OXLY	1,492.00	49.73	30.00
POLK	1,331.00	77.62	17.15
<b>ROTHVILLE</b>	345.00	48.30	7.14
STARK CITY	985.00	33.81	29.13
STELIZABTH	823.00	56.52	14.56
STOCKTON	5,142.00	227.99	22.55
STOVER	3,372.00	160.44	21.02
VANDALIA	5,474.00	160.00	34.21
VERONA	2,353.00	56.19	41.88
WHEATON	2,142.00	65.22	32.84

Total Population Coverage by MO RSA 5 Partnership:	1,105.00		
Total Coverage Area by MO RSA 5 (square mile):		157.17	
MO RSA Total Density:			7.03
Full Zone:	40,721.00	2,033.81	20.02
MO RSA 5 - % Coverage:	2.71%	7.73%	

\* Only the highlighted wire centers are included in the proposed ETC service area.

**CHARITON VALLEY TELEPHONE CO.**

ATLANTA	Full Study Area
BUCKLIN	Full Study Area
BEVIER	Full Study Area
BOSWORTH	Full Study Area
BYNUMVILLE	Full Study Area
CALLAO	Full Study Area
CLIFTON HILL	Full Study Area
DE WITT	Full Study Area
ETHEL	Full Study Area
EXCELLO	Full Study Area
FOREST GREEN	Full Study Area
HALE	Full Study Area
HUNTSVILLE	Full Study Area
JACKSONVILLE	Full Study Area
NEW BOSTON	Full Study Area
NEW CAMBRIA	Full Study Area
PRAIRIE HILL	Full Study Area
SALISBURY	Full Study Area

**GRAND RIVER MUTUAL TELEPHONE CO.\***

**Zone 2**

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
ANDOVER	156.00	16.86	9.25
BARNARD	1,220.00	107.65	11.33
BRIMSON	494.00	48.46	10.19
<b>BROWNING</b>	744.00	93.68	7.94
CAINSVILLE	1,008.00	92.62	10.88
CHULA	616.00	63.40	9.72
CONCETNJCT	587.00	47.95	12.24
DARLINGTON	519.00	89.30	5.81
DENVER	226.00	45.93	4.92
EAGLEVILLE	972.00	128.26	7.58
GALT	1,149.00	158.12	7.27
GENTRY	608.00	110.35	5.51
GILMANCITY	726.00	87.59	8.29
GRAHAM	504.00	63.02	8.00
JAMESPORT	1,645.00	108.74	15.13
LAREDO	745.00	79.70	9.35
<b>LINNEUS</b>	531.00	74.12	7.16
LUCERNE	301.00	66.93	4.50
<b>MEADVILLE</b>	939.00	74.04	12.68
MERCER	896.00	130.15	6.88
MT MORIAH	394.00	57.90	6.80
NEWHAMPTON	642.00	93.86	6.84
NEWTOWN	565.00	97.16	5.82
PARNELL	701.00	64.72	10.83
POWERSVL	192.00	42.53	4.51
PRINCETON	2,061.00	221.84	9.29
<b>PURDIN</b>	651.00	82.76	7.87
RAVENWOOD	883.00	77.79	11.35
RIDGEWAY	585.00	66.33	8.82
SHERIDAN	478.00	62.37	7.66
SO LINEVL	136.00	17.33	7.85
SODAVIS CY	89.00	8.85	10.06
SPICKARD	1,345.00	146.74	9.17
WASHITCTR	683.00	102.70	6.65

Total Population Coverage by MO RSA 5 Partnership:	2,865.00		
Total Coverage Area by MO RSA 5 (square mile):		324.60	
MO RSA Total Density:			8.83
Full Zone:	23,991.00	2,829.75	8.48
MO RSA 5 - % Coverage:	11.94%	11.47%	

\* Only the highlighted wire centers are included in the proposed ETC service area.

**MARK TWAIN RURAL TELEPHONE CO.\***

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
BARING	611.00	60.14	10.16
<b>BETHEL</b>	528.00	89.34	5.91
BRASHEAR	1,176.00	84.04	13.99
DURHAM	674.00	22.79	29.57
GREENTOP	922.00	66.07	13.95
HURDLAND	401.00	50.26	7.98
KNOX CITY	593.00	98.08	6.05
<b>LEONARD</b>	692.00	70.41	9.83
NEWARK	300.00	49.68	6.04
NOVELTY	270.00	66.87	4.04
PHILA	2,451.00	201.11	12.19
STEFFENVL	191.00	24.72	7.73
WILLIAMSTN	576.00	87.69	6.57
WYACONDA	491.00	60.44	8.12

Total Population Coverage by MO RSA 5 Partnership:	1,220.00		
Total Coverage Area by MO RSA 5 (square mile):		159.75	
MO RSA Total Density:			7.64
Full Zone:	9,876.00	1031.64	9.57
MO RSA 5 - % Coverage:	12.35%	15.49%	

\* Only the highlighted wire centers are included in the proposed ETC service area.

**NORTHEAST MISSOURI RURAL TELEPHONE CO.\***

**Group 1 Zone 2**

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
GREEN CITY	852.00	188.24	4.53
LEMONS	258.00	45.40	5.68
POLLOCK	369.00	53.11	6.95
<b>WINIGAN</b>	257.00	71.99	3.57

Total Population Coverage by MO RSA 5 Partnership:	257.00		
Total Coverage Area by MO RSA 5 (square mile):		71.99	
MO RSA Total Density:			3.57
Full Zone:	1,736.00	358.74	4.84
MO RSA 5 - % Coverage:	14.80%	20.07%	

\* Only the highlighted wire centers are included in the proposed ETC service area.

**SPECTRA COMMUNICATIONS GROUP, LLC\*****Zone 1**

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
AURORA	9,956.00	74.92	132.89
<b>BRUNSWICK</b>	1,251.00	46.65	26.82
CAMERON	10,803.00	131.32	82.26
CANTON	4,152.00	139.31	82.26
CONCORDIA	3,647.00	93.69	38.93
KAHOKA	3,053.00	98.85	30.89
<b>MACON</b>	7,189.00	119.40	60.21
MONROECITY	3,710.00	173.43	21.39
MOUNTANGRV	8,337.00	190.63	43.73
MT VERNON	7,659.00	131.44	58.27
PALMYRA	5,769.00	136.94	42.13
POTOSI	13,623.00	320.96	42.44
SAVANNAH	6,790.00	78.72	86.26

Total Population Coverage by MO RSA 5 Partnership:	8,440.00		
Total Coverage Area by MO RSA 5 (square mile):		166.05	
MO RSA Total Density:			50.83
Full Zone:	85,939.00	1,736.26	49.50
MO RSA 5 - % Coverage:	9.82%	9.56%	

\* Only the highlighted wire centers are included in the proposed ETC service area.

**Zone 2**

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
AMAZONIA	1,212.00	35.19	34.44
ANNAPOLIS	1,658.00	148.43	11.17
ARCOLA	413.00	56.28	7.34
AVENUECITY	1,611.00	34.45	46.76
AVILLA	1,612.00	98.40	16.38
BELGRADE	728.00	58.16	12.52
BELLEVIEW	779.00	96.79	8.05
BIRCH TREE	2,100.00	151.63	13.85
BOLCKOW	630.00	39.18	16.08
BOSS	1,168.00	97.22	12.01
BRAYMER	1,924.00	97.66	19.70
BRONAUGH	760.00	60.99	12.46
BUNKER	1,587.00	219.18	7.24
CALEDONIA	1,291.00	52.59	24.55
CENTERVL	622.00	70.19	8.86
<b>CLARENCE</b>	1,525.00	148.76	10.25
CLARKSDALE	549.00	38.99	14.08



## Appendix D

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
COLLINS	1,311.00	99.25	13.21
COSBY	267.00	12.29	21.72
DADEVILLE	1,028.00	89.50	11.49
<b>DALTON</b>	244.00	27.90	8.75
EASTON	391.00	19.66	19.89
EDGAR SPG	2,462.00	205.12	12.00
ELDORDOSPG	7,033.00	156.29	45.00
ELLSINORE	2,132.00	139.85	15.24
<b>ELMER</b>	218.00	33.35	6.54
EMINENCE	1,396.00	220.02	6.34
EVERTON	1,432.00	76.57	18.70
EWING	474.00	41.11	11.53
FILLMORE	622.00	54.24	11.47
FREMONT	520.00	104.25	4.99
GOLDENCITY	2,075.00	131.12	15.83
GORIN	294.00	43.97	6.69
GOWER	2,715.00	87.81	30.92
GREENFIELD	2,799.00	107.91	25.94
GROVESPRNG	1,723.00	117.02	14.72
HAMILTON	2,982.00	114.69	26.00
HARTVILLE	2,851.00	147.96	19.27
HELENA	790.00	40.52	19.50
HOUSTON	5,587.00	221.40	25.23
HUMANSVL	2,959.00	118.12	25.05
<b>HUNNEWELL</b>	619.00	65.18	9.50
IRONDALE	1,431.00	30.24	47.32
IRONTON	6,966.00	232.00	30.03
JERICO SPG	1,425.00	124.85	11.41
<b>KEYTESVL</b>	618.00	72.91	8.48
KIDDER	1,113.00	69.34	16.05
KINGSTON	1,009.00	75.88	13.30
LA BELLE	1,158.00	97.38	11.89
LA GRANGE	2,389.00	96.58	24.74
<b>LA PLATA</b>	3,085.00	205.00	15.05
LADDONIA	1,219.00	69.01	17.66
LAWSON	5,864.00	91.65	63.98
LESTERVL	676.00	106.65	6.34
LEWISTOWN	1,210.00	72.05	16.79
LICKING	5,527.00	238.15	23.21
LOWRY CITY	2,500.00	162.12	15.42
MANES	1,596.00	148.81	10.73
MAYSVILLE	3,533.00	206.22	17.13
MILO	1,105.00	73.40	15.05
MONTAUK	762.00	52.83	14.42
MONTICELLO	454.00	50.89	8.92

## Appendix D

	<b>Population</b>	<b>Square Miles</b>	<b>Density</b>
NEBO	1,236.00	153.00	8.08
NORWOOD	1,981.00	105.39	18.80
OATES	1,225.00	144.35	8.49
OSBORN	731.00	57.30	12.76
OSCEOLA	3,761.00	263.12	14.29
PARIS	2,893.00	180.53	16.03
PERRY	1,685.00	151.52	11.12
PLATTSBURG	4,574.00	125.00	36.59
RAYMONDVL	898.00	65.91	13.62
REVERE	569.00	72.02	7.90
ROBY	2,240.00	189.43	11.82
ROCKVILLE	831.00	104.19	7.98
ROSENDALE	1,194.00	43.20	27.64
SANTA FE	222.00	34.01	6.53
SARCOXIE	3,712.00	96.45	38.49
SHELLCITY	1,570.00	149.21	10.52
<b>SHELBINA</b>	<b>3,117.00</b>	<b>159.10</b>	<b>19.59</b>
<b>SHELBYVL</b>	<b>1,249.00</b>	<b>86.22</b>	<b>14.49</b>
SHELDON	1,101.00	92.97	11.84
STEWARTSVL	1,504.00	46.67	32.23
STOUTSVL	212.00	33.44	6.34
TIMBER	1,335.00	251.87	5.30
TRIMBLE	337.00	11.81	28.54
TURNEY	308.00	16.13	19.09
VAN BUREN	2,216.00	197.56	11.22
VANZANT	1,103.00	138.06	7.99
WALKER	2,517.00	182.81	13.77
WAYLAND	2,474.00	156.10	15.85
WEAUBLEAU	971.00	36.58	26.54
WESTQUINCY	457.00	30.31	15.08
WHITESVL	393.00	45.78	8.58
WINONA	2,684.00	182.78	14.68

Total Population Coverage by MO RSA 5 Partnership:	10,675.00		
Total Coverage Area by MO RSA 5 (square mile):		798.42	
MO RSA Total Density:			13.37
Full Zone:	160,033.00	9,857.97	16.23
MO RSA 5 - % Coverage:	6.67%	8.10%	

\* Only the highlighted wire centers are included in the proposed ETC service area.

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