

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

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

NOTICE OF FILING

In ordering paragraph 6 of the Commission's May 3, 2007 Report and Order in this docket, the Commission required USCOC of Greater Missouri, LLC d/b/a U.S. Cellular (U.S. Cellular) to file with the Commission a copy of its petition to the Federal Communications Commission (FCC) seeking concurrence in the redefinition of its service areas.

On September 18, 2007 U.S. Cellular made such a filing with the FCC. Attached is a copy of the filing.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 19th day of September, 2007.

/s/ Roger W. Steiner
Attorney for Applicant USCOC of Greater
Missouri, LLC

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
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Federal-State Joint Board on)	
Universal Service)	CC Docket No. 96-45
)	
Petition by USCOC of Greater)	
Missouri, LLC d/b/a U.S. Cellular)	
For Commission Agreement in)	
Redefining the Service Areas of Rural)	
Telephone Companies in the)	
State of Missouri Pursuant)	
To 47 C.F.R. Section 54.207(c))	

**PETITION FOR COMMISSION AGREEMENT IN REDEFINING THE
SERVICE AREAS OF RURAL TELEPHONE COMPANIES IN MISSOURI**

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September 18, 2007

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Summary

USCOC of Greater Missouri, Inc., d/b/a/ U.S. Cellular (“U.S. Cellular”) requests the Commission’s concurrence with the proposal by the Missouri Public Service Commission (“MPSC”) to redefine the service areas of certain Missouri rural incumbent local exchange carriers (“ILECs”) pursuant to the process set forth in Section 54.207(c) of the Commission’s rules.

U.S. Cellular provides PCS and cellular telephone service in rural areas of Missouri and was recently designated as an eligible telecommunications carrier (“ETC”) pursuant to Section 214(e) of the Act. By granting ETC status to U.S. Cellular, the MPSC found that the use of federal high-cost support to develop its competitive operations would serve the public interest. Because U.S. Cellular’s FCC-licensed service territory does not correlate with rural ILEC service areas, the Act provides that the affected rural ILEC service areas must be redefined before designation in certain areas can take effect. Accordingly, the MPSC has proposed that each wire center of each affected rural ILEC should be redefined as a separate service area so that U.S. Cellular’s designation can become effective throughout the portions of the ILEC service area in which it is licensed to provide service. Consistent with the MPSC’s order and with previous actions taken by the FCC and several other states, redefinition is requested such that each wire center of each affected ILECs is reclassified as a separate service area.

The proposed redefinition is warranted under the Commission’s competitively neutral universal service policies, and it constitutes precisely the same relief granted to similarly situated carriers by the Commission and several states. Unless the relevant ILEC service areas are redefined, U.S. Cellular will be unable to use high-cost support to improve and expand service to consumers in many areas of its licensed service territories and consumers will be denied the

benefits. As the Commission and several states have consistently held, competitive and technological neutrality demand the removal of these artificial barriers to competitive entry. Moreover, the requested redefinition satisfies the analysis provided by the Federal-State Joint Board on Universal Service (“Joint Board”) in that it eliminates the payment of uneconomic support or cream-skimming opportunities, duly recognizes the special status of rural carriers under the Act, and does not impose undue administrative burdens on ILECs.

The MPSC’s proposed redefinition is well-supported by the record at the state level, and all affected parties were provided ample opportunity to ensure that the Joint Board’s recommendations were taken into account. Accordingly, U.S. Cellular requests that the Commission grant its concurrence expeditiously and allow the proposed redefinition to become effective without further action.

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**PETITION FOR COMMISSION AGREEMENT IN REDEFINING THE
SERVICE AREAS OF RURAL TELEPHONE COMPANIES IN MISSOURI**

USCOC of Greater Missouri, Inc., d/b/a/ U.S. Cellular (“U.S. Cellular”) submits this Petition seeking the FCC’s agreement with the decision of the Missouri Public Service Commission (“MPSC”) to redefine the service areas of certain rural incumbent local exchange carriers (“ILECs”) doing business in Missouri, so that each of the ILECs’ wire centers constitutes a separate service area. U.S. Cellular provides service in the greater part of Missouri through its cellular and Personal Communications Service (“PCS”) authorizations. U.S. Cellular was recently granted eligible telecommunications carrier (“ETC”) status by the MPSC pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”). In its designating order, the MPSC proposed to redefine several rural ILEC service areas such that U.S. Cellular’s designation would take effect upon a grant of concurrence by the FCC. As set

forth below, classifying each individual wire center of the affected ILECs as a separate service area will foster federal and state goals of encouraging competition in the telecommunications marketplace and extending universal service to rural Missouri’s consumers.

I. BACKGROUND

Pursuant to Section 214(e) of the Communications Act of 1934, as amended (the “Act”), state commissions generally have authority to designate carriers that satisfy the requirements of the federal universal service rules as ETCs and to define their service areas.¹ In rural areas, service areas are generally defined as the ILEC’s study area. However, the Act explicitly sets forth a process whereby a competitive ETC may be designated for a service area that differs from that of the ILEC. Specifically, Section 214(e) of the Act provides:

... “service area” means such company’s “study area” unless and until the Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under Section 410(c), establish a different definition of service area for such company.²

The FCC and the Federal-State Joint Board on Universal Service (“Joint Board”) have recognized that a strict rule requiring a competitive ETC to serve an area exactly matching a rural LEC’s study area would preclude competitive carriers that fully satisfy ETC requirements from bringing the benefits of competition to consumers throughout their service territory.³ Therefore, the FCC established a streamlined procedure for the FCC and states to act together to

¹ 47 U.S.C. § 214(e).

² *Id.*

³ See *Petition for Agreement with Designation of Rural Company Eligible Telecommunications Carrier Service Areas and for Approval of the Use of Disaggregation of Study Areas for the Purpose of Distributing Portable Federal Universal Service Support, Memorandum Opinion and Order*, 15 FCC Rcd 9924, 9927 n. 40 (1999) (“*Washington Redefinition Order*”), citing *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87, 181 (1996) (“*Joint Board Recommended Decision*”).

redefine rural ILEC service areas.⁴ Using this procedure, the FCC and state commissions have applied the analysis contained in Section 214(e) and concluded that it is necessary and appropriate to redefine the LEC service areas along wire center boundaries to permit the designation of competitive ETCs in those areas.⁵ This process, as well as the underlying necessity of redefinition, was reaffirmed in the FCC's *ETC Report and Order* released March 17, 2005.⁶

U.S. Cellular petitioned the MPSC for ETC status for purposes of receiving high-cost support from the federal universal service fund.⁷ For rural ILEC areas which were only partially within the proposed ETC service area, U.S. Cellular requested that the MPSC approve the redefinition of those ILECs' service areas such that each of their wire centers constitutes a separate service area.⁸ An attachment to the Application listed all of the wire centers in each study area of the relevant ILECs.⁹ As U.S. Cellular's Application explained, this reclassification of all wire centers throughout each study area as a separate service area would enable U.S. Cellular to be designated in the portion of each study area within its proposed ETC service

⁴ See 47 C.F.R. § 54.207(c). See also *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, 8881 (1997) ("*First Report and Order*").

⁵ See, e.g., *Public Notice, Smith Bagley, Inc. Petitions for Agreement to Redefine the Service Areas of Navajo Communications Company, Citizens Communications Company of the White Mountains, and CenturyTel of the Southwest, Inc. On Tribal Lands Within the State of Arizona*, DA 01-409 (rel. Feb. 15, 2002) (effective date May 16, 2002); *Washington Redefinition Order, supra*, 15 FCC Rcd at 9927-28.

⁶ *Federal-State Joint Board on Universal Service, Report & Order*, 20 FCC Rcd 6371 (2005) ("*ETC Report and Order*").

⁷ Application of USCOC of Greater Missouri, LLC for Designation as an Eligible Telecommunications Carrier (filed April 22, 2005) ("*Application*").

⁸ Application at p. 22.

⁹ See Application at Exhibit F. A copy of this list is attached hereto as Appendix A for the Commission's reference.

area.¹⁰ The MPSC granted U.S. Cellular's petition on May 3, 2007 (effective May 13, 2007), concluding that a grant of ETC status was in the public interest.¹¹ The MPSC also granted U.S. Cellular's request for redefinition, conditioning ETC status in rural ILEC areas that are only partially covered by U.S. Cellular's proposed ETC service areas on FCC concurrence with the redefinition of those rural ILEC service areas pursuant to the process established under Section 54.207(c) of the Act. 47 C.F.R. § 54.207(c).¹² The MPSC directed U.S. Cellular to petition the FCC for concurrence with the redefinition of the affected ILEC service areas.¹³

II. DISCUSSION

The MPSC's proposal to redefine rural ILEC service areas is consistent with FCC rules, the recommendations of the Joint Board, and the competitively neutral universal service policies embedded in the Act. Specifically, redefining the affected rural ILEC service areas so that each wire center is a separate service area will promote competition and the ability of rural consumers to have similar choices among telecommunications services and at rates that are comparable to those available in urban areas.¹⁴ The proceedings at the state level provided all affected parties with an opportunity to comment on the proposed redefinition, and the MPSC fully considered and addressed the parties' arguments on this subject. The record at the state level, including U.S. Cellular's Application and the MPSC Order, demonstrates that the requested redefinition fully comports with federal requirements and provides the FCC with ample justification to concur.

¹⁰ Petition at p. 21.

¹¹ Report and Order in Case No. TO-2005-0384 (adopted May 3, 2007, effective May 13, 2007) ("MPSC Order"). Applications for Rehearing and/or Clarification were denied on grounds unrelated to this Petition. A copy of the MPSC Order is attached hereto as Appendix B for the Commission's reference.

¹² *Id.* at p. 38.

¹³ *Id.* at p. 39.

¹⁴ *See* 47 U.S.C. § 254(b)(3).

A. The Requested Redefinition Is Consistent With Federal Universal Service Policy.

Congress, in passing the 1996 amendments to the Act, declared its intent to “promote competition and reduce regulation” and to “encourage the rapid deployment of new telecommunications technologies.”¹⁵ As part of its effort to further these pro-competitive goals, Congress enacted new universal service provisions that, for the first time, envision multiple ETCs in the same market.¹⁶ In furtherance of this statutory mandate, the FCC has adopted the principle that universal service mechanisms be administered in a competitively neutral manner, meaning that no particular type of carrier or technology should be unfairly advantaged or disadvantaged.¹⁷

Consistent with this policy, the FCC and many state commissions have affirmed that ETC service areas should be defined in a manner that removes obstacles to competitive entry.¹⁸ In 2002, for example, the FCC granted a petition of the Colorado Public Utilities Commission (“CPUC”) for a service area redefinition identical in all material respects to the redefinition proposed in this Petition.¹⁹ In support of redefining CenturyTel’s service area along wire-center boundaries, the CPUC emphasized that “in CenturyTel’s service area, no company could receive

¹⁵ Pub. L. No. 104-104, 110 Stat. 56 (1996) (preamble).

¹⁶ See 47 U.S.C. § 214(e)(2).

¹⁷ See *First Report and Order*, supra, 12 FCC Rcd at 8801. Competitive neutrality is a “fundamental principle” of the FCC’s universal service policies. *Guam Cellular and Paging, Inc., Petition for Waiver of Section 54.314 of the Commission’s Rules and Regulations*, CC Docket No. 96-45, DA 03-1169 at ¶ 7 (Tel. Acc. Pol. Div. rel. April 17, 2003). Moreover, competitive neutrality was not among the issues referred by the FCC to the Joint Board. See *Federal-State Joint Board on Universal Service*, FCC 02-307 (rel. Nov. 7, 2002) (“*Referral Order*”).

¹⁸ See, e.g., *First Report and Order*, supra, 12 FCC Rcd at 8880-81; Petition by the Public Utilities Commission of the State of Colorado to Redefine the Service Area of CenturyTel of Eagle, Inc., Pursuant to 47 C.F.R. § 54.207(c) at p. 4 (filed with the FCC Aug. 1, 2002) (“*CPUC Petition*”).

¹⁹ See CPUC Petition at p. 5 (“Petitioner requests agreement to redefine CenturyTel’s service area to the wire center level”).

a designation as a competitive ETC unless it is able to provide service in 53 separate, non-contiguous wire centers located across the entirety of Colorado . . . [T]his constitutes a significant barrier to entry.”²⁰ The FCC agreed and, by declining to open a proceeding, allowed the requested redefinition to take effect.²¹ The FCC similarly approved a petition by the Washington Utilities and Transportation Commission (“WUTC”) and about 20 rural ILECs for the redefinition of the ILECs’ service areas along wire center boundaries, finding that:

[O]ur concurrence with rural LEC petitioners’ request for designation of their individual exchanges as service areas is warranted in order to promote competition. The Washington Commission is particularly concerned that rural areas . . . are not left behind in the move to greater competition. Petitioners also state that designating eligible telecommunications carriers at the exchange level, rather than at the study area level, will promote competitive entry by permitting new entrants to provide service in relatively small areas . . . We conclude that this effort to facilitate local competition justifies our concurrence with the proposed service area redefinition.²²

In Washington, several competitive ETCs have been designated in various service areas without any apparent adverse consequences to date. No ILEC in Washington has ever introduced any evidence that they, or consumers, have been harmed by the WUTC’s service area redefinition.²³

Other state commissions have similarly concluded that redefining rural ILEC service areas along wire center boundaries is fully justified by the pro-competitive goals of the 1996 Act.

²⁰ CPUC Petition at p. 4.

²¹ CenturyTel has petitioned the FCC to reconsider its decision. However, as of this date CenturyTel’s service area redefinition is effective.

²² *Washington Redefinition Order, supra*, 15 FCC Rcd at 9927-28 (footnotes omitted).

²³ Sprint Corp. d/b/a Sprint PCS et al., Docket No. UT-043120 at p. 11 (Wash. Util. & Transp. Commn., Jan. 13, 2005) (stating that the WUTC’s designation of multiple competitive ETCs, “if not benefiting customers (which it does), certainly is not failing customers. In the five years since we first designated an additional ETC in areas served by rural telephone companies, the Commission has received only two customer complaints in which the consumers alleged that a *non*-rural, wireline ETC was not providing service. No Rural ILEC has requested an increase in revenue requirements based on need occasioned by competition from wireless or other ETCs. This record supports our practice of not seeking commitments or adding requirements as part of the ETC designation process.”).

For example, the Minnesota Public Utilities Commission (“PUC”) approved the proposal by WWC Holding Co., Inc. d/b/a CellularOne to redefine certain rural ILEC service areas to the wire center level.²⁴ Addressing the concerns expressed by ILEC commenters, the PUC concluded that the proposed redefinition would neither harm the affected rural ILECs nor create significant cream-skimming opportunities.²⁵ The FCC agreed, and allowed the proposed redefinition to enter into effect. Similar conclusions were reached by regulators in other states, including Arizona, Colorado, Illinois, New Mexico, Kansas, Maine, Michigan, the Dakotas, Oregon, Kentucky, Nebraska, Mississippi, and West Virginia.²⁶

As in those cases, the redefinition requested in the instant proceeding will enable U.S. Cellular to make the network investments necessary to bring competitive service to people

²⁴ WWC Holding Co., Inc. d/b/a CellularOne, MPUC Docket No. P-5695/M-04-226, Order Approving ETC Designation (Minn. PUC, Aug. 19, 2004) (FCC concurrence granted Dec. 28, 2004).

²⁵ *Id.* at p. 9.

²⁶ *See, e.g.*, Illinois Valley Cellular RSA 2-I Partnership et al., Docket Nos. 04-0454 et al. (Ill. Commerce Comm’n, Apr. 19, 2006) (FCC concurrence granted Nov. 27, 2006) (“IVC Illinois Order”); Bluegrass Wireless, LLC, et al., Case Nos. 2005-00017 et al. (Ky. PSC, July 8, 2005) (FCC concurrence granted Feb. 15, 2006) (“Bluegrass Kentucky Order”); N.E. Colorado Cellular, Inc. d/b/a Viaero Wireless, Application No. C-3324 (Neb. PSC, Oct. 18, 2005) (FCC concurrence granted April 11, 2006) (“Viaero Nebraska Order”); Centennial Tri-State Operating Partnership et al., Case No. 2003-UA-0234 (Miss. PSC, Aug. 10, 2004) (FCC concurrence granted Sept. 21, 2005) (“Centennial Mississippi Order”); NPI-Omnipoint Wireless, LLC, Case No. U-13714 (Mich. PSC, Aug. 26, 2003) (FCC concurrence granted Feb. 1, 2005) (“NPI-Omnipoint Order”); Brookings Municipal Utilities d/b/a Swiftel, TCO4-213 (S.D. PSC, Feb. 10, 2006) (FCC concurrence granted June 8, 2006) (“Swiftel S.D. Order”); Highland Cellular, Inc., Case No. 02-1453-T-PC, Recommended Decision (W.V. PSC Sept. 15, 2003), *aff’d* by Final Order Aug. 27, 2004 (FCC concurrence granted Jan. 24, 2005) (“Highland W.V. Order”); Cellular Mobile Systems of St. Cloud, Docket No. PT6201/M-03-1618 (Minn. PUC, May 16, 2004) (FCC concurrence granted Oct. 7, 2004) (“CMS Minnesota Order”); United States Cellular Corp., Docket 1084 (Oregon PUC, June 24, 2004) (FCC concurrence granted Oct. 11, 2004) (“USCC Oregon Order”); Smith Bagley, Inc., Docket No. T-02556A-99-0207 (Ariz. Corp. Comm’n Dec. 15, 2000) (FCC concurrence granted May 16 and July 1, 2001) (“SBI Arizona Order”); Smith Bagley, Inc., Utility Case No. 3026, Recommended Decision of the Hearing Examiner and Certification of Stipulation (N.M. Pub. Reg. Comm’n Aug. 14, 2001, adopted by Final Order (Feb. 19, 2002) (FCC concurrence granted June 11, 2002) (“SBI N.M. Order”); RCC Minnesota, Inc., Docket No. 04-RCCT-338-ETC (Kansas Corp. Comm’n, Sept. 30, 2004) (FCC concurrence pending) (“RCC Kansas Order”); RCC Minnesota, Inc. et al., Docket No. 2002-344 (Maine PUC May 13, 2003) (FCC concurrence granted March 17, 2005) (“RCC Maine Order”); Northwest Dakota Cellular of North Dakota Limited Partnership d/b/a Verizon Wireless et al., Case No. PU-1226-03-597 et al. (N.D. PSC, Feb. 25, 2004) (FCC concurrence pending) (“Northwest Dakota Order”); In the Matter of the Application of N.E. Colorado Cellular, Inc., to Re-define the Service Area of Eastern Slope Rural Telephone Association, Inc.; Great Plains Communications, Inc.; Plains Cooperative Telephone Association, Inc.; and Sunflower Telephone Co., Inc., Docket No. 02A-444T (ALJ, May 23, 2003), *aff’d* by Colo. PUC Oct. 2, 2003 (FCC concurrence pending) (“Colorado Redefinition Order”).

throughout its licensed service areas. Redefinition will therefore benefit Missouri's rural consumers, who will begin to see a variety in pricing packages and service options on par with those available in urban and suburban areas.²⁷ They will see infrastructure investment in areas formerly controlled solely by ILECs, which will bring improved wireless service and important health and safety benefits associated with increased levels of radiofrequency coverage.²⁸ Redefinition will also remove a major obstacle to competition, consistent with federal telecommunications policy.²⁹

B. The Requested Redefinition Satisfies the Three Joint Board Factors Under Section 54.207(c)(1) of the Commission's Rules.

A petition to redefine an ILEC's service area must contain "an analysis that takes into account the recommendations of any Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company."³⁰ In the *Recommended Decision* that laid the foundation for the FCC's *First Report and Order*, the Joint Board enumerated three factors to be considered when reviewing a request to redefine a LEC's service area.³¹

First, the Joint Board expressed concern as to whether the competitive carrier is attempting to "cream skim" by only proposing to serve the lowest cost exchanges.³² As a

²⁷ See 47 U.S.C. § 254(b)(3).

²⁸ See MPSC Order at p. 12.

²⁹ See Joint Explanatory Statement of the Committee of Conference, H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess. at 113 (stating that the 1996 Act was designed to create "a pro-competitive, de-regulatory national policy framework" aimed at fostering rapid deployment of telecommunications services to all Americans "by opening *all telecommunications markets* to competition....")(emphasis added).

³⁰ 47 C.F.R. § 54.207(c)(1).

³¹ *Joint Board Recommended Decision, supra.*

³² See *Joint Board Recommended Decision*, 12 FCC Rcd at 180.

wireless carrier, U.S. Cellular is restricted to providing service in those areas where it is licensed by the FCC. U.S. Cellular is not picking and choosing the lowest-cost exchanges; on the contrary, the MPSC designated U.S. Cellular for an ETC service area that is based on the geographic limitations of its licensed service territory.³³ U.S. Cellular has not attempted to select areas to enter based on support levels.

Opportunities for receiving uneconomic levels of support are further diminished by the FCC's decision to allow rural ILECs to disaggregate support below the study-area level.³⁴ By moving support away from low-cost areas and into high-cost areas, ILECs have had the ability to minimize or eliminate cream-skimming and the payment of uneconomic support to competitors.³⁵ Furthermore, any ILECs that failed to disaggregate support effectively may modify their disaggregation filings subject to state approval.³⁶

U.S. Cellular's Application also makes clear that that it meets the FCC's criteria in its analysis of population density as a means of determining the likelihood of U.S. Cellular receiving uneconomic levels of support. Based upon the FCC's assumption in *Virginia Cellular* that "a low population density typically indicates a high-cost area," U.S. Cellular's Application provided population density figures to demonstrate that no cream skimming will result from

³³ See MPSC Order at pp. 32-33.

³⁴ See *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order, twenty-second Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 16 FCC Rcd 11244, 11302-09 (2001) ("*Fourteenth Report and Order*").

³⁵ See *ETC Report and Order, supra*, 20 FCC Rcd at 6393-94. See also *Federal-State Joint Board on Universal Service, Western Wireless Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota, Memorandum Opinion and Order*, 16 FCC Rcd 18133, 18141 (2001).

³⁶ See 47 C.F.R. §§ 54.315(b)(4); 54.315(c)(5), 54.315(d)(5).

designation in the proposed areas.³⁷ As indicated in the table attached as Appendix C, U.S. Cellular is not proposing to serve only, or even primarily, the more densely populated rural ILEC wire centers.

- BPS Telephone Company. The average population density of the BPS wire centers U.S. Cellular proposes to cover is approximately 37.75 psm, while the population density of the wire centers outside of U.S. Cellular’s proposed ETC service area is 54.32 psm. Because U.S. Cellular is proposing to serve the lower-density areas, there is no risk of cream skimming in BPS’s study area.
- Craw-Kan Telephone Cooperative, Inc. (Missouri). The average population density of the two Craw-Kan wire centers U.S. Cellular proposes to cover is approximately 44.85 psm, while the average population density of the remaining wire centers in that study area is 10.63 psm. This disparity does not approach the 8 to 1 differential the FCC disapproved of in *Virginia Cellular* (approximately 273 psm inside and 33 psm outside).³⁸ Moreover, a substantial percentage of U.S. Cellular’s potential subscribers within Craw-Kan’s study area are in relatively low-density areas. In the *Highland Cellular* order, the FCC declined to designate a competitive ETC in Verizon South’s study area where 94% of Highland’s potential customers resided in the highest-density wire centers.³⁹ Here, by contrast, the population of the highest-density Craw-Kan wire center comprises slightly under 60% of U.S. Cellular’s potential customers in Craw-Kan’s study area. Therefore, under the applicable FCC analytical framework,

³⁷ See Application at pp. 24-27.

³⁸ *Id.* at 1579-80.

³⁹ See *Highland Cellular, Inc.*, 19 FCC Rcd 6422, 6436-37 (2004) (“*Highland Cellular*”).

U.S. Cellular is not proposing to serve “primarily” the highest-density wire centers in Craw-Kan’s service area.

- Goodman Telephone Company. The average population density of the Goodman wire centers U.S. Cellular proposes to cover is approximately 42.76 psm, while the population density of the wire centers outside of U.S. Cellular’s proposed ETC service area is approximately 47.50 psm. Because U.S. Cellular is proposing to serve the lower-density areas, there is no risk of cream skimming in Goodman’s study area.
- Le-Ru Telephone Company. The average population density of the Le-Ru wire centers U.S. Cellular proposes to cover is approximately 27.15 psm, while the population density of the wire centers outside of U.S. Cellular’s proposed ETC service area is approximately 25.92 psm. This difference is too small to be significant under the analysis used by the FCC.⁴⁰ Accordingly, there is no risk of cream-skimming in this case.
- Mid-Missouri Telephone Company. The average population density of the Mid-Missouri wire centers U.S. Cellular proposes to cover is approximately 15.76 psm, while the population density of the wire centers outside of U.S. Cellular’s proposed ETC service area is approximately 12.88 psm. Because the differential is very small, and because both the covered and uncovered portions of Mid-Missouri’s study area have very low population densities there is no risk that U.S. Cellular might receive

⁴⁰ See *Virginia Cellular, supra*, 19 FCC Rcd at 1579 and n.110 (“The average population density for the MGW wire centers for which Virginia Cellular seeks ETC designation is approximately 2.30 persons per square mile and the average population density for MGW’s remaining wire centers is approximately 2.18 persons per square mile. . . Although the average population density of the MGW wire centers which Virginia Cellular proposes to serve is slightly higher than the average population density of MGW’s remaining wire centers, the amount of this difference is not significant enough to raise cream skimming concerns.”)

high levels of support for a low-cost area.⁴¹ Accordingly, there is no risk of cream-skimming in Mid-Missouri's study area.

United Telephone Company of Missouri d/b/a Sprint. The average population density of the United wire centers U.S. Cellular proposes to cover is approximately 60.02 psm, while the population density of the wire centers outside of U.S. Cellular's proposed ETC service area is approximately 56.25 psm. This difference is too small to be significant under the analysis used by the FCC.⁴² Accordingly, there is no risk of cream-skimming in this case.

In sum, U.S. Cellular is not proposing to serve "only the low-cost, high revenue customers in a rural telephone company's study area."⁴³ This fact, in conjunction with the availability of disaggregation to the affected ILECs, demonstrates that cream-skimming will not result from a grant of this Petition.

Second, the Joint Board recommended that the FCC and the States consider the rural carrier's special status under the 1996 Act.⁴⁴ In reviewing U.S. Cellular's Petition, the MPSC weighed numerous factors in ultimately determining that such designation was in the public interest. Congress mandated this public-interest analysis in order to protect the special status of rural carriers in the same way it established special considerations for rural carriers with regard to interconnection, unbundling, and resale requirements.⁴⁵ No action in this proceeding will affect or prejudice any future action the MPSC or the FCC may take with respect to any ILEC's

⁴¹ *See id.*

⁴² *See Virginia Cellular, supra*, 19 FCC Rcd at 1579 and n.110.

⁴³ *See id.* at 1578.

⁴⁴ *See Joint Board Recommended Decision*, 12 FCC Rcd at 180.

⁴⁵ *See id.*

status as a rural telephone company, and nothing about service area redefinition will diminish an ILEC's status as such.⁴⁶

Third, the Joint Board recommended that the FCC and the States consider the administrative burden a rural ILEC would face.⁴⁷ In the instant case, U.S. Cellular's request to redefine the affected rural ILECs' service areas along wire center boundaries is made solely for ETC designation purposes. Defining the service area in this manner will in no way impact the way the affected rural ILECs calculate their costs, but is solely to enable U.S. Cellular to begin receiving high-cost support in those areas in the same manner as the ILECs. Rural ILECs may continue to calculate costs and submit data for purposes of collecting high-cost support in the same manner as they do now.

Should any of the affected rural ILECs choose to disaggregate support out of concerns about cream-skimming by U.S. Cellular or any other carrier, this disaggregation of support will not represent an undue administrative burden.⁴⁸ The FCC placed that burden on rural ILECs in its *Fourteenth Report and Order* independent of service area redefinition and made no mention of this process being a factor in service area redefinition requests. To the extent those ILECs may find this process burdensome, the benefit of preventing cream-skimming and the importance of promoting competitive neutrality will outweigh any administrative burden involved.

In sum, the proposed redefinition fully satisfies both the Joint Board's recommendations and the *Virginia Cellular* analysis.

⁴⁶ See MPSC Order at p. 33.

⁴⁷ See *Joint Board Recommended Decision*, 12 FCC Rcd at 180.

⁴⁸ See MPSC Order at p. 33.

C. The Proposed Redefinition Along Wire-Center Boundaries Is Consistent With the FCC’s “Minimum Geographic Area” Policy.

In its April 2004 *Highland Cellular* decision, the FCC declared that an entire rural ILEC wire center “is an appropriate minimum geographic area for ETC designation”.⁴⁹ The FCC reiterated this finding in its *ETC Report and Order*.⁵⁰ As set forth in the attached MPSC Order, U.S. Cellular’s designated ETC service area does not include any partial rural ILEC wire centers. Accordingly, the instant request for concurrence with redefinition to the wire-center level, and not below the wire center, is consistent with FCC policy.

III. CONCLUSION

U.S. Cellular stands ready to provide reliable, high-quality telecommunications service to Missouri’s rural consumers by investing federal high-cost support in building, maintaining and upgrading wireless infrastructure throughout their licensed service territories, thereby providing facilities-based competition in many of those areas for the very first time. The MPSC has found that U.S. Cellular’s use of high-cost support will increase the availability of additional services and increase investment in rural Missouri and therefore serve the public interest. Yet, without the FCC’s concurrence with the rural ILEC service area redefinition proposed herein, U.S. Cellular will not be able to bring those benefits to consumers in many areas in which they are authorized by the FCC to provide service. The redefinition requested in this Petition will enable U.S. Cellular’s ETC designation to take effect throughout its licensed service territory in Missouri.

The relief proposed herein is exactly the same in all material respects as that granted by the FCC and state commissions to numerous other carriers throughout the country, and the FCC is well within its authority to grant its prompt concurrence. U.S. Cellular submits that the

⁴⁹ *Highland Cellular, supra*, 19 FCC Rcd at 6438.

⁵⁰ *See ETC Report and Order, supra*, 20 FCC Rcd at 6405.

benefits of permitting its ETC designation to take effect throughout its proposed service area are substantial, and those benefits will inure to rural consumers who desire U.S. Cellular's service, particularly those consumers who are eligible for Lifeline and Link-Up benefits and currently have no choice of service provider. Accordingly, U.S. Cellular requests that the Commission grant its concurrence with the MPSC's decision to redefine the rural ILEC service areas so that each of the wire centers listed in Appendix A hereto constitutes a separate service area.

Respectfully submitted,

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APPENDIX A

LIST OF WIRE CENTERS FOR WHICH REDEFINITION IS REQUESTED

Exhibit F
Rural ILEC Wire Centers
To Be Redefined

Carrier Name	Wire Center Code	Wire Center Name	Covered
ALLTEL Communications, Inc	ALBYMOXADS0	ALBANY	Yes
ALLTEL Communications, Inc	ALDRMOXARS0	ALDRICH	Yes
ALLTEL Communications, Inc	ALDLMOXARS0	ALLENDALE	Yes
ALLTEL Communications, Inc	BLFLMOXARS0	BELLFLOWER	Yes
ALLTEL Communications, Inc	BLVRMOXADS0	BOLIVAR	Yes
ALLTEL Communications, Inc	CLUBMOXXRS0	CLUBB	Yes
ALLTEL Communications, Inc	CFFYMOXARS0	COFFEY	Yes
ALLTEL Communications, Inc	CRCRMOXADS0	CROCKER	Yes
ALLTEL Communications, Inc	DIXNMOXADS0	DIXON	Yes
ALLTEL Communications, Inc	DNPHMOXXDS0	DONIPHAN	Yes
ALLTEL Communications, Inc	EOLIMOXARS0	EOLIA	Yes
ALLTEL Communications, Inc	FRDLMOXARS0	FAIRDEALING	Yes
ALLTEL Communications, Inc	FRPLMOXARS0	FAIRPLAY	Yes
ALLTEL Communications, Inc	FRVWMOXARS0	FAIRVIEW	Yes
ALLTEL Communications, Inc	FLRNMOXADS0	FLORENCE	Yes
ALLTEL Communications, Inc	GALLMOXADS0	GALLATIN	Yes
ALLTEL Communications, Inc	GDINMOXARS0	GRANDIN	Yes
ALLTEL Communications, Inc	GTCYMOXARS0	GRANT CITY	Yes
ALLTEL Communications, Inc	GNVLMOXXDS0	GREENVILLE	Yes
ALLTEL Communications, Inc	HLWYMOXARS0	HALFWAY	Yes
ALLTEL Communications, Inc	HLDYMOXARS0	HOLLIDAY	Yes
ALLTEL Communications, Inc	IBERMOXXDS0	IBERIA	Yes
ALLTEL Communications, Inc	BRWKMOXARS0	INDIAN GROVE	Yes
ALLTEL Communications, Inc	JMSNMOXARS0	JAMESON	Yes
ALLTEL Communications, Inc	LCLDMOXADS0	LACLEDE	No
ALLTEL Communications, Inc	LBRLMOXADS0	LIBERAL	No
ALLTEL Communications, Inc	MDSNMOXADS0	MADISON	Yes
ALLTEL Communications, Inc	MRBGMOXARS0	MARTINSBURG	Yes
ALLTEL Communications, Inc	MNDNMOXXRS0	MENDON	Yes
ALLTEL Communications, Inc	MDTWMOXARS0	MIDDLETOWN	Yes
ALLTEL Communications, Inc	MILNMOXADS0	MILAN	Yes
ALLTEL Communications, Inc	MDNMMOXARS0	MINDEN MINES	No
ALLTEL Communications, Inc	MRVLMOXARS0	MORRISVILLE	Yes
ALLTEL Communications, Inc	MYRTMOXADS0	MYRTLE	Yes
ALLTEL Communications, Inc	NYLRMOXXRS0	NAYLOR	Yes
ALLTEL Communications, Inc	NLVLMOXARS0	NEELYVILLE	Yes
ALLTEL Communications, Inc	NHFRMOXARS0	NEW HARTFORD	Yes
ALLTEL Communications, Inc	OLNYMOXARS0	OLNEY	Yes
ALLTEL Communications, Inc	OXLYMOXARS0	OXLY	Yes
ALLTEL Communications, Inc	PASNMOXXRS0	PATTERSON	Yes
ALLTEL Communications, Inc	PTBGMOXXRS0	PATTONSBURG	Yes
ALLTEL Communications, Inc	PDMTMOXXDS0	PIEDMONT	Yes
ALLTEL Communications, Inc	PLHPMOXARS0	PLEASANT HOPE	Yes
ALLTEL Communications, Inc	POLKMOXARS0	POLK	Yes
ALLTEL Communications, Inc	PNDRMOXARS0	PONDER	Yes
ALLTEL Communications, Inc	PRDYMOXADS0	PURDY	Yes
ALLTEL Communications, Inc	RTVLMOXXRS0	ROTHVILLE	Yes
ALLTEL Communications, Inc	SILXMOXARS0	SILEX	Yes
ALLTEL Communications, Inc	STEZMOXARS0	ST ELIZABETH	Yes

Rural ILEC Wire Centers
To Be Redefined

ALLTEL Communications, Inc	STCYMOXARS0	STARK CITY	Yes
ALLTEL Communications, Inc	SKTNMOXARS0	STOCKTON	Yes
ALLTEL Communications, Inc	SOCYMOXADS0	STOTTS CITY	Yes
ALLTEL Communications, Inc	STVRMOXADS0	STOVER	Yes
ALLTEL Communications, Inc	SMNRMOXARS0	SUMNER	Yes
ALLTEL Communications, Inc	UNSTMOXADS0	UNION STAR	Yes
ALLTEL Communications, Inc	VANDMOXADS0	VANDALIA	Yes
ALLTEL Communications, Inc	VRNAMOXADS0	VERONA	Yes
ALLTEL Communications, Inc	WPPLMOXXRS0	WAPPAPELLO PARK	Yes
ALLTEL Communications, Inc	WHTNMOXARS0	WHEATON	Yes
ALLTEL Communications, Inc	WSVLMOXARS0	WILLIAMSVILLE	Yes
ALLTEL Communications, Inc	WNTNMOXARS0	WINSTON	Yes
BPS Telephone Co	BERNMOXADS0	BERNIE	Yes
BPS Telephone Co	PARMMOXARS0	PARMA	Yes
BPS Telephone Co	STELMOXADS0	STEELE	No
Chariton Valley Telephone Corp	ATLNMOXADS0	ATLANTA	Yes
Chariton Valley Telephone Corp	BEVRMOXADS0	BEVIER	Yes
Chariton Valley Telephone Corp	BSWOMOXADS0	BOSWORTH	No
Chariton Valley Telephone Corp	BCKLMOXADS0	BUCKLIN	Yes
Chariton Valley Telephone Corp	BYVLMOXADS0	BYNUMVILLE	Yes
Chariton Valley Telephone Corp	CALLMOXADS0	CALLAD	Yes
Chariton Valley Telephone Corp	CLHLMOXADS0	CLIFTON HILL	Yes
Chariton Valley Telephone Corp	DWTTMOXADS0	DE WITT	No
Chariton Valley Telephone Corp	ETHLMOXADS0	ETHEL	Yes
Chariton Valley Telephone Corp	EXCLMOXADS0	EXCELLO	Yes
Chariton Valley Telephone Corp	FRGRMOXADS0	FOREST GREEN	Yes
Chariton Valley Telephone Corp	HALEMOXADS0	HALE	No
Chariton Valley Telephone Corp	HNVMOXADS0	HUNTSVILLE	Yes
Chariton Valley Telephone Corp	JCVLMOXADS0	JACKSONVILLE	Yes
Chariton Valley Telephone Corp	NBTNMOXADS0	NEW BOSTON	Yes
Chariton Valley Telephone Corp	NWCMMOXADS0	NEW CAMBRIA	Yes
Chariton Valley Telephone Corp	PRHLMOXADS0	PRAIRIE HILL	Yes
Chariton Valley Telephone Corp	SLBRMOXADS0	SALISBURY	Yes
Craw-Kan Telephone Coop	AMRTMOXARS0	AMORET	No
Craw-Kan Telephone Coop	AMSTMOXARS0	AMSTERDAM	No
Craw-Kan Telephone Coop	ASBRMOXARS0	ASBURY	Yes
Craw-Kan Telephone Coop	MLBYKSXARS0	EAST ARCADIS	No
Craw-Kan Telephone Coop	MLBYKSXARS0	EAST MULBERRY	No
Craw-Kan Telephone Coop	FSTRMOXARS0	FOSTER	No
Craw-Kan Telephone Coop	HUMEMOXARS0	HUME	No
Craw-Kan Telephone Coop	PLTNKSXADS0	PLEASANTON	No
Craw-Kan Telephone Coop	PRCLMOXADS0	PURCELL	Yes
Goodman Telephone Co	GDMNMOXARS0	GOODMAN	Yes
Goodman Telephone Co	LNGNMOXARS0	LANAGAN	No
Grand River Mutual Tel Corp	ALTOIAXORS0	ALLERTON	No
Grand River Mutual Tel Corp	BRNRMOXARS0	BARNARD	Yes
Grand River Mutual Tel Corp	BTHNMOXADS0	BETHANY	Yes
Grand River Mutual Tel Corp	BLTNIAXORS0	BLOCKTON	Yes
Grand River Mutual Tel Corp	BRSNMOXARS0	BRIMSON	Yes
Grand River Mutual Tel Corp	BRNGMOXARS0	BROWNING	Yes

Exhibit F
Rural ILEC Wire Centers
To Be Redefined

Grand River Mutual Tel Corp	CAVLMOXARS0	CAINSVILLE	Yes
Grand River Mutual Tel Corp	CHULMOXARS0	CHULA	No
Grand River Mutual Tel Corp	CNJTMOXADS0	CONCEPTION JCT	Yes
Grand River Mutual Tel Corp	DRTNMOXARS0	DARLINGTON	Yes
Grand River Mutual Tel Corp	DVCYIAXORS0	DAVIS CITY	Yes
Grand River Mutual Tel Corp	DNVRMOXARS0	DENVER	Yes
Grand River Mutual Tel Corp	EAVLMOXARS0	EAGLEVILLE	Yes
Grand River Mutual Tel Corp	GALTMOXADS0	GALT	Yes
Grand River Mutual Tel Corp	GALTMOXADS0	GENTRY	Yes
Grand River Mutual Tel Corp	GLCYMOXARS0	GILMAN CITY	Yes
Grand River Mutual Tel Corp	GLCYMOXARS0	GRAHAM	Yes
Grand River Mutual Tel Corp	GLCYMOXARS0	JAMESPORT	Yes
Grand River Mutual Tel Corp	GLCYMOXARS0	LAMONI	Yes
Grand River Mutual Tel Corp	LARDMOXARS0	LAREDO	No
Grand River Mutual Tel Corp	LNVLIAXORS0	LINEVILLE	Yes
Grand River Mutual Tel Corp	LNVLIAXORS0	LINNEUS	No
Grand River Mutual Tel Corp	LCRNMOXARS0	LUCERNE	Yes
Grand River Mutual Tel Corp	MDVLMOXARS0	MEADVILLE	No
Grand River Mutual Tel Corp	MRCRMOXARS0	MERCER	Yes
Grand River Mutual Tel Corp	MTMRMOXARS0	MOUNT MORIAH	Yes
Grand River Mutual Tel Corp	NHTNMOXARS0	NEW HAMPTON	Yes
Grand River Mutual Tel Corp	NWTWMOXARS0	NEWTON	Yes
Grand River Mutual Tel Corp	PRNLMOXARS0	PARNELL	Yes
Grand River Mutual Tel Corp	PWVLMOXARS0	POWERSVILLE	Yes
Grand River Mutual Tel Corp	PRTNMOXARS0	PRINCETON	Yes
Grand River Mutual Tel Corp	PRDNMOXARS0	PURDIN	No
Grand River Mutual Tel Corp	RVWDMOXARS0	RAVENWOOD	Yes
Grand River Mutual Tel Corp	RDWYMOXARS0	RIDGEWAY	Yes
Grand River Mutual Tel Corp	SHRDMOXARS0	SHERIDAN	Yes
Grand River Mutual Tel Corp	SPCKMOXARS0	SPICKARD	No
Grand River Mutual Tel Corp	WSCTMOXARS0	WASHINGTON CENTER	Yes
Le-Ru Telephone Co	POWLMOXADS0	POWELL	No
Le-Ru Telephone Co	STLLMOXADS0	STELLA	Yes
Mid-Missouri Telephone Co	ARRKMOXADS0	ARROW ROCK	No
Mid-Missouri Telephone Co	BLWRMOXADS0	BLACKWATER	Yes
Mid-Missouri Telephone Co	BCTNMOXADS0	BUNCETON	Yes
Mid-Missouri Telephone Co	FTUNMOXADS0	FORTUNA	Yes
Mid-Missouri Telephone Co	GLLMMOXADS0	GILLIAM	No
Mid-Missouri Telephone Co	HGPNMOXADS0	HIGH POINT	Yes
Mid-Missouri Telephone Co	LTHMMOXADS0	LATHAM	Yes
Mid-Missouri Telephone Co	MRJTMOXADS0	MARSHALL JCT	No
Mid-Missouri Telephone Co	MIAMMOXADS0	MIAMI	No
Mid-Missouri Telephone Co	NLSNMOXADS0	NELSON	No
Mid-Missouri Telephone Co	PLGVMOXADS0	PILOT GROVE	Yes
Mid-Missouri Telephone Co	SPEDMOXADS0	SPEED	Yes
Spectra Communications Group, LLC	AMZNMOXARS1	AMAZONIA	Yes
Spectra Communications Group, LLC	ANNPMOXARS0	ANNAPOLIS	Yes
Spectra Communications Group, LLC	ARCLMOXARS0	ARCOLA	Yes
Spectra Communications Group, LLC	AURRMOXADS1	AURORA	Yes
Spectra Communications Group, LLC	AVCYMOXARS1	AVENUE CITY	Yes

Exhibit F
Rural ILEC Wire Centers
To Be Redefined

Spectra Communications Group, LLC	AVLLMOXARS0	AVILLA	Yes
Spectra Communications Group, LLC	BLGRMOXARS0	BELGRADE	Yes
Spectra Communications Group, LLC	BLVWMOXARS0	BELLEVIEW	Yes
Spectra Communications Group, LLC	BCTRMOXARS0	BIRCH TREE	Yes
Spectra Communications Group, LLC	BLCKMOXARS1	BOLCKOW	Yes
Spectra Communications Group, LLC	BOSSMOXARS0	BOSS	Yes
Spectra Communications Group, LLC	BRYMMOXARS1	BRAYMER	No
Spectra Communications Group, LLC	BNGHMOXARS1	BRONAUGH	No
Spectra Communications Group, LLC	BRWKMOXARS0	BRUNSWICK TRIPLETT	Yes
Spectra Communications Group, LLC	BNKRMOXARS0	BUNKER	Yes
Spectra Communications Group, LLC	CLDNMOXARS0	CALEDONIA	Yes
Spectra Communications Group, LLC	CMRNMOXADS1	CAMERON	No
Spectra Communications Group, LLC	CNTNMOXADS0	CANTON	Yes
Spectra Communications Group, LLC	CNVLMOXARS0	CENTERVILLE	Yes
Spectra Communications Group, LLC	CLNCMOXARS0	CLARENCE	Yes
Spectra Communications Group, LLC	CSDLMOXARS1	CLARKSDALE	Yes
Spectra Communications Group, LLC	CLNSMOXARS1	COLLINS	No
Spectra Communications Group, LLC	CNCRMOXADS1	CONCORDIA	No
Spectra Communications Group, LLC	CSBYMOXARS1	COSBY	Yes
Spectra Communications Group, LLC	DDVLMOXARS0	DADEVILLE	Yes
Spectra Communications Group, LLC	DLTNMOXARS0	DALTON	Yes
Spectra Communications Group, LLC	ESTNMOXARS0	EASTON	No
Spectra Communications Group, LLC	EGSPMOXARS1	EDGAR SPRINGS	Yes
Spectra Communications Group, LLC	EDSPMOXADS1	ELDORADO SPRINGS	No
Spectra Communications Group, LLC	ELSNMOXADS0	ELLSINORE	Yes
Spectra Communications Group, LLC	EMERMOXARS0	ELMER	Yes
Spectra Communications Group, LLC	EMNNMOXARS0	EMINENCE	Yes
Spectra Communications Group, LLC	EVTNMOXARS0	EVERTON	Yes
Spectra Communications Group, LLC	EWNGMOXARS0	EWING	Yes
Spectra Communications Group, LLC	FLMRMOXARS1	FILLMORE	Yes
Spectra Communications Group, LLC	FRMTMOXARS0	FREMONT	Yes
Spectra Communications Group, LLC	GDCYMOXARS0	GOLDEN CITY	No
Spectra Communications Group, LLC	GORNMOXARS0	GORIN	Yes
Spectra Communications Group, LLC	GOWRMOXARS0	GOWER	No
Spectra Communications Group, LLC	GNFDMOXADS0	GREENFIELD	Yes
Spectra Communications Group, LLC	GVSPMOXARS0	GROVE SPRING	Yes
Spectra Communications Group, LLC	HMTNMOXARS0	HAMILTON	No
Spectra Communications Group, LLC	HTVLMOXARS0	HARTVILLE	Yes
Spectra Communications Group, LLC	HLNAMOXARS1	HELENA	Yes
Spectra Communications Group, LLC	HSTNMOXADS1	HOUSTON	Yes
Spectra Communications Group, LLC	HMVLMOXARS1	HUMANSVILLE	Yes
Spectra Communications Group, LLC	HNWLMOXARS0	HUNNIEWELL	Yes
Spectra Communications Group, LLC	IRDLMOXARS0	IRONDALE	Yes
Spectra Communications Group, LLC	IRTNMOXADS0	IRONTON	Yes
Spectra Communications Group, LLC	JRSPMOXARS0	JERICO SPRINGS	No
Spectra Communications Group, LLC	KAHKMOXADS0	KAHOKA	Yes
Spectra Communications Group, LLC	KTVLMOXADS0	KEYTESVILLE	Yes
Spectra Communications Group, LLC	KDDRMOXARS0	KIDDER	No
Spectra Communications Group, LLC	KGTNMOXARS0	KINGSTON	No
Spectra Communications Group, LLC	LBLLMOXARS0	LA BELLE	Yes

Exhibit F
Rural ILEC Wire Centers
To Be Redefined

Spectra Communications Group, LLC	LGRNMOXARS0	LA GRANGE	Yes
Spectra Communications Group, LLC	LPLTMOXADS0	LA PLATA	Yes
Spectra Communications Group, LLC	LDDNMOXARS0	LADDONIA	Yes
Spectra Communications Group, LLC	LWSNMOXARS0	LAWSON	No
Spectra Communications Group, LLC	LSVLMOXARS0	LESTERVILLE	Yes
Spectra Communications Group, LLC	LWTWMOXARS0	LEWISTOWN	Yes
Spectra Communications Group, LLC	LCNGMOXADS1	LICKING	Yes
Spectra Communications Group, LLC	LWCYMOXARS1	LOWRY CITY	No
Spectra Communications Group, LLC	MACNMOXADS0	MACON	Yes
Spectra Communications Group, LLC	MNESMOXADS0	MANES	Yes
Spectra Communications Group, LLC	MYVLMOXADS0	MAYSVILLE	Yes
Spectra Communications Group, LLC	MILOMOXARS1	MILO	No
Spectra Communications Group, LLC	MNCYMOXADS0	MONROE CITY	Yes
Spectra Communications Group, LLC	MNTKMOXARS0	MONTAUK PARK	Yes
Spectra Communications Group, LLC	MNTIMOXARS0	MONTICELLO	Yes
Spectra Communications Group, LLC	MTGVMOXADS1	MOUNTAIN GROVE	Yes
Spectra Communications Group, LLC	MTVRMOXADS1	MT VERNON	Yes
Spectra Communications Group, LLC	NEBOMOXARL0	NEBO	Yes
Spectra Communications Group, LLC	NRWDMOXARS0	NORWOOD	Yes
Spectra Communications Group, LLC	OATSMOXARS0	OATES	Yes
Spectra Communications Group, LLC	OSBRMOXARS0	OSBORN	No
Spectra Communications Group, LLC	OSCLMOXARS1	OSCEOLA	No
Spectra Communications Group, LLC	PLMYMOXADS0	PALMYRA	Yes
Spectra Communications Group, LLC	PARSMOXADS0	PARIS	Yes
Spectra Communications Group, LLC	PRRYMOXARS1	PERRY	Yes
Spectra Communications Group, LLC	PLBGMOXARS1	PLATTSBURG	No
Spectra Communications Group, LLC	POTSMOXADS0	POTOSI	Yes
Spectra Communications Group, LLC	RMVLMOXARS0	RAYMONDVILLE	Yes
Spectra Communications Group, LLC	REVRMOXARS0	REVERE	Yes
Spectra Communications Group, LLC	ROBYMOXARS0	ROBY	Yes
Spectra Communications Group, LLC	RKVLMOXADS0	ROCKVILLE	No
Spectra Communications Group, LLC	RODLMOXARS1	ROSENDALE	Yes
Spectra Communications Group, LLC	SNFEMOXARS0	SANTA FE	Yes
Spectra Communications Group, LLC	SRCXMOXADS0	SARCOXIE	Yes
Spectra Communications Group, LLC	SVNHMOXADS1	SAVANNAH	Yes
Spectra Communications Group, LLC	SHCYMOXARS1	SHELL CITY	No
Spectra Communications Group, LLC	SLBNMOXARS0	SHELBINA	Yes
Spectra Communications Group, LLC	SHVLMOXARS0	SHELBYVILLE	Yes
Spectra Communications Group, LLC	SHLNMOXARS0	SHELDON	No
Spectra Communications Group, LLC	SWVLMOXARS0	STEWARTSVILLE	No
Spectra Communications Group, LLC	STVLMOXARS0	STOUTSVILLE	Yes
Spectra Communications Group, LLC	TMBRMOXARS0	TIMBER	Yes
Spectra Communications Group, LLC	TRMBMOXARS0	TRIMBLE	No
Spectra Communications Group, LLC	TRNYMOXARS0	TURNEY	No
Spectra Communications Group, LLC	VNBRMOXADS0	VAN BUREN	Yes
Spectra Communications Group, LLC	VNZNMOXARS0	VANZANT	Yes
Spectra Communications Group, LLC	WLKRMOXARS0	WALKER	No
Spectra Communications Group, LLC	WYLDMOXARS0	WAYLAND	Yes
Spectra Communications Group, LLC	WEBLMOXARS1	WEAUBLEAU	Yes
Spectra Communications Group, LLC	WQNCMOXARS0	WEST OUINCY	Yes

Rural ILEC Wire Centers

To Be Redefined

Spectra Communications Group, LLC	WHVLMOXARS1	WHITESVILLE	Yes
Spectra Communications Group, LLC	WINOMOXARS0	WINONA	Yes
Sprint	APCYMOXARS0	APPLETON CITY	No
Sprint	BLBNMOXARS0	BLACKBURN	No
Sprint	BLTWMOXARS0	BLAIRS TOWN	No
Sprint	BRZTMOXARS0	BRAZITO	Yes
Sprint	BCKNMOXARS0	BUCKNER	No
Sprint	BTLRMOXARS0	BUTLER	No
Sprint	CLHNMOXBRS0	CALHOUN	No
Sprint	CLFRMOXARS0	CALIFORNIA	Yes
Sprint	CMPNMOXARS0	CAMDEN POINT	No
Sprint	CNTWMOXARS0	CENTER TOWN	Yes
Sprint	CNVWMOXARS0	CENTERVIEW	No
Sprint	CHLHMOXARS0	CHILHOWEE	No
Sprint	CLBGMOXARS0	CLARKSBURG	Yes
Sprint	CLTNMOXADS0	CLINTON	No
Sprint	COALMOXARS0	COAL	No
Sprint	CLCMMOXXRS0	COLE CAMP	Yes
Sprint	CRAGMOXARS0	CORNING	Yes
Sprint	CRAGMOXARS0	CRAIG	Yes
Sprint	DRBRMOXARS0	DEARBORN	No
Sprint	DPWRMOXARS0	DEEP WATER	No
Sprint	EGTNMOXARS0	EDGERTON	No
Sprint	EUGNMOXARS0	EUGENE	Yes
Sprint	FRFXMOXARS0	FAIRFAX	Yes
Sprint	FLVWMOXADS0	FERRILVIEW	No
Sprint	FTLWMOXARS0	FORT LEONARD WOOD	Yes
Sprint	GNRGMOXARS0	GREEN RIDGE	Yes
Sprint	HRDNMOXARS0	HARDIN	No
Sprint	HNVLMOXARS0	HARRISONVILLE	No
Sprint	HNRTMOXARS0	HENRIETTA	No
Sprint	HLDNMOXARS0	HOLDEN	No
Sprint	HOLTMOXARS0	HOLT	No
Sprint	HPKNMOXARS0	HOPKINS	Yes
Sprint	HOSTMOXARS0	HOUSTONA	Yes
Sprint	IONIMOXARS0	IONIA	Yes
Sprint	HLSMMOXARS0	JEFFERSON CITY	Yes
Sprint	JFSNTXMORS0	JEFFERSON CITY	Yes
Sprint	KRNYMOXADS1	KEARNEY	No
Sprint	KGCYMOXARS0	KING CITY	Yes
Sprint	KGVLMOXARS0	KINGSVILLE	No
Sprint	LKLTMOXARS0	LAKE LOTAWANA	No
Sprint	LBNNMOXADS0	LEBANON	Yes
Sprint	LETNMOXARS0	LEETON	No
Sprint	LXTNMOXARS0	LEXINGTON	No
Sprint	LNCLMOXARS0	LINCOLN	Yes
Sprint	LNJCMOXARS0	LONE JACK	No
Sprint	MLBNMOXARS0	MALTA BEND	No
Sprint	MAVLMOXADS1	MARYVILLE	Yes
Sprint	MSCYMOXARS0	MISSOURI CITY	No

Exhibit F
Rural ILEC Wire Centers
To Be Redefined

Sprint	MTRSMOXARS0	MONTROSE	No
Sprint	MDCYMOXARS0	MOUND CITY	Yes
Sprint	NBFDMOXARS0	NEW BLOOMFIELD	Yes
Sprint	NWBGMOXARS0	NEWBURG	Yes
Sprint	NRBRMOXARS0	NORBORNE	No
Sprint	OKGVMOXADS1	OAK GROVE	No
Sprint	ODSSMOXARS0	ODESSA	No
Sprint	ORCKMOXARS0	ORRICK	No
Sprint	OEVLMOXARS0	OTTERVILLE	Yes
Sprint	PCNGMOXARS0	PICKERING	Yes
Sprint	PLCYMOXARS0	PLATTE CITY	No
Sprint	PLHLMOXARS0	PLEASANT HILL	No
Sprint	RCLDMOXARS0	RICHLAND	Yes
Sprint	ROLLMOXADS0	ROLLA	Yes
Sprint	RLVLMOXARS2	RUSSELLVILLE	Yes
Sprint	SALMNOXARS0	SALEM	Yes
Sprint	SHTNMOXARS0	SMITHTON	Yes
Sprint	STRBMOXARS3	ST ROBERT	Yes
Sprint	STTMNOXARS0	ST THOMAS	Yes
Sprint	STBGMOXXRS0	STRASBURG	No
Sprint	SWSPMOXARS0	SWEET SPRINGS	No
Sprint	SYRCMOXARS0	SYRACUSE	Yes
Sprint	TAOSMOXARS0	TAOS	Yes
Sprint	TARKMOXARS0	TARKIO	Yes
Sprint	TPTNMOXARS0	TIPTON	Yes
Sprint	URCHMOXARS0	URICH	No
Sprint	WRBGMOXADS0	WARRENSBURG	No
Sprint	WRSWMOXADS0	WARSAW	Yes
Sprint	WWRLMOXARS0	WAVERLY	No
Sprint	WYVLMOXARS7	WAYNESVILLE	Yes
Sprint	WGTNMOXARS0	WELLINGTON	No
Sprint	WSTNMOXARS0	WESTON	No
Sprint	WNDSMOXARS0	WINDSOR	No

APPENDIX C
POPULATION DENSITY ANALYSIS

Exhibit G
Population Density Chart

Carrier Name	Wire Center Name	Covered	Pop. Density (persons/sq. mi.)
ALLTEL Communications, Inc	ALLENDALE	Yes	3 57
ALLTEL Communications, Inc	SUMNER	Yes	3 68
ALLTEL Communications, Inc	INDIAN GROVE	Yes	6 07
ALLTEL Communications, Inc	CLUBB	Yes	6 42
ALLTEL Communications, Inc	PONDER	Yes	6 85
ALLTEL Communications, Inc	JAMESON	Yes	6 91
ALLTEL Communications, Inc	ROTHVILLE	Yes	7 00
ALLTEL Communications, Inc	GRANDIN	Yes	7 33
ALLTEL Communications, Inc	MENDON	Yes	8 06
ALLTEL Communications, Inc	PATTONSBURG	Yes	8.45
ALLTEL Communications, Inc	NEW HARTFORD	Yes	8 63
ALLTEL Communications, Inc	COFFEY	Yes	9 04
ALLTEL Communications, Inc	HOLLIDAY	Yes	9 66
ALLTEL Communications, Inc	MYRTLE	Yes	10 59
ALLTEL Communications, Inc	WAPPAPELLO PARK	Yes	11 61
ALLTEL Communications, Inc	MIDDLETOWN	Yes	11 79
ALLTEL Communications, Inc	PATTERSON	Yes	12 38
ALLTEL Communications, Inc	GRANT CITY	Yes	13 09
ALLTEL Communications, Inc	MINDEN MINES	No	13 15
ALLTEL Communications, Inc	GREENVILLE	Yes	13 30
ALLTEL Communications, Inc	LIBERAL	No	13 32
ALLTEL Communications, Inc	WILLIAMSVILLE	Yes	14 20
ALLTEL Communications, Inc	LACLEDE	No	14 28
ALLTEL Communications, Inc	ST ELIZABETH	Yes	14 45
ALLTEL Communications, Inc	MARTINSBURG	Yes	14 61
ALLTEL Communications, Inc	ALDRICH	Yes	15 27
ALLTEL Communications, Inc	FLORENCE	Yes	15 32
ALLTEL Communications, Inc	OLNEY	Yes	15 47
ALLTEL Communications, Inc	UNION STAR	Yes	15 69
ALLTEL Communications, Inc	MADISON	Yes	16 28
ALLTEL Communications, Inc	NEELYVILLE	Yes	16 40
ALLTEL Communications, Inc	MILAN	Yes	16 68
ALLTEL Communications, Inc	BELLFLOWER	Yes	17 00
ALLTEL Communications, Inc	STOVER	Yes	17 12
ALLTEL Communications, Inc	EOLIA	Yes	19 11
ALLTEL Communications, Inc	HALFWAY	Yes	19 91
ALLTEL Communications, Inc	FAIRDEALING	Yes	22 57
ALLTEL Communications, Inc	STOTTS CITY	Yes	22 71
ALLTEL Communications, Inc	STOCKTON	Yes	23 17
ALLTEL Communications, Inc	IBERIA	Yes	24 05
ALLTEL Communications, Inc	WINSTON	Yes	24 42
ALLTEL Communications, Inc	POLK	Yes	25 27
ALLTEL Communications, Inc	FAIRPLAY	Yes	25 44
ALLTEL Communications, Inc	SILEX	Yes	26 08
ALLTEL Communications, Inc	DONIPHAN	Yes	26 48
ALLTEL Communications, Inc	NAYLOR	Yes	26 51
ALLTEL Communications, Inc	ALBANY	Yes	27 03
ALLTEL Communications, Inc	OXY	Yes	27 08

Exhibit G
Population Density Chart

ALLTEL Communications, Inc	GALLATIN	Yes	27 64
ALLTEL Communications, Inc	VANDALIA	Yes	31 26
ALLTEL Communications, Inc	DIXON	Yes	32 98
ALLTEL Communications, Inc	CROCKER	Yes	33 78
ALLTEL Communications, Inc	MORRISVILLE	Yes	34 10
ALLTEL Communications, Inc	STARK CITY	Yes	34 96
ALLTEL Communications, Inc	PIEDMONT	Yes	35 65
ALLTEL Communications, Inc	WHEATON	Yes	37 32
ALLTEL Communications, Inc	FAIRVIEW	Yes	40 73
ALLTEL Communications, Inc	PLEASANT HOPE	Yes	44 00
ALLTEL Communications, Inc	VERONA	Yes	45 09
ALLTEL Communications, Inc	PURDY	Yes	50 05
ALLTEL Communications, Inc	BOLIVAR	Yes	102 53
		Avg. Inside:	21.43
		Avg. Outside:	13.58
		Overall Average:	21.04
BPS Telephone Co	PARMA	Yes	21 28
BPS Telephone Co	BERNIE	Yes	54 22
BPS Telephone Co	STEELE	No	54 32
		Avg. Inside:	37.75
		Avg. Outside:	54.32
		Overall Average:	43.27
Chariton Valley Telephone Corp	PRAIRIE HILL	Yes	4 16
Chariton Valley Telephone Corp	NEW BOSTON	Yes	4 29
Chariton Valley Telephone Corp	ETHEL	Yes	4 45
Chariton Valley Telephone Corp	FOREST GREEN	Yes	5 18
Chariton Valley Telephone Corp	DE WITT	No	5 44
Chariton Valley Telephone Corp	NEW GAMBRIA	Yes	7 51
Chariton Valley Telephone Corp	BYNUMVILLE	Yes	7 53
Chariton Valley Telephone Corp	CLIFTON HILL	Yes	9 78
Chariton Valley Telephone Corp	BOSWORTH	No	9 94
Chariton Valley Telephone Corp	CALLAD	Yes	10 50
Chariton Valley Telephone Corp	ATLANTA	Yes	10 55
Chariton Valley Telephone Corp	BUCKLIN	Yes	11 06
Chariton Valley Telephone Corp	HALE	No	11 43
Chariton Valley Telephone Corp	EXCELLO	Yes	11 74
Chariton Valley Telephone Corp	JACKSONVILLE	Yes	14 13
Chariton Valley Telephone Corp	SALISBURY	Yes	26 51
Chariton Valley Telephone Corp	HUNTSVILLE	Yes	27 04
Chariton Valley Telephone Corp	BEVIER	Yes	28 44
		Avg. Inside:	12.19
		Avg. Outside:	8.94
		Overall Average:	11.65
Craw-Kan Telephone Coop	PLEASANTON	No	0 00
Craw-Kan Telephone Coop	EAST ARCADIS	No	2 06

Exhibit G
Population Density Chart

Craw-Kan Telephone Coop	FOSTER	No	8 58
Craw-Kan Telephone Coop	HUME	No	10 89
Craw-Kan Telephone Coop	AMORET	No	14 25
Craw-Kan Telephone Coop	AMSTERDAM	No	14 83
Craw-Kan Telephone Coop	ASBURY	Yes	22 15
Craw-Kan Telephone Coop	EAST MULBERRY	No	23 83
Craw-Kan Telephone Coop	PURCELL	Yes	67 54
		Avg. Inside:	44.85
		Avg. Outside:	10.63
		Overall Average:	18.24
Goodman Telephone Co	GOODMAN	Yes	42 76
Goodman Telephone Co	LANAGAN	No	47 50
		Avg. Inside:	42.76
		Avg. Outside:	47.50
		Overall Average:	45.13
Grand River Mutual Tel Corp	ALLERTON	No	0 00
Grand River Mutual Tel Corp	DAVIS CITY	Yes	2 23
Grand River Mutual Tel Corp	DENVER	Yes	3 35
Grand River Mutual Tel Corp	WASHINGTON CENTER	Yes	4 01
Grand River Mutual Tel Corp	LUCERNE	Yes	4 15
Grand River Mutual Tel Corp	LAMONI	Yes	4 59
Grand River Mutual Tel Corp	BLOCKTON	Yes	4 85
Grand River Mutual Tel Corp	POWERSVILLE	Yes	4 85
Grand River Mutual Tel Corp	DARLINGTON	Yes	5 25
Grand River Mutual Tel Corp	NEWTON	Yes	5 49
Grand River Mutual Tel Corp	GENTRY	Yes	5 55
Grand River Mutual Tel Corp	MOUNT MORIAH	Yes	5 78
Grand River Mutual Tel Corp	BROWNING	Yes	6 85
Grand River Mutual Tel Corp	PARNELL	Yes	6 86
Grand River Mutual Tel Corp	PURDIN	No	6 91
Grand River Mutual Tel Corp	SHERIDAN	Yes	7 74
Grand River Mutual Tel Corp	GRAHAM	Yes	7 76
Grand River Mutual Tel Corp	MERCER	Yes	7 78
Grand River Mutual Tel Corp	CAINSVILLE	Yes	7 95
Grand River Mutual Tel Corp	GILMAN CITY	Yes	8 10
Grand River Mutual Tel Corp	SPICKARD	No	8 14
Grand River Mutual Tel Corp	GALT	Yes	8 18
Grand River Mutual Tel Corp	LAREDO	No	8 21
Grand River Mutual Tel Corp	NEW HAMPTON	Yes	8 69
Grand River Mutual Tel Corp	BRIMSON	Yes	8 96
Grand River Mutual Tel Corp	EAGLEVILLE	Yes	9 06
Grand River Mutual Tel Corp	LINEVILLE	Yes	9 31
Grand River Mutual Tel Corp	PRINCETON	Yes	9 32
Grand River Mutual Tel Corp	CHULA	No	9 40
Grand River Mutual Tel Corp	BARNARD	Yes	9 82
Grand River Mutual Tel Corp	LINNEUS	No	11 07
Grand River Mutual Tel Corp	RIDGEWAY	Yes	11 33

Exhibit G
Population Density Chart

Grand River Mutual Tel Corp	MEADVILLE	No	12.41
Grand River Mutual Tel Corp	RAVENWOOD	Yes	13.60
Grand River Mutual Tel Corp	CONCEPTION JCT	Yes	16.16
Grand River Mutual Tel Corp	JAMESPORT	Yes	18.57
Grand River Mutual Tel Corp	BETHANY	Yes	23.74
		Avg. Inside:	8.33
		Avg. Outside:	8.02
		Overall Average:	8.27
Le-Ru Telephone Co	POWELL	No	25.92
Le-Ru Telephone Co	STELLA	Yes	27.15
		Avg. Inside:	27.15
		Avg. Outside:	25.92
		Overall Average:	26.54
Mid-Missouri Telephone Co	MIAMI	No	7.83
Mid-Missouri Telephone Co	MARSHALL JCT	No	8.83
Mid-Missouri Telephone Co	BUNCETON	Yes	9.72
Mid-Missouri Telephone Co	ARROW ROCK	No	10.68
Mid-Missouri Telephone Co	GILLIAM	No	10.75
Mid-Missouri Telephone Co	SPEED	Yes	11.77
Mid-Missouri Telephone Co	BLACKWATER	Yes	12.30
Mid-Missouri Telephone Co	NELSON	No	12.88
Mid-Missouri Telephone Co	FORTUNA	Yes	14.10
Mid-Missouri Telephone Co	PILOT GROVE	Yes	17.19
Mid-Missouri Telephone Co	LATHAM	Yes	18.79
Mid-Missouri Telephone Co	HIGH POINT	Yes	26.45
		Avg. Inside:	15.76
		Avg. Outside:	12.88
		Overall Average:	13.44
Spectra Communications Group, LLC	TIMBER	Yes	2.31
Spectra Communications Group, LLC	FREMONT	Yes	3.74
Spectra Communications Group, LLC	DALTON	Yes	3.86
Spectra Communications Group, LLC	WEST QUINCY	Yes	4.75
Spectra Communications Group, LLC	OATES	Yes	5.67
Spectra Communications Group, LLC	STOUTSVILLE	Yes	5.86
Spectra Communications Group, LLC	ELMER	Yes	5.95
Spectra Communications Group, LLC	BUNKER	Yes	6.01
Spectra Communications Group, LLC	BOSS	Yes	6.65
Spectra Communications Group, LLC	MONTICELLO	Yes	6.74
Spectra Communications Group, LLC	LESTERVILLE	Yes	6.78
Spectra Communications Group, LLC	EMINENCE	Yes	6.86
Spectra Communications Group, LLC	NEBO	Yes	6.89
Spectra Communications Group, LLC	ROCKVILLE	No	7.03
Spectra Communications Group, LLC	ARCOLA	Yes	7.23
Spectra Communications Group, LLC	CENTERVILLE	Yes	7.38
Spectra Communications Group, LLC	BELLEVIEW	Yes	8.18

Exhibit G
Population Density Chart

Spectra Communications Group, LLC	REVERE	Yes	8 26
Spectra Communications Group, LLC	MONTAUK PARK	Yes	8 53
Spectra Communications Group, LLC	VANZANT	Yes	8 93
Spectra Communications Group, LLC	HUNNIEWELL	Yes	9 27
Spectra Communications Group, LLC	SCHELL CITY	No	9 34
Spectra Communications Group, LLC	WHITESVILLE	Yes	9 41
Spectra Communications Group, LLC	GORIN	Yes	9 47
Spectra Communications Group, LLC	SANTA FE	Yes	9 67
Spectra Communications Group, LLC	BRONAUGH	No	10 27
Spectra Communications Group, LLC	JERICO SPRINGS	No	10 27
Spectra Communications Group, LLC	MANES	Yes	10 27
Spectra Communications Group, LLC	FILLMORE	Yes	10 31
Spectra Communications Group, LLC	PERRY	Yes	10 34
Spectra Communications Group, LLC	LA BELLE	Yes	10 40
Spectra Communications Group, LLC	SHELBYVILLE	Yes	10 82
Spectra Communications Group, LLC	BELGRADE	Yes	11 90
Spectra Communications Group, LLC	DADEVILLE	Yes	11 92
Spectra Communications Group, LLC	VAN BUREN	Yes	11 99
Spectra Communications Group, LLC	LADDONIA	Yes	12 21
Spectra Communications Group, LLC	WALKER	No	12 25
Spectra Communications Group, LLC	SHELDON	No	12 51
Spectra Communications Group, LLC	ANNAPOLIS	Yes	12 54
Spectra Communications Group, LLC	CLARENCE	Yes	12 59
Spectra Communications Group, LLC	BOLCKOW	Yes	12 81
Spectra Communications Group, LLC	KEYTESVILLE	Yes	12 99
Spectra Communications Group, LLC	ROBY	Yes	13 27
Spectra Communications Group, LLC	EDGAR SPRINGS	Yes	13 39
Spectra Communications Group, LLC	LA PLATA	Yes	13 63
Spectra Communications Group, LLC	COLLINS	No	13 82
Spectra Communications Group, LLC	GROVE SPRING	Yes	14 10
Spectra Communications Group, LLC	WINONA	Yes	14 36
Spectra Communications Group, LLC	OSBORN	No	14 39
Spectra Communications Group, LLC	AVILLA	Yes	14 74
Spectra Communications Group, LLC	MILO	No	14 74
Spectra Communications Group, LLC	LEWISTOWN	Yes	14 87
Spectra Communications Group, LLC	KINGSTON	No	15 21
Spectra Communications Group, LLC	BIRCH TREE	Yes	15 23
Spectra Communications Group, LLC	PARIS	Yes	15 27
Spectra Communications Group, LLC	WAYLAND	Yes	15 30
Spectra Communications Group, LLC	KIDDER	No	15 92
Spectra Communications Group, LLC	BRUNSWICK TRIPLETT	Yes	15 99
Spectra Communications Group, LLC	MAYSVILLE	Yes	16 28
Spectra Communications Group, LLC	GOLDEN CITY	No	16 30
Spectra Communications Group, LLC	LOWRY CITY	No	16 40
Spectra Communications Group, LLC	OSCEOLA	No	16 45
Spectra Communications Group, LLC	ELLSINORE	Yes	16 53
Spectra Communications Group, LLC	ROSENDALE	Yes	17 21
Spectra Communications Group, LLC	BRAYMER	No	17 38
Spectra Communications Group, LLC	RAYMONDVILLE	Yes	17 46
Spectra Communications Group, LLC	SHELBINA	Yes	18 10
Spectra Communications Group, LLC	EVERTON	Yes	18 33

Exhibit G
Population Density Chart

Spectra Communications Group, LLC	CLARKSDALE	Yes	19 19
Spectra Communications Group, LLC	TURNEY	No	19 51
Spectra Communications Group, LLC	HARTVILLE	Yes	20 82
Spectra Communications Group, LLC	CALEDONIA	Yes	21 46
Spectra Communications Group, LLC	NORWOOD	Yes	21 52
Spectra Communications Group, LLC	WEAUBLEAU	Yes	22 11
Spectra Communications Group, LLC	HELENA	Yes	22 79
Spectra Communications Group, LLC	EWING	Yes	23 34
Spectra Communications Group, LLC	MONROE CITY	Yes	24 23
Spectra Communications Group, LLC	LICKING	Yes	24 32
Spectra Communications Group, LLC	STEWARTSVILLE	No	24 62
Spectra Communications Group, LLC	IRONTON	Yes	24 83
Spectra Communications Group, LLC	LA GRANGE	Yes	25 53
Spectra Communications Group, LLC	HUMANSVILLE	Yes	25 65
Spectra Communications Group, LLC	GREENFIELD	Yes	27 05
Spectra Communications Group, LLC	HAMILTON	No	27 13
Spectra Communications Group, LLC	ELDORADO SPRINGS	No	28 87
Spectra Communications Group, LLC	HOUSTON	Yes	31 10
Spectra Communications Group, LLC	EASTON	No	31 21
Spectra Communications Group, LLC	PLATTSBURG	No	31 38
Spectra Communications Group, LLC	AMAZONIA	Yes	31 63
Spectra Communications Group, LLC	CANTON	Yes	34 12
Spectra Communications Group, LLC	KAHOKA	Yes	34 26
Spectra Communications Group, LLC	GOWER	No	34 58
Spectra Communications Group, LLC	COSBY	Yes	38 50
Spectra Communications Group, LLC	PALMYRA	Yes	38 98
Spectra Communications Group, LLC	SARCOXIE	Yes	39 64
Spectra Communications Group, LLC	CONCORDIA	No	41 18
Spectra Communications Group, LLC	IRONDALE	Yes	43 82
Spectra Communications Group, LLC	MOUNTAIN GROVE	Yes	43 98
Spectra Communications Group, LLC	POTOSI	Yes	44 36
Spectra Communications Group, LLC	AVENUE CITY	Yes	48 75
Spectra Communications Group, LLC	MACON	Yes	59 45
Spectra Communications Group, LLC	MT VERNON	Yes	64 61
Spectra Communications Group, LLC	LAWSON	No	75 96
Spectra Communications Group, LLC	TRIMBLE	No	81 98
Spectra Communications Group, LLC	CAMERON	No	94 30
Spectra Communications Group, LLC	SAVANNAH	Yes	94 38
Spectra Communications Group, LLC	AURORA	Yes	145 18
		Avg. Inside:	20.61
		Avg. Outside:	26.65
		Overall Average:	22.08
Sprint	CORNING	Yes	2 53
Sprint	CRAIG	Yes	7 99
Sprint	MALTA BEND	No	8 22
Sprint	FAIRFAX	Yes	9 03
Sprint	MONTROSE	No	10 32
Sprint	BLAIRS TOWN	No	11 54
Sprint	MOUND CITY	Yes	11 72

Exhibit G
Population Density Chart

Sprint	HOPKINS	Yes	11 73
Sprint	BLACKBURN	No	11 99
Sprint	PICKERING	Yes	12 54
Sprint	URICH	No	12 82
Sprint	HOUSTONA	Yes	12 87
Sprint	KING CITY	Yes	13 02
Sprint	IONIA	Yes	13 81
Sprint	HARDIN	No	14 88
Sprint	APPLETON CITY	No	15 87
Sprint	CHILHOWEE	No	16 48
Sprint	GREEN RIDGE	Yes	16 60
Sprint	SYRACUSE	Yes	17 69
Sprint	TARKIO	Yes	17 98
Sprint	CALHOUN	No	18 13
Sprint	CLARKSBURG	Yes	18 59
Sprint	COLE CAMP	Yes	19 62
Sprint	WAVERLY	No	19 82
Sprint	OTTERVILLE	Yes	20 34
Sprint	SWEET SPRINGS	No	20 80
Sprint	DEEP WATER	No	21 03
Sprint	COAL	No	21 64
Sprint	LEETON	No	22 35
Sprint	NORBORNE	No	23 10
Sprint	CENTERVIEW	No	23 14
Sprint	LINCOLN	Yes	23 65
Sprint	EUGENE	Yes	25 88
Sprint	HENRIETTA	No	26 60
Sprint	BUTLER	No	26 71
Sprint	SALEM	Yes	27 09
Sprint	RICHLAND	Yes	27 64
Sprint	NEWBURG	Yes	29 04
Sprint	WINDSOR	No	30 56
Sprint	WELLINGTON	No	31 40
Sprint	EDGERTON	No	31 65
Sprint	STRASBURG	No	31 88
Sprint	DEARBORN	No	32 11
Sprint	ORRICK	No	32 61
Sprint	SMITHTON	Yes	36 05
Sprint	KINGSVILLE	No	37 11
Sprint	MISSOURI CITY	No	39 09
Sprint	BRAZITO	Yes	39 39
Sprint	NEW BLOOMFIELD	Yes	39 68
Sprint	WESTON	No	41 02
Sprint	RUSSELLVILLE	Yes	41 50
Sprint	HOLDEN	No	42 10
Sprint	ST THOMAS	Yes	45 10
Sprint	CENTER TOWN	Yes	45 36
Sprint	WARSAW	Yes	47 05
Sprint	CALIFORNIA	Yes	50 53
Sprint	CLINTON	No	51 30
Sprint	CAMDEN POINT	No	53 33

Exhibit G
Population Density Chart

Sprint	FERRILVIEW	No	59.79
Sprint	TIPTON	Yes	63.98
Sprint	LEBANON	Yes	70.80
Sprint	ODESSA	No	71.01
Sprint	LEXINGTON	No	71.42
Sprint	LONE JACK	No	72.39
Sprint	MARYVILLE	Yes	89.09
Sprint	BUCKNER	No	95.08
Sprint	TAOS	Yes	107.49
Sprint	PLATTE CITY	No	114.03
Sprint	HOLT	No	115.31
Sprint	WARRENSBURG	No	117.40
Sprint	PLEASANT HILL	No	119.45
Sprint	FORT LEONARD WOOD	Yes	127.68
Sprint	ROLLA	Yes	134.42
Sprint	JEFFERSON CITY	Yes	135.60
Sprint	WAYNESVILLE	Yes	152.99
Sprint	HARRISONVILLE	No	154.95
Sprint	OAK GROVE	No	156.12
Sprint	KEARNEY	No	157.18
Sprint	ST ROBERT	Yes	214.97
Sprint	LAKE LOTAWANA	No	334.87
Sprint	JEFFERSON CITY	Yes	499.54
		Avg. Inside:	60.02
		Avg. Outside:	56.25
		Overall Average:	58.01

25.22
35.96
28.49



Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ... USCOC of Greater Missouri, LLC d/b/a U.S. Cellular ...and Thank You for Your Comments

Your Confirmation Number is: '2007918969036 '

Date Received: Sep 18 2007

Docket: 96-45

Number of Files Transmitted: 4

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