

Exhibit No:
Issue: Qualifications and Need for ETC
Designation
Witness: Nick Wright
Type of Exhibit: Supplemental Surrebuttal
Testimony
Sponsoring Party: U.S. Cellular
Case No: TO-2005-0384

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO: TO-2005-0384

SUPPLEMENTAL SURREBUTTAL TESTIMONY

OF

NICK WRIGHT

ON BEHALF OF

USCOC OF GREATER MISSOURI, LLC d/b/a U.S. CELLULAR

December 7, 2006

****Denotes Highly Confidential Information****

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

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

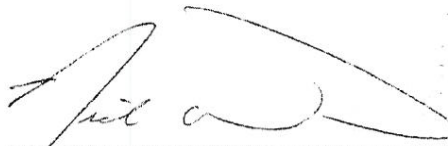
AFFIDAVIT OF NICK WRIGHT

I, Nick Wright, under penalty of perjury, affirm and state this 6th day of December, 2006:

1. My name is Nick Wright. I am employed by United States Cellular Corporation as Vice President - West Operations. My office is located at 4700 S. Garnett Road, Tulsa, Oklahoma.

2. Attached hereto and made a part hereof for all purposes is my Supplemental Surrebuttal Testimony on behalf of USCOC of Greater Missouri, LLC d/b/a U.S. Cellular, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby affirm that my answers contained in the attached testimony to the questions propounded, including any attachment thereto, are true and accurate to the best of my knowledge, information and belief.



NICK WRIGHT

*Dandra K. Littlejohn, Notary
My Commission expires 6/28/08*

1 **SUPPLEMENTAL SURREBUTTAL TESTIMONY OF NICK WRIGHT**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Nick Wright. I am employed by United States Cellular Corporation and
4 perform work for USCOC of Greater Missouri, LLC, (“U.S. Cellular”). My office is located at
5 4700 S. Garnett Road, Suite 100, Tulsa, Oklahoma 74146.

6
7 **Q. ARE YOU THE SAME PERSON WHO HAS PREVIUOSLY TESTIFIED IN THIS**
8 **CASE?**

9 A. Yes.

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?**

11 A. To respond to supplemental rebuttal testimony of various witnesses in this proceeding
12 regarding U.S. Cellular’s plan for using federal high-cost support during its first two years as an
13 ETC in Missouri, as well as other issues raised in that testimony.

14
15 **Q. DO YOU BELIEVE U.S. CELLULAR HAS PROPERLY RESPONDED TO THE**
16 **COMMISSION’S ORDER OF MARCH 21, 2006, DIRECTING FURTHER**
17 **FILINGS BY U.S. CELLULAR?**

18
19 A. Yes I do. It is my understanding that the Commission has asked U.S. Cellular for
20 additional evidence that complies with the Commission’s new rules requiring information on
21 how a carrier will use high-cost support for the intended purposes, including a demonstration of
22 how it will use support to improve and expand service to Missouri consumers. We have
23 provided a response to the best of our ability and it is my hope that the Commission will find our
24 filing to be sufficient, or request additional information if need be.

1 **Q. THE ILEC WITNESSES CRITICIZE U.S. CELLULAR'S BUILD-OUT PLAN, IN**
2 **PART, BASED ON THE ARGUMENT THAT U.S. CELLULAR HAS NOT**
3 **SHOWN THAT IT WILL BUILD FACILITIES TO EVERY PORTION OF ITS**
4 **REQUESTED ETC SERVICE AREA. SHOULD THIS ARGUMENT GIVE THE**
5 **COMMISSION PAUSE?**

6 A. Not at all. Our expert witness will address this in more detail, however it is my
7 understanding that we are not required to build out the entire ETC service area within two years.
8 Again, as I understand it, we were asked to show how U.S. Cellular will use the first two years of
9 federal high-cost support to invest in facilities that will improve and expand service to rural
10 Missouri. I'm advised that a separate obligation is to provide service to consumers upon
11 reasonable request throughout our requested ETC service area, which we demonstrated we will
12 do in the last hearing. As I testified previously, our commitment to offer and advertise service
13 throughout the proposed ETC service area is immediate. However, our initial draw of high-cost
14 support is simply not enough to build out to every portion of our requested ETC service area
15 within two years and I am advised that it has never been a requirement that a carrier build
16 facilities throughout an area within any set period of time. As I have testified before, we will
17 expand our facilities as quickly as available high-cost support allows.

18

19 **Q. HOW LONG HAS U.S. CELLULAR BEEN OFFERING SERVICE IN**
20 **MISSOURI?**

21 A. We have been operating in Missouri since 1989.

22

23 **Q. SO IN OTHER WORDS, U.S. CELLULAR'S MISSOURI NETWORK IS IN ITS**
24 **RELATIVE INFANCY?**

25 A. That is correct. Our current level of Missouri coverage is where we stand today as a
26 result of building a network virtually from the ground up over a 17-year period. Compared with
27 the ILECs, U.S. Cellular is just getting started in terms of rolling out service to Missouri's more

1 rural areas.

2 **Q. WILL U.S. CELLULAR USE SUPPORT TO CONTINUE ITS PUSH INTO**
3 **RURAL AREAS?**

4 A. Absolutely. High-cost support will enable us to greatly accelerate our progress bringing
5 high-quality signal coverage out to rural Missouri. We have shown how we will use all available
6 support to invest aggressively in new facilities in the first two years, and each listed project will
7 enable us to provide new coverage in areas we do not currently cover with facilities-based
8 service. Each subsequent year, we will continue to expand our service footprint by using high-
9 cost support to build out to fill in weak or nonexistent coverage, and to report our progress to the
10 Commission.

11
12 **Q. SOME OF THE SUPPLEMENTAL REBUTTAL TESTIMONY CLAIMS THAT**
13 **U.S. CELLULAR'S PROPOSED BUILD-OUT FOR ITS FIRST TWO YEARS AS**
14 **EN ETC WOULD PRIMARILY OVERLAY EXISTING SERVICE. DO YOU**
15 **AGREE?**

16
17 A. No, I do not. As Mr. Johnson's testimony demonstrates, substantially all of the wire
18 centers affected by the 39 proposed sites will receive new coverage in areas that previously had
19 spotty to no coverage. Further, Mr. Johnson's study shows that the 39 proposed sites will bring
20 improved coverage primarily to more rural, sparsely populated areas.

21
22 **Q. WITNESS SCHOONMAKER STATES THAT U.S. CELLULAR'S WEB SITE**
23 **INDICATES NO SERVICE IN AREAS WHERE IT CURRENTLY SEEKS ETC**
24 **STATUS. SHOULD THIS BE A CONCERN?**

25
26 A. No. The drop-down menu on our web site does not include many communities that are
27 outside of our current coverage area for one simple reason: we do not yet face an obligation as an
28 ETC to provide service. If U.S. Cellular is designated, we will update our web site to provide
29 consumers with information where our service is available, either through our facilities or

1 through resale (roaming) relationships we have with other carriers.

2 **Q. WHAT IS THE PRINCIPAL BENEFIT TO MISSOURI CONSUMERS OF U.S.**
3 **CELLULAR HAVING ACCESS TO HIGH-COST SUPPORT IN RURAL**
4 **AREAS?**

5 A. This question gets to the core of what I understand the federal high-cost program to be
6 all about. U.S. Cellular is going to build some facilities in Missouri, irrespective whether it
7 receives high-cost support. But it is not going to build facilities out to rural areas of Missouri
8 nearly as fast as it would if it does receive high-cost support. If a community would most likely
9 not see new or improved wireless coverage in the next 4 to 5 years, then using high-cost support
10 next year to expedite service to that area will be enormously beneficial to that community.
11 Moreover, if there are rural communities that would only support sparse coverage, high-cost
12 support can be used to improve coverage so that consumers in these areas can use their phones
13 virtually everywhere they live, work and play, similar to consumers in urban areas. Our initial
14 two-year plan sets forth only the beginning of what we can do in Missouri if high-cost support is
15 provided. Our substantial capital investments in St. Louis and other high value areas are going to
16 be made – but the 39 sites we have identified in the build-out plan represent a significant leap
17 forward in our construction plans that would not occur in the absence of support.

18

19 **Q. WITNESS SCHOONMAKER STATES THAT THE LACK OF A STATE-**
20 **SPECIFIC CAPITAL EXPENDITURE BUDGET WILL MAKE IT**
21 **PROBLEMATIC FOR THE COMMISSION TO REVIEW U.S. CELLULAR'S**
22 **ETC EXPENDITURES. DO YOU AGREE?**

23 A. No I do not. We are successfully demonstrating our use of high-cost support in other
24 states that have reporting requirements similar to those contained in the Commission's new rules
25 here. U.S. Cellular does not need to prepare a state-specific budget to demonstrate to the
26 Commission that it is properly allocating support to facilities serving consumers in its Missouri

1 ETC area. By reviewing the disbursement information published by the Universal Service
2 Administrative Company (“USAC”), U.S. Cellular will be able to identify how much support is
3 intended for its Missouri ETC areas. These amounts will then be allocated to projects in
4 Missouri, including those set forth in its two-year plan and subsequent plans submitted to the
5 Commission. As I have stated in my previous testimony, and repeat here under oath, the
6 company will invest all of the high-cost support it receives on constructing, upgrading, and
7 maintaining its network in Missouri, and it will report every USF-funded expenditure to the
8 Commission. We will use all of the available federal high-cost support to fund projects that
9 would not otherwise be undertaken if support were not provided. When it reviews our
10 performance each year, the Commission will have the opportunity to determine whether
11 Missouri is getting the benefits that it deserves from the federal universal service program
12 because we will demonstrate each year those investments being made with high-cost support.

13

14 **Q. DO YOU AGREE WITH WITNESS SCHOONMAKER’S STATEMENT THAT**
15 **THE COMMISSION NEEDS TO REVIEW ALL OF U.S. CELLULAR’S**
16 **NETWORK EXPENDITURES TO SATISFY ITSELF THAT SUPPORT IS ONLY**
17 **BEING USED FOR EXPENDITURES THAT ARE ‘OVER AND ABOVE’ WHAT**
18 **U.S. CELLULAR WOULD DO WITHOUT SUPPORT?**

19 A. No I don’t. Mr. Schoonmaker and Mr. Brown both advocate using a “baseline” that
20 really doesn’t exist, and one that they should know does not even exist for the wireline industry.
21 As Alan Johnson explains in more detail in his testimony, wireless network expenditures can and
22 do vary greatly from year to year. In view of that fact, the amount spent on capital
23 improvements one year will be of little use in anticipating what would “normally” be spent the
24 next year. I believe the Commission will get a far clearer picture of how support is being used
25 by reviewing U.S. Cellular’s annually reported USF expenditures in Missouri, confirming
26 whether they correspond to the amounts received by U.S. Cellular, and determining whether U.S.

1 Cellular has made satisfactory progress on its service quality improvement plans for the rural
2 parts of the state.

3
4 **Q. WHAT SHOULD THE COMMISSION DO IF IT IDENTIFIES ANY**
5 **SHORTCOMINGS IN U.S. CELLULAR'S RECENT FILING?**
6

7 A. As Witness Don Wood explains in more detail, if the Commission identifies any
8 shortcomings in U.S. Cellular's recent submission, or for that matter any aspect of its
9 application, the best course of action would be to request additional information from U.S.
10 Cellular. We are prepared to go forward and it would seem pretty wasteful of the Commission's
11 resources to require us to start all over for a matter that could be addressed through a
12 supplemental request or a post-grant compliance filing.

13
14 **Q. HAS U.S. CELLULAR MADE A DEMONSTRATION OF ITS ABILITY TO**
15 **REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS, INCLUDING A**
16 **DEMONSTRATION THAT IT HAS A REASONABLE AMOUNT OF BACK-UP**
17 **POWER TO ENSURE FUNCTIONALITY WITHOUT AN EXTERNAL POWER**
18 **SOURCE, IS ABLE TO REROUTE TRAFFIC AROUND DAMAGED**
19 **FACILITIES AND IS CAPABLE OF MANAGING TRAFFIC SPIKES**
20 **RESULTING FROM EMERGENCY SITUATIONS?**
21

22 A. Yes, we have previously made this showing.

23
24 **Q. HAS U.S. CELLULAR MADE A DEMONSTRATION THAT THE**
25 **COMMISSION'S GRANT OF THE APPLICANT'S REQUEST FOR ETC**
26 **DESIGNATION WOULD BE CONSISTENT WITH THE PUBLIC INTEREST,**
27 **CONVENIENCE AND NECESSITY?**
28

29 A. Yes, we have shown that the company's designation will serve the public interest in
30 numerous ways, including the use of support to improve and expand our service coverage in
31 rural areas, and the provision of discounted wireless service and handsets to qualifying low-
32 income consumers.

33
34 **Q. HAS U.S. CELLULAR COMMITTED TO ADVERTISE THE AVAILABILITY**
35 **OF SERVICES AND CHARGES THEREFORE USING MEDIA OF GENERAL**

1 **DISTRIBUTION THROUGHOUT THE ETC SERVICE AREA?**

2
3 A. Yes, we have made this commitment, both in the Petition and in my prior prefiled and
4 live testimony. We reiterate that our commitment to offer and advertise our services throughout
5 the proposed ETC service area is immediate, even though we may not be able to construct
6 facilities-based service for some time. We can only expand as fast as our internally generated
7 capital and available support permit.

8
9 **Q. HAS U.S. CELLULAR COMMITTED TO PROVIDE LIFELINE AND LINK UP**
10 **DISCOUNTS CONSISTENT WITH 47 CFR 54.401 AND 47 CFR 54.411. EACH**
11 **REQUEST FOR ETC DESIGNATION SHALL INCLUDE A COMMITMENT TO**
12 **PUBLICIZE THE AVAILABILITY OF LIFELINE SERVICE IN A MANNER**
13 **REASONABLY DESIGNED TO REACH THOSE LIKELY TO QUALIFY FOR**
14 **THE SERVICE CONSISTENT WITH 47 CFR 54.405?**

15
16 A. Yes, we have made this commitment, both in the Application and in my prior prefiled
17 and live testimony.

18
19 **Q. WILL U.S. CELLULAR SATISFY CONSUMER PRIVACY PROTECTION**
20 **STANDARDS AS PROVIDED IN 47 CFR 64 SUBPART U AND SERVICE**
21 **QUALITY STANDARDS AS APPLICABLE?**

22
23 A. Yes.

24
25 **Q. HAS U.S. CELLULAR ACKNOWLEDGED THAT IT SHALL PROVIDE EQUAL**
26 **ACCESS PURSUANT TO 4 CSR 240-32.100(3) AND (4) IF ALL OTHER ETCS IN**
27 **THAT SERVICE AREA RELINQUISH THEIR DESIGNATIONS PURSUANT**
28 **TO SECTION 214(E) OF THE TELECOMMUNICATIONS ACT OF 1996?**

29
30 A. Yes.

31
32 **Q. HAS U.S. CELLULAR COMMITTED TO OFFER A LOCAL USAGE PLAN**
33 **COMPARABLE TO THOSE OFFERED BY THE INCUMBENT LOCAL**
34 **EXCHANGE CARRIER IN THE AREAS FOR WHICH THE CARRIER SEEKS**
35 **DESIGNATION. SUCH COMMITMENT SHALL INCLUDE A COMMITMENT**
36 **TO PROVIDE LIFELINE AND LINK UP DISCOUNTS AND MISSOURI**
37 **UNIVERSAL SERVICE FUND (MOUSF) DISCOUNTS PURSUANT TO**

1 **CHAPTER 4 CSR 240-31, IF APPLICABLE, AT RATES, TERMS AND**
2 **CONDITIONS COMPARABLE TO THE LIFELINE AND LINK UP OFFERINGS**
3 **AND MOUSF OFFERINGS OF THE INCUMBENT LOCAL EXCHANGE**
4 **CARRIER PROVIDING SERVICE IN THE ETC SERVICE AREA?**
5

6 A. Yes. In my previous testimony, and in exhibits, we demonstrated that U.S. Cellular
7 offers several rate plans that offer comparable value to that offered by ILECs serving the
8 requested ETC service area.

9
10 **Q. WITNESS SCHOONMAKER NOTES AT PAGE 10 OF HIS TESTIMONY THAT**
11 **U.S. CELLULAR'S LIFELINE SERVICE OFFERINGS IN OTHER STATES**
12 **HAVE CHANGED SINCE YOU LAST TESTIFIED. CAN YOU CLARIFY?**
13

14 A. Yes. If we are designated, we will make the \$25 plan with 400 minutes referred to in my
15 previous testimony available to lifeline-eligible consumers. Moreover, we will offer and
16 advertise this rate plan to prospective lifeline-eligible consumers.

17
18 **Q. PLEASE EXPLAIN WHY THE COMMISSION SHOULD NOT BE CONCERNED**
19 **BY THE FACT THAT U.S. CELLULAR CHANGES ITS RATE PLANS.**

20 A. That we modify our offerings is a reflection of the fact that we operate in a competitive
21 marketplace. We must offer new rate plans in response to consumer feedback and usage patterns
22 so that we can best meet consumers' varied and changing needs, and we will continue to do so as
23 an ETC. For example, whereas our lowest-priced plan featured at the time of last year's hearing
24 was priced at \$25 for 125 anytime minutes, our lowest-priced rate plan currently featured on our
25 web site is our \$29.99 Wide Area plan, which offers 300 minutes, more than double the quantity
26 under the old plan. In addition, all of our Wide Area plans now have a significantly expanded
27 local calling scope – that is, the area throughout which a customer can travel and initiate calls
28 without incurring roaming charges. This new local calling scope encompasses U.S. Cellular's

1 entire service territory across 25 states, and it adds most of eastern Kansas and most of the
2 eastern two-thirds of Nebraska to the Midwestern portion of the local calling scope. (I have
3 attached both the old and new local calling scopes as Exhibits A and B for comparison.)

4
5 **Q. DO YOU BELIEVE U.S. CELLULAR OFFERS A RATE PLAN THAT IS**
6 **COMPARABLE TO THAT OFFERED BY THE ILECS?**

7 A. Yes, all of our rate plans offer comparable value to ILEC rate plans. As one example, the
8 \$39.99 Wide Area Plan is comparable to the plans available to ILEC customers. Judging by the
9 rapid uptake from our customers, and our data on how they use their phone, we know it to be
10 comparable. We think the Commission should focus on the fact that we don't get customers by
11 offering them less value than our competition, including ILECs. By focusing only on the
12 monthly access rate, Mr. Schoonmaker ignores that consumers get additional features, or that our
13 calling scope (the area within which calls can be placed without roaming charges) has expanded
14 from several Midwestern states to an area spanning 25 states from coast to coast. He also
15 ignores the limitations of a wireline network such as small local calling scope and small local
16 calling area.

17 ** _____
18 _____.** In our experience, the fact that someone is low-income
19 does not mean they use the phone less, or need a mobile phone any less than a higher-income
20 person. With free incoming minutes, which our system reports to be roughly ** ___** for the
21 average customer on this plan, it offers overall minutes ** _____** comparable to
22 what the average customer uses on a landline network, and includes a long list of features that
23 ILECs charge extra for, such as Call Waiting, Conference calling, Caller ID, Voicemail, and Call



1 Forwarding. Most importantly, this plan allows a consumer to call every phone in the
2 continental U.S. as if it were a local call. We know this is a critical selling point for our
3 consumers – an opportunity to get away from toll charges on the wireline network. Moreover,
4 for just six dollars more, a customer can make unlimited toll-free nights and weekend calls, again
5 throughout the continental US.

6 As I have stated in my previous testimony, the overall value of our rate plans is equal to
7 or greater than ILEC plans, which may offer lower flat monthly rates but (1) exclude many
8 features included in U.S. Cellular’s offerings, (2) do not offer mobility, and (3) have a very small
9 local calling area that allow customers to call without per-minute toll charges to a single
10 exchange or handful of exchanges.

11 My understanding is that the FCC has specifically advised that comparability must be
12 determined by examining the rate plans in their totality. Under that standard, there is no question
13 but that we offer one or more rate plans that provides comparable local usage to that of ILECs in
14 the state.

15

16 **Q. WILL U.S. CELLULAR APPLY ALL AVAILABLE LIFELINE DISCOUNTS?**

17

18 A. Yes. We are aware that the amount of Lifeline discounts varies by the amount of the end
19 user common line (EUCL) charge that ILECs impose. We have a Lifeline department that takes
20 care of this in other states and we’ll see that the appropriate discount levels are applied here in
21 Missouri.

22

23 **Q. DO YOU AGREE WITH WITNESS SCHOONMAKER’S STATEMENT THAT A**
24 **LIFELINE CONSUMER, “FROM A FINANCIAL STANDPOINT, WOULD NOT**
25 **BE FINANCIALLY BETTER OFF BY SUBSCRIBING TO THE USCOC**
26 **LIFELINE SERVICE”?**

1
2 A. No, I do not. Mr. Schoonmaker's analysis is a simplistic "apples to oranges" comparison
3 that completely ignores why most people are choosing wireless as an affordable alternative. One
4 cannot simply compare the base rate when assessing a consumer's financial burden. I refer the
5 Commission to Don Wood's previous testimony which outlines the added costs wireline
6 customers face when one looks beyond the monthly rate and his supplemental testimony here. If
7 a Lifeline customer opts for wireline service at a lower base rate, that customer will have to pay
8 per-minute toll charges for all calls beyond a very small local calling area. Some exchanges
9 have only a few thousand or even a few hundred access lines that can be called "toll-free."
10 Moreover, that customer will lack mobile calling capability and will have to pay to use a
11 telephone to make a call outside his or her home. Some qualifying low-income consumers may
12 find that this makes more economic sense to them, and they can opt for wireline service. But
13 others will find that they are financially better off taking U.S. Cellular's service with the
14 attendant benefits of mobility, wider local calling, and other included features that ILECs charge
15 for such as caller ID. They certainly deserve to have that choice; indeed, it is my understanding
16 that increasing customer choice, not duplicating wireline service, is a big benefit of universal
17 service. Mr. Schoonmaker's blanket conclusion that low-income consumers are better off
18 financially with wireline service is remarkably shortsighted and flies in the face of our
19 experience. We already serve a substantial number low-income consumers, even without
20 Lifeline. Those that are eligible for Lifeline should be very happy to learn that we are eligible to
21 offer them discounted telephone service. By intimating that somehow we don't want a paying
22 customer, Mr. Schoonmaker's analysis is directly contradicted by everything I know about our
23 business. This is especially so since we can only get high-cost support when we get and keep a
24 customer.

1

2 **Q. WHAT ABOUT CUSTOMERS THAT DO NOT WANT TO ENTER INTO A**
3 **CONTRACT? DO YOU OFFER ANYTHING TO THEM?**

4

5 A. Yes we do. We offer a range of prepaid service offerings called “TalkTracker”. Please
6 see Exhibit C. These prepaid offerings do not require a monthly contract, include phones for as
7 little as \$9.95, and include most of the same features as our post-paid plans, such as Caller ID,
8 call waiting, voice mail, and a local calling area that is the continental US. People who want a
9 phone for emergencies, or would rather not enter a contract for any number of reasons, find
10 TalkTracker an attractive option.

11

12 **Q. HAS U.S. CELLULAR PROVIDED A PLAN OUTLINING THE METHOD FOR**
13 **HANDLING UNUSUAL CONSTRUCTION OR INSTALLATION CHARGES?**

14

15 A. Yes. We have set forth the six-step service provisioning process the FCC and this
16 Commission require ETCs to undertake in response to consumer requests for service. I
17 respectfully disagree with witness Schoonmaker’s claim that U.S. Cellular has failed to address
18 special construction charges. In response to Staff’s data requests last year, we stated: “U.S.
19 Cellular bears the costs associated with going through the six-step process to determine what
20 solutions are feasible. Costs for provisioning service will be borne by the company, the high-cost
21 fund, the customer, or a combination of the three, and will be undertaken on a case-by-case basis.
22 If USCC requests the customer to make a contribution to the cost of extending service, and the
23 customer believes USCC’s request is unreasonable, then the customer may ask the Commission
24 to determine whether the request for service is reasonable.” This process has been acceptable in
25 every other state where we are designated. We have successfully gone through the six-step
26 process for provisioning service to consumers in other states and its difficult to understand what
27 “procedures”, other than examining each request on a case-by-case basis, that Mr. Schoonmaker

1 envisions. Every case is different and the only way to determine what is a reasonable request
2 and whether and how much of the costs a customer should bear, is through a case-by-case
3 analysis.

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes.

COVERAGE MAP and CALLING PLANS



M O N T H L Y A C C E S S							
\$25	\$35	\$40	\$50	\$75	\$100	\$140	\$200
All plans include Nationwide Long Distance							

Local Plans

125	700	1100	1400	1800	2200	2500	3600
40¢/min.	40¢/min.	40¢/min.	40¢/min.	30¢/min.	30¢/min.	30¢/min.	30¢/min.

Included Features: Voice Mail*, Call Waiting, Caller ID*, Call Forwarding, Three-Way Calling, Detailed Billing* and Mobile Messaging (10¢ per message).
Roaming Rate: 69¢/minute (nationwide, includes long distance) (includes long distance); 30¢/minute (expanded local rate applies)
ShareTalk:** \$15.00/line, per month *Not included on \$25 plan

Regional Plans

500	650	800	1300	1500	2300	3300
40¢/min.	40¢/min.	40¢/min.	30¢/min.	30¢/min.	30¢/min.	30¢/min.

Included Features: Voice Mail, Call Waiting, Caller ID, Call Forwarding, Three-Way Calling, Detailed Billing and Mobile Messaging (10¢ per message).
Roaming Rate: 69¢/minute (nationwide, includes long distance)
ShareTalk:** \$20.00/line, per month

SpanAmerica® Plans

200	250	400	700	1000	1500	2000
40¢/min.	40¢/min.	40¢/min.	30¢/min.	30¢/min.	30¢/min.	30¢/min.

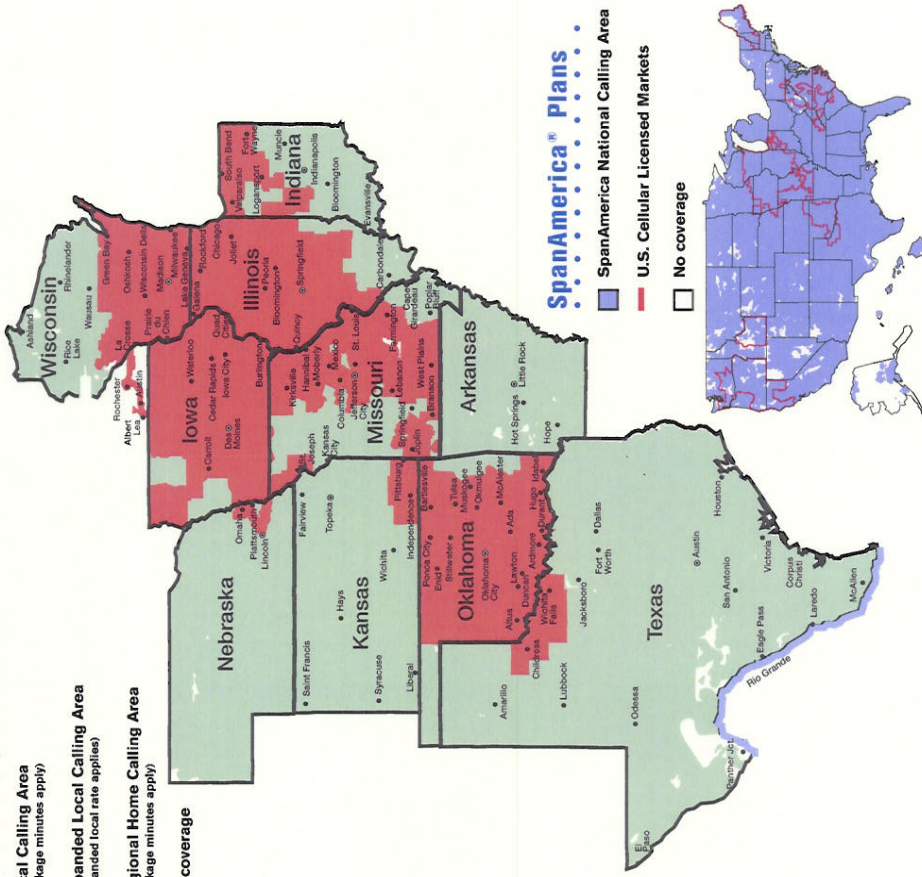
Included Features: Voice Mail, Call Waiting, Caller ID, Call Forwarding, Three-Way Calling, Detailed Billing and Mobile Messaging (10¢ per message).

U.S. Cellular nights and Weekends Packages (Select one, based on your calling plan.)
 Unlimited local night and weekend minutes, including nationwide long distance.
 Add to any Local (0¢/min plans of \$35 and higher), Regional or SpanAmerica Plan.
 3000 regional night and weekend minutes, including nationwide long distance. Add to any Regional Plan.
 Rates subject to change without notice. Subject to eligibility requirements; additional deposit may be required. See reverse side for other information and restrictions.

\$4.95/mo.
\$4.95/mo.

Local Plans/Regional Plans

- Local Calling Area (package minutes apply)
- Expanded Local Calling Area (expanded local rate applies)
- Regional Home Calling Area (package minutes apply)
- No coverage



Maps depict an approximation of coverage area. Actual coverage may vary. User may incur roaming charges at borders of calling areas.



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- Store Finder

U.S. Cellular Home

Products and Services

Plans

> Coverage Maps

Phones

Prepaid Service

Business Services

Features

Special Offers

Accessories

About Us

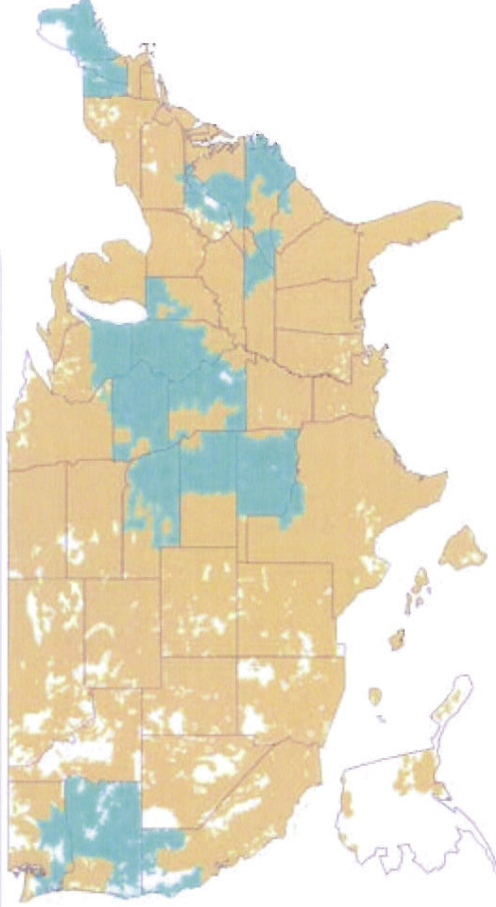
Customer Support



COVERAGE MAPS

Choose a coverage map:

- >> National
- >> Wide Area
- >> Mobile-to-Mobile
- >> SpeedTalk®
- >> easyedgeSM Download Service
- >> BlackBerry®
- >> TalkTracker®
- >> Wireless Modems



Wide Area Voice Coverage

- Wide Area Calling
- Roaming
- No Coverage

Click highlighted areas on the map to zoom in.

*The map shows an approximation of service coverage. Actual coverage may vary. Service may be interrupted or limited due to weather, terrain, customer equipment, or network limitations. Coverage indoors may also vary. U.S. Cellular does not guarantee coverage. User may incur roaming charges at borders of calling areas.



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TalkTracker® Plan Comparison

TalkTracker Wide Area Plans (VIEW PLANS)				
Monthly Access	\$25	\$45	BEST VALUE	\$80
Anytime Minutes	100	350	600	1000
CALL ME Minutes SM	not available	Unlimited		
Night Minutes*	not available	Unlimited <small>starting at 9 p.m.</small>	Unlimited <small>starting at 9 p.m.</small>	
Night & Weekend Minutes**	not available			
Additional Minutes	50¢/min.	15¢/min.	10¢/min.	
Roaming	69¢/min.			
Text Messaging	All incoming messages – Free Pay-As-You-Go – 15¢/message Text Messaging 250 – \$4.95/mo./line Text Messaging 750 – \$9.95/mo./line Text Messaging Unlimited – \$14.95/mo./line			
International Services	Calls to Mexico and Canada: 50¢/min. Other International Calls: \$1.25/min.			
Directory Assistance	\$1.50/call within your home calling area. <small>Pricing in other areas may vary.</small>			
Signal Dial Direct Plus®	\$5.95/mo. Replaces or repairs your phone if it's lost, stolen or damaged. <small>(requires Instant Refill) See Signal brochure for coverage details.</small>			
Included Features: Nationwide Long Distance, Voice Mail, Call Waiting, Caller ID, Three-Way Calling, Incoming Text Messages				

UNLIMITED CALL ME MinutesSM are only available on TalkTracker plans \$45 and higher. Unlimited CALL ME Minutes are not deducted from monthly package minutes and are available in your home calling area.

Additional Minutes: Overage rate per minute once the package minutes are exhausted.

***Night Minutes** are from 9:00 p.m. to 6:00 a.m. Sunday - Saturday

****Night, Weekend & Holiday Minutes** are from 9:00 p.m. to 6:00 a.m. Monday - Friday and all day Saturday and Sunday. Holidays include: New Year's Day, Memorial Day, July 4th, Labor Day, Thanksgiving and Christmas.

Balance Expiration: *TalkTracker* plan minutes expire 30 days from bill cycle day.

Daytime Minutes are from 6:00 a.m. to 8:59 p.m. Monday through Friday.



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EXHIBIT C