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**Midwestern Telecommunications Inc. Provides the Core Services  
Required to Qualify for Universal Service Support**

4. Pursuant to section 54.101(a) of the FCC's Rules, the following core services and functions are to be offered by an ETC and should be supported by federal universal support mechanisms:

- **Voice Grade Access to the public switched network.** "Voice Grade Access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3000 hertz;
- **Local Usage.** "Local Usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;
- **Dual Tone Multi-Frequency signaling or its functional equivalent.** "Dual Tone Multi-Frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;
- **Single Party Service or its functional equivalent.** "Single Party service is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a transmission.
- **Access to Emergency Services.** "Access to Emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911" to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (AH), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- **Access to Operator Services.** "Access to Operator Services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
- **Access to Interexchange Service.** "Access to Interexchange Service" is defined as use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;
- **Access to Directory Assistance.** "Access to Directory Assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings;
- **Toll Limitation for Qualifying Low-Income Consumers.**

5. Midwestern Telecommunications Inc. offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNE's from Bell South. According to FCC Rules, facilities obtained as UNE's satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carriers services. Accordingly, MTI satisfies the requirement set forth in Section 214(e)(1)(A).

#### **MTI Will Comply with Advertising Rules and Requirements**

6. MTI's advertising will conform to rules adopted by this Commission. MTI will advertise the general availability of, and charges for, the supported services listed above to all telecommunications customers in the specified geographic area on a quarterly basis. We will place those advertisements in a media of general distribution that targets the residential customer. In addition, if the commission so requests, MTI will provide proof of its advertising practices to the Commission. With regard to the availability of low-income services, MTI will also advertise in accordance with the Commission's rules. In addition, MTI is willing to provide written notification of universal service programs to the directors of municipal, State and Federal governmental agencies within MTI's service territory whose clientele is likely to benefit from the program.

#### **Midwestern Telecommunications Inc Proposed ETC Service Area**

7. MTI is not a "rural telephone company" as that term is defined by 153(37) of the Act. Under Section 54.207(a) of the FCC's Rules a "service area" is a "geographic area" established by a state commission for the purpose of determining universal service obligations and support mechanisms. For non-rural service areas, there are no restrictions on how a state commission defines the "service area" for purposes of designating a competitive ETC. Therefore, the Commission may designate MTI as an ETC in all of the non-rural wire centers of Bell South in the state of Ohio. MTI does not request ETC designation in any rural area at this time.

#### **ETC Designation for MTI Will Greatly Enhance Lifeline and Link-Up Services Available in Ohio**

8. MTI acknowledges that Section 54.405 of the FCC's Rules requires all ETC's to make Lifeline services (as defined in Section 54.401 of the FCC's Rules) available to qualifying low-income consumers. Lifeline services are available to qualifying low-income consumers in its service areas. Indeed, designation of MTI as an ETC would also allow Lifeline and Link-up service to be available to MTI' customers thereby offering telecommunications to a market that is often limited in services and selection.
9. The MTI Application is before this Commission under an established set of rules and statutory requirements.

10. MTI does not have any pending action or unsatisfied judgments or decisions against it from any state agency or court which involve customer service or rates, which action, judgments or decision has occurred within (5) years of the date of this application
11. MTI is in good standing with Universal Service Fund and does not have any annual reports or assessment fees that are overdue.

### **Conclusion**

WHEREFORE, on the basis of the foregoing, MTI respectfully requests that the Commission: (1) designate MTI as a telecommunications carrier eligible under the provisions of Section 54.201(d) of the FCC's Rules to receive federal universal service support; and (2) respectfully request that the Ohio Public Service Commission either by order or minute action without a hearing within ninety (90) days from the date of this Application; (3) Request that the Executive Secretary to send appropriate notice of this order to the Federal Communication Commission; and, (4) issue such other orders as deemed necessary or convenient in this matter.

DATED this 29<sup>th</sup> day of April, 2009

Respectfully submitted,



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