The Public Utilities Commission of Ohio

TELECOMMUNICATIONS SUPPLEMENTAL APPLICATION FORM for

COMPETITIVE ELIGIBLE TELECOMMUNICATION CARRIER (CETC) DESIGNATION HIGH-COST UNIVERSAL SERVICE

Per the Commission's 01/19/2011 "Implementation Order" in Case No. 10-1010-TP-ORD

(Effective: 01/20/2011)

TRF Docket No. 90-____

In the Matter of the Application of Allied Wireless Communications Corporation Petition for Designation as a High-Cost Rural Competitive Eligible Telecommunications Carrier)

Case No. __-____-**TP-UNC**

Note: Unless you have a reserved a Case No. leave the "Case No" fields BLANK

Name of Applicant Allied Wireless Communication Corporation
DBA(s) of Applicant Alltel Wireless
Address of Applicant 1001 Technology Drive, Little Rock, AR 72223
Company Web Address www.alltelwireless.com
Contact Person(s) Rohan Ranaraja
Contact Person's Email Address rohanranaraja@awcc.com Phone 501-448-1249 Fax 501-448-1580

Part I - Requirements:

Facilities-based Wireline applicant must obtain a Certificate of Public Convenience and Necessity in Ohio prior to applying for CETC Designation

Facilities-based Wireless applicant must register as a Wireless Service Provider in Ohio prior to applying for CETC Designation

Part II - Requirements:

Demonstration of Rural Telephone Company Status

The Carrier provides that it meets at least one of the following four criteria for rural telephone company status **(check [✓] at least one)** consistent with the Communications Act of 1934, as amended (SEC. 3 [47 USC § 153(37]).

Section 3 [47 USC § 153(37)] states that the term "rural telephone company" means a local exchange carrier operating to the extent that such entity:

_____ (A) provides common carrier service to any local exchange carrier study area that does not include either –

(i) any incorporated place of 10,000 inhabitants or more, or any part thereof, based on the most recently available population statistics of the Bureau of the Census; or

(ii) any territory, incorporated or unincorporated, included in an urbanized area, as defined by the Bureau of Census as of August 10, 1993;

_____ (B) provides telephone exchange service, including exchange access, to fewer than 50,000 access lines:

_____ (C) provides telephone exchange service to any local exchange carrier study area with fewer than 100,000 access lines; or

_____ (D) has less than 15 percent of its access lines in communities of more than 50,000 on the date of enactment of the Telecommunications Act of 1996.

If the carrier checks any letter other than "B" or "C" above, it must attach supporting documentation to this application demonstrating how it meets the criteria delineated of either "A" or "D."

Check [✓]

X FCC-Required Services 47 C.F.R. §54.101

The carrier provides that it is capable of providing the following services supported by the federal universal service fund:

- Voice grade access to the public switched network
- Local usage
- Touch-tone service or its functional equivalent
- Single-party service or its functional equivalent
- Access to emergency services, including 911 and enhanced 911
- Access to operator services
- Access to interexchange services
- Access to directory assistance
- Toll limitation for qualifying low-income customers

Facilities 47 C.F.R. §54.201

Offer the services that are supported by federal universal service support mechanisms under subpart B of this part and section 254(c) of the Act,

The carrier will provide these services through **(check [✓] the one that applies)**:

X Its own facilities;

_____ Its own facilities (which includes the purchase of unbundled network elements);

_____ Its own facilities and resale of another carriers services; or

_____ Its own facilities (which include the purchase of unbundled network elements), and resale.

Advertising 47 C.F.R. § 54.201
(check [✓] all that apply)

X The carrier will advertise the availability of supportable services and their rates annually in a print media(s) of general circulation throughout its service territory(s) utilizing the language recommended by the Commission. (Carriers are at liberty to propose their own advertising language, but are put on notice that it may lengthen the ETC approval process. Any proposed alternative language must be attached to this application.)

X Indicate generally the type of media to be employed:

_____ Intend to utilize the Commission's recommended advertising language

Copy of proposed advertising language and materials to advertise available services (Exhibit F)

Public Interest Standard 47 C.F.R. §54.202

Public Interest Standard determination of an application will be evaluated on a case-by-case basis considering increased customer choice, advantages and disadvantages. In the case of an applicant seeking designation below the study area level of a rural telephone company a cream-skimming analysis may be appropriate comparing the population density of each wire center in which the applicant seeks designation against that of the wire centers in the study area in which the applicant does not seek designation, as well as other determining factors. Explain in application benefits including unique advantages (Exhibit E)

CETC requirements: 47 C.F.R. 54.202

Under section 214(e)(6) common carrier in its application must **(check [✓] all):**

X Commitment to provide service throughout proposed designated service area to all customers making reasonable requests for service [§ 54.202 (1)(i)]

X Carrier certifies [§54.202(a)(1)] that it will:

1. Provide service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises
2. Provide service within a reasonable period of time, if the potential customer is within the applicant's licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by:
    1. Modifying or replacing the requesting customer's equipment;
    2. Deploying a roof-mounted antenna or other equipment;
    3. Adjusting the nearest cell tower;
    4. Adjusting network or customer facilities;
    5. Reselling services from another carrier's facilities to provide service; or
    6. Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

X Submit a five-year plan [54.202(B)(ii)] (Exhibit A)

X Remain functional in emergency situations [§54.201(a)(2)] (Exhibit C)

X Local usage plan [§54.202(a)(4)] (Exhibit D)

- Commit to satisfy applicable consumer protection and service quality standards. A commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Associations' Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be considered on a case-by-case basis. [§54.202(a)(3)]
- Applicant acknowledges that per the FCC equal access rules it may be required to provide equal access to long distance carriers in the event that no other eligible telecommunication carrier is providing equal access within the service area. [§54.202(a)(5)]
- Retain all records required to demonstrate to auditors that the support received was consistent with the universal service high-cost program rules. This documentation must be maintained for at least five years from the receipt of funding. [§54.202(a)(5)(e)]. These records should include the following:
    - Data supporting line count filings;
    - Historical customer records; fixed asset property accounting records;
    - General ledgers;
    - Invoice copies for the purchase and maintenance of equipment;
    - Maintenance contracts for the upgrade or equipment;
    - and any other relevant documentation.

Part III - Exhibits

Note that the following exhibits are required for all filings using this form.

Included	Identified As:	Description of Required Exhibit:
☐ See Petition	Exhibit A	Submit 5-year plan specifically detailing proposed improvements or upgrades to applicants network on a wire-center by wire-center basis throughout its proposed designated service area: • how signal quality, coverage or capacity will improve due to the receipt of high-cost support; • the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high-cost support; • the specific geographic areas where the improvements will be made; • and the estimated population that will be served as a result of the improvements.
☐ See Petition	Exhibit B	If an applicant believes that service improvements in a particular wire center are not needed, it must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area. [54.202(B)(ii)]
☐ See Petition	Exhibit C	Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.[§54.201(a)(2)]
☐ See Petition	Exhibit D	One-time customer notice of detariffing and related changes consistent with rule 4901:1-06-04. Demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation. [§54.202(a)(4)]
☐ See Petition	Exhibit E	Public Interest Standard : Explain customer benefits or unique advantages
☐ See Petition	Exhibit F	Copy of proposed advertising language and materials to advertise available services

Part III – Attestation

Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.

AFFIDAVIT

Compliance with Commission Rules

I am an officer of the applicant corporation, Allied Wireless Communications Corp and am authorized to make this statement on its behalf.

I attest that this petition complies with all applicable rules for the state of Ohio. I understand that this petition filing does not imply Commission approval and that the Commission's rules, as modified and clarified from time to time, supersede any contradictory provisions in our petition. We will fully comply with the rules of the state of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on (Date) June 1, 2012 at (Location) Little Rock, Arkansas

*(Signature and Title) Rohan Ranaraja, Dir - Regulatory (Date) 6/1/12

- *This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

VERIFICATION

I, Rohan Ranaraja
verify that I have utilized the Supplemental Application for Petition for Designation as a Competitive Eligible Telecommunications Carrier for High-Cost Universal Service provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

*(Signature and Title) Director of Regulatory Compliance (Date) 6/1/12

**Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

Send your completed Supplemental Application Form, including all required attachments as well as the required number of copies, to:

Public Utilities Commission of Ohio
Attention: Docketing Division
180 East Broad Street, Columbus, OH 43215-3793

Or
Make such filing electronically as directed in Case No 06-900-AU-WVR

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Petition of	)
Allied Wireless Communications Corporation d/b/a	)
Alltel for Conditional Designation as an Eligible	)
Telecommunications Carrier for Purposes of Participating	)
in the Mobility Fund Phase I Auction	)

PETITION OF ALLIED WIRELESS COMMUNICATIONS CORPORATION D/B/A ALLTEL FOR CONDITIONAL DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER FOR THE PURPOSES OF ESTABLISHING ELIGIBILITY TO PARTICIPATE IN THE FEDERAL COMMUNICATION COMMISSION MOBILITY FUND PHASE I AUCTION AND REQUEST FOR EXPEDITIED CONSIDERATION

Allied Wireless Communications Corporation d/b/a Alltel, on behalf of itself and its controlled/managed partnerships[1], (collectively "Allied" or the "Company"), pursuant to 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.1003, and rules 4901:1-6-09 and 4901:1-6-19 of the Ohio Administrative Code ("OAC"), hereby petitions the Public Utilities Commission of Ohio (the "Commission") for conditional designation as an Eligible Telecommunications Carrier ("ETC") in all areas in Ohio where Allied is licensed by the Federal Communications Commission ("FCC") to provide commercial mobile radio services ("CMRS") and with respect to which it is the successful bidder in the FCC Mobility Fund Phase 1 auction presently scheduled to be conducted on September 27, 2012 (the "Phase I Auction").[2] Conditional ETC designation is sought so that it will be

[1] Ohio RSA 2 Limited Partnership, Ohio RSA #3 Limited Partnership, Ohio RSA 5 Limited Partnership and Ohio RSA 6 Limited Partnership.

[2] Connect America Fund, WC Docket No. 10-90, A National Broadband Plan for Our Future, GN Docket No. 09-51, Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135, High-Cost Universal Service Support, WC Docket No. 05-337, Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92, Federal State Joint Board on Universal Service, CC Docket No. 96-45, Lifeline and Link-up, WC Docket No. 03-109, Universal Service Reform - Mobility, WT Docket No. 10-208, *Report and Order and Further Notice of Proposed Rulemaking,* FCC 11-161, rel. November 18, 2011 ("*USF Transformation Order*")

eligible to participate in the FCC Mobility Fund Phase I Auction. The Phase I Auction is to provide up to $300 million of support on a one-time basis to accelerate deployment of networks for mobile voice and broadband services in unserved areas. Because some of the areas of Ohio where Allied is licensed to provide CMRS are generally very rural and the FCC has determined are unserved, the public would benefit substantially if Allied is qualified to bid and if funds are awarded to Allied from the Phase I Auction.

In order to submit a bid in the Phase 1 Auction, Allied must first be designated as an ETC in all the census blocks for which it will submit a bid. ETC designation by this Commission is, therefore, a prerequisite for bidding. Bids are presently required to be submitted between **June 29, 2012 and July 12, 2012**. Allied, therefore, must receive ETC designation before these dates and is seeking **expedited approval** of this petition.

Further, Allied is requesting that the ETC designation requested herein be made **conditional** on it being the successful bidder in the Phase 1 Auction. Therefore, any ETC designation granted pursuant to this petition would only continue in effect with respect to unserved areas where it is the successful bidder.

1. IDENTIFICATION OF THE COMPANY

Allied, a wholly-owned subsidiary of Atlantic Tele-Network, Inc., a publicly traded corporation headquartered in Beverly, Massachusetts, is licensed by the FCC as a facilities based provider of CMRS, including voice and data services and provides those services in principally rural areas of Idaho, Georgia, Illinois, Ohio, North Carolina, and South Carolina. Allied was formed and acquired certain FCC licenses and facilities in areas in the above states when Verizon Wireless acquired Alltel Communications in 2009

and was required to divest those licenses and facilities.[3] Allied is presently designated and operates as an ETC in certain areas of Idaho, Georgia and North Carolina and has an application on file in South Carolina.[4] Allied is filing or will file applications essentially identical to this petition seeking conditional ETC designation in Idaho and Illinois in order to allow it to also participate in the Phase I Auction with respect to unserved locations of its licensed area in those states. The FCC has stated that ETC designations may be conditioned on success in bidding in the Phase I Auction.[5]

2. THE MOBILITY FUND AND PHASE I AUCTION

In connection with its adoption of comprehensive reform of the universal service system in November 2011, the FCC created the Mobility Fund, part of the Connect America Fund. The FCC indicated the Mobility Fund will provide up to $300 million to accelerate the deployment of next generation 3G or better networks for mobile voice and broadband services in unserved areas. Phase I Auction funds are to be awarded through a reverse auction that will be held on September 27, 2012.[6] The FCC has also determined the census blocks that are considered unserved and thus eligible for awards under the Phase I Auction. Some of these designated census blocks are located in Ohio and within the area where Allied is licensed to provide CMRS. Allied, therefore, as one of the few carriers licensed to provide CMRS in the designated unserved census blocks, is uniquely

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[3] *See Atlantic Tele-Network, Inc. and Verizon Wireless Seek FCC Consent to Assign or Transfer Control of Licenses and Authorizations*, WT Docket No. 09-119, Public Notice, DA 09-1515 (rel. July 9, 2009).
[4] In the Matter of: Application of Allied Wireless Communications Corporation for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934, Public Service Commission of South Carolina, Docket No. 2010-385-C.
[5] *USF Transformation Order* at Para. 390.
[6] *Mobility fund Phase I Auction Scheduled for September 27, 2012, Comment Sought on Competitive Bidding Procedures for Auction 901 and Certain Program Requirements, AU Docket No. 12-25,* Public Notice, DA 12-121 (rel. Feb. 2, 2012) ("Phase I Mobility Fund PN").

positioned to bring the benefit of the Phase I Auction to rural unserved areas of Ohio where it is licensed to provide CMRS.

3. THIS COMMISSION HAS AUTHORITY AND ALLIED IS QUALIFIED TO BE DESIGNATED AS AN ETC

Federal law allows states to exercise the authority to designate a qualified carrier as an ETC.[7] This Commission thus has the authority under state law to designate a qualified carrier as an ETC.

Allied satisfies all the relevant requirements for designation as an ETC specified in federal law[8] and those under state law[9]. Allied is (i) a common carrier; (ii) offers all the supported services; (iii) uses its own facilities to provide the services; and (iv) offers service throughout its designated service area and following designation and success in receiving Phase I Auction funds it also will (v) advertise the availability of its universal service offerings and charges through media of general distribution and utilize the Commission recommended language[10]; (vi) make Lifeline service available to qualifying low-income consumers; (vii) certify that it complies with the service requirements applicable to the support it receives; (viii) submit a service improvement plan; (ix) be able to remain functional in emergency situations; (x) satisfy consumer protection and service quality standards; (xi) provide local usage plans comparable to the incumbent local exchange carriers already operating in the area; (xii) comply with applicable reporting requirements and (xiii) take steps to limit fraud, waste and abuse in the federal universal fund programs. Because Allied is uniquely positioned to bring and improve service in rural unserved areas of Ohio where it is licensed, and the provision of those

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[7] 47 U.S.C. § 214(e) and 47 C.F.R. §54.1003.
[8] 47 U.S.C. § 214Ie)(1).
[9] Rule 4901:1-6-09 and 4901:1-6-19 of the OAC.
[10] See Exhibit F to the registration of Allied filed simultaneous with this petition.

services will benefit the public, granting this petition is in the public interest. Demonstration that Allied meets or exceeds each of the above requirements is provided in the following corresponding sections.

(i) Common Carrier Status- Allied is a CMRS provider licensed by the FCC and therefore regulated as and subject to the requirements applicable to a common carrier. Allied is a common carrier and meets this requirement of ETC designation.[11]

(ii) Provide the Supported Services- Allied provides (a) voice grade access to the public switched telephone network; (b) local usage; (c) access to emergency services and (d) toll-limitation services for qualifying low-income consumers. These are the supported services that a carrier must provide and that are supported by universal service funds. Allied therefore satisfies this qualification for ETC designation as previously determined by the Commission. Attached hereto as Exhibit 2 is a certification of Mr.Wade McGill, the Chief Administrative Officer of the Company, that it provides these services. Further, attached hereto as Exhibit 3 is a copy of local service plans provided by Allied. Exhibit 3 also supports the conclusion that Allied provides the supported services.

(iii) Use of Allied Facilities- Allied is a facilities based provider of services and as such principally utilizes its network and facilities to serve its customers rather than resell the service of another carrier.

(iv) Supported Services Provided Throughout Service Area- Allied commits to provide all of the supported services throughout its designated service area as

[11] 47 C.F.R. § 20.9

required. Allied is licensed to provide CMRS in all the area indicated on Exhibit 1 for which it is seeking conditional ETC designation and, therefore, satisfies this requirement. Approval of this petition and success in receiving Phase I Auction funds will further enable Allied to fulfill this requirement in those areas indicated on Exhibit 1.

(v) Advertise the Availability of Supported Services- Allied currently advertises the availability of supported services through media of general distribution. It utilizes newspapers, its website, and other direct advertising methods throughout its service area. Allied will expand upon these media, as necessary, to ensure that consumers within its ETC designated area are fully informed of its universal service offerings. Further, Allied will advertise its Lifeline and Link Up services throughout its ETC area and will incorporate the PUCO recommended language in some of its media advertising as reflected on Exhibit F to the registration of Allied filed on this same date. Allied therefore will satisfy this requirement for ETC designation.

(vi) Lifeline Service Availability- Allied will offer Lifeline and Link Up service within its ETC area to all qualifying low-income consumers in accordance with applicable federal and state lifeline requirements. Details of Allied's proposed Lifeline offering in Ohio are attached hereto as Exhibit 4. Upon designation as an ETC pursuant to this petition and receipt of Phase I Auction funds, Allied will make its Lifeline offering available in the areas indicated on Exhibit 1.

(vii) Provision of Service Requirements- Allied commits to provide service throughout its designated service area to all customers making a reasonable request for service. Allied commits that will process such requests consistent with the provisions of section 54.202(a)(1)(A) of the FCC rules.[12] Allied believes the service provisioning commitments in these rules will ensure that Allied will be responsive to consumers' needs in its ETC area and will enable it to act as a proper steward of available federal service support.

(viii) Service Improvement Plan- Allied is seeking designation conditioned on receipt of Phase I Auction funds. Therefore, in connection with a bid for those funds and approval of any bid, Allied will identify the service improvements that can be accomplished with any funds approved. Allied requests approval of this application conditional on its success in bidding and requests that it be allowed to provide the bid to the commission on a confidential basis when details relating to the bid are filed with the FCC. The bid information filed with the FCC and the Commission would constitute its proposed improvement plan, as it would consists of the same information required in a service improvement plan, subject to success in bidding for any portion of the improvements detailed in the bid. Alltel believes that this proposal will satisfy this requirement as its ETC designation will be specifically conditioned on the one-time receipt of funds and those funds must be expressly used for the improvements specified in the bid to provide service in unserved areas. Allied commits to submit to the commission the details of any successful bid and proposed use of the funds after those are determined by

[12] 47 C.F.R. § 54.202(A)(1)(a).

a successful bid. The FCC has established several specific requirements with respect to carriers that are awarded Phase I Auction support. For example carriers supporting 3G service will have two years from authorization of the support to meet the requirements.[13] Therefore, while the PUCO requires a five year service improvement plan, the support distributed from the Phase I Mobility Fund will be exhausted in a shorter time frame.

(ix) Ability to Function in Emergency Situations- Allied has the ability to remain functional in emergency situations as required by FCC rules.[14] Specifically, Allied has adequate amounts of back-up power to ensure functionality without an external power source, and is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations. Allied further commits to comply with any applicable reporting requirements of the FCC with respect to outages. The Allied network is reinforced by the presence of generator backups, capable of running for extended periods in the event of a major electrical outage. These include back-up batteries that provide at least four hours of back-up power and portable generators can be moved to individual cell sites, as needed. Because individual cell sites are spread out, it is highly unlikely that an electrical outage would affect more than two sites simultaneously. In the event of power or other types of failure, the cell sites are equipped with alarms that will alert Allied technicians. Additionally, the sites are monitored remotely by Allied's 24/7 Network Operations Center (NOC) should there be a total

[13] USF Transformation Order at paragraphs 360-365.
[14] 47 CFR. § 54.202(a)(2)

communications failure at the site. Allied's main switch connectivity to the public switched voice network is based on a ring topology and is redundant – if the ring is cut, call traffic can be re-routed. Allied uses both microwave and leased lines for added diversity to cell site hubs. Backbone traffic lines are designed with sufficient capacity to manage extraordinary spikes. The company has multiple agreements with long distance providers to absorb excess calling, if needed. Allied has cell sites on wheels, mobiles towers, and mobile generators available for deployment to areas where there are traffic spikes, due to emergencies or special events. Again, Allied satisfies this requirement for ETC designation.

(x) Consumer Protection Requirements- Allied complies with applicable consumer protection and service quality standards specified by the FCC and this Commission.[15] Allied complies with the CTIA Consumer Code which sets forth several consumer protections developed by the industry. The FCC has determined that a commitment to comply with the CTIA Consumer Code satisfies this requirement for ETC designation. Allied is committed to abide by the CTIA Consumer Code, as it may be amended from time to time, throughout its ETC designated area. Allied also certifies annually that it complies with the CTIA Consumer Code.

(xi) Comparable Local Usage Plans- Allied is committed to offering local usage plans comparable to those offered by the incumbent LECs in the service areas for which it seeks ETC designation. Exhibit 3 to this petition describes the local used plans it offers that are comparable to those provided by local

[15] 47 C.F.R. §202(a)(3) and rule 4901:1-6-09(A) of the OAC.

exchange carriers. While the FCC has eliminated this requirement in the recent reform of universal service, Allied commits to continue offering a local usage plan comparable to that offered by the incumbent LECs within its ETC designated area to the extent still applicable in Ohio and, therefore, satisfies this requirement for ETC designation if applicable.

(xii) Additional Reporting Requirements- Allied commits that it will comply with all applicable reporting requirements imposed by Ohio.

(xiii) Limit Fraud, Waste, and Abuse- On February 6, 2012 the FCC adopted comprehensive reforms to the low-income program to revise the Lifeline service requirements.[16] In the Lifeline Reform Order, the FCC adopted specific reforms attempting to limit fraud, waste and abuse in the low-income program. Allied commits to compliance with the rules as they are applicable.

4. DESIGNATION OF ALLIED AS AN ETC IS IN THE PUBLIC INTEREST

As described above, this petition is for conditional ETC designation specifically to enable Allied to submit a bid to the FCC in its September Phase I Auction. This auction will provide up to $300 million in one-time support to immediately accelerate deployment of networks for mobile voice and broadband services in unserved areas.[17] The FCC has already determined that certain census blocks are unserved and qualify for these funds. Some of those unserved census blocks are located in area where Allied is licensed to provide CMRS and for which it is not presently designated as an ETC. Allied is, therefore, one of the few carriers that is qualified and uniquely

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[16] *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking,* WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("Lifeline Reform Order").

[17] USF Transformation Order, at ¶ 28.

positioned as a predominately rural wireless carrier to accelerate deployment of networks for mobile voice and broadband services in these unserved census blocks. Until the bids are submitted, it can not be concluded whether Allied may be the sole or one of few that will seek Phase I Auction funds with respect to these areas of Ohio. It is, therefore, clearly in the public interest to approve this petition and to condition it on Allied being the successful bidder. The overarching principles embodied in the Telecommunications Act of 1996 that continue to guide the FCC decision to establish the Mobility Fund and embodied in the USF Transformation Order is the promotion of competition, the deployment of higher quality services and the rapid deployment of new telecommunications technologies.[18] Conditional designation and successful bidding by Allied will undeniably increase customer choice and service availability and make available to consumers new service offerings, including wireless broadband and Lifeline services as the areas where the funds are to be used are presently unserved. Areas that are presently served will have service. The public interest is unmistakable and, therefore, this petition is clearly in the public interest. Further, as structured, the Mobility Fund will not adversely impact the current universal service mechanisms. Approval of this petition on an expedited basis and conditioned upon Allied being a successful bidder in the Phase I Auction is clearly in the public interest.

CONCLUSION

WHEREFORE, Allied Wireless Communications Corporation d/b/a Alltel, respectfully requests the following: (i) that the commission expeditiously designate Allied as an ETC with respect to the areas indicated on Exhibit 1 conditioned on

[18] 47 U.S.C. § 254.

Allied being a successful bidder in the Phase I Auction; (ii) that the Commission send prompt notice of the designation to the FCC and the Universal Service Administrative Company; and (iii) for such other relief as may be appropriate.

/s/David A. Ferris, Esq.

David A. Ferris
The Ferris Law Group LLC
P.O. Box 1237
6797 N. High Street, Suite 214
Worthington, Ohio 43085-1237
Telephone: (614) 844-4777

EXHIBIT 1

ALLIED WIRELESS' OHIO LICENSED AREA

- CMA 158 - Lima OH MSA (Counties: Allen, Auglaize, Putnam, Van Wert)
- CMA 231 - Mansfield OH MSA (Counties: Richland)
- CMA 586 - OH RSA 2 (Counties: Erie, Huron, Sandusky, Seneca)
- CMA 587 - OH RSA 3 (Counties: Ashtabula)
- CMA 589 - OH RSA 5 (Counties: Crawford, Hancock, Hardin, Marion, Wyandot)
- CMA 590 - OH RSA 6 (Counties: Ashland, Coshocton, Holmes, Knox, Licking, Morrow, Wayne)

EXHIBIT 2

OFFICER CERTIFICATION

CERTIFICATION

State of Arkansas)
)
County of Pulaski)

Wade McGill, being duly sworn, states that he serves as Chief Administrative Officer of Allied Wireless Communications Corporation ("Allied Wireless"); that in such capacity, he is qualified and authorized to file and verify such Petition; that he has carefully examined all the statements and matters contained in the Petition; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

Affiant further states that Allied Wireless offers or will offer all of the services designated for support by the Federal Communications Commission throughout the areas in which Allied Wireless is requesting designation as an ETC, that the Expanded Application is made in good faith, with the intention of presenting evidence in support thereof in every particular.

Wade McGill
Chief Administrative Officer
Allied Wireless Communications Corporation

Subscribed and sworn to before me, a Notary Public in and for the State and County named above, this 31st day of May, 2012

Teddy Allen

(SEAL) Notary Public

TEDDY ALLEN
NOTARY
My Comm. Expires
SEPT. 13, 2014
PUBLIC
WHITE COUNTY, ARK.

EXHIBIT 3

ALLIED WIRELESS' LOCAL SERVICE RATE PLANS

alltel wireless

BEST JUST GOT BETTER!

BEST VALUE Unlimited

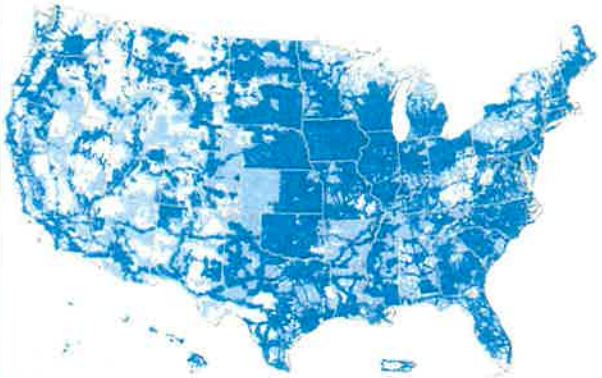
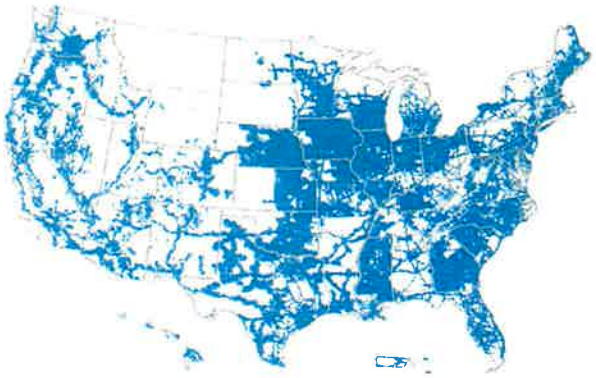
Contract & No Contract

new low price

BEST VALUE Unlimited

$45/mo Unlimited Talk & Text

Mobile Web* included

Contract	No Contract
 Voice and Broadband (3G or 1x) Voice and High Speed (1x) No Coverage	 Voice and Broadband (3G or 1x) No Coverage
Add up to 4 family lines—$40/mo per line	No credit check, no deposits
Preferred phone pricing	No roaming or long-distance charges
Smartphone Data Plans* $30/mo per line-2GB $20/mo-Mobile Hotspot	Smartphone Data Plans* $15/mo-100MB $30/mo-1GB
Convenient electronic billing* included	Refill online or at thousands of convenient refill locations: alltelwireless.com/storelocator

Manage your account online at alltelwireless.com/myaccount

*** Mobile Web:** allows access to your feature phone's browser and third party services for purchases of ringtones, graphics and other media applications but does not provide a full web browsing experience. **Data:** required with purchase of a Smartphone. Additional data 2¢ per MB for contract; 15¢ per MB for no contract. Additional 15¢ per minute calls, 10¢ per text message & 25¢ per picture message rates apply if full refill is not made on no contract plan. **Electronic billing:** required for contract plan. Paper billing available for $2 per mo.

See additional Wireless Plans on reverse side.

Contract Plan Add Ons

Voice2TXT

Plan	Price
Turn your voicemail into text messages. Read & respond to missed calls in situations when you can't answer the phone	$2.99/mo

Phone Insurance

Plan	Price
PlatinumGuard℠ Plus (covers phones $300+) PlatinumGuard℠ Plus combines insurance coverage and an enhanced warranty covering loss, theft, damage, electrical/mechanical malfunctions or defects during and after the manufacturer's warranty has expired. Insurance claim deductible: $95.*	$7/mo
ProductGuard℠ Plus (covers phones $299 or less) ProductGuard℠ Plus combines insurance coverage and an enhanced warranty covering loss, theft, damage, electrical/mechanical malfunctions or defects during and after the manufacturer's warranty has expired. Insurance claim deductible: $50.*	$5/mo

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1-800-alltel-1

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PlatinumGuard and ProductGuard are services provided to subscribers of Alltel. e-Securitel is the agent and provides claims servicing under this program. New Hampshire Insurance Company is the underwriter of this product. ***Deductibles** only apply for claims filed for lost, stolen or damaged equipment. A $50 Processing Fee only applies to claims filed for electrical/mechanical malfunction or defect outside the 12-month manufactures warranty period. At no time will a **Processing Fee** and Deductible be charged for the same claim; it's either one or the other based on the claim type (malfunction, lost, stolen, or damage). Deductibles/Processing Fees are non-refundable and payable at the time you receive your replacement. This amount is based on the non-subsidized or non-contract retail value of the phone or device at the time of purchase. Qualifying Alltel rate plan, credit approval & approved handset required.

Contract Plans

See reverse for coverage map

Anytime Minutes	My Circle Numbers	Free Fridays	Plan	Add a Line	Text Messages	Picture Messages	Feature Phone Unlimited Messages	Smartphone Data (per line)
1000	1	–	$39.99/mo	$20/mo	15¢ per text	25¢ per picture	$10/mo	–
900	15	FREE	$59.99/mo	$9.99/mo	15¢ per text	25¢ per picture	$10/mo	$30/mo-2GB
1400	15	FREE	$79.99/mo	$9.99/mo	15¢ per text	25¢ per picture	$10/mo	$30/mo-2GB
2100	25	FREE	$99.99/mo	$9.99/mo	15¢ per text	25¢ per picture	$10/mo	$30/mo-2GB

All plans include **FREE** Mobile-to-Mobile, **FREE** Long Distance and **Unlimited** Nights & Weekends

No Contract Plans

See reverse for coverage map

Pay Per Minute

Just pay for the minutes you use – 15¢ a minute all the time.
Customize your plan – Add 300 text messages for $5/mo or 750 text messages for $10/mo.

Pay Per Day

Choose up to four unlimited features for one low rate and get 10¢ a minute any time.

UNLIMITED Nights & Weekends **UNLIMITED** Mobile-to-Mobile **UNLIMITED** Messaging **UNLIMITED** Favorite Number Calling	**2 Features** - $0.75/day **3 Features** - $1.00/day **4 Features** - $1.25/day

Plus any unlimited feature that is not chosen as a part of your rate plan package is only 10¢ per minute or message.

Pay Per Month

Anytime Minutes	Mobile-to-Mobile	Nights & Weekends	Plan	Text Messages	Picture Messages	Ringback Tones	Mobile Web	Data
300	UNLIMITED	1000	$29.99/mo	10¢ per text	25¢ per picture	99¢ Monthly Subscription	$5.99/mo $1.99/day	$15/mo-100MB $30/mo-1GB

Customize your plan: Add 300 Text Messages for $5/mo or 750 Text Messages for $10/mo. Add Unlimited Favorite Number Calling for $5/mo.

Manage your account online with My Account

- Check your balance
- Make a payment
- Check minutes of use
- View rate plan
- Get detailed phone information

Register at alltelwireless.com/myaccou

SUBJECT TO ALLTEL TERMS & CONDITIONS; see store or alltelwireless.com. Taxes & government charges apply. $25 non-refundable activation fee and possible $200 early termination fee apply per line. 411 directory assista are currently charged $1.99 per call plus airtime when on the Alltel network. Maps are a general representation of coverage for illustrative purposes only. We charge you a **REGULATORY COST RECOVERY CHARGE** of up to $2 help us defray our cost of compliance with government regulations and offset charges to us; this is neither a tax nor required by government. **Features:** all features may not be available in all areas. If not included in your plan are available for an additional charge. **Certain Plan Details:** usage outside of your calling plan/coverage area is subject to additional roaming, minute & long-distance charges. Nights are Mon-Thurs 9:00 pm-5:59 am. Week Fri 9:00 pm-Mon 5:59 am. Mobile-to-Mobile Minutes apply to calls between eligible Alltel Wireless customers that begin & end in your plan's calling area. Call forwarding and voice mail calls excluded and use airtime. **Free** action required. Eligible customers must request this feature to be added to their account by either visiting a retail store or calling 1-800-alltel-1. Available for a limited time on current select plans $59.99 & up. "Free Fridays" unlimited voice minutes beginning at 7 or 9 pm Thursday (depending on your plan & features) & ending 5:59 am Monday. **Add a Line:** limited to 4 additional lines; all share voice minutes & calling features only.

EXHIBIT 4

ALLIED WIRELESS' LIFELINE OFFERING

LIFELINE 500 PLAN

Monthly Fee	$10.00
Anytime Minutes Included Each Month	500
Text Messages Included Each Month	500
Mobile-to-Mobile (other U-Lifeline Customers)	Free
Long Distance Charges	Free
Caller ID	Free
Handset	Free
Additional anytime minutes above the 500 Included in the Plan	$0.10 cents a minute
Additional text messages above the 500 Included in the Plan	$0.10 cents per text
Roaming	$0.59 cents a minute

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in

Case No(s). 12-1730-TP-UNC

Summary: Application of Allied Wireless Communications Corporation Petition for Designation as a High-Cost Rural Competitive Eligible Telecommunications Carrier electronically filed by Mr. DAVID A FERRIS on behalf of ALLIED WIRELESS COMMUNICATIONS CORPORATION