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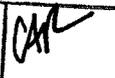
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December 15, 2004

Arizona Corporation Commission  
**DOCKETED**

DEC 15 2004

DOCKETED BY 

Mr. Brian C. McNeil  
Executive Secretary  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

RE: Designation of ALLTEL Communications, Inc. as an Eligible  
Telecommunications Carrier Pursuant to Section 214(e)(2) of the  
Communications Act of 1934, Docket No. T-03887A-03-0316

Dear: Mr. McNeil:

ALLTEL Communications, Inc. ("ALLTEL") submits this letter in response to the Commission Decision No. 67403, issued November 2, 2004. This Decision designated ALLTEL as an Eligible Telecommunications Carrier ("ETC") for purposes of receiving federal universal service support in Arizona. The Commission's designation was conditioned upon ALLTEL's agreement to comply with specific conditions set forth in the Decision (Decision No. 67403, ¶¶ 69-72).

Prior to accepting conditions for ETC designation, ALLTEL must, as a wireless carrier operating in a competitive market place, consider the impacts of such conditions on its ability to compete effectively in the marketplace. As evidenced by ALLTEL's acceptance of ETC designation and conditions in other states, ALLTEL is willing to comply with reasonable operational and monitoring requirements as a condition for ETC designation. Unfortunately, however, the conditions placed on ALLTEL by the Decision No. 67403 exceed the conditions considered by the FCC in the Virginia Cellular and subsequent orders or that ALLTEL has accepted in other states. Accordingly, as detailed in its Exceptions to the Recommended Opinion and Order that were filed August 24, 2004, ALLTEL has determined that the compliance obligations set forth in the above Decision would significantly impede ALLTEL's ability to compete effectively in the Arizona wireless marketplace. The burdens created by the specific conditions required by the Decision clearly outweigh the benefits that ALLTEL and its Arizona customers would receive through federal universal service support for ALLTEL's Arizona operations. As a result, ALLTEL must regretfully decline ETC designation in the state of Arizona.

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ALLTEL appreciates the Commission's consideration of this matter.

Very truly yours,



Michael W. Patten  
Counsel for ALLTEL Communications, Inc.

MWP:mi

cc: Teena Wolfe, Administrative Law Judge, Hearing Division  
Brian Bozzo, Utilities Division, Compliance

Original and 13 copies  
filed with Docket Control  
this 15<sup>th</sup> day of December,  
2004.