

ORIGINAL
OPEN MEETING



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MEMORANDUM
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Arizona Corporation Commission

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AZ CORP COMMISSION
DOCKET CONTROL

TO: THE COMMISSION

FROM: Utilities Division

DATE: September 27, 2011

DOCKETED BY

RE: COX ARIZONA TELCOM, L.L.C. APPLICATION FOR APPROVAL OF A DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER PURSUANT TO SECTION 214(E)(2) OF THE COMMUNICATIONS ACT OF 1934 (DOCKET NO. T-03471A-11-0168)

I. Procedural History

On April 20, 2011, Cox Arizona Telcom, LLC ("Cox") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to sections 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 and 54.207. In its Application, Cox requests that the Arizona Corporation Commission ("ACC" or "Commission") designate it as an ETC in certain wire centers served by Qwest Corporation ("Qwest"), a non-rural incumbent local exchange carrier ("ILEC") and the Lake Pleasant rate center served by Accipiter Communications, Inc. dba Zona Communications ("Accipiter"), a rural ILEC, for the purpose of receiving federal Universal Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline¹ and Link Up² support). Cox is not requesting high cost support.

On August 10, 2011, Cox filed an updated rate center list to delete the Lake Pleasant 928 Rate Center served by Accipiter from Exhibit 1 in its original application. Therefore, Cox is requesting ETC designation in rate centers served by Qwest only.

No parties intervened in this docket. A hearing has not been requested in this matter.

II. Background

Cox is authorized to do business in Arizona and was granted a Certificate of Convenience and Necessity ("CC&N") to provide local exchange and long distance toll services throughout

¹ Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. These discounts can be up to \$10.00 per month, depending on the residence's state.

² Federal Link Up Assistance pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional, wireline telephone or activation fee for a wireless telephone for a primary residence. It also allows participants to pay any remaining amount owed on a deferred schedule, interest-free.

Arizona pursuant to Decision No. 60285, granted July 2, 1997.³ Cox provides local exchange service, long distance toll service, internet and cable television services and serves approximately 2.4 million customers in 16 states⁴, including Arizona.

Cox is seeking ETC designation in its current coverage area within the Qwest rate centers specific in Revised Exhibit 1. Exhibit 2 of the application is a map showing Cox's current service coverage area in Arizona overlaid on the specific ILEC rate centers. Cox has offered Lifeline and Link Up discounts since its initial tariff was approved in 1998 but has never received federal support for these discounts. Designation as an ETC will enable Cox to apply for and receive support from the FUSF.

III. Requirements for Designation as an ETC

Designation as an ETC makes a carrier eligible to receive federal universal service funds. The requirements for designation of ETCs are specified by 47 U.S.C. § 214(e)(1). It states that:

“A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with section 254 and shall throughout the service area for which the designation is received: (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the corresponding charges using media of general distribution.”

The Telecommunications Act of 1996 (“1996 Act”) defines “service area” as a geographic area established by a State commission for the purpose of determining universal service obligation and support mechanisms. In the case of an area served by a rural ILEC, “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.⁵

47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to receive Federal universal service fund support. The services include:

- (1) Voice grade access to the Public Switched Network. “Voice grade access to the Public Switched Network” 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 receive voice communications,

³ Cox Arizona Telcom, Inc. was issued a CC&N in Decision No. 60285. The CC&N was subsequently transferred to Cox Arizona Telcom, LLC in Decision No. 61569, March 15, 1999.

⁴ Arkansas, California, Connecticut, Florida, Georgia, Iowa, Idaho, Kansas, Louisiana, Nebraska, Nevada, Ohio, Oklahoma, Rhode Island and Virginia.

⁵ 47 U.S.C. § 214(e)(5).

including receiving a signal indicating there is an incoming call. For purposes of this Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;

- (2) Local usage. "Local usage" means minutes of use for local exchange service, prescribed by the Federal Communications Commission, provided free of charge to end users;
- (3) Dual tone Multi-Frequency or its Functional Equivalent. "Dual tone multi-frequency" ("DTMF") is a method of signaling that facilitates the transportation of signaling throughout the network, shortening call set-up time;
- (4) Single-party service or its functional equivalent. "Single-party service" is a 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 user's particular transmission;
- (5) 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 Safety 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 identification ("ALI"), 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;
- (6) 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;
- (7) Access to interexchange service. "Access to interexchange service" is defined as the 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;
- (8) 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; and

- (9) Toll Limitation for Qualifying Low-Income Consumers. "Toll limitation denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, 'toll limitation' denotes toll blocking and toll control."⁶

In order to be designated as an ETC, a carrier must offer Lifeline and Link Up service to all qualifying low-income customers within its service area.⁷ Lifeline service provides basic telephone service, typically by passing on discounts to monthly telecommunications charges. Link Up service provides financial assistance to help cover the installation charges for telecommunication service.

Further, 47 U.S.C. § 214 (e)(2) states that "Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission."

IV. Cox's Compliance with the Requirements for ETC Designation

A. Offering the Services Designated for Support

Cox states it is a common carrier as that term is defined in 47 U.S.C. § 153(10) and it currently offers the services that are supported by Federal universal service support mechanisms designated for support under Section 254(c) of the 1996 Act and that are eligible for universal service support as described in U.S.C. § 51.101(a) as follows:

1. Voice grade access to the public switched network;
2. Local usage;
3. Dual tone, multi-frequency signaling or its functional equivalent;
4. Single party service or its functional;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income customers.

In its application, Cox states it will offer all of the supported services using primarily its own facilities and some leased transport lines. Therefore, Staff recommends that the Commission find that Cox meets this requirement for ETC designation.

⁶ 47 C.F.R. § 54.400(d)

⁷ 47 C.F.R. §§ 54.405 and 54.411(a)

B. Advertising of Supported Services

47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. To comply with this requirement, Cox states it will advertise within the vicinity of its service area the availability of supported services and the corresponding charges using media of general distribution. Cox states it will publicize the availability of Lifeline and Link Up service in a manner designed to reach those likely to qualify for the service. Cox plans to utilize marketing and outreach efforts which may take the form of door tags, mail inserts, in-store signage at all of Cox's retail locations, newspaper and billboard ads, television commercials and information on Cox's website. Advertising will be specifically targeted to those who qualify for such services and be provided in both English and Spanish. In addition, Cox agrees to comply with all forms and content requirements, if any, promulgated by the FCC or the ACC in the future that is required of all ETCs. Cox provided examples of its Lifeline and Link Up advertisements in other jurisdictions directly to Staff for review.

Based on the information above and Cox's advertising materials provided to Staff, Staff concludes that Cox will advertise the availability of its supported services and the corresponding charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). Staff believes that Cox meets this ETC designation criteria.

C. ETC Requirements in 47 C.F.R. § 54.202(a)(1)-(5)

In addition to the requirements listed above, on March 17, 2005, the FCC issued a Report and Order⁸ that established additional minimum criteria that all ETC applicants must satisfy in order to be granted ETC status by the FCC. These requirements were added to the FCC's rules under 47 C.F.R. § 54.202(a)(1)-(5). In this Report and Order, the FCC determined that an ETC applicant must comply with the following requirements in its application⁹:

C.1 A Commitment and Ability to Provide Supported Services

In 47 C.F.R. § 54.202(a)(1), the FCC outlines "the requirement that an ETC applicant must demonstrate its commitment and ability to provide the supported services throughout the designated service area by providing services to all requesting customers within its designated service area and by submitting a formal network improvement plan that demonstrates how universal service funds will be used to improve coverage, signal strength, or capacity that would not otherwise occur absent the receipt of high-cost support".¹⁰

Cox states it provides service to residential customers within its service area within typical industry time frames, and usually can serve new customers as soon as the telephone

⁸ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) ("ETC Minimum Requirements Report and Order" or "Report and Order").

⁹ *Ibid.*, ¶ 20.

¹⁰ *Ibid.*, ¶ 21.

number can be ported from the customer's previous carrier or the next business day for customers not porting a number from another carrier. Cox states it stands ready to provide service on a timely basis to customers passed by Cox's facilities and to provide service within a reasonable time to customers who are not passed by its facilities if the service can be provided at a reasonable cost within its service area. Because Cox seeks only low-income support, and does not intend to apply for or receive high-cost support, it did not submit a network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii).

Based on the above information, Staff believes that Cox meets this ETC designation criteria.

C.2 Remain Functional in Emergency Situations

In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant demonstrate its ability to remain functional in emergency situations. Specifically, "an applicant must demonstrate 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."¹¹

To demonstrate its ability to remain functional in emergency situations, Cox states it included backup power in its network design to ensure that customers retain service even when commercial power is unavailable. In addition, Cox uses facility route diversity and other techniques to limit the likelihood that damage to its facilities will not interrupt service to its customers. Cox's Internet Protocol ("IP")-based service includes battery backup in the customer equipment in accordance with industry standards and relevant regulatory requirements, including a program for replacement for backup batteries to ensure that customers do not experience unexpected loss of service. These features allow Cox to maintain service during substantial power outages within its service area. Cox also follows industry standard procedures for addressing traffic spikes or congestion in its network by monitoring telephone traffic on an ongoing basis.

Based on the above information, Staff concludes that Cox has demonstrated its ability to remain functional in emergency situations by maintaining a reasonable amount of back-up power. Staff believes that Cox meets this ETC designation criteria.

C.3 Satisfy Consumer Protection and Service Quality Standards

In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application...¹² The sufficiency of other commitments will be considered on a case-by-case basis.

¹¹ *Ibid.*, ¶ 25.

¹² *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005), ¶ 28.

To demonstrate its commitment to meeting consumer protection, Cox states since it was first authorized to provide telecommunications services in Arizona, it has been and will continue to be committed to meeting all applicable customer service requirements and that it will comply with all applicable state and federal consumer protection standards. In addition, Cox states it will continue to comply with all mandated consumer protection requirements, including federal and state Customer Proprietary Network Information (“CPNI”) protection requirements, federal truth-in-billing rules, advertising requirements and state-specific requirements governing customer notices, late fees, disputes and other consumer issues.

To demonstrate its commitment to high service quality standards, Cox states it will continue to provide service on a timely basis to requesting customers within its service area where Cox’s network passes the potential customer’s premises. As a certified CLEC in Arizona, Cox will continue to abide by applicable rules and regulations of this Commission, including the quality of service standards the Commission approved in Docket No. T-01051B-93-0183. Cox states it is committed to meeting all applicable quality of service standard requirements and will comply with all applicable state and federal service quality standards.

Based on the above information, Staff believes that Cox meets this ETC designation criteria.

C.4 Offer Local Usage Plan Comparable to Incumbent LECs

In 47 C.F.R. § 54.202(a)(4), the FCC requires an ETC applicant to “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.”¹³ However, the FCC did not adopt a specific local usage threshold for petitioning applicants.

To demonstrate its provisions local usage comparable to that offered by the incumbent Local Exchange Carriers (“ILECs”) Cox states it offers three different plans in Arizona that include local telephone usage and a local calling area at least as large as those offered by the relevant ILECs. The most basic plan provides basic local telephone service and includes unlimited local calling. Cox also offers packages that include additional features, such as call waiting and voice mail, and a bundle with calling features and an unlimited number of domestic long distance minutes. All of these packages include unlimited local calling.

Based on the above information, Staff believes that Cox meets this ETC designation criteria.

C.5 Certify Requirement to Provide Equal Access

In 47 C.F.R. § 54.202(a)(5), the FCC, having determined it would not impose a general equal access requirements on ETC applications, directed ETC applicants to certify that it

¹³ *Ibid*, ¶ 32.

acknowledges that the FCC may require it "to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area."¹⁴ Further, the FCC determined it would decide whether to impose any equal access requirements on a case-by-case basis.

Cox acknowledges that it could be required to provide equal access to long distance carriers and certified that it would comply with any equal access requirements imposed on it if no other ETC is providing equal access in the service area covered by this petition. As such, Cox states it currently provides equal access to its local exchange telephone customers in Arizona as required by A.A.C. R14-2-1111 and an equal access requirement would not require any changes to Cox's current operating procedures. As such, Staff believes that Cox meets this ETC designation criteria.

C.6 Expanded Eligibility Criteria, Dispute Resolution, Certification, Verification, Recordkeeping and Outreach

In addition to adding the above criteria applying to ETC applicants, the FCC also adopted expanded eligibility criteria for Lifeline and Link Up, dispute resolution procedure, certification procedures, verification procedures and recordkeeping procedures and outreach for ETCs. The Commission adopted these additional criteria on June 21, 2005, in Decision No. 67941.

In its application, Cox states it is prepared to satisfy the requirements in the FCC's Lifeline order and will comply with the Lifeline certification and verification requirements as set forth in 47 C.F.R. § 54.410. Further, Cox certifies that it will comply with all the requirements for expanded eligibility criteria, certification, verification and recordkeeping requirements set forth in Decision No. 67941.

D. Public Interest Determination

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity for rural areas. They also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act. Congress did not establish specific criteria to be applied under the public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.¹⁵ Accordingly, before designating a carrier as an ETC, the Commission must make an affirmative determination that such designation is in the

¹⁴ *Ibid*, para 37.

¹⁵ In the Matter of Federal-State Joint Board on Universal Services, CC Docket No. 96-45, Order FCC 05-46 (¶40), Adopted: February 25, 2005, Released: March 17, 2005.

public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.

Cox states it is in the public interest for the Commission to grant Cox's request for designation as an eligible telecommunications carrier as designation will lead to increased consumer choice of carriers for low income users, subscribership, and availability of basic telephone and installation services to qualifying low income consumers. Cox states it will pass through to its Lifeline and Link-Up eligible customers all discounts and waivers required by the FCC's rules. Designating Cox as an ETC for the purpose of receiving federal low-income support will have minimal impact on the federal universal service fund as Lifeline customers switching from another provider as low-income funds for these customers will simply move from the previous provider to Cox. Any increase to the FUSF would be due to increased consumer participation. Finally, Cox states there are no public interest risks in granting ETC status to Cox. Cox is a well established local telephone company in Arizona, with a proven track record of quality service (as recipient of the J.D. Powers award for telephone for the last eight years), so there is significant benefit and virtually no potential harm to consumers from designating Cox as an ETC.

E. Designated Service Area

The Commission must establish a geographic area for the purpose of determining universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b).

Cox was granted a Certificate of Convenience and Necessity to provide competitive local exchange, and intrastate interexchange wireline telecommunications in Arizona on July 2, 1997, in Decision No. 60285. Cox requests that the Commission designate it as an ETC for the service area consisting of each of the rate centers served by Qwest Communications, Inc. as listed in Attachment 1.

F. Staff Recommendation

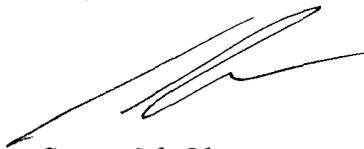
Staff recommends that Cox's Application for designation as an ETC be approved subject to the following conditions:

1. Cox shall submit its advertising plan and materials for Lifeline and Link Up services to Staff for review within thirty (30) days of the effective date of this decision.
2. Cox shall notify the Commission of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;

3. In the event that Cox requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
4. Cox shall submit an annual report by April 15th of each year, beginning April 15, 2012, that contains its total number of Lifeline subscribers, total amount of Federal USF support received and an affidavit stating that the Lifeline and the Link Up discounts or the equivalent are equal to the amount of total Federal USF support per line. The annual filing shall be submitted as a compliance item in this docket;
5. In the event there is a future change of Cox's ownership, the new owners shall be required to file a petition with the Commission and make a showing of public interest to maintain Cox's ETC designation. This will ensure that only carriers that are financially viable, likely to remain in the market, willing and able to provide the supported services throughout the designated service area, and able to provide consumers an evolving level of universal service are designated as ETCs; and
6. Should Cox expand its Lifeline and Link Up service beyond the designated service area specified in this application, Cox is required to seek ETC designation from the Commission to serve the additional area.

V. Conclusion

47 U.S.C. § 214(e)(2) provides in part that a "State commission shall, upon its own motion or upon request, designate a common carrier that meets the requirements of paragraph (1)¹⁶ as an eligible telecommunications carrier for a service area designated by the State commission." Staff recommends that the Commission grant Cox's Application for Designation as an Eligible Telecommunications Carrier under U.S.C. §214(e)(2) subject to the conditions discussed above.



Steven M. Olea
Director
Utilities Division

SMO:LLM:sms\MAS

ORIGINATOR: Lori Morrison

¹⁶ 47 U.S.C. § 214(e)(1).

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BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE
Chairman
BOB STUMP
Commissioner
SANDRA D. KENNEDY
Commissioner
PAUL NEWMAN
Commissioner
BRENDA BURNS
Commissioner

IN THE MATTER OF THE APPLICATION
OF COX ARIZONA TELCOM, L.L.C. FOR
APPROVAL OF A DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER PURSUANT TO SECTION
214(E)(2) OF THE COMMUNICATIONS
ACT OF 1934

DOCKET NO. T-03471A-11-0168
DECISION NO. _____
ORDER

Open Meeting
October 11 and 12, 2011
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On April 20, 2011, Cox Arizona Telcom, LLC ("Cox") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to sections 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 and 54.207. In its Application, Cox requests that the Arizona Corporation Commission ("ACC" or "Commission") designate it as an ETC in certain wire centers served by Qwest Corporation ("Qwest"), a non-rural incumbent local exchange carrier ("ILEC") and the Lake Pleasant rate center served by Accipiter Communications, Inc. dba Zona Communications ("Accipiter"), a rural ILEC, for the purpose of receiving federal Universal Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline¹ and Link Up² support). Cox is not requesting high cost support.

¹ Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. These discounts can be up to \$10.00 per month, depending on the residence's state.

1 2. On August 10, 2011, Cox filed an updated rate center list to delete the Lake
2 Pleasant 928 Rate Center, served by Accipiter, from Exhibit 1 in its original application.
3 Therefore, Cox is requesting ETC designation in rate centers served by Qwest only.

4 3. No parties intervened in this docket. A hearing has not been requested in this
5 matter.

6 **Background**

7 4. Cox is authorized to do business in Arizona and was granted a Certificate of
8 Convenience and Necessity ("CC&N") to provide local exchange and long distance toll services
9 throughout Arizona pursuant to Decision No. 60285, granted July 2, 1997.³ Cox provides local
10 exchange service, long distance toll service, internet and cable television services and serves
11 approximately 2.4 million customers in 16 states⁴, including Arizona.

12 5. Cox is seeking ETC designation in its current coverage area within the Qwest rate
13 centers specific in Revised Exhibit 1. Exhibit 2 of the application is a map showing Cox's current
14 service coverage area in Arizona overlaid on the specific ILEC rate centers. Cox has offered
15 Lifeline and Link Up discounts since its initial tariff was approved in 1998 but has never received
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18 **Requirements for Designation as an ETC**

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24 are supported by Federal universal service support mechanisms under section 254(c), either using

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any remaining amount owed on a deferred schedule, interest-free.

27 ³ Cox Arizona Telcom, Inc. was issued a CC&N in Decision No. 60285. The CC&N was subsequently transferred to
Cox Arizona Telcom, LLC in Decision No. 61569, March 15, 1999.

28 ⁴ Arkansas, California, Connecticut, Florida, Georgia, Iowa, Idaho, Kansas, Louisiana, Nebraska, Nevada, Ohio,
Oklahoma, Rhode Island and Virginia.

1 its own facilities or a combination of its own facilities and resale of another carrier's services
2 (including the services offered by another eligible telecommunications carrier); and (B) advertise
3 the availability of such services and the corresponding charges using media of general
4 distribution."

5 7. The Telecommunications Act of 1996 ("1996 Act") defines "service area" as a
6 geographic area established by a State commission for the purpose of determining universal
7 service obligation and support mechanisms. In the case of an area served by a rural ILEC, "service
8 area" means such company's "study area" unless and until the Commission and the States, after
9 taking into account recommendations of a Federal-State Joint Board instituted under section
10 410(c), establish a different definition of service area for such company.⁵

11 8. 47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to
12 receive Federal universal service fund support. The services include:

- 13 a) Voice grade access to the Public Switched Network. "Voice grade access to the Public
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16 network that the caller wishes to place a call, and receive voice communications,
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Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
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users;
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22 telecommunications service that permits users to have exclusive use of a wireline
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service, a dedicated message path for the length of a user's particular transmission;
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user, by dialing the three-digit code "911", to call emergency services through a Public

28 ⁵ 47 U.S.C. § 214(e)(5).

1 Safety Access Point ("PSAP") operated by the local government. "Enhanced 911" is
 2 defined as 911 service that includes the ability to provide automatic numbering
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 4 and automatic location identification ("ALI"), which permits emergency service
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23 9. In order to be designated as an ETC, a carrier must offer Lifeline and Link Up
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...

...

⁶ 47 C.F.R. § 54.400(d)

⁷ 47 C.F.R. §§ 54.405 and 54.411(a)

1 one common carrier as an eligible telecommunications carrier for a service area designated by the
2 State commission.”

3 **Cox's Compliance with the Requirements for ETC Designation- Offering the Services**
4 **Designated for Support**

5 11. Cox states it is a common carrier as that term is defined in 47 U.S.C. § 153(10) and
6 it currently offers the services that are supported by Federal universal service support mechanisms
7 designated for support under Section 254(c) of the 1996 Act and that are eligible for universal
8 service support as described in U.S.C. § 51.101(a) as follows:

- 9 (a) Voice grade access to the public switched network.
10 (b) Local usage.
11 (c) Dual tone, multi-frequency signaling or its functional equivalent.
12 (d) Single party service or its functional equivalent.
13 (e) Access to emergency services.
14 (f) Access to operator services.
15 (g) Access to interexchange service.
16 (h) Access to directory service.
17 (i) Toll limitation for qualifying low-income consumers.

18 12. In its application, Cox states it will offer all of the supported services using
19 primarily its own facilities and some leased transport lines. Therefore, Staff recommends that the
20 Commission find that Cox meets this requirement for ETC designation.

21 **Cox's Compliance with Requirements - Advertising of Supported Services**

22 13. 47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible
23 telecommunications carrier to advertise the availability of such services and the corresponding
24 charges using media of general distribution. To comply with this requirement, Cox states it will
25 advertise within the vicinity of its service area the availability of supported services and the
26 corresponding charges using media of general distribution. Cox states it will publicize the
27 availability of Lifeline and Link Up service in a manner designed to reach those likely to qualify
28 for the service. Cox plans to utilize marketing and outreach efforts which may take the form of
door tags, mail inserts, in-store signage at all of Cox's retail locations, newspaper and billboard
ads, television commercials and information on Cox's website. Advertising will be specifically
targeted to those who qualify for such services and be provided in both English and Spanish. In

1 addition, Cox agrees to comply with all forms and content requirements, if any, promulgated by
2 the FCC or the ACC in the future that is required of all ETCs. Cox provided examples of it
3 Lifeline and Link Up advertisements in other jurisdictions directly to Staff for review.

4 14. Based on the information above and Cox's advertising materials provided to Staff,
5 Staff concludes that Cox will advertise the availability of its supported services and the
6 corresponding charges using media of general distribution as required by 47 U.S.C. §
7 214(e)(1)(B). Staff believes that Cox meets this ETC designation criteria.

8 **Cox's Compliance with Requirements - ETC Requirements in 47 C.F.R. § 54.202(a)(1)-(5)**

9 15. In addition to the requirements listed above, on March 17, 2005, the FCC issued a
10 Report and Order⁸ that established additional minimum criteria that all ETC applicants must
11 satisfy in order to be granted ETC status by the FCC. These requirements were added to the
12 FCC's rules under 47 C.F.R. § 54.202(a)(1)-(5). In this Report and Order, the FCC determined
13 that an ETC applicant must comply with the following requirements in its application⁹:

14 **A Commitment and Ability to Provide Supported Services**

15 16. In 47 C.F.R. § 54.202(a)(1), the FCC outlines "the requirement that an ETC
16 applicant must demonstrate its commitment and ability to provide the supported services
17 throughout the designated service area by providing services to all requesting customers within its
18 designated service area and by submitting a formal network improvement plan that demonstrates
19 how universal service funds will be used to improve coverage, signal strength, or capacity that
20 would not otherwise occur absent the receipt of high-cost support".¹⁰

21 17. Cox states it provides service to residential customers within its service area within
22 typical industry time frames, and usually can serve new customers as soon as the telephone
23 number can be ported from the customer's previous carrier or the next business day for customers
24 not porting a number from another carrier. Cox states it stands ready to provide service on a
25 timely basis to customers passed by Cox's facilities and to provide service within a reasonable

26 _____
27 ⁸ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March
17, 2005) ("ETC Minimum Requirements Report and Order" or "Report and Order").

28 ⁹ *Ibid.*, ¶ 20.

¹⁰ *Ibid.*, ¶ 21.

1 time to customers who are not passed by its facilities if the service can be provided at a reasonable
2 cost within its service area. Because Cox seeks only low-income support, and does not intend to
3 apply for or receive high-cost support, it did not submit a network improvement plan under 47
4 C.F.R. § 54.202(a)(1)(ii).

5 18. Based on the above information, Staff believes that Cox meets this ETC designation
6 criteria.

7 **Remain Functional in Emergency Situations**

8 19. In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC
9 applicant demonstrate its ability to remain functional in emergency situations. Specifically, “an
10 applicant must demonstrate that it has a reasonable amount of back-up power to ensure
11 functionality without an external power source, is able to reroute traffic around damaged facilities,
12 and is capable of managing traffic spikes resulting from emergency situations.”¹¹

13 20. To demonstrate its ability to remain functional in emergency situations, Cox states
14 it included backup power in its network design to ensure that customers retain service even when
15 commercial power is unavailable. In addition, Cox uses facility route diversity and other
16 techniques to limit the likelihood that damage to its facilities will not interrupt service to its
17 customers. Cox’s Internet Protocol (“IP”)-based service includes battery backup in the customer
18 equipment in accordance with industry standards and relevant regulatory requirements, including a
19 program for replacement for backup batteries to ensure that customers do not experience
20 unexpected loss of service. These features allow Cox to maintain service during substantial power
21 outages within its service area. Cox also follows industry standard procedures for addressing
22 traffic spikes or congestion in its network by monitoring telephone traffic on an ongoing basis.

23 21. Based on the above information, Staff concludes that Cox has demonstrated its
24 ability to remain functional in emergency situations by maintaining a reasonable amount of back-
25 up power. Staff believes that Cox meets this ETC designation criteria.

26 ...

27
28 ¹¹ *Ibid.*, ¶ 25.

Satisfy Consumer Protection and Service Quality Standards

22. In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application...¹²

The sufficiency of other commitments will be considered on a case-by-case basis.

23. To demonstrate its commitment to meeting consumer protection, Cox states since it was first authorized to provide telecommunications services in Arizona, it has been and will continue to be committed to meeting all applicable customer service requirements and that it will comply with all applicable state and federal consumer protection standards. In addition, Cox states it will continue to comply with all mandated consumer protection requirements, including federal and state Customer Proprietary Network Information (“CPNI”) protection requirements, federal truth-in-billing rules, advertising requirements and state-specific requirements governing customer notices, late fees, disputes and other consumer issues.

24. To demonstrate its commitment to high service quality standards, Cox states it will continue to provide service on a timely basis to requesting customers within its service area where Cox’s network passes the potential customer’s premises. As a certified CLEC in Arizona, Cox will continue to abide by applicable rules and regulations of this Commission, including the quality of service standards the Commission approved in Docket No. T-01051B-93-0183. Cox states it is committed to meeting all applicable quality of service standard requirements and will comply with all applicable state and federal service quality standards.

25. Based on the above information, Staff believes that Cox meets this ETC designation criteria.

Offer Local Usage Plan Comparable to Incumbent LECs

26. In 47 C.F.R. § 54.202(a)(4), the FCC requires an ETC applicant to “demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service

...

...

¹² *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005), ¶ 28.

1 areas for which it seeks designation.”¹³ However, the FCC did not adopt a specific local usage
2 threshold for petitioning applicants.

3 27. To demonstrate it provisions local usage comparable to that offered by the
4 incumbent Local Exchange Carriers (“ILECs”) Cox states it offers three different plans in Arizona
5 that include local telephone usage and a local calling area at least as large as those offered by the
6 relevant ILECs. The most basic plan provides basic local telephone service and includes unlimited
7 local calling. Cox also offers packages that include additional features, such as call waiting and
8 voice mail, and a bundle with calling features and an unlimited number of domestic long distance
9 minutes. All of these packages include unlimited local calling.

10 28. Based on the above information, Staff believes that Cox meets this ETC designation
11 criteria.

12 **Certify Requirement to Provide Equal Access**

13 29. In 47 C.F.R. § 54.202(a)(5), the FCC, having determined it would not impose a
14 general equal access requirements on ETC applications, directed ETC applicants to certify that it
15 acknowledges that the FCC may require it “to provide equal access to long distance carriers in the
16 event that no other eligible telecommunications carrier is providing equal access within the service
17 area.”¹⁴ Further, the FCC determined it would decide whether to impose any equal access
18 requirements on a case-by-case basis.

19 30. Cox acknowledges that it could be required to provide equal access to long distance
20 carriers and certified that it would comply with any equal access requirements imposed on it if no
21 other ETC is providing equal access in the service area covered by this petition. As such, Cox
22 states it currently provides equal access to its local exchange telephone customers in Arizona as
23 required by A.A.C. R14-2-1111 and an equal access requirement would not require any changes to
24 Cox’s current operating procedures. As such, Staff believes that Cox meets this ETC designation
25 criteria.

26 ...

27 _____
28 ¹³ *Ibid*, ¶ 32.

¹⁴ *Ibid*, para 37.

1 **Expanded Eligibility Criteria, Dispute Resolution, Certification, Verification,**
2 **Recordkeeping and Outreach**

3 31. In addition to adding the above criteria applying to ETC applicants, the FCC also
4 adopted expanded eligibility criteria for Lifeline and Link Up, dispute resolution procedure,
5 certification procedures, verification procedures and recordkeeping procedures and outreach for
6 ETCs. The Commission adopted these additional criteria on June 21, 2005, in Decision No.
7 67941.

8 32. In its application, Cox states it is prepared to satisfy the requirements in the FCC's
9 Lifeline order and will comply with the Lifeline certification and verification requirements as set
10 forth in 47 C.F.R. § 54.410. Further, Cox certifies that it will comply with all the requirements for
11 expanded eligibility criteria, certification, verification and recordkeeping requirements set forth in
12 Decision No. 67941.

13 **Public Interest Determination**

14 33. Under Section 214 of the Act, the FCC and state commissions must determine that
15 an ETC designation is consistent with the public interest, convenience and necessity for rural
16 areas. They also must consider whether an ETC designation serves the public interest consistent
17 with Section 254 of the Act. Congress did not establish specific criteria to be applied under the
18 public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC
19 designation must be analyzed in a manner that is consistent with the purposes of the Act itself,
20 including the fundamental goals of preserving and advancing universal service; ensuring the
21 availability of quality telecommunications services at just, reasonable, and affordable rates; and
22 promoting the deployment of advanced telecommunications and information services to all regions
23 of the nation, including rural and high-cost areas.¹⁵ Accordingly, before designating a carrier as an
24 ETC, the Commission must make an affirmative determination that such designation is in the
25 public interest, regardless of whether the applicant seeks designation in an area served by a rural or
26 non-rural carrier.

27 _____
28 ¹⁵ In the Matter of Federal-State Joint Board on Universal Services, CC Docket No. 96-45, Order FCC 05-46 (¶40),
Adopted: February 25, 2005, Released: March 17, 2005.

1 34. Cox states it is in the public interest for the Commission to grant Cox's request for
2 designation as an eligible telecommunications carrier as designation will lead to increased
3 consumer choice of carriers for low income users, subscribership, and availability of basic
4 telephone and installation services to qualifying low income consumers. Cox states it will pass
5 through to its Lifeline and Link-Up eligible customers all discounts and waivers required by the
6 FCC's rules. Designating Cox as an ETC for the purpose of receiving federal low-income support
7 will have minimal impact on the federal universal service fund as Lifeline customers switching
8 from another provider as low-income funds for these customers will simply move from the
9 previous provider to Cox. Any increase to the FUSF would be due to increased consumer
10 participation. Finally, Cox states there are no public interest risks in granting ETC status to Cox.
11 Cox is a well established local telephone company in Arizona, with a proven track record of
12 quality service (as recipient of the J.D. Powers award for telephone for the last eight years), so
13 there is significant benefit and virtually no potential harm to consumers from designating Cox as
14 an ETC.

15 **Designated Service Area**

16 35. The Commission must establish a geographic area for the purpose of determining
17 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §
18 214(e)(2); 47 C.F.R. § 54.201(b).

19 36. Cox was granted a Certificate of Convenience and Necessity to provide competitive
20 local exchange, and intrastate interexchange wireline telecommunications in Arizona on July 2,
21 1997, in Decision No. 60285. Cox requests that the Commission designate it as an ETC for the
22 service area consisting of each of the rate centers served by Qwest Communications, Inc. as listed
23 in Attachment 1.

24 **Staff Recommendation**

25 37. Staff has recommended that Cox's Application for designation as an ETC be
26 approved subject to the following conditions:

- 27 (a) Cox shall submit its advertising plan and materials for Lifeline and Link Up services to
28 Staff for review within thirty (30) days of the effective date of this decision;

- 1 (b) Cox shall notify the Commission of any future changes to its rates, terms and/or
2 conditions regarding its Lifeline offerings and file such changes in its tariff and amend
3 its tariff in compliance with A.R.S. § 40-367;
- 4 (c) In the event that Cox requests to relinquish its ETC status and no longer provide
5 Lifeline services, it must provide notice to both the Commission and its customers.
6 Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
- 7 (d) Cox shall submit an annual report by April 15th of each year, beginning April 15, 2012,
8 that contains its total number of Lifeline subscribers, total amount of Federal USF
9 support received and an affidavit stating that the Lifeline and the Link Up discounts or
10 the equivalent are equal to the amount of total Federal USF support per line. The
11 annual filing shall be submitted as a compliance item in this docket;
- 12 (e) In the event there is a future change of Cox's ownership, the new owners shall be
13 required to file a petition with the Commission and make a showing of public interest
14 to maintain Cox's ETC designation. This will ensure that only carriers that are
15 financially viable, likely to remain in the market, willing and able to provide the
16 supported services throughout the designated service area, and able to provide
17 consumers an evolving level of universal service are designated as ETCs; and
- 18 (f) Should Cox expand its Lifeline and Link Up service beyond the designated service area
19 specified in this application, Cox is required to seek ETC designation from the
20 Commission to serve the additional area.

21 Conclusion

22 38. 47 U.S.C. § 214(e)(2) provides in part that a "State commission shall, upon its own
23 motion or upon request, designate a common carrier that meets the requirements of paragraph (1)¹⁶
24 as an eligible telecommunications carrier for a service area designated by the State commission."
25 Staff has recommended that the Commission grant Cox's Application for Designation as an
26 Eligible Telecommunications Carrier under U.S.C. §214(e)(2) subject to the conditions discussed
27 above.

28 CONCLUSIONS OF LAW

1. Cox is a public service corporation as defined in Article XV Section 2 of the
Arizona Constitution. Cox Arizona Telcom, LLC is a telecommunications corporation as defined
in A.R.S. § 40-201. Cox was granted a Certificate of Convenience and Necessity to provide
...

¹⁶ 47 U.S.C. § 214(e)(1).

1 competitive local exchange, and intrastate interexchange wireline telecommunications in Arizona
2 on July 2, 1997, in Decision No. 60285.

3 2. The Commission has jurisdiction over the subject matter of the application.

4 3. Cox meets the requirements for ETC designation under U.S.C. § 214(e)(1) subject
5 to Cox's compliance with the conditions set forth in Finding of Fact No. 37 herein.

6 4. It is in the public interest to designate Cox as an ETC in the non-rural requested
7 service area, subject to Cox's compliance with the conditions set forth in Finding of Fact No. 37
8 herein.

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ORDER

IT IS THEREFORE ORDERED that the application of Cox Arizona Telcom, LLC for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support in Arizona, for the service area set forth in Attachment 1 attached hereto and incorporated herein by reference, be and hereby is approved, subject to Cox Arizona Telcom, LLC's compliance with the conditions set forth in Finding of Fact No. 37 above.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, ERNEST G. JOHNSON, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2011.

ERNEST G. JOHNSON
EXECUTIVE DIRECTOR

DISSENT: _____

DISSENT: _____

SMO:LLM:sms\MS

1 SERVICE LIST FOR: Cox Arizona Telcom, LLC
2 DOCKET NO. T-03471A-11-0168

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ATTACHMENT 1

COX ETC SERVICE AREA RATE CENTERS
DOCKET NO. T-03471A-11-0168

CLLI Code	Rate Center	Serving ILEC	Rural/Non-Rural
AGFIAZSR	AGUA FRIA	Qwest/CenturyLink	Non-Rural
AGULAZXC	AGUILA	Qwest/CenturyLink	Non-Rural
BNSNAZMA	BENSON	Qwest/CenturyLink	Non-Rural
BNSNAZSD	BENSON	Qwest/CenturyLink	Non-Rural
BRDSAZMA	AGUA FRIA	Qwest/CenturyLink	Non-Rural
CHNDAZMA	CHANDLER	Qwest/CenturyLink	Non-Rural
CHNDAZSO	CHANDLER	Qwest/CenturyLink	Non-Rural
CHNDAZWE	TEMPE	Qwest/CenturyLink	Non-Rural
CLDGAZMA	COOLIDGE	Qwest/CenturyLink	Non-Rural
CSGRAZMA	CASAGRANDE	Qwest/CenturyLink	Non-Rural
CVCKAZMA	CVCRKCRFRE	Qwest/CenturyLink	Non-Rural
DGLSAZMA	DOUGLAS	Qwest/CenturyLink	Non-Rural
DRVYAZNO	GLENDALE	Qwest/CenturyLink	Non-Rural
FLRNAZMA	FLORENCE	Qwest/CenturyLink	Non-Rural
FTMDAZMA	FT MCDOWEL	Qwest/CenturyLink	Non-Rural
FTMDAZNO	FT MCDOWEL	Qwest/CenturyLink	Non-Rural
GDYRAZCW	LITCHFLDPK	Qwest/CenturyLink	Non-Rural
GLBTAZXX	GILBERT	Qwest/CenturyLink	Non-Rural
GLDLAZMA	GLENDALE	Qwest/CenturyLink	Non-Rural
GNVYAZMA	GREEN VLY	Qwest/CenturyLink	Non-Rural
HGLYAZMA	HIGLEY	Qwest/CenturyLink	Non-Rural
HGLYAZQC	HIGLEY	Qwest/CenturyLink	Non-Rural
LTPKAZMA	LITCHFLDPK	Qwest/CenturyLink	Non-Rural
MESAAZGI	MESA	Qwest/CenturyLink	Non-Rural
MESAAZMA	MESA	Qwest/CenturyLink	Non-Rural
NWRVAZMA	NEW RIVER	Qwest/CenturyLink	Non-Rural
PHNXAZ81	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZBW	GLENDALE	Qwest/CenturyLink	Non-Rural
PHNXAZCA	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZEA	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZGR	GLENDALE	Qwest/CenturyLink	Non-Rural
PHNXAZLV	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZMA	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZMR	AGUA FRIA	Qwest/CenturyLink	Non-Rural
PHNXAZMY	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZNE	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZNO	NO PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZNW	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZPP	CHANDLER	Qwest/CenturyLink	Non-Rural
PHNXAZPR	PEORIA	Qwest/CenturyLink	Non-Rural
PHNXAZSE	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZSO	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZSY	PHOENIX	Qwest/CenturyLink	Non-Rural
PHNXAZWE	PHOENIX	Qwest/CenturyLink	Non-Rural
PRVYAZPP	PARADISVLY	Qwest/CenturyLink	Non-Rural
SCDLAZMA	SCOTTSDALE	Qwest/CenturyLink	Non-Rural
SCDLAZSH	SCOTTSDALE	Qwest/CenturyLink	Non-Rural
SCDLAZTH	SCOTTSDALE	Qwest/CenturyLink	Non-Rural
SPRSAZEA	SPSTNAPJCT	Qwest/CenturyLink	Non-Rural
SPRSAZMA	SPSTNAPJCT	Qwest/CenturyLink	Non-Rural
SPRSAZWE	MESA	Qwest/CenturyLink	Non-Rural
SRVSAZMA	SIERRAVSTA	Qwest/CenturyLink	Non-Rural
SRVSAZNO	SIERRAVSTA	Qwest/CenturyLink	Non-Rural
SRVSAZSO	SIERRAVSTA	Qwest/CenturyLink	Non-Rural
TCSNAZCA	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZCR	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZEA	TUCSON	Qwest/CenturyLink	Non-Rural

ATTACHMENT 1

CLLI Code	Rate Center	Serving ILEC	Rural/Non-Rural
TCSNAZFW	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZMA	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZRN	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZSE	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZSO	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZSW	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZTV	TUCSON	Qwest/CenturyLink	Non-Rural
TCSNAZWE	TUCSON	Qwest/CenturyLink	Non-Rural
TEMPAZMA	TEMPE	Qwest/CenturyLink	Non-Rural
TEMPAZMC	TEMPE	Qwest/CenturyLink	Non-Rural
TLSNAZMA	LITCHFLDPK	Qwest/CenturyLink	Non-Rural
TMSAZMA	TOMBSTONE	Qwest/CenturyLink	Non-Rural
VAILAZNO	VAIL	Qwest/CenturyLink	Non-Rural
VAILAZSO	VAIL	Qwest/CenturyLink	Non-Rural
WHTKAZMA	LITCHFLDPK	Qwest/CenturyLink	Non-Rural
WNBGAZ01	BUCKEYE	Qwest/CenturyLink	Non-Rural