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BEFORE THE ARIZONA CORPORATION CO.

COMMISSIONERS

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

Arizona Corporation Commission

DOCKETED

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IN THE MATTER OF THE APPLICATION OF
CRICKET COMMUNICATIONS, INC. FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE
STATE OF ARIZONA.

DOCKET NO. T-20721A-10-0019

DECISION NO. 72665

ORDER

Open Meeting
November 8 and 9, 2011
Phoenix, Arizona

BY THE COMMISSION:

* * * * *

Having considered the entire record herein and being fully advised in the premises, the
Arizona Corporation Commission ("Commission") finds, concludes, and orders that:

FINDINGS OF FACT

I. Procedural History

- 1. On January 20, 2010, Cricket Communications, Inc. ("Cricket" or "Company") filed with the Commission an application for designation as an eligible telecommunications carrier ("ETC") to provide Lifeline and Link-Up services to low income households in Arizona.
2. On December 9, 2010, by Procedural Order, a Status Conference was set to be held on January 24, 2011.
3. On January 24, 2011, the Status Conference was held as scheduled. Cricket and the Commission's Utilities Division ("Staff") appeared through counsel. Staff stated that the application was in the review process and that Staff anticipated filing a Staff Report in the near future.
4. On February 24, 2011, Cricket filed a revised Exhibit B to its application.
5. On April 7, 2011, Staff filed a Staff Report recommending approval of Cricket's

1 application with conditions.

2 6. On June 14, 2011, by Procedural Order, a hearing on the proceeding was scheduled to
3 commence August 22, 2011, and other procedural deadlines were established.

4 7. On June 24, 2011, Cricket filed an Affidavit of Publication, showing notice of the
5 application and hearing date had been published in the *Arizona Republic*, a newspaper of general
6 circulation in Arizona, on June 20, 2011.

7 8. On June 29, 2011, Cricket filed a Notice of Filing showing that a copy of the June 14,
8 2011, Procedural Order had been mailed to all Arizona rural incumbent local exchange carriers and to
9 the tribal communities located within Cricket's requested ETC designation area. The filing also
10 included a revised Exhibit B to its application.

11 9. On July 8, 2011, Cricket docketed an updated Wire Center List for its proposed
12 designation area and which stated Cricket does not intend to provide Lifeline and Link Up services
13 on Tribal Lands in Arizona.

14 10. On July 12, 2011, the Arizona Local Exchange Carriers Association ("ALECA") filed
15 a Motion to Intervene in this matter ("Motion"). The Motion stated that ALECA is comprised of
16 small telephone companies and member-owned cooperatives, all of which provide discounted
17 Lifeline telephone service to customers in rural areas of Arizona; each ALECA member receives
18 support from the Federal Universal Service Fund ("FUSF") in the form of High Cost Support; and
19 that each ALECA member also provides discounted Lifeline telephone service and receives
20 compensation for the discounts from the FUSF. In its Motion, ALECA expressed concern that
21 Cricket's offering may unfairly duplicate the offerings of ALECA member companies, cause demand
22 on the FUSF to grow to the point where ALECA member companies' FUSF compensation is
23 endangered, and undermine public support for the Federal Communications Commission's ("FCC")
24 universal service programs.

25 11. On July 19, 2011, Staff filed a revised Exhibit B to its Staff Report to reflect the
26 removal of Tribe owned carrier wire centers from the list of wire centers contained in Cricket's
27 proposed ETC coverage area.

28 12. On August 1, 2011, by Procedural Order, ALECA's Motion to Intervene was granted.

1 The pre-hearing conference scheduled for August 16, 2011, was vacated and rescheduled to be held
2 on August 22, 2011.

3 13. On August 12, 2011, Staff, Cricket, and Intervenor ALECA initiated a telephonic
4 procedural conference with the Commission's Hearing Division. The parties and Staff requested that
5 the evidentiary hearing scheduled for August 22, 2011, be vacated because all issues had been
6 resolved. However, because notice of the hearing had been published it was agreed that the hearing
7 would proceed for the purpose of taking public comment only.

8 14. On August 22, 2011, the public comment hearing convened before a duly authorized
9 Administrative Law Judge ("ALJ") of the Commission. Staff and the parties appeared through
10 counsel. No members of the public were present to give public comments on the application. At the
11 conclusion of the hearing, the matter was taken under advisement pending submission of a
12 Recommended Opinion and Order to the Commission.

13 15. On October 19, 2011, Cricket filed a Notice of Filing, waiving the 10-day period to
14 file exceptions.

15 **II. Background**

16 16. Cricket is a Delaware corporation, authorized to transact business in Arizona.¹

17 17. Cricket currently provides digital wireless services in Arizona, offering customers
18 unlimited calling at flat rates without requiring a fixed term contract or a credit check.²

19 18. Cricket is a telecommunications corporation as defined in A.R.S. § 40-0201.

20 19. Cricket is a Commercial Mobile Radio Service ("CMRS") provider as defined in 47
21 C.F.R. 20.3³ and the Company provides telecommunications services as defined in 47 U.S.C. §
22 157(45).

23 20. Cricket is authorized to do business in Arizona, and throughout the requested ETC
24 area, pursuant to a CMRS license granted by the FCC.⁴

26 ¹ Application at 1.

27 ² Application at 1.

28 ³ Commercial Mobile Radio Service is defined as a "mobile service that is: (a)(1) provided for profit, i.e., with the intent of receiving compensation of monetary gain; (2) an Interconnected service; and (3) available to the public, or to such classes of eligible users as to be effectively available to a substantial portion of the public."

⁴ Application at 2.

1 21. Cricket currently serves approximately 4.6 million customers (directly and through its
2 affiliates) in 34 states, and the District of Columbia.⁵

3 22. On January 20, 2010, Cricket filed with the Commission an application for
4 designation as an ETC to provide Lifeline and Link-Up support to qualified households in Arizona.
5 Cricket's application also seeks designation in its current coverage area in Arizona, which includes
6 the following counties: Maricopa, Pinal, Pima and Santa Cruz.⁶

7 23. Notice of the application was given in accordance with the law.

8 24. Through the Lifeline program, qualified customers can receive a free wireless handset
9 and, under the Link-Up program, customers can receive financial assistance to cover the cost of
10 installation charges to begin service.

11 25. ALECA is comprised of small telephone companies and member-owned cooperatives
12 providing local exchange telecommunication services to customers in rural, high cost areas of
13 Arizona and are considered "rural telephone companies" under the Telecommunications Act of 1996
14 ("1996 Act").⁷

15 26. ALECA states its members are Fort Mojave Telephone Company; Frontier
16 Communications Corporation; Gila River Telecommunications, Inc.; Hopi Telecommunications, Inc.;
17 Midvale Telephone Exchange, Inc.; San Carlos Apache Telecommunications Utility, Inc.; South
18 Central Communications; Table Top Telephone Company, Inc.; TDS; Tohono O'odham Utility
19 Authority; Valley Telephone Cooperative; and Zona Communications.⁸

20 27. ALECA stated that each of its members, including its Tribally-owned members,
21 receives support from the FUSF in the form of High Cost Support.⁹ ALECA was concerned that
22 Cricket's proposed Lifeline services in Arizona will be duplicative of the services already provided
23 by its member companies and may cause the FUSF to grow to a point where its members'
24 compensation under the fund is endangered, and public support for the universal service programs
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26 _____
⁵ Application at 1.

27 ⁶ Id.

⁷ Motion to Intervene at 1.

28 ⁸ Id.

⁹ Id. at 2.

1 may be undermined.¹⁰

2 28. On August 12, 2011, ALECA and Cricket entered into a Stipulation Agreement
3 (“Stipulation”) (attached hereto and incorporated herein as Exhibit A) whereby Cricket agreed to
4 remove carrier wire centers from the list of wire centers for which it seeks ETC designation; Cricket
5 will not provide Lifeline or Link-Up service to eligible residents residing on Federally Recognized
6 Tribal Lands in Arizona; and Cricket’s Lifeline enrollment application will require an applicant to
7 provide a street address and self-certify under penalty of perjury that the applicant does not reside on
8 Federally Recognized Tribal Lands.¹¹ Based on the Stipulation, ALECA stated it does not oppose
9 Cricket’s application and that a hearing was not necessary to address ALECA’s concerns.¹²

10 **III. Requirements for Designation as an ETC**

11 **A. Telecommunications Act and FCC Rules**

12 29. Pursuant to 47 U.S.C. § 214(e)(1) of the 1996 Act, in order to qualify for designation
13 as an ETC, a common carrier must meet the following requirements:

14 “A common carrier designated as an eligible telecommunications carrier
15 under paragraph (2) or (3) shall be eligible to receive universal service
16 support in accordance with Section 254 and shall throughout the service area
17 for which the designation is received – (A) offer the services that are
18 supported by Federal universal service support mechanisms under Section
19 254(c), either using its own facilities or a combination of its own facilities
20 and resale of another carrier’s services (including the services offered by
21 another eligible telecommunications carrier); and (B) advertise the
22 availability of such services and the corresponding charges using media of
23 general distribution.”

20 30. Cricket states it will provide its proposed services using its own facilities or a
21 combination of its own facilities and the resale of another carrier’s service.¹³

22 31. Cricket states it will primarily use its own network infrastructure, which includes the
23 same antennae, cell sites, towers, trucking, mobile switching and interconnection facilities used to
24 serve its existing customers to provide its supported services.¹⁴

26 ¹⁰ Id.

27 ¹¹ Stipulation at 1.

27 ¹² Stipulation at 2.

28 ¹³ Application at 3.

28 ¹⁴ Id.

1 **B. Staff Recommendations**

2 32. In addition to the conditions set forth by the FCC, Staff recommends approval of
3 Cricket's application for designation as an ETC subject to the following conditions:

- 4 a. Cricket shall file a tariff with the Commission, setting forth the rates, terms and
5 conditions for its Lifeline service within 30 days of a Commission Order in
6 this matter;
- 7 b. Cricket shall notify the Commission of any future changes to its rates, terms
8 and/or conditions regarding its Lifeline offerings and file such changes in its
9 tariff and amend its tariff in compliance with A.R.S. § 40-367;
- 10 c. Cricket shall make available Lifeline services to qualifying low-income
11 applicants in its ETC service area no later than 90 days after a Commission
12 decision and concurrently notify the Utilities Division Director, by making a
13 filing in Docket Control, of the commencement date for such services;
- 14 d. Cricket shall apprise the Commission of any customer complaints that may
15 arise from its ETC service offerings by making a filing in Docket Control;
- 16 e. Cricket shall provide a regulatory contact to the Commission through Docket
17 Control;
- 18 f. In the event that Cricket requests to relinquish its ETC status and no longer
19 provide Lifeline services, it must provide notice to both the Commission and
20 its customers. Such notice(s) shall be in accordance with A.A.C. R11-2-1107;
- 21 g. Cricket shall submit an annual report by April 15th of each year, beginning
22 April 15, 2012, that contains its total number of Lifeline subscribers, total
23 amount of Federal USF support received and an affidavit stating that the
24 Lifeline discounts or the equivalent are equal to the amount of total Federal
25 USF support per line. The annual filing shall be submitted as a compliance
26 item in this docket; and
- 27 h. Cricket shall submit a quarterly report detailing the total number of Lifeline
28 customers, the total number of customers removed from the customer base due
to 60-day inactivity, the number of customers removed from the customer base
due to annual verification, and the total number of customers who voluntarily
relinquished Lifeline service. The quarterly report should be submitted as a
compliance item in this docket on the 15th of the month following the end of a
quarter, beginning October, 2011.

22 **IV. Cricket's Compliance with the Requirements for ETC Designation**

23 **A. Services Designated for Support**

24 33. Cricket states in its application that it currently offers the services supported by the
25 federal universal service support mechanisms under 47 U.S.C. § 51.101(A) as follows:

- 26 a. Voice Grade Access to the Public Switched Network ("PSTN"): "Voice grade
27 access" is defined as a functionality that enables a user of telecommunications
28 services to transmit voice communications, including signaling the network
that the caller wishes to place a call, and to receive voice communications,
including receiving a signal indicating there is an incoming call. The

bandwidth for voice grade access should be at a minimum, 300 to 3,000 Hertz;

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- b. Local Usage: “Local usage” means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users;
 - c. Dual Tone, Multi-Frequency Signaling or Its Functional Equivalent (“DTMF”): – Cricket states it currently uses out-of-band digital signaling and in-band multi-frequency signaling that is the functional equivalent to DTMF signaling;
 - d. 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;
 - e. Access to Emergency Services: “Access to emergency services” includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code “911,” to call emergency services through a Public Service Access Point (“PSAP”) operated by the local government. “Enhanced 911” is defined as 911 service that includes the ability to provide *automatic numbering information* (“ANI”), which enables the PSAP to call back if the call is disconnected, and *automatic location information* (“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;
 - f. 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;
 - g. 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;
 - h. 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,
 - i. Toll Limitation for Qualifying Low-Income Customers: “Toll limitation denotes either toll blocking or toll control for ETCs that are incapable of providing both services. For ETCs that are capable of providing both services “toll limitation” denotes toll blocking and toll control.

26 34. Cricket states Lifeline customers will receive voice grade access through its
27 interconnection agreements with local exchange carriers in Arizona and customers will be able to
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1 receive and make calls on the PSTN with a minimum bandwidth of 300 to 3,000 Hertz.¹⁵

2 35. Cricket asserts that its current local usage plans are comparable to other incumbent
3 local exchange carriers (“ILEC”) operating in its proposed designation area and that Cricket’s service
4 plans offer consumers benefits that include: larger local calling areas; the availability of mobile
5 service; unlimited local and long-distance calling options; caller ID; unlimited domestic text and
6 picture messaging; unlimited text messaging to Mexico; extended coverage (at no extra charge) to
7 4,600 domestic cities and towns; and call waiting, three-way calling, and voicemail.¹⁶

8 36. Cricket states it currently uses out-of-band and in-band multi-frequency signaling that
9 is the functional equivalent to DTMF signaling.¹⁷

10 37. Cricket asserts it meets the “Single Party Service” criteria with respect to each of its
11 service offerings.

12 38. Cricket states it currently provides voice customers with access to emergency services
13 via its existing network and provides ANI, ALI, and E911 services.¹⁸ Cricket states it will continue
14 to work with local PSAPs within its proposed ETC designation area to make 911 and E911 available
15 to all customers.¹⁹

16 39. Cricket asserts it provides access to operator services with respect to billing questions
17 when customers dial “611” and call completion when customers dial “411.”²⁰

18 40. Cricket states it provides access to interexchange service by allowing customers to
19 make and receive interexchange (long distance) or toll calls through Cricket’s network.²¹

20 41. Based on the above information, Staff recommends that the Commission find that
21 Cricket meets the services designated for support criteria for designation as an ETC.

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24 **B. Advertising of Supported Services**

25 ¹⁵ Application at 4.

26 ¹⁶ Application at 4.

27 ¹⁷ Id. at 5.

28 ¹⁸ Id.

¹⁹ Id.

²⁰ Id.

²¹ Id. at 6.

1 42. Pursuant to 47 U.S.C. § 214(e)(1)(B), Cricket states that it will advertise the
2 availability of its supported services and the corresponding rates and charges using media of general
3 distribution.²² Cricket states that it plans to utilize marketing and outreach efforts, such as print and
4 broadcast advertising, in media outlets most likely to reach consumers eligible for Lifeline services.²³
5 This includes some combination of media channels, radio, newspaper, magazines, national
6 publications, and other print advertisements, outdoor advertising, direct marketing, and the internet.²⁴

7 43. Cricket states that it also intends to work with state agencies that administer qualifying
8 assistance programs and with social services agencies to ensure that they are aware Cricket is a
9 Lifeline provider.²⁵

10 44. Cricket states all advertisements will be in both English and Spanish.

11 45. Cricket submitted examples of prior relevant advertisements for Staff's review. Based
12 on the information provided, Staff concludes that Cricket will advertise the availability of its
13 supported services and corresponding charges using media of general distribution and therefore meets
14 this ETC designation criteria.

15 **C. Additional ETC Requirements Pursuant to 47 C.F.R. § 54.2025(A)(1)-(5)**

16 46. Pursuant to 47 C.F.R. § 54.202(a)(1), an "ETC applicant must demonstrate its
17 commitment and ability to provide the supported services throughout the designated service area by
18 providing services to all requesting customers within its designated service area and by submitting a
19 formal network improvement plan that demonstrates how universal service funds will be used to
20 improve coverage, signal strength, or capacity that would not otherwise occur absent the receipt of
21 high cost support."²⁶

22 47. Cricket states that it will provide Lifeline/Link-Up service to qualifying customers
23 requesting these services in Qwest Corporation, Gila River Telecommunications, Inc., Accipiter
24 Communications, Inc., Midvale Telephone Exchange, Inc., and Saddleback Communications

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26 ²² Application at 6..

27 ²³ Id.

28 ²⁴ Id.

²⁵ Id. at 7.

²⁶ *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*").

1 territories throughout the licensed area in Arizona pursuant to the universal service program and in
2 accordance with 47 C.F.R. § 54.202(a)(1).²⁷

3 48. Cricket states it will provide service to requesting qualifying customers in the
4 designated areas on a timely basis or within a reasonable period of time in accordance with the rule
5 using its standard customer equipment (handsets/wireless devices).²⁸ However, Cricket states if it
6 finds that a potential customer is outside of Cricket's proposed designated service area, Cricket will
7 use the six-step process specified in the FCC Rules to determine customer eligibility.²⁹

8 49. Cricket's application seeks only low-income support, as opposed to high cost funds, to
9 support the construction of network facilities, and therefore, under FCC rules, Cricket was not
10 required to submit a network improvement plan.³⁰

11 50. Based on the information provided by Cricket, Staff believes that Cricket meets this
12 ETC designation criteria.

13 51. In accordance with 47 C.F.R. § 54.202(a)(2), an applicant for ETC designation must
14 demonstrate that "it has a reasonable amount of back-up power to ensure functionality without an
15 external power source, is able to reroute traffic around damaged facilities, and is capable of managing
16 traffic spikes resulting from emergency situations."

17 52. Cricket states that it has the ability to maintain functionality in an emergency situation
18 because all of its mobile switching centers and cell sites have battery backup power, each switching
19 center has a dedicated diesel generator, and there are several cell site generators in the market area.³¹

20 53. Based the information provided by Cricket, Staff concluded that Cricket has
21 demonstrated its ability to remain functional in emergency situations by maintaining a reasonable
22 amount of back-up power and therefore Staff believes Cricket meets this ETC designation criteria.

23 54. Cricket states it will comply with the Cellular Telecommunications and Internet
24 Association's ("CTIA") Consumer Code for Wireless Service to meet the ETC criteria that all ETC
25 applicants must demonstrate "a commitment to meeting consumer protection and service quality

26 ²⁷ Application at 7.

27 ²⁸ Application at 7.

27 ²⁹ 47 C.F.R. § 54.202(a)(1)(i).

28 ³⁰ Application at 8.

28 ³¹ Id.

1 standards,” pursuant to 47 C.F.R. § 54.202(a)(3).³² Cricket states it has adopted the CTIA Code
 2 throughout its service area to satisfy consumer protection and quality service standards. Cricket also
 3 states it will use its best efforts to resolve complaints received by the Commission and Cricket
 4 provided the Commission with a designated contact person to work with Staff to resolve any
 5 complaints and/or compliance matters.³³

6 55. Staff believes that Cricket meets the consumer protection and service quality standard
 7 criteria as set forth in 47 C.F.R. § 54.202(a)(3).

8 56. Pursuant to 47 C.F.R. § 54.202(a)(4), an ETC applicant must “demonstrate that it
 9 offers a local usage plan comparable to the one offered by the incumbent local exchange carrier
 10 (“LEC”) in the service areas for which it seeks designation.”³⁴

11 57. Cricket states that its current local usage plans are comparable in value to those
 12 offered by ILECs operating in the requested ETC service area.³⁵ Cricket further states that
 13 consumers will receive numerous benefits (see Finding of Fact No. 35) through its service
 14 offerings.³⁶

15 58. Based on the information provided by Cricket, and recognizing that the FCC has not
 16 set a local usage threshold, Staff believes that Cricket meets this ETC designation criteria for
 17 minimum local usage.³⁷

18 59. Cricket acknowledges that the FCC may require an ETC, pursuant to 47 C.F.R. §
 19 54.202(a)(5) “to provide equal access to long distance carriers in the event that no other eligible
 20 telecommunications carrier is providing equal access within the service area.”³⁸ The FCC has
 21 determined that it will decide whether to impose any equal access requirements on a case-by-case
 22 basis.

23 60. Staff believes that Cricket meets this ETC designation criteria.
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25 ³² Application at 8.

26 ³³ Application at 8.

27 ³⁴ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17,
 2005), para 32.

28 ³⁵ Application at 9

³⁶ Id.

³⁷ Staff Report at 8.

³⁸ Application at 9.

1 **D. ETC Requirements Pursuant to 47 C.F.R. §§ 54.410 and 54.416**

2 61. FCC Rules require ETC providers to comply with certification of eligibility and
3 verification of continued eligibility for Lifeline and Link-Up participation, dispute resolution and
4 recordkeeping procedures, and outreach for ETCs.

5 62. Cricket certified that it will comply with the FCC's expanded eligibility criteria,
6 certification, verification, and recordkeeping requirements pursuant to Section 54.410, which were
7 adopted in Commission Decision No. 67941 (June 21, 2005).³⁹

8 **IV. Analysis**

9 63. Cricket asserts that approval of its request for designation as an ETC in Arizona is in
10 the public interest.⁴⁰ Cricket states its designation as an ETC will further the public interest because:
11 Cricket has specifically tailored its wireless service plans to share the benefits of wireless service
12 with underserved customers; Cricket offers unlimited voice service for as low as \$30 per month and
13 unlimited broadband starting at \$35 per month; and Cricket's plans do not require credit checks, long
14 term commitments, or early termination fees.⁴¹

15 64. Cricket states as an ETC it will service a distinct market. Cricket distinguishes its
16 services from other wireless providers in that 80 percent of Cricket's customers have an annual
17 household income less than \$50,000 (other carriers 48 percent), and 55 percent have an annual
18 household income of less than \$30,000; 90 percent of Cricket's customers use their phones as their
19 primary phone (compared to the industry average of 50 percent); and 68 percent of Cricket's
20 customers do not have a traditional land line (15 percent industry average).⁴² Cricket believes its
21 market is distinct and is currently underserved by other wireless carriers.⁴³

22 65. Staff recommends that the Commission grant Cricket's application for designation as
23 an ETC in Arizona.

24 66. Cricket will serve a distinct market in Arizona. Cricket's plans provide affordable
25 alternatives to wireless consumers, without the barriers to service like credit checks, long term

26 ³⁹ Application at 9.

27 ⁴⁰ Application at 9.

28 ⁴¹ Id.

⁴² Id. at 10

⁴³ Id.

1 commitments, or early termination fees. Therefore, we find that approval of Cricket's designation as
2 an ETC is in the public interest. Further, we adopt the Stipulation Agreement entered into by Cricket
3 and ALECA and will require Cricket to abide by the terms set forth in the agreement. We also
4 determine that Cricket's designated service area shall encompass the areas it currently serves as
5 illustrated in Exhibit B, attached hereto and incorporated herein.

6 67. Staff's recommendations, as set forth herein, are reasonable and should be adopted.

7 CONCLUSIONS OF LAW

8 1. Cricket is a telecommunications corporation as defined in A.R.S. § 40-201(26), and is
9 a "telecommunications carrier" as defined in 47 U.S.C. § 153(44). Cricket is a Commercial Mobile
10 Radio Service provider, as defined in 47 U.S.C. 153 (27) and A.A.C. R14-2-1201.

11 2. The Commission has jurisdiction over the subject matter of this Application.

12 3. Under 47 U.S.C. § 214(e)(1), a common carrier that is designated as an Eligible
13 Telecommunications Carrier must, throughout its service area, offer the services that are supported by
14 Federal universal service support mechanisms either using its own facilities or a combination of its
15 own facilities and resale of another carrier's services. The carrier must also advertise the availability
16 of such services and the rates for the services using media of general distribution.

17 4. Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area for
18 the purpose of determining universal service obligations and support mechanisms. Cricket's
19 application, as amended, applies to its current service area throughout the counties of Maricopa,
20 Pinal, Pima, and Santa Cruz.

21 5. Under C.F.R. § 54.405 and 47 C.F.R. § 54-411, as part of its obligations as an Eligible
22 Telecommunications Carrier, the carrier is required to make available Lifeline and Link-Up services
23 to qualifying low-income customers.

24 6. Cricket meets the requirements contained in 47 U.S.C. § 214 and C.F.R. § 54.201 *et*
25 *seq.* to be designated as an Eligible Telecommunications Carrier.

26 7. Staff's findings and recommendations, which are set forth herein, are reasonable and
27 should be adopted.

28 ORDER

1 IT IS THEREFORE ORDERED that the application of Cricket Communications, Inc., for
2 designation as an Eligible Telecommunications Carrier under 47 U.S.C. § 214(e)(2) is hereby
3 granted, conditioned upon compliance with the following Ordering Paragraphs.

4 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall file a tariff with the
5 Commission, setting forth the rates, terms and conditions for its Lifeline service within thirty (30)
6 days of the effective date of this Decision.

7 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall notify the Commission
8 of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file
9 such changes in its tariff and amend its tariff in compliance with A.R.S. §40-367.

10 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall comply with all
11 Federal Communications Commission Rules and Staff's conditions as set forth in Finding of Fact No
12 32.

13 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall make available
14 Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90)
15 days after the effective date of this Decision and shall concurrently notify the Commission's Utilities
16 Division Director of the commencement date for such services, by making a compliance filing in this
17 docket with Docket Control.

18 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall make a filing
19 indicating a regulatory contact for the Company within thirty (30) days of the effective date of this
20 Decision or prior to serving its first Lifeline customer, whichever comes first.

21 IT IS FURTHER ORDERED that in the event that Cricket Communications, Inc., desires to
22 relinquish its Eligible Telecommunications Carrier status and no longer desires to provide Lifeline
23 services, it shall provide notice to both the Commission and its customers in accordance with A.A.C.
24 R14-2-1107.

25 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall file with Docket
26 Control, as a compliance item in this docket, an annual report by April 15th of each year, beginning
27 April 15, 2012, that contains the total number of Lifeline subscribers, total amount of Federal
28 Universal Service Fund support received and an affidavit certifying that the Lifeline discounts or the

1 equivalent are equal to the amount of total Federal Universal Service Fund support per line.

2 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall file with Docket
3 Control, as a compliance item in this docket, a quarterly report detailing the total number of Lifeline
4 customers, the total number of customers removed from the customer base due to 60-day inactivity,
5 the number of customers removed from the customer base due to annual verification and the total
6 number of customers who voluntarily relinquished Lifeline service. The quarterly report shall be filed
7 on the 15th of the month following the end of each calendar quarter, with the first filing due by
8 January 15, 2012.

9 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall file with Docket
10 Control, as a compliance item in this docket, as part of its quarterly report a discussion of the number
11 of customer complaints that have been filed with the Company arising from its ETC service offerings
12 in Arizona.

13 IT IS FURTHER ORDERED that Cricket Communications, Inc.'s designated service area as
14 an Eligible Telecommunications Carrier shall include the wire centers attached hereto and
15 incorporated herein as Exhibit B.

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1 IT IS FURTHER ORDERED that Cricket Communications, Inc., shall abide by the
2 Stipulation Agreement with the Arizona Local Exchange Carriers Association, attached hereto as
3 Exhibit A, and incorporated herein.

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

5 BY ORDER OF THE ARIZONA CORPORATION COMMISSION.

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CHAIRMAN

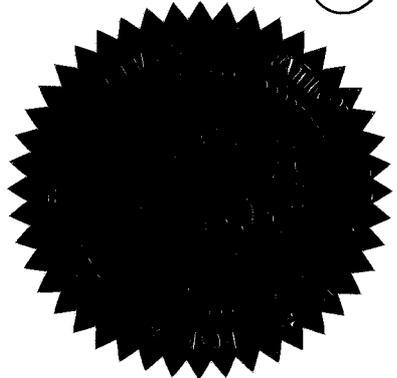

COMMISSIONER

9 **EXCUSED**
COMM. NEWMAN

10 
COMMISSIONER

COMMISSIONER


COMMISSIONER



11 IN WITNESS WHEREOF, I, ERNEST G. JOHNSON,
12 Executive Director of the Arizona Corporation Commission,
13 have hereunto set my hand and caused the official seal of the
14 Commission to be affixed at the Capitol, in the City of Phoenix,
15 this 17th day of November, 2011.

16 
ERNEST G. JOHNSON
17 EXECUTIVE DIRECTOR

18 DISSENT _____

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20 DISSENT _____

21 YBK:db

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1 SERVICE LIST FOR: CRICKET COMMUNICATIONS, INC.

2 DOCKET NO.: T-20721A-10-0019

3 Michael W. Patten
4 ROSHKA, DeWULF & PATTEN, PLC
5 One Arizona Center
6 400 East Van Buren, Suite 800
7 Phoenix, AZ 85004
8 Attorneys for Cricket Communications, Inc.

9 Craig Marks
10 CRAIG A. MARKS, PLC
11 10645 North Tatum Boulevard, Suite 200-676
12 Phoenix, AZ 85028
13 Attorney for ALECA

14 Janice Alward, Chief Counsel
15 Legal Division
16 ARIZONA CORPORATION COMMISSION
17 1200 West Washington Street
18 Phoenix, AZ 85007

19 Steven M. Olea, Director
20 Utilities Division
21 ARIZONA CORPORATION COMMISSION
22 1200 West Washington Street
23 Phoenix, AZ 85007

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EXHIBIT A

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

GARY PIERCE- CHAIRMAN
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS
ARIZONA CORPORATION COMMISSION
HEARING DIVISION

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2011 AUG 12 P 3:52

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. T-20721A-10-0019
CRICKET COMMUNICATIONS, INC. FOR)	
DESIGNATION AS AN ELIGIBLE)	
TELECOMMUNICATIONS CARRIER IN THE)	
STATE OF ARIZONA.)	STIPULATION BETWEEN
)	ALECA AND CRICKET
)	COMMUNICATIONS, INC.

Cricket Communications, Inc. ("Cricket") and the Arizona Local Exchange Carriers Association ("ALECA") submit the following stipulation concerning Cricket's Application in this docket.

1. ALECA has intervened in this docket in order to address potential concerns about the Application.

2. To address ALECA's concerns, Cricket agrees as follows:

a. As set forth in its July 8, 2011, filing in this docket, Cricket has removed carrier wire centers from the list of wire centers for which it seeks ETC designation

b. Cricket will not provide Lifeline or LinkUp service to eligible residents residing on Federally-Recognized Tribal Lands in Arizona.

c. Cricket's Lifeline enrollment application for Arizona will:

(i) Require an applicant to provide a street address, and

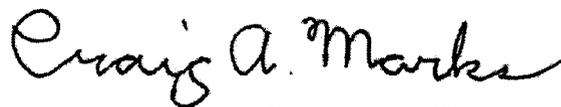
(ii) Include a provision that requires an applicant to self-certify under penalty of perjury that it does not reside on Federally-Recognized Tribal Lands.

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3. Given the stipulation and the revised wire center list for the ETC designation area filed on July 8, 2011, ALECA does not oppose Cricket's Application in this docket and does not believe a hearing is necessary to address ALECA's concerns.

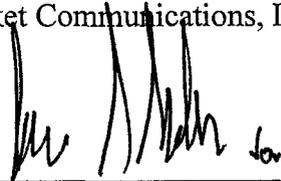
RESPECTFULLY SUBMITTED this 12th day of August 2011.

Arizona Local Exchange Carriers Association



By _____
Craig Marks
Craig A. Marks, PLC
10645 North Tatum Blvd, Suite 200-676
Phoenix, Arizona 85028

Cricket Communications, Inc.



By _____
Michael W. Patten
Roshka DeWulf & Patten, PLC
One Arizona Center
400 East Van Buren Street
Phoenix, Arizona 85004

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 Original and 13 copies of the foregoing
filed this 12th day of August 2011 with:

2 Docket Control
3 Arizona Corporation Commission
1200 West Washington Street
4 Phoenix, Arizona 85007

5 Copy of the foregoing hand-delivered/mailed
this 12th day of August 2011 to:

6 Yvette Kinsey, Esq.
7 Administrative Law Judge
Hearing Division
8 Arizona Corporation Commission
1200 West Washington
9 Phoenix, Arizona 85007

10 Maureen A. Scott, Esq.
Legal Division
11 Arizona Corporation Commission
1200 West Washington
12 Phoenix, Arizona 85007

13 Steve Olea
Director, Utilities Division
14 Arizona Corporation Commission
1200 West Washington
15 Phoenix, Arizona 85007

16 Blessing Chukwu
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23 By Mary Spolito

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FACSIMILE 602-256-6800

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AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 335 PHNXAZNW	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 336 PHNXAZNW	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 338 PHNXAZGR	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 340 PHNXAZMA	D54	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 342 PRVYAZPP	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PARADISVLY
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 345 TEMPZAMC	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 347 PHNXAZNW	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 348 SCDLAZTH	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 350 TEMPZAMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 351 PHNXAZNO	D53	EOC	666 9636 QWEST CORPORATION	RBOC	NO PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 352 PHNXAZWE	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 353 PHNXAZWE	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 354 SPRSAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SPSTNAPHIC
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 355 PHNXAZNE	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 357 SPRSAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SPSTNAPHIC
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 358 HGLYAZQC	D52	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 358 SCDLAZSH	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 358 SPRSAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SPSTNAPHIC
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 362 AGFAZSR	D50	EOC	666 9636 QWEST CORPORATION	RBOC	AGUA FRIA
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 364 PHNXAZMA	D51	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 365 PHNXAZMA	D51	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 365 SCDLAZTH	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 367 SCDLAZTH	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 368 SCDLAZTH	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 371 PHNXAZSY	D50	EOC	666 9636 QWEST CORPORATION	RBOC	NO PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 372 PHNXAZMA	D51	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 373 SPRSAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SPSTNAPHIC
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 374 BLCNAZMA	RS1	EOC	666 9636 QWEST CORPORATION	RBOC	BLACKCNVON
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AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 377 TEMPZAMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 378 PHNXAZMA	D54	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
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AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 379 TEMPZAMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 380 SPRSAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SPSTNAPHIC
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AZ	Maricopa	PHOENIX	PHOENIX	AZ-PHOENIX	480 393 WNBGAZ01	RS1	EOC	666 9636 QWEST CORPORATION	RBOC	BUCKEYE
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 865 PHINXAZNW	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 866 GLDLAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	GLENDALE
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 866 PHINXAZMY	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 872 TEMPAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 877 PHINXAZBW	D50	EOC	666 9636 QWEST CORPORATION	RBOC	LITCHFLDPK
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 882 SCDLAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 883 CHNDZSO	D50	EOC	666 9636 QWEST CORPORATION	RBOC	CHANDLER
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 888 HGLVZCZC	D52	EOC	666 9636 QWEST CORPORATION	RBOC	HIGLEY
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 888 PRVYAZPP	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PARADISVLY
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 890 MESAZGI	D50	EOC	666 9636 QWEST CORPORATION	RBOC	MESA
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 892 MESAZAZI	D50	EOC	666 9636 QWEST CORPORATION	RBOC	GILBERT
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 893 CHNDZAZWE	D50	EOC	666 9636 QWEST CORPORATION	RBOC	CHANDLER
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 894 TEMPAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 895 CHNDZAZSO	D50	EOC	666 9636 QWEST CORPORATION	RBOC	CHANDLER
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 896 PHINXAZGR	D50	EOC	666 9636 QWEST CORPORATION	RBOC	NO PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 896 PHINXAZGR	D50	EOC	666 9636 QWEST CORPORATION	RBOC	NO PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 897 TEMPAZMC	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 898 MESAZAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	MESA
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 899 CHNDZAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	CHANDLER
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 906 PHINXAZSY	D50	EOC	666 9636 QWEST CORPORATION	RBOC	NO PHOENIX
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AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 914 PHINXAZEA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 915 GLDLAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	GLENDALE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 916 PHINXAZMA	D51	EOC	666 9636 QWEST CORPORATION	RBOC	NO PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 917 CHNDZAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	CHANDLER
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 921 TEMPAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 922 SCDLAZTH	D50	EOC	666 9636 QWEST CORPORATION	RBOC	SCOTTSDALE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 923 PHINXAZCA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	PHOENIX
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 924 SPRSAZWE	D50	EOC	666 9636 QWEST CORPORATION	RBOC	MESA
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 925 BCKYAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	BUCKEYE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 925 GDRVZCZC	D50	EOC	666 9636 QWEST CORPORATION	RBOC	LITCHFLDPK
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 926 MESAZAZGI	D50	EOC	666 9636 QWEST CORPORATION	RBOC	GILBERT
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 927 CHNDZAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	CHANDLER
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 927 PRVYAZPP	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE
AZ	Maricopa	PHOENIX	PHOENIX	PHOENIX	AZ-PHOENIX	480 927 TEMPAZMA	D50	EOC	666 9636 QWEST CORPORATION	RBOC	TEMPE

AZ	Pima	TUCSON	AZ-TUCSON	520	877 TCSNAZNO	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	878 TCSNAZNO	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	879 TCSNAZMA	DS1	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	879 VAILAZSO	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	VAIL
AZ	Pima	TUCSON	AZ-TUCSON	520	880 TCSNAZMA	DS1	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	881 TCSNAZEA	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	882 TCSNAZMA	DS1	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	883 TCSNAZSW	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	884 TCSNAZMA	DS1	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	885 TCSNAZRN	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	886 TCSNAZRN	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	887 TCSNAZFW	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	888 TCSNAZFW	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	889 TCSNAZSO	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	903 TCSNAZMA	DS1	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pima	TUCSON	AZ-TUCSON	520	908 TCSNAZSW	DS0	EOC	668 9636 QWEST CORPORATION	RBOC	TUCSON
AZ	Pinal	WHITLOW	AZ-WHITLOW	520	463 WHITLAZMA	DS0	EOC	666 9636 QWEST CORPORATION	RBOC	WHITLOW