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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

Arizona Corporation Commission

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

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IN THE MATTER OF THE APPLICATION OF
I-WIRELESS, LLC FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF ARIZONA FOR THE LIMITED
PURPOSE OF OFFERING LIFELINE SERVICE
TO QUALIFIED HOUSEHOLDS.

DOCKET NO. T-20538A-10-0332

DECISION NO. 72666

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 August 6, 2010, i-wireless, LLC (“i-wireless” and the “Company”) filed with the Commission an application for designation as an eligible telecommunications carrier (“ETC”) for the limited purpose of offering Lifeline Service to qualified households in Arizona.

2. On October 14, 2010, the Arizona Local Exchange Carriers Association (“ALECA”) filed a Motion to Intervene (“Motion”) in this proceeding. The Motion stated ALECA is comprised of small telephone companies and member-owned cooperatives, all of which provide local exchange telecommunication services to customers in rural, high-cost areas of Arizona. In its Motion, ALECA expressed concern that i-wireless’ offering may unfairly duplicate the similar offerings of its member companies. No objections were filed to ALECA’s Motion to Intervene.

1 3. On December 7, 2010, by Procedural Order, ALECA's Motion to Intervene was
2 granted and a procedural conference was scheduled for January 10, 2011.

3 4. On January 4, 2011, Michael W. Patten filed Notice of appearance as local counsel on
4 behalf of i-wireless.

5 5. On January 10, 2011, i-wireless filed responses to Staff's First Set of Data Requests.

6 6. On the same date, the procedural conference was held as scheduled. i-wireless,
7 ALECA, and the Commission's Utilities Division ("Staff") appeared through counsel. During the
8 procedural conference, discussions were held regarding a procedural schedule for this matter.

9 7. On February 11, 2011, by Procedural Order, i-wireless, ALECA, and Staff were
10 directed to file, by March 18, 2011, a joint status report updating the Commission on the status of the
11 application and discussing whether there had been resolution of any issues raised in this docket.
12 Further, i-wireless was directed to provide, by February 28, 2011, notice of its application and a copy
13 of the February 11, 2011, Procedural Order, to all Arizona rural incumbent local exchange carriers
14 that were not members of ALECA.

15 8. On March 8, 2011, i-wireless filed an Affidavit of Mailing.

16 9. On March 18, 2011, i-wireless, ALECA, and Staff filed a Joint Status Report
17 ("Report"). The Report stated that because i-wireless continues to request ETC designation for some
18 tribal lands, the issue should be addressed in a hearing. The Company requested that the matter be
19 bifurcated to allow the non-tribal land request for ETC designation to go forward without a hearing
20 and that a hearing be held on the ETC designation for the tribal land at a later time. Staff and
21 ALECA objected to i-wireless' recommendation that the proceeding should be bifurcated. Staff
22 requested that the matter be set for hearing.

23 10. On April 11, 2011, i-wireless filed responses to Staff's Second Set of Data Requests.

24 11. On May 9, 2011, i-wireless filed responses to Staff's Third Set of Data Requests.

25 12. On June 13, 2011, by Procedural Order, a hearing was scheduled to begin on August
26 31, 2011, i-wireless was directed to provide notice of its application and hearing date by July 15,
27 2011, and other procedural deadlines were established.

28 13. On June 24, 2011, i-wireless filed its affidavit stating the notice had been published in

1 the *Arizona Republic*, a newspaper of general circulation in Arizona.

2 14. On July 18, 2011, Staff filed a Staff Report recommending approval of i-wireless'
3 application, subject to certain conditions.

4 15. On July 26, 2011, i-wireless filed Comments on the Staff Report.

5 16. On July 28, 2011, the National Tribal Telecommunications Association ("NTTA")
6 filed a Motion to intervene. NTTA's motion stated that NTTA is comprised of 10 tribally owned
7 telecommunications companies providing telecommunication services on the reservations. The
8 motion stated that six of NTTA's members provide local exchange, including discounted Lifeline
9 services to customers in rural, high cost areas of Arizona and receive support from the Federal
10 Universal Service Fund ("FUSF"). NTTA's motion requested, among other things, intervention to
11 protect consumers residing on tribal lands.

12 17. On August 12, 2011, the parties filed a copy of an executed Stipulation Between
13 ALECA and i-wireless ("Stipulation"). In the Stipulation, i-wireless agreed not to provide Lifeline
14 and Linkup services within Arizona zip codes that are located within Federally-Recognized Tribal
15 lands and to have all applicants for Lifeline services within its designated service self-certify under
16 penalty of perjury that they do not reside within Federally-Recognized Tribal lands.

17 18. On August 18, 2011, NTTA filed a notice withdrawing its motion to intervene, stating
18 that with the Stipulation between ALECA and i-wireless, and the recent adoption of a resolution by
19 the Inter-Tribal Council of Arizona ("ITCA") requiring all telecommunications carriers to obtain
20 Tribal consent prior to serving on tribal lands, NTTA concluded that it no longer needed to intervene
21 in this proceeding.

22 19. On August 23, 2011, Staff, the Company, and Intervenor ALECA initiated a
23 telephonic procedural conference with the Commission's Hearing Division. During the telephonic
24 procedural conference, Staff and the parties stated that all issues involving the application had been
25 settled and that the evidentiary portion of the hearing could be vacated. It was determined that
26 because notice of the application and hearing date had been published, public comment would be
27 taken on the hearing date and the evidentiary portion of hearing would be vacated.

28 20. On August 24, 2011, i-wireless filed Notice of Filing Revised Zip Code List for ETC

1 Designation.

2 21. On August 31, 2011, the public comment hearing convened as scheduled before a duly
3 authorized Administrative Law Judge of the Commission. Staff and the parties appeared through
4 counsel. No members of the public were present to give public comment, and the matter was taken
5 under advisement pending submission of a Recommended Opinion and Order to the Commission.

6 **II. Background**

7 22. i-wireless is a telecommunications limited liability company, incorporated under the
8 laws of North Carolina, with its principal place of business in Newport, Kentucky.¹

9 23. On August 6, 2010, i-wireless filed with the Commission an application for
10 designation as an ETC to provide Lifeline services to qualified low-income households in Arizona.

11 24. i-wireless has been conducting business in Arizona since 2007 as a reseller of
12 commercial mobile radio service (“CMRS”) providing prepaid wireless services through Sprint
13 Nextel’s (“Sprint”) network and using Sprint’s infrastructure and wireless transmission facilities to
14 operate as a Mobile Virtual Network Operator (“MVNO”).²

15 25. i-wireless is 50 percent owned by The Kroger Company (“Kroger”) and 50 percent
16 owned by Genie Inc.³

17 26. i-wireless intends to sell its Lifeline services using its 118 Kroger store network
18 located throughout Arizona, under the brand name Access Mobile.⁴

19 27. Under the Lifeline Program, i-wireless will offer qualifying customers a 911 capable
20 free handset, the option to choose from several prepaid plans (without going through credit checks,
21 long-term service contracts, or incurring activation fees) where customers are only charged for the
22 minutes they use, and customers will receive a limited amount of free voice usage at no charge.⁵ In
23 addition, Lifeline customers will have access to a variety of other features at no cost, including voice
24 mail, caller I.D., call waiting, and E911 capabilities. Under the program, customers can also earn
25

26 _____
27 ¹ Application at 2.

² Application at 2.

³ Response to Staff’s Third Set of Data Requests at 1.

⁴ Response to Staff’s First Set of Data Requests at 10.

⁵ Id. at 16.

1 Free Minutes by shopping at select Kroger stores using their loyalty cards.⁶

2 28. i-wireless differentiates its proposed Lifeline services from other wireless ETCs and
3 prepaid competitors in that i-wireless does not charge for incoming text messages, balance inquiries,
4 or calls to i-wireless' customer service (except for customers utilizing the 250-minute option), and
5 unused minutes are carried forward from one month to the next.⁷

6 29. ALECA is comprised of small telephone companies and member-owned cooperatives
7 providing local exchange telecommunication services to customers in rural, high cost areas of
8 Arizona, and are considered "rural telephone companies" under the Telecommunications Act of 1996
9 ("1996 Act").⁸

10 30. ALECA states its members are Fort Mojave Telephone Company; Frontier
11 Communications Corporation; Gila River Telecommunications, Inc.; Hopi Telecommunications, Inc.;
12 Midvale Telephone Exchange, Inc.; San Carlos Apache Telecommunications Utility, Inc.; South
13 Central Communications; Table Top Telephone Company, Inc.; TDS; Tohono O'odham Utility
14 Authority; Valley Telephone Cooperative; and Zona Communications.⁹

15 31. ALECA stated that each of its members, including its Tribally-owned members,
16 receives support from the FUSF in the form of High Cost Support.¹⁰ ALECA is concerned that i-
17 wireless' proposed Lifeline services in Arizona will be duplicative of the services already provided
18 by its member companies and may cause the FUSF to grow to a point where its members'
19 compensation under the fund is endangered, and public support for the universal service programs
20 may be undermined.¹¹

21 32. NTTA is comprised of 10 Tribally-owned telecommunication companies providing
22 telecommunication services within their reservations.¹² NTTA states it is a rural telephone company
23 under the 1996 Act; it receives support from the FUSF in the form of High Cost Support; and it
24 provides discounted Lifeline services to customers in rural high cost areas in Arizona.¹³

25 ⁶ Response to Staff's First Set of Data Requests at 16.

26 ⁷ Id.

26 ⁸ ALECA Motion to Intervene at 1.

27 ⁹ Id.

27 ¹⁰ Id. at 2.

27 ¹¹ Id.

28 ¹² NTTA Motion to Intervene at 1.

28 ¹³ Id.

1 33. Several of NTTA's members are also members of ALECA.¹⁴

2 34. ALECA and i-wireless have entered into a Stipulation whereby i-wireless will not
3 provide Lifeline or LinkUp service to eligible residents residing on Federally-Recognized Tribal
4 Lands in Arizona.¹⁵ Further, i-wireless agreed that its Lifeline enrollment application for Arizona
5 will require an applicant to provide a street address and for the applicant to self-certify under penalty
6 of perjury that the applicant does not reside on Federally-Recognized Tribal Lands.¹⁶ i-wireless also
7 agreed to program its data base so that Lifeline applications with addresses located entirely within
8 tribal lands will be denied.¹⁷ A copy of the Stipulation is attached hereto and incorporated herein as
9 Exhibit B.

10 35. Based on the Stipulation between i-wireless and ALECA, ALECA stated it does not
11 oppose i-wireless' application and that a hearing was not necessary to address ALECA's concerns.¹⁸

12 36. NTTA withdrew its motion to intervene in this proceeding. Based on the resolution
13 passed by ITCA and the Stipulation reached between i-wireless and ALECA, NTTA concluded that it
14 no longer needed to intervene in this proceeding.¹⁹

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

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

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

19 "A common carrier designated as an eligible telecommunications carrier
20 under paragraph (2) or (3) shall be eligible to receive universal service
21 support in accordance with Section 254 and shall throughout the service
22 area for which the designation is received – (A) offer the services that are
23 supported by Federal universal service support mechanisms under Section
24 254(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."

26 ¹⁴ NTTA Motion to Intervene at 2.

27 ¹⁵ Stipulation at 1.

27 ¹⁶ Id.

27 ¹⁷ Id.

28 ¹⁸ Id. at 2.

28 ¹⁹ Id. at 2.

1 38. i-wireless acknowledges that Section 214(e)(1)(A) requires that a common carrier
 2 seeking designation as an ETC must “offer services, at least in part, over their own facilities and the
 3 Federal Communication Commission (“FCC”) rules prohibits state commission from designating as
 4 an ETC a telecommunications carrier that offers services exclusively through resale of another
 5 carrier’s services.²⁰

6 39. i-wireless attached to its application a Forbearance Order issued by the FCC granting
 7 i-wireless forbearance from the facilities-based service requirement pursuant to Section 214(e)(1)(A)
 8 for an ETC for purposes of federal universal service support services, at least in part, over its own
 9 facilities.²¹ The FCC Order limited forbearance related to i-wireless’ proposed Lifeline service, but
 10 denied forbearance related to the Link Up program.²² The Forbearance Order requires i-wireless to:

- 11 a. Provide its Lifeline customers with 911 and enhanced 911 (“E911”) access
 12 regardless of the activation status and availability of prepaid minutes;
- 13 b. Provide its Lifeline customers with E911-compliant handsets and replace, at no
 14 additional charge to the customer, non-compliant handsets of existing
 15 customers who obtain Lifeline supported services;
- 16 c. Comply with conditions (a) and (b) as of the date it provides Lifeline services;
 17 and
- 18 d. Obtain a certification from each Public Safety Answering Point (“PSAP”)
 19 where i-wireless seeks to provide Lifeline service confirming that the carrier
 20 provides its customers with 911 and E911 access or self-certifying that it does
 21 so if certain conditions are met.
- 22 e. Require each of its customers to self-certify at time of service activation and
 23 annually thereafter that they are the head of the household and receive Lifeline
 24 supported service only from i-wireless;
- 25 f. Establish safeguards to prevent its customers from receiving multiple Lifeline
 26 subsidies from i-wireless at the same address;
- 27 g. Deal directly with the customer to certify and verify the customers’ Lifeline
 28 eligibility; and
- h. Submit to the Wireline Competition Bureau a compliance plan outlining the
 measures the carrier will take to implement the obligations contained in the
 order within 30 days of the effective date of the order.²³

²⁰ Application at 4.

²¹ Application at Exhibit 2.

²² Application at Exhibit 2.

²³ Petition of i-wireless, LCC for Forbearance from 47 USC § 214(e)(1)(A), Order, FCC 10-117 (rel. June 25, 2010) (“FCC Forbearance Order”).

1 40. In compliance with the FCC Forbearance Order, i-wireless submitted a compliance
2 plan describing the measures i-wireless would take to implement the conditions placed on it in the
3 Forbearance Order.²⁴

4 **B. Staff Recommendations**

5 41. In addition to the conditions set forth in the FCC Forbearance Order, Staff
6 recommends approval of i-wireless' application for designation as an ETC subject to the following
7 additional conditions:

- 8 a. i-wireless shall provide Lifeline customers who choose the 250-minute option
9 free access to Customer Service from i-wireless handsets;
- 10 b. i-wireless shall file a tariff with the Commission, setting forth the rates, terms
11 and conditions for its Lifeline service within 30 days of a Commission Order in
12 this matter;
- 13 c. i-wireless shall notify the Commission of any future changes to its rates, terms
14 and/or conditions regarding its Lifeline offerings and file such changes in its
15 tariff and amend its tariff in compliance with A.R.S. § 40-367;
- 16 d. i-wireless shall make available Lifeline services to qualifying low-income
17 applicants in its ETC service area no later than 90 days after a Commission
18 decision and concurrently notify the Utilities Division Director, by making a
19 filing in Docket Control, of the commencement date for such services;
- 20 e. i-wireless shall apprise the Commission of any customer complaints that may
21 arise from its ETC service offerings by making a filing in Docket Control;
- 22 f. i-wireless shall provide a regulatory contact to the Commission through
23 Docket Control;
- 24 g. In the event that i-wireless requests to relinquish its ETC status and no longer
25 provide Lifeline services, it must provide notice to both the Commission and
26 its customers. Such notice(s) shall be in accordance with A.A.C. R11-2-1107;
- 27 h. i-wireless shall submit an annual report by April 15th of each year, beginning
28 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 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; and
- i. i-wireless will submit a quarterly report detailing the total number of Lifeline
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

²⁴ See, Application at Exhibit 2.

quarter, beginning October, 2011.

1
2 **V. i-wireless' Compliance with the Requirements for ETC Designation**

3 **A. Services Designated for Support**

4 42. i-wireless' application states it will offer services set forth in Section 54.101(a) and
5 Section 54.202(a) of the FCC rules, in order to receive FUSF support for its Lifeline services and to
6 comply with the requirements for ETC designation.²⁵ i-wireless' proposed services include:

- 7 a. Voice Grade Access to the Public Switched Telephone Network ("PSTN"): i-
8 wireless will provide voice grade access to the PSTN through the purchase of
9 wholesale CMRS services provide by Sprint, at a bandwidth that is at a
10 minimum between 300 and 3,000 MHz as required under the FCC rules;
- 11 b. Local usage: As part of the voice grade access to the PSTN, an ETC must
12 provide local calling services to its customers and offer plans that are
13 comparable to plans offered by incumbent local exchange carriers in the same
14 service area;
- 15 c. Dual Tone Multi-Frequency Signaling ("DTMF") or its Functional Equivalent:
16 i-wireless will provide DTMF signaling to expedite the transmission of call set
17 up and call detail information throughout its network and all handsets offered
18 for sale by i-wireless will be DTMF capable;
- 19 d. Single-Party Service or its Functional Equivalent: "Single-party service" is a
20 telecommunications service that permits only one party to be served by a
21 subscriber loop or access line during a telephone transmission. i-wireless will
22 provide single party service to its customers for the duration of each telephone
23 call and does not provide multi-party (i.e., party line) services;
- 24 e. Access to Emergency Services: i-wireless will provide 911 and E911 access to
25 all of its customers; comply with FCC regulations governing the deployment
26 and availability of E911 compliant handsets; comply FCC E911 requirements
27 applicable to all wireless resellers; and comply with 47 CFR § 54.202(a)(2)
28 requiring carriers to remain functional during emergency situations;
- f. Access to Operator Services: i-wireless will offer all customers access to
operator services;
- g. Access to Interexchange Service: i-wireless will provide customers with
interexchange or long distance service at no additional charge;
- h. Access to Directory Assistance: i-wireless customers will be able to dial
"411" to reach directory assistance services from their wireless handsets; and
- i. Toll Limitation for Qualifying Low-Income Consumers: i-wireless describes
Toll Limitation as allowing customers to block completion of outgoing long
distance calls to prevent them from incurring significant long distance charges.
i-wireless will provide its customers with pre-paid, pay-as-you-go services and
will not offer services based on distance and minutes for local or domestic long
distance services will not be charged separately. i-wireless will require
customers to specifically authorize access for international services, for which

²⁵ Application at 7.

additional charges may apply.²⁶

43. Based on the information provided by i-wireless, Staff concluded that i-wireless' proposed services comply with FCC rules to receive FUSF and therefore meets this ETC criteria.

B. Advertising of Supported Services

44. Pursuant to Section 214(e)(1)(A) of the 1996 Act and FCC rule 54.201(d)(2) i-wireless states it will advertise the availability of its Lifeline services using media of general distribution, including newspapers, radio, and the internet.²⁷ Further, i-wireless states it will design advertising campaigns to promote the availability of its cost-effective wireless services; utilize its retail partners to promote Lifeline services; and provide vendors with signage and written material where Lifeline will be sold.²⁸ In addition, i-wireless will market its Lifeline services through its 118 Kroger owned stores in Arizona; reach qualifying customers by placing information on cash register receipts printed for those customers using a qualifying program to pay; and the distribution of brochures through various state and local social services agencies.²⁹

45. i-wireless provided samples of its advertising materials for Staff's review. Based on the information provided by i-wireless, Staff concludes that i-wireless will advertise the availability of its supported services and the corresponding charges using media of general distribution as required by FCC rules and that i-wireless meets this ETC designation criteria.

C. ETC Requirements Pursuant to 47 C.F.R. § 54.202(a)(1)-(5)³⁰

46. Pursuant to 47 C.F.R. § 54.202(a)(1) 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."³¹

²⁶ Id. 8-11.

²⁷ Application at 12.

²⁸ Id.

²⁹ Response to Staff First Set of Data Requests at LM 1.39.

³⁰ 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").

³¹ Id.

1 47. i-wireless states that it currently provides services through its underlying facilities-
2 based provider and i-wireless can commence offering its Lifeline service to all locations served by its
3 facilities-based provider upon Commission approval.³² Further, i-wireless states its underlying
4 facilities-based provider is operational and largely built out and therefore i-wireless can provide
5 Lifeline service to all qualified customers on a timely basis or within a reasonable period of time in
6 accordance with FCC rules.³³ However, i-wireless states that the FCC rule for an ETC to provide a
7 network improvement plan does not apply to i-wireless because it is not seeking “high cost” USF
8 support.³⁴ i-wireless states that because it is seeking ETC designation solely for purposes of
9 reimbursement for the provision of subsidized Lifeline service eligible customer, submission of a
10 network improvement plan is not required.³⁵

11 48. Based on the information provided by i-wireless, Staff believes i-wireless meets the
12 non-facilities based portion of this ETC criteria.

13 49. In accordance with Section 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.”³⁶

17 50. i-wireless states that its underlying carrier, Sprint, is a Tier 1 carrier, using a state-of-
18 the-art network, that can provide a reasonable amount of back-up power to ensure functionally
19 without an external power source, reroute traffic around damaged facilities, and manage traffic
20 spikes.³⁷

21 51. Based on the information provided by i-wireless, Staff concluded that i-wireless has
22 demonstrated its ability to remain functional in emergency situations by reselling the service of a
23 carrier that uses state-of-the-art network reliability standards. Therefore, Staff believes i-wireless
24 meets this ETC designation criteria.

25
26 ³² Application at 11.

³³ Application at 12.

27 ³⁴ Id. at 11.

³⁵ Id.

28 ³⁶ See, *ETC Minimum Requirements Report and Order*.

³⁷ Response to Staff’s Second Set of Data Requests at LM 2.16.

1 52. i-wireless states it will comply with the consumer protection and service quality
2 standards set forth in 47 C.F.R. § 54.202(a)(3).³⁸ i-wireless states that as a reseller, it will provide the
3 same consumer protections and service quality as its underlying carrier; it will comply with the
4 Cellular Telecommunications and Internet Association's ("CITA") Consumer Code for Wireless
5 Service; and that information on the Company's privacy policy will be included in each customer's
6 initial welcome packet and on the Company's website.³⁹

7 53. Based on the information provided by i-wireless, Staff believes i-wireless meets this
8 ETC designation criteria.

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

12 55. According to Staff, i-wireless reported that its service offerings will be compatible to
13 other LECs and that in some respects i-wireless' services will exceed those of incumbent LECs.⁴⁰
14 i-wireless distinguishes its services from other incumbent LEC in that i-wireless will offer customers
15 a certain amount of service free of charge or at a discount, including calls made statewide or even
16 nationally, and customers will have a variety of features (voice mail, caller ID, call waiting, and E911
17 capability) at no additional charge.⁴¹

18 56. Staff states that although the FCC has not set a minimum local usage threshold, Staff
19 believes i-wireless meets this ETC designation criteria.

20 57. Applicants for designation as an ETC are required under 47 C.F.R. § 54.202(a)(5) "to
21 provide equal access to long distance carriers in the event that no other eligible telecommunications
22 carrier is providing equal access within the service area." Further, the FCC has determined it would
23 decide whether to impose the equal access requirements on a case-by-case basis.

24 58. In its response to Staff's Data Request, i-wireless acknowledged that the FCC may
25 require it to provide equal access to long distance carriers in the event no other ETC is providing
26

27 ³⁸ Application at 12.

³⁹ Response to Staff Second Set of Data Requests at LM 2.18.

⁴⁰ Staff Report at 8.

28 ⁴¹ Id.

1 equal access within its designated service area. Staff concludes i-wireless has met this requirement.

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

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

6 60. i-wireless certified that it will comply with the FCC's expanded eligibility criteria,
7 certification, verification, and recordkeeping requirements pursuant to Section 54.410, which were
8 adopted in Commission Decision No. 67941 (June 21, 2005).⁴²

9 61. FCC rules requires that the Commission establish a geographic area for the purpose of
10 determining universal service obligations and support mechanisms for each designated ETC.⁴³

11 62. i-wireless initially sought state-wide authority as an ETC, including providing service
12 to Federal-Recognized Tribal lands.⁴⁴ Through the Stipulation Agreement, i-wireless agreed to not
13 service customers residing on Federally-Recognized Tribal lands and ALECA withdrew its objections
14 to i-wireless' application.

15 63. Attached hereto and incorporated herein as Exhibit A, is the list of zip codes i-wireless
16 states encompasses its proposed designated service area.⁴⁵ i-wireless' proposed designated service
17 area consists of all zip codes listed in Exhibit A, with the exception of those zip codes located entirely
18 within tribal lands.

19 64. Staff expressed concerns over i-wireless' proposal to deduct minutes from Lifeline
20 customers' handsets for calling Customer Service if the Lifeline customer is under the 250 minute
21 monthly plan.⁴⁶ Staff states generally major wireless carriers do not deduct minutes for Customer
22 Service calls.⁴⁷ Staff recommends that i-wireless provide Lifeline customers choosing the 250 minute
23 option free access to Customer Service.

24 . . .

25

26 ⁴² Response to Staff's Data Requests at LM 1.48.

27 ⁴³ 47 U.S.C. § 214(e)(2).

28 ⁴⁴ Application at 14.

⁴⁵ Staff Report at Attachment 3.

⁴⁶ Staff Report at 12.

⁴⁷ Id.

1 ...

2 **V. Analysis**

3 65. i-wireless asserts that its proposed designation as an ETC in Arizona is in the public
4 interest.⁴⁸ i-wireless states that approval of its designation as an ETC will further the public interest
5 by providing low-income households with lower priced, high quality telecommunications services;
6 Arizona consumers will reap the benefits of an intensely competitive wireless market; consumers will
7 receive affordable and comparable telecommunication services; i-wireless' distribution platform is
8 unique in that consumers can purchase phones and refill minutes at small, local neighborhood stores
9 in their communities; i-wireless has existing relationships with over 2,500 neighborhood retailers
10 across America; and increasing the number of ETCs in Arizona will increase the amount of funds
11 from the FUSF to be distributed in Arizona.⁴⁹

12 66. Staff believes i-wireless meets the overall criteria for designation as an ETC. Staff
13 recommends that the Commission grant i-wireless' application for designation as an ETC pursuant to
14 1996 Act.

15 67. Based on the information that i-wireless will provide Lifeline services to low-
16 income households throughout Arizona, will provide free of charge a variety of options
17 including free 911 and E911 services, and the accessibility of such services through retail
18 providers, we find that i-wireless' application for designation as an ETC is in the public
19 interest. Further, we believe that all calls from i-wireless handsets to customer service should
20 be treated the same (at no charge) and therefore we do not approve i-wireless' proposal to
21 charge customers using the 250-minute option for customer service calls. Therefore, we adopt
22 Staff's recommendation for approval of i-wireless' application for designation as an ETC in Arizona,
23 subject to the conditions set forth in the Forbearance Order and Staff's recommendations.

24 68. We also adopt the Stipulation Agreement entered into by i-wireless and ALECA and
25 will require i-wireless to abide by the terms set forth in the agreement.

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28 ⁴⁸ Application at 15.

⁴⁹ Id.

1 choose the 250 minute plan with free access to Customer Service from i-wireless handsets.

2 IT IS FURTHER ORDERED that i-wireless, LLC shall file a tariff with the Commission,
3 setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of the
4 effective date of this Decision.

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

8 IT IS FURTHER ORDERED that i-wireless, LLC shall comply with all Federal
9 Communications Commission Rules and Staff's conditions as set forth in Finding of Fact Nos. 39,
10 40, and 41.

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

16 IT IS FURTHER ORDERED that i-wireless shall make a filing indicating a regulatory
17 contact for the Company within thirty (30) days of the effective date of this Decision or prior to
18 serving its first Lifeline customer, whichever comes first.

19 IT IS FURTHER ORDERED that in the event that i-wireless, LLC desires to relinquish its
20 Eligible Telecommunications Carrier status and no longer desires to provide Lifeline services, it shall
21 provide notice to both the Commission and its customers in accordance with A.A.C. R14-2-1107.

22 IT IS FURTHER ORDERED that i-wireless, LLC shall file with Docket Control, as a
23 compliance item in this docket, an annual report by April 15th of each year, beginning April 15, 2012,
24 that contains the total number of Lifeline subscribers, total amount of Federal Universal Service Fund
25 support received and an affidavit certifying that the Lifeline discounts or the equivalent are equal to
26 the amount of total Federal Universal Service Fund support per line.

27 IT IS FURTHER ORDERED that i-wireless, LLC shall file with Docket Control, as a
28 compliance item in this docket, a quarterly report detailing the total number of Lifeline customers, the

1 total number of customers removed from the customer base due to 60-day inactivity, the number of
2 customers removed from the customer base due to annual verification and the total number of
3 customers who voluntarily relinquished Lifeline service. The quarterly report shall be filed on the
4 15th of the month following the end of each calendar quarter, with the first filing due by January 15,
5 2012.

6 IT IS FURTHER ORDERED that i-wireless, LLC shall file with Docket Control, as a
7 compliance item in this docket, as part of its quarterly report discussing the number of customer
8 complaints that have been filed with the Company arising from its ETC service offerings in Arizona.

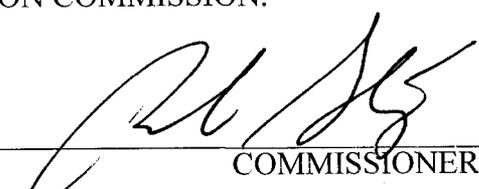
9 IT IS FURTHER ORDERED that i-wireless, LLC's designated service area as an Eligible
10 Telecommunications Carrier shall include the zip codes attached hereto and incorporated herein as
11 Exhibit A, with the exception of those zip codes covering Federally-Recognized Tribal lands in
12 Arizona.

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1 IT IS FURTHER ORDERED that i-wireless, LLC shall abide by the Stipulation Agreement
2 with the Arizona Local Exchange Carriers Association, attached hereto as Exhibit B, and
3 incorporated herein.

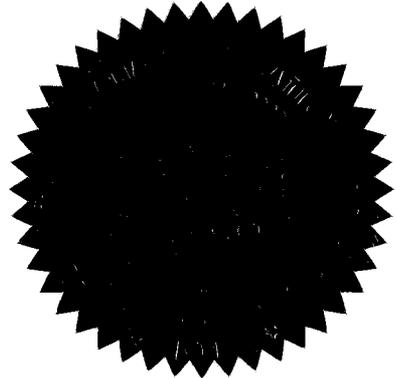
4 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

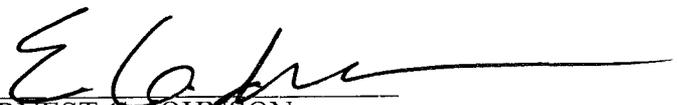
5 BY ORDER OF THE ARIZONA CORPORATION COMMISSION.

6
7
8  CHAIRMAN  COMMISSIONER

9  COMMISSIONER **EXCUSED** COMM. NEWMAN  COMMISSIONER
10

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



17 
18 ERNEST G. JOHNSON
19 EXECUTIVE DIRECTOR

20 DISSENT _____

21 DISSENT _____

22 YBK:db

1 SERVICE LIST FOR: I-WIRELESS, LLC

2 DOCKET NO.: T-20538A-10-0332

3 Lance J.M. Steinhart
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22 1200 West Washington Street
23 Phoenix, AZ 85007

24 Steven M. Olea, Director
25 Utilities Division
26 ARIZONA CORPORATION COMMISSION
27 1200 West Washington Street
28 Phoenix, AZ 85007

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EXHIBIT A

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85001	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85002	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85003	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85004	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85005	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85006	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85007	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85008	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85009	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85010	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85011	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85012	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85013	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85014	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85015	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85016	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85017	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85018	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85019	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85020	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85021	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85022	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85023	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85024	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85025	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85026	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85027	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85028	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85029	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85030	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85031	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85032	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85033	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85034	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85035	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85036	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85037	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85038	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85040	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85041	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85042	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85043	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85044	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85045	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85046	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85048	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85050	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85051	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85053	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85054	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85055	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85060	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85061	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85062	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85063	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85064	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85065	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85066	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85067	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85068	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85069	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85070	Laveen	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85071	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85072	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85074	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85075	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85076	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85078	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85079	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85080	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85082	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85083	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85085	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85086	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85087	New River	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85096	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85097	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85098	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85099	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85117	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85118	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85119	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85120	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85121	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.

Attachement 3 1-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85122	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85123	Arizona City	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85127	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85138	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85130	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85131	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85132	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85138	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85139	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85140	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85141	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85142	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85143	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85145	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85147	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85172	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85178	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85190	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85191	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85193	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85194	Casa Grande	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85201	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85202	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85203	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85204	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85205	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85206	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85207	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85208	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85209	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85210	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85211	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85212	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85213	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85214	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85215	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85216	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85217	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85218	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85219	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85220	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85221	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.

Attachement 3 l-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85222	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority
85223	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85224	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85225	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85226	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85227	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85228	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc./Tohono O'odham Utility Authority
85230	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85231	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85232	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85233	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85234	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85236	Higley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85238	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85239	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85240	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85241	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85242	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85243	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85244	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85245	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85246	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85247	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85248	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85249	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85250	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85251	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85252	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85253	Paradise Valley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85254	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85255	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85256	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85257	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85258	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85259	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85260	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85261	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85263	Rio Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85266	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85267	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85268	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85269	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85271	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85272	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85274	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85275	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85277	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85278	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85280	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85281	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85282	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85283	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85284	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85285	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85286	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85287	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85291	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85295	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85294	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85295	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85296	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85297	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85298	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85299	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85301	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85302	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85303	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85304	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85305	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85306	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85307	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85308	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85309	Luke AFB	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85310	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85311	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85312	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85318	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85322	Arlington	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85323	Avondale	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85326	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85327	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85328	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85329	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85331	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85333	Dateland	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85334	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85335	El Mirage	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85336	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85337	Gila Bend	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85338	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85339	Avellan	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85340	Litchfield Park	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85342	Morristown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85343	Palo Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85345	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85346	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85349	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85350	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85351	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85352	Wellton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85353	Tolleson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85354	Tonopah	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85355	Waddell	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85358	Wickenburg	AZ	Phoenix_AZ	PHXWC8928	WICKENBURG, AZ 928	
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85360	Lake Havasu City	AZ	LakeHavasuCity_AZ	NMXLHCS20	LAKE HAVASU CITY, NV 520	
85361	Wittmann	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85363	Youngtown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85364	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85365	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85366	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85367	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85369	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85372	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85373	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85374	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85375	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85376	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85377	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85378	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85379	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85380	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85381	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85382	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85383	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85385	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85387	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85388	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85392	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85395	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85396	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85502	Globe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85537	Miami	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85547	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85553	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85603	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85605	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85606	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85608	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85609	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85616	Huachuca City	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85617	MC Neal	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85618	Mammoth	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85619	Mount Lemmon	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85620	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85622	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85623	Oracle	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85626	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85627	Benson	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85628	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85629	Sahuarita	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85630	Saint David	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85632	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85635	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85636	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85640	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85641	Vail	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85644	Willcox	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85645	Amado	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85646	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85648	Rio Rico	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85650	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85652	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85653	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85654	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85655	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85658	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85662	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85670	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85701	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85702	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85703	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85704	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85705	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85706	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85707	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85708	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85709	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85710	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85711	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85712	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85713	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85714	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85715	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85716	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85717	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85718	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85719	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85721	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85722	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85723	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85724	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85725	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85726	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85728	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85730	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85731	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85732	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85733	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85734	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85735	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85737	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85738	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85739	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85740	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85741	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85742	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85743	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85744	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85745	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85746	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85747	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85748	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85749	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85750	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85751	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85752	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85754	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85755	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85756	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85757	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85942	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86002	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86003	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86004	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86011	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86015	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86017	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86018	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86023	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86025	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86028	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86029	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86032	Winslow	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86301	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86302	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86304	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86313	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86320	Ash Fork	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86322	Camp Verde	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86325	Cornville	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86326	Cottonwood	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86327	Dewey	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86329	Dewey	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86330	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESOTT, AZ 520	
86331	Clarkdale	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	

Attachement 3 i-wireless zip code coverage.xls

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
86333	Mayer	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520	
86335	Rimrock	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86339	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86340	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86341	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86342	Rimrock	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86351	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86402	Kingman	AZ	LakeHavasuCITY_AZ	NMXXKGM520	KINGMAN, AZ 520	
86403	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86404	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86405	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86409	Kingman	AZ	LakeHavasuCITY_AZ	NMXXKGM520	KINGMAN, AZ 520	
86412	Kingman	AZ	LakeHavasuCITY_AZ	NMXXKGM520	KINGMAN, AZ 520	
86413	Golden Valley	AZ	LakeHavasuCITY_AZ	NMXXKGM520	KINGMAN, AZ 520	
86426	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86427	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86429	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86430	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86431	Kingman	AZ	LakeHavasuCITY_AZ	NMXXKGM520	KINGMAN, AZ 520	
86436	Topock	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86438	Bullhead City	AZ	LakeHavasuCITY_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86439	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86440	Mohave Valley	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86446	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86506	Ganado	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86511	Ganado	AZ	Farmington_NM	NMXXGLL505	GALLUP, NM 505	
86512	Chambers	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86515	Ganado	AZ	Farmington_NM	NMXXGLL505	GALLUP, NM 505	Frontier/Navajo
86555	Douglas	AZ	SierraVista_AZ	NMXXBNS520	BENSON, AZ 520	

EXHIBIT B

BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

GARY PIERCE- CHAIRMAN
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

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ARIZONA CORPORATION COMMISSION
HEARING DIVISION

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AZ CORP COMMISSION
DOCKET CONTROL

HEARING

IN THE MATTER OF THE PETITION OF I-)
WIRELESS, LLC FOR DESIGNATION AS AN)
ELIGIBLE TELECOMMUNICATIONS CARRIER)
IN THE STATE OF ARIZONA FOR THE)
LIMITED PURPOSE OF OFFERING LIFELINE)
SERVICE TO QUALIFIED HOUSEHOLDS.)

DOCKET NO. T-20538A-10-0332

**STIPULATION BETWEEN
ALECA AND i-wireless, LLC**

i-wireless, LLC ("i-wireless") and the Arizona Local Exchange Carriers Association ("ALECA") submit the following stipulation concerning i-wireless' 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 potential concerns, i-wireless agrees that it will not provide Lifeline or LinkUp service to eligible residents residing on Federally-Recognized Tribal Lands in Arizona. To achieve this, i-wireless agrees as follows:

a. i-wireless' 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.

b. i-wireless will program its data base so as to deny applications for Lifeline service to Zip Codes located entirely within tribal lands (see Exhibit A, for a list of these Zip Codes);

3. Given the stipulation and the zip code list for the ETC designation area attached to the Staff Report. ALECA does not oppose i-wireless' 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 A. Marks
Craig Marks
Craig A. Marks, PLC
10645 North Tatum Blvd, Suite 200-676
Phoenix, Arizona 85028

i-wireless, LLC.

By Michael W. Patten
Michael W. Patten
Roshka DeWulf & Patten, PLC
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Phoenix, Arizona 85004

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

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

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

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

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Company	Zip Codes
	Wholly Within Tribal Lands
Frontier Navajo	86033
Frontier Navajo	86035
Frontier Navajo	86040
Frontier Navajo	86045
Frontier Navajo	86047
Frontier Navajo	86053
Frontier Navajo	86054
Frontier Navajo	86502
Frontier Navajo	86503
Frontier Navajo	86504
Frontier Navajo	86505
Frontier Navajo	86505
Frontier Navajo	86507
Frontier Navajo	86510
Frontier Navajo	86511
Frontier Navajo	86514
Frontier Navajo	86515
Frontier Navajo	86535
Frontier Navajo	86538
Frontier Navajo	86544
Frontier Navajo	86545
Frontier Navajo	86556
Gila River Telecomm, Inc.	85147
Hopi Telecomm, Inc.	86030
Hopi Telecomm, Inc.	86034
Hopi Telecomm, Inc.	86039
Hopi Telecomm, Inc.	86042
Hopi Telecomm, Inc.	86043
Hopi Telecomm, Inc.	86044
San Carlos Apache Tel, Utility, Inc	85530
San Carlos Apache Tel, Utility, Inc	85542
San Carlos Apache Tel, Utility, Inc	85550
TDS	86435
Tohono O'odham Utility, Authority	85634
Tohono O'odham Utility, Authority	85639