

ORIGINAL

OPEN MEETING



MEMORANDUM

AZ CORP. COMMISSION
DOCKET 0000142083

Arizona Corporation Commission

DOCKETED

FEB 01 2013

TO: THE COMMISSION

2013 FEB 1 PM 2 33

FROM: Utilities Division

DATE: February 1, 2013

DOCKETED BY *JM*

RE: IN THE MATTER OF THE APPLICATION OF TELRITE CORPORATION DBA LIFE WIRELESS FOR DESIGNATION AS A WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF ARIZONA (LOW INCOME ONLY). (DOCKET NO. T-04288A-11-0405)

1. PROCEDURAL HISTORY

On November 8, 2011, Telrite Corporation dba Life Wireless ("Telrite") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to section 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 and 54.207. In its Application, Telrite requests the Arizona Corporation Commission ("ACC" or "Commission") designate it as an ETC in certain zip codes, excluding tribal lands, for the purpose of receiving federal Universal Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline¹). Telrite is not requesting high cost support.

On December 26, 2012, the FCC approved Telrite's Revised Compliance Plan ("RCP") and waived the company owned-facilities requirement. On December 27, 2012, Telrite filed a copy of the RCP in the docket.

2. BACKGROUND

Telrite Corporation is a Georgia corporation with its principal offices located at 4113 Monticello Street, Covington, Georgia 30014. Telrite provides Commercial Mobile Radio Service ("CMRS") through the resale of service of other wireless carriers. Although Telrite is certificated to provide resold long distance² services in Arizona, these services will not be utilized in the provision of Telrite's Lifeline services. Instead, Telrite proposes to provide wireless Lifeline services through the resale of CMRS provided by other wireless carriers. Telrite has been granted wireless ETC designation in fourteen (14) jurisdictions³ with nine (9) applications pending in other jurisdictions,⁴ excluding Arizona. In the jurisdictions it currently

¹ Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. The federal support amount provided to the ETC is \$9.25.

² Decision No. 67812, issued May 5, 2005.

³ Arkansas, Georgia, Illinois, Indiana, Louisiana, Maine, Maryland, Minnesota, Missouri, Oklahoma, Rhode Island, South Carolina, West Virginia and Puerto Rico.

⁴ Idaho, Kansas, Michigan, Mississippi, New Jersey, Pennsylvania, Utah, Washington and Wisconsin.

operates, Telrite serves over 800,000 wireless customers,⁵ of which over 740,000 are Lifeline customers. Telrite will provide wireless service through a “virtual network” consisting of services obtained from licensed wireless network operator AT&T Wireless (“AT&T”)⁶ and does not own or operate any of its own wireless facilities. Telrite’s arrangement with AT&T enables it to offer services wherever the underlying wireless carrier offers service in the State of Arizona. Both non-rural and rural incumbent local exchange carriers (“ILECs”) provide wireline service within these areas. For its proposed designated service area, Telrite provided a list of zip codes in which it will provide service and identified the ILEC(s) serving each zip code in Exhibit A of the Application.

On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link Up Reform and Modernization (“Lifeline Reform Order”)*,⁷ in which the FCC adopted comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its own facilities (“the facilities requirement”), subject to certain public safety and compliance obligations, was appropriate for carriers seeking to provide Lifeline-only service.⁸ Specifically, in the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act’s Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) FCC Wireline Competition Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁹

On March 12, 2012, Telrite submitted its initial Compliance Plan to the FCC in order to benefit from the “blanket forbearance” of the own-facilities requirement used to provide Lifeline services. Since its initial filing, Telrite has submitted numerous revisions to its RCP, making changes as the result of discussions with FCC Staff. Telrite filed its last/final RCP December 19, 2012. On December 26, 2012, in DA 12-2063, the FCC issued a Public Notice¹⁰ approving Telrite’s December 19, 2012 Revised Compliance Plan.

⁵ Response to Staff Data Request STF 2.1.

⁶ Application, Page 10, line 4 and response to Staff Data Request STF 1.24.

⁷ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 (“*Lifeline Reform Order*”).

⁸ *Ibid.*, at paras. 368-381.

⁹ *See id.* at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

¹⁰ *See* “Wireline Competition Bureau Approves the Compliance Plans of AirVoice Wireless, AmeriMex Communications, Blue Jay Wireless, Millennium 2000, Nexus Communications, Platinumtel Communications, Sage Telecom, Telrite and Tescape Communications, Public Notice from FCC Wireline Competition Bureau, WC Docket Nos. 09-197 and 11-42 (rel. December 26, 2012).

3. REQUIREMENTS FOR DESIGNATION AS AN ETC AND TELRITE'S COMPLIANCE WITH THE REQUIREMENTS

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

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

In order to be designated as an ETC, a carrier must offer Lifeline service to all qualifying low-income customers within its service area.¹¹ Lifeline service provides basic telephone service, typically by passing on discounts to monthly telecommunications charges. As a wireless reseller of prepaid wireless service, Telrite is proposing to offer qualified customers a free handset and the choice of either a free prepaid minutes calling plan, of which there are two options,¹² or applying a Lifeline discount for Telrite's unlimited voice calls/text messaging monthly prepaid retail plan.

As indicated above, the FCC granted Telrite forbearance from the requirement that it provide service using its own facilities or a combination of its own facilities and resale of another carrier's service and also any criteria related to facilities build out plans. Telrite would be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other criteria required of ETCs.

A. Offering the Services Designated for Support

On December 23, 2011, the FCC adopted and released an Order on Reconsideration in which the FCC modified, on its own motion, the definition of “voice telephony”, as adopted in the *USF/ICC Transformation Order*.¹³ In that Order, the FCC reduced its former list of nine

¹¹ 47 C.F.R. §§ 54.405 and 54.411(a)

¹² See RCP, pages 22-24. Telrite is offering Lifeline customers a choice of 125 free monthly voice minutes/text messages with monthly rollover of unused voice minutes/texts messages or 250 free monthly voice minutes/text messages with no rollover to Lifeline customers. Text messages for either of these two plans are counted at 3 text messages per 1 voice minute

¹³ See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up*,

supported services to four supported services and amended 47 C.F.R. § 54.101 to specify the “voice telephony services” supported by federal universal service support mechanisms.¹⁴

47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to receive Federal universal service fund support. The services and Telrite’s response to the provision of each service are as follows:

(i) Voice grade access to the Public Switched Network. “Voice grade access to the Public Switched Network” is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and receive voice communications, including receiving a signal indicating there is an incoming call. For purposes of this Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz. Telrite states¹⁵ its services include voice telephony services that provide voice grade access to the public switched network.

(ii) Local usage. “Local usage” means minutes of use for local exchange service, prescribed by the Federal Communications Commission, provided free of charge to end users. Telrite states¹⁶ its service offerings provide customers with a preset number of minutes of use for local service at no charge to the customer and the current Lifeline offerings include packages that can be used for local and domestic toll service.

(iii) Access to emergency services. “Access to emergency services” includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code “911”, to call emergency services through a Public Safety Access Point (“PSAP”) operated by the local government. “Enhanced 911” is defined as 911 service that includes the ability to provide automatic numbering information (“ANI”), which enables the PSAP to call back if the call is disconnected, and automatic location identification (“ALI”), which permits emergency service providers to identify the geographic location of the calling party. “Access to emergency services” includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911 systems. Telrite states¹⁷ it will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available.

Universal Service Reform-Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (*USF/ICC Transformation Order on Reconsideration*) at para. 3.

¹⁴ *Id.* at para. 78; *see also id.* App. A at 536 (revising section 54.101(a) of the Commission’s rules); *see* 76 FR 73830, 73870 (Nov. 29, 2011) (revising 47 C.F.R. § 54.101(a) with an effective date of December 29, 2011).

¹⁵ *See* Application, Page 12, lines 1-3 and RCP, Page 25.

¹⁶ *Ibid.*, lines 9-16 and RCP, Page 25.

¹⁷ *See* Application, Page 13, lines 7-13 and RCP, Page 25.

(iv) Toll Limitation for Qualifying Low-Income Consumers. “Toll limitation denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, ‘toll limitation’ denotes toll blocking and toll control.”¹⁸ In the *Lifeline Reform Order* the FCC relieved ETCs of the obligation to offer toll limitation services if their Lifeline offering does not distinguish in the pricing of toll and non-toll calls.¹⁹ Telrite’s wireless prepaid calling plans do not distinguish between non-toll (i.e. local) and toll calls. Telrite’s prepaid plans include a specific number of minutes that cannot be exceeded. Therefore, customers cannot incur any charges for excessive toll calling or be disconnected for non-payment.

In its application, Telrite states it has the ability to provide all the supported services and functionalities required in the proposed ETC designated service area to all subscribers taking service under its Lifeline plan through arrangements with its underlying carrier. Based on the above information and explanations, Staff believes that Telrite meets this ETC designation criteria.

B. Advertising of Supported Services

47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. Telrite states it will advertise the availability of its Lifeline services and the charges for its Lifeline services using media of general distribution.²⁰ Specifically, Telrite will advertise its Lifeline program through community outreach events with local churches, charities, and community groups, televising public service announcements²¹ and will also market through its website.²² Telrite will announce and advertise telecommunications services as an ETC where it provides service in its Service Area and will publicize the availability of Lifeline services in a manner reasonably calculated to reach those likely to qualify for those services.²³ Advertisements will be both English and Spanish.²⁴ Telrite submitted examples of prior relevant advertisements to Staff. In addition, Telrite submitted examples of its advertisements in Exhibit C of its RCP to the FCC.

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

¹⁸ 47 C.F.R. § 54.400(d).

¹⁹ *Lifeline Reform Order*, ¶238.

²⁰ Application, Page 5, lines 16-19 and Page 14, lines 15-23 and Response to Staff Data Request STF 2.4.

²¹ Response to Staff Data Request STF 2.4.

²² Response to Staff Data Request STF 1.44

²³ Application, Page 14, lines 17-20.

²⁴ Response to Staff Data Request STF 2.2.

C. Additional ETC Requirements

In addition to the requirements listed above, the FCC adopted, in the *Lifeline Reform Order*, comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste, and abuse within the system. Below are the additional requirements and Telrite's response to each requirement.

C.1 A Commitment and Ability to Provide Supported Services

In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

(i) Certify that it will comply with the service requirements applicable to the support that it receives; and

(ii) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each applicant shall estimate the area and population that will be served as a result of the improvements. Except, a common carrier seeking designation as an eligible telecommunications carrier in order to provide supported services only under subpart E of this part does not need to submit such a five-year plan.²⁵

Telrite states²⁶ it will comply with the service requirements applicable to the support that it receives. The requirement directing submissions of a formal network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii) does not apply to Telrite because it is seeking only to provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the facilities-based requirements for Telrite.

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

C.2 Remain Functional in Emergency Situations

In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant demonstrate its ability to remain functional in emergency situations. Specifically, "an applicant must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."²⁷

²⁵ *Lifeline Reform Order*, ¶ 386.

²⁶ Application, Page 15, lines 3-14.

²⁷ *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*"), ¶ 25.

To demonstrate its ability to remain functional in emergency situations, Telrite states²⁸ it provides service in Arizona by reselling the services of its underlying wireless carrier, specifically AT&T, in Arizona. Telrite further states that its underlying wireless carriers' networks have implemented state-of-the-art network reliability standards and have the ability to remain functional in emergency situations such that Telrite's service reliability compares favorably with that of any facilities-based operator in the wireless telecommunications industry.

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

C.3 Satisfy Consumer Protection and Service Quality Standards

In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application²⁹. The sufficiency of other commitments will be considered on a case-by-case basis.

To demonstrate its ability to satisfy consumer protection and service quality standards, Telrite states³⁰ it will satisfy all such standards. Telrite commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards and will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service (the "CTIA Code"). In addition, Telrite commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's USF Order.³¹ Telrite also commits to use its best efforts to resolve customer complaints received by the Commission.

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

C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability

In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part. In the *Lifeline Reform Order*³², the FCC provides guidance on specific information to be considered when determining if an applicant meets this requirement:

²⁸ Application, Page 15, lines 16-24 and Response to Staff Data Request STF 2.7(b).

²⁹ *ETC Minimum Requirements Report and Order*, ¶ 28.

³⁰ Application, Page 16, lines 1-7.

³¹ FCC 97-157, Universal Service Order ("USF Order") at ¶ 4.

³² See *Lifeline Reform Order*, ¶388.

“...Among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline customers, how long its has been in business, whether the applicant intends to rely exclusively on USF distributions to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.”

Telrite states³³ it has been offering Lifeline service to customers since October, 2010. Telrite also offers several other telecommunication services in addition to its Lifeline service. In 2011, the wireline services offered by Telrite produced substantial net income. This revenue was generated from more than 30,000 customers of Telrite’s local and long distance service, which Telrite has been providing for over 10 years. In sum, Telrite has access to sufficient funds to run its business and is not solely dependent on reimbursements from USF distributions.

In response to Staff’s inquiry about complaints, at the state and at the FCC level, Telrite discussed three incidents.³⁴ First, Telrite was the subject of one complaint in West Virginia by a customer about an alleged receipt of a handset claimed to not have been ordered by the customers. This complaint was resolved. Second, Telrite is participating in an FCC enforcement bureau inquiry regarding activities of a rogue agent in Missouri. While the investigation has not been formally closed, Telrite states³⁵ that it has provided FCC staff will all requested information, including information demonstrating that Telrite has restored all subsidies to the federal universal service fund attributable to the fraudulent rogue agent activity. Telrite has also reformed and refined its policies, procedures and training to guard against recurrence of such activity in the future. Third, Telrite, as a toll reseller providing interstate and information services to residential and business customers nationwide, is subject to regulatory obligations which include contributing to the federal Universal Service Fund (“USF”), the Telecommunications Relay Service (“TRS”) Fund, cost recovery mechanisms for North American Numbering Plan (“NANP”) and Local Number Portability (“LNP”) administration, and federal regulatory fees. Following Telrite’s purchase of Onestar Long Distance, Inc. in 2004, the Universal Service Administrative Company (USAC) referred Telrite to the FCC Enforcement Bureau (“Bureau”) for potential enforcement action, alleging that Telrite had failed to comply with the FCC’s USF contribution and reporting rules. The Bureau issued Letters of Inquiry to Telrite dated December 15, 2005,³⁶ June 9, 2006,³⁷ and November 8, 2006,³⁸ seeking information about Telrite’s compliance with its regulatory obligations. Telrite submitted responses to the Bureau’s inquiries, and on July 10, 2006, Telrite admitted that it had failed to

³³ RCP, Page 24.

³⁴ Response to Staff Data Request STF 1.54.

³⁵ Response to Staff Data Request STF 2.5(a).

³⁶ Letter from Hillary S. DeNigro, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, FCC, to Telrite Corporation (Dec. 15, 2005) (Initial LOI).

³⁷ Letter from Hillary S. DeNigro, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, FCC, to Michael Geoffroy, Corporate Counsel, Telrite Corporation (June 9, 2006) (Second LOI).

³⁸ Letter from Trent Harkrader, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, FCC, to Michael Geoffroy, Corporate Counsel, Telrite Corporation (November 8, 2006) (Third LOI).

accurately report revenue data on its annual Form 499-A filed in March 2006.³⁹ On April 17, 2008, the FCC released a Notice of Apparent Liability (“NAL”) for Forfeiture & Order finding Telrite apparently liable for a forfeiture of \$924,212.⁴⁰ Telrite filed a Statement Seeking Reduction of Proposed Forfeiture on June 2, 2008.⁴¹ On April 18, 2012, the FCC released an Order⁴² adopting a Consent Decree between the Bureau and Telrite, in which Telrite agrees to develop and implement a Compliance Plan to help ensure future compliance with the Communications Laws, including the Federal Regulatory Reporting and Contribution Rules, and with the terms and conditions of this Consent Decree. The Order states⁴³ that Telrite has paid all invoiced amounts to the USF, TRS Fund, cost recovery mechanisms for NANP and LNP administration, and regulatory fees. Telrite also agreed to make a voluntary contribution to the United States Treasury in the amount of five hundred and twenty-five thousand dollars (\$525,000). Other than the NAL and the Order discussed above, Telrite states it has not been subject to any enforcement sanctions or ETC revocation proceedings in any state.

Having reviewed Telrite’s financial statements and having found no further other instances of regulatory or administrative enforcement actions by the FCC or other regulatory agency, based on the above information, Staff believes that Telrite meets this ETC designation criteria.

C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline Service Plans

In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.

Telrite provided Staff with its informational tariff⁴⁴ in which it describes the calling plans for Lifeline subscribers, including the number of free minutes in each calling plan, along with the terms and conditions of Lifeline service as provided by Telrite. Based on the information contained in Telrite’s informational tariff, Staff believes that Telrite meets this ETC designation criteria.

³⁹ Letter from Michael G. Geoffroy, Corporate Counsel, Telrite Corporation, to Christopher Shields, Enforcement Bureau, Federal Communications Commission (July 10, 2006).

⁴⁰ Telrite Corporation, *Notice of Apparent Liability for Forfeiture and Order*, 23 FCC Rcd 7231(2008) (NAL)(FCC 08-116).

⁴¹ Telrite Corporation’s Statement Seeking Reduction of Proposed Forfeiture (June 2, 2008).

⁴² See Telrite Corporation, File No. EB-05-1H-2348, Order and Consent Decree, DA 12-612 (rel. Apr. 18, 2012).

⁴³ *Ibid*, ¶9.

⁴⁴ Response to Staff Data Request STF 1.56.

D. Steps to Limit Fraud, Waste and Abuse of the FUSF

In the *Lifeline Reform Order* the FCC adopted various new measures and revised or eliminated other existing measures in order to limit fraud, waste and abuse of the Federal Universal Service Fund (“FUSF”). These measures include establishing uniform eligibility criteria to qualify for Lifeline services, clarifying the restriction of one Lifeline telephone allowed per household, initial certification and annual re-certification of consumer eligibility, establishing a national lifeline accountability database to ensure and enforce the one-per-household requirement, total elimination of toll limitation support for wireless carriers and a tapered elimination of toll limitation support for landline ETCs, elimination of the Link Up subsidy except on federally-recognized tribal lands and establishing additional provisions for USAC audits.

In its RCP, Telrite outlines the steps it will take to limit fraud, waste and abuse of the FUSF and to comply with all applicable Lifeline requirements and implement measures to prevent fraud, waste, and abuse.

E. Public Interest Determination

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity for rural areas. They also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act. Congress did not establish specific criteria to be applied under the public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.⁴⁵ Accordingly, before designating a carrier as an ETC, the Commission must make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.

Telrite states that by designating it as an ETC in Arizona, the public interest will be served as, by offering two free minutes of use of plans and options, Telrite will provide a competitive and affordable Lifeline service to eligible low-income subscribers who might not otherwise have access to basic communication services. This service will also allow Arizona residents access to larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage in the event that included usage has been exhausted, 911 and, where available,

⁴⁵ *ETC Minimum Requirements Report and Order*, ¶ 40.

E911 service in accordance with current FCC requirements. Finally, inclusion of Telrite's wireless service in the Lifeline program will serve the public interest by furthering the provision of communications service to low-income consumers, who, due to the restrictive credit criteria, deposit requirements, and long-term commitments of traditional service providers, are off network and are likely to remain so without any viable alternative. These factors, in addition to the increased competitive choice, show that granting Telrite ETC designation is in the public interest.

F. Designated Service Area

The Commission must establish a geographic area for the purpose of determining universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b). Telrite requests that the Commission designate it as an ETC for service areas in Arizona. Through resale of wireless service provided by AT&T in Arizona, Telrite will provide Lifeline service in many zip codes in the State of Arizona, excluding tribal lands.

There are a number of zip codes that encompass both tribal lands and non-tribal lands. Some of the tribal lands are served by tribally-owned telephone companies and some of the tribal lands are served by non-tribally owned telephone companies. For those zip codes that encompass tribal lands, Telrite requested to serve only the non-tribal areas of the zip code. Attachment 1 of the Recommended Opinion and Order contains the list of zip codes to be served by Telrite.

G. Reporting Requirement for Prepaid Wireless Deactivations

Staff recommends that Telrite be required to provide a quarterly report to the ACC, to be filed in docket control as a Compliance item, summarizing the total number of customers with periods of inactivity greater than 60 days, but did not cancel service with Telrite, are no longer qualified for Lifeline service or who voluntarily deactivate service during that quarter. The purpose of this report is to monitor the number of deactivated customers so that Telrite does not continue to receive Lifeline reimbursement per handset for these customers every month from the Universal Service Administrative Company ("USAC"). In compiling the data for these reports, Telrite must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report must also include the total number of Lifeline customers and, as separate items, the number of customers who voluntarily relinquish their Telrite provided Lifeline service, the number of customers who do not annually recertify their eligibility for Lifeline services and the number of customers deactivated for 60 days of inactivity.

4. LINK UP

In its application, Telrite requested Link Up support. Federal Link Up Assistance pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional, wireline

telephone or activation fee for a wireless telephone for a primary residence. It also allows participants to pay any remaining amount owed on a deferred schedule, interest-free.

In the Lifeline Reform Order, the FCC eliminated the Link Up program, effective April 1, 2012, with the exception ETCs serving Tribal lands.⁴⁶ Telrite will not be providing Lifeline service on Tribal lands. Given the FCC's elimination of the Link Up program on non-tribal lands, Telrite's Link Up support request is moot and no longer needs to be addressed by this Commission.

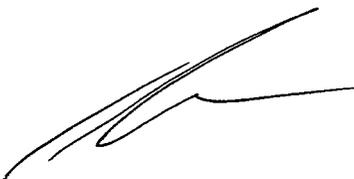
5. STAFF RECOMMENDATIONS

In addition to the conditions set forth by the FCC, Staff recommends Telrite's Application for designation as an ETC be granted subject to the following conditions:

1. Telrite shall file a tariff, in this docket, setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of a Commission Order in this matter;
2. Telrite shall notify the Commission of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
3. Telrite shall make available Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90) days after a Commission decision and concurrently notify the Commission, by making a filing in Docket Control, in this docket, of the commencement date for such services;
4. Telrite shall apprise the Commission of any customer complaints that may arise from its ETC service offerings by making a filing in Docket Control in this docket;
5. Telrite shall provide a regulatory contact to the Commission by making a filing in Docket Control in this docket;
6. In the event that Telrite requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
7. Telrite shall submit in Docket Control an annual report by April 15th of each year, beginning April 15, 2014, 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;

⁴⁶ See Lifeline Reform Order, ¶245 and footnote 652.

8. Telrite shall submit in Docket Control as a compliance item in this docket, 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. In compiling the data for these reports, Telrite must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the disenrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report should be submitted as a compliance item in this docket on the 15th of the month following the end of each calendar quarter, beginning July 15, 2013, or with the first complete quarter following the offering of prepaid Lifeline calling plans, whichever is earlier;
9. In the event of a transfer of control that involves Telrite, a new ETC petition shall be filed with the Commission. This will ensure ETCs undergoing reorganization remain financially viable and able to provide the supported services throughout the designated service areas as originally approved by the Commission; and
10. Telrite shall not expand its Lifeline service beyond the designated service area specified in this application, without acquiring ETC designation from the Commission to serve the additional area.



Steven M. Olea
Director
Utilities Division

SMO:LLM:sms\MAS

ORIGINATOR: Lori Morrison

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **BOB STUMP**

3 Chairman

4 **GARY PIERCE**

5 Commissioner

6 **BRENDA BURNS**

7 Commissioner

8 **BOB BURNS**

9 Commissioner

10 **SUSAN BITTER SMITH**

11 Commissioner

12 IN THE MATTER OF THE APPLICATION }
13 OF TELRITE CORPORATION DBA LIFE }
14 WIRELESS FOR DESIGNATION AS A }
15 WIRELESS ELIGIBLE }
16 TELECOMMUNICATIONS CARRIER IN }
17 THE STATE OF ARIZONA (LOW INCOME }
18 ONLY). }

DOCKET NO. T-04288A-11-0405

DECISION NO. _____

ORDER

19 Open Meeting
20 February 12 and 13, 2013
21 Phoenix, Arizona

22 BY THE COMMISSION:

23 FINDINGS OF FACT

24 **INTRODUCTION**

25 1. On November 8, 2011, Telrite Corporation dba Life Wireless ("Telrite") filed an
26 Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant
27 to section 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal
28 Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 and 54.207. In its
Application, Telrite requests the Arizona Corporation Commission ("ACC" or "Commission")
designate it as an ETC in certain zip codes, excluding tribal lands, for the purpose of receiving
federal Universal Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline¹).
Telrite is not requesting high cost support.

1 Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. The federal support amount provided to the ETC is \$9.25.

1 2. On December 26, 2012, the FCC approved Telrite's Revised Compliance Plan
2 ("RCP") and waived the company owned-facilities requirement. On December 27, 2012, Telrite
3 filed a copy of the RCP in the docket.

4 **BACKGROUND**

5 3. Telrite Corporation is a Georgia corporation with its principal offices located at
6 4113 Monticello Street, Covington, Georgia 30014. Telrite provides Commercial Mobile Radio
7 Service ("CMRS") through the resale of service of other wireless carriers. Although Telrite is
8 certificated to provide resold long distance² services in Arizona, these services will not be utilized
9 in the provision of Telrite's Lifeline services. Instead, Telrite proposes to provide wireless
10 Lifeline services through the resale of CMRS provided by other wireless carriers. Telrite has been
11 granted wireless ETC designation in fourteen (14) jurisdictions³ with nine (9) applications pending
12 in other jurisdictions,⁴ excluding Arizona. In the jurisdictions it currently operates, Telrite serves
13 over 800,000 wireless customers,⁵ of which over 740,000 are Lifeline customers. Telrite will
14 provide wireless service through a "virtual network" consisting of services obtained from licensed
15 wireless network operator AT&T Wireless ("AT&T")⁶ and does not own or operate any of its own
16 wireless facilities. Telrite's arrangement with AT&T enables it to offer services wherever the
17 underlying wireless carrier offers service in the State of Arizona. Both non-rural and rural
18 incumbent local exchange carriers ("ILECs") provide wireline service within these areas. For its
19 proposed designated service area, Telrite provided a list of zip codes in which it will provide
20 service and identified the ILEC(s) serving each zip code in Exhibit A of the Application.

21 ...

22 ...

23 ...

24 ...

25 ² Decision No. 67812, issued May 5, 2005.

26 ³ Arkansas, Georgia, Illinois, Indiana, Louisiana, Maine, Maryland, Minnesota, Missouri, Oklahoma, Rhode Island,
South Carolina, West Virginia and Puerto Rico.

27 ⁴ Idaho, Kansas, Michigan, Mississippi, New Jersey, Pennsylvania, Utah, Washington and Wisconsin.

28 ⁵ Response to Staff Data Request STF 2.1.

⁶ Application, Page 10, line 4 and response to Staff Data Request STF 1.24.

1 4. On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link*
2 *Up Reform and Modernization ("Lifeline Reform Order")*⁷, in which the FCC adopted
3 comprehensive reforms to the low-income program to revise and modernize the Lifeline service
4 requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that
5 Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its
6 own facilities ("the facilities requirement") subject to certain public safety and compliance
7 obligations, was appropriate for carriers seeking to provide Lifeline-only service.⁸ Specifically, in
8 the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act's
9 Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-
10 only ETC designation, subject to the following conditions: (1) compliance with certain 911 and
11 enhanced 911 (E911) public safety requirements; and (2) FCC Wireless Competition Bureau
12 approval of a compliance plan providing specific information regarding the carrier and its service
13 offerings and outlining the measures the carrier will take to implement the obligations contained in
14 the *Order*.⁹

15 5. On March 12, 2012, Telrite submitted its initial Compliance Plan to the FCC in
16 order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide
17 Lifeline services. Since its initial filing, Telrite has submitted numerous revisions to its RCP,
18 making changes as the result of discussions with FCC Staff. Telrite filed its last/final RCP
19 December 19, 2012. On December 26, 2012, in DA 12-2063, the FCC issued a Public Notice¹⁰
20 approving Telrite's December 19, 2012 Revised Compliance Plan.

21 ...

22 _____
23 ⁷ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed*
24 *Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("*Lifeline Reform Order*").

25 ⁸ *Ibid.*, at paras. 368-381.

26 ⁹ *See id.* at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans
27 pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of*
28 *Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC
Rcd 2186 (Wireline Comp. Bur. 2012).

¹⁰ *See* "Wireline Competition Bureau Approves the Compliance Plans of AirVoice Wireless, AmeriMex
Communications, Blue Jay Wireless, Millennium 2000, Nexus Communications, Platinumtel Communications, Sage
Telecom, Telrite and Tescape Communications, Public Notice from FCC Wireline Competition Bureau, WC Docket
Nos. 09-197 and 11-42 (rel. December 26, 2012).

1 **REQUIREMENTS FOR DESIGNATION AS AN ETC AND GLOBAL'S COMPLIANCE**
2 **WITH THE REQUIREMENTS**

3 6. Designation as an ETC makes a carrier eligible to receive federal universal service
4 funds. The requirements for designation of ETCs are specified by federal law in 47 U.S.C. §
5 214(e)(1), which states:

6 "A common carrier designated as an eligible telecommunications carrier under paragraph
7 (2) or (3) shall be eligible to receive universal service support in accordance with section
8 254 and shall throughout the service area for which the designation is received: (A) offer
9 the services that are supported by Federal universal service support mechanisms under
10 section 254(c), either using its own facilities or a combination of its own facilities and
11 resale of another carrier's services (including the services offered by another eligible
12 telecommunications carrier); and (B) advertise the availability of such services and the
13 corresponding charges using media of general distribution."

14 7. In order to be designated as an ETC, a carrier must offer Lifeline service to all
15 qualifying low-income customers within its service area.¹¹ Lifeline service provides basic
16 telephone service, typically by passing on discounts to monthly telecommunications charges. As a
17 wireless reseller of prepaid wireless service, Telrite is proposing to offer qualified customers a free
18 handset and the choice of either a free prepaid minutes calling plan, of which there are two
19 options,¹² or applying a Lifeline discount for Telrite's unlimited voice calls/text messaging
20 monthly prepaid retail plan.

21 8. As indicated above, the FCC granted Telrite forbearance from the requirement that
22 it provide service using its own facilities or a combination of its own facilities and resale of
23 another carrier's service and also any criteria related to facilities build out plans. Telrite would be a
24 ...

25 _____
26 ¹¹ 47 C.F.R. §§ 54.405 and 54.411(a)

27 ¹² See RCP, pages 22-24. Telrite is offering Lifeline customers a choice of 125 free monthly voice minutes/text
28 messages with monthly rollover of unused voice minutes/texts messages or 250 free monthly voice minutes/text
messages with no rollover to Lifeline customers. Text messages for either of these two plans are counted at 3 text
messages per 1 voice minute

1 Lifeline-only ETC, eligible only for Lifeline support and must meet all the other criteria required
2 of ETCs.

3 **A. OFFERING THE SERVICES DESIGNATED FOR SUPPORT**

4 9. On December 23, 2011, the FCC adopted and released an Order on
5 Reconsideration, in which the FCC modified, on its own motion, the definition of “voice
6 telephony”, as adopted in the *USF/ICC Transformation Order*.¹³ In that Order, the FCC reduced
7 its former list of nine supported services to four supported services and amended 47 C.F.R. §
8 54.101 to specify the “voice telephony services” supported by federal universal service support
9 mechanisms.¹⁴

10 10. 47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to
11 receive Federal universal service fund support. The services and Telrite’s response to the
12 provision of each service are as follows:

13
14 (a) Voice grade access to the Public Switched Network. “Voice grade access to the
15 Public Switched Network” is defined as a functionality that enables a user of
16 telecommunications services to transmit voice communications, including signaling the
17 network that the caller wishes to place a call, and receive voice communications,
18 including receiving a signal indicating there is an incoming call. For purposes of this
19 Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.
20 Telrite states¹⁵ its services include voice telephony services that provide voice grade
21 access to the public switched network.

22 (b) Local usage. “Local usage” means minutes of use for local exchange service,
23 prescribed by the Federal Communications Commission, provided free of charge to end
24 users. Telrite states¹⁶ its service offerings provide customers with a preset number of
25 minutes of use for local service at no charge to the customer and the current Lifeline
26 offerings include packages that can be used for local and domestic toll service.

27
28
13 See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform-Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (*USF/ICC Transformation Order on Reconsideration*) at para. 3.

14 *Id.* at para. 78; see also *id.* App. A at 536 (revising section 54.101(a) of the Commission’s rules); see 76 FR 73830, 73870 (Nov. 29, 2011) (revising 47 C.F.R. § 54.101(a) with an effective date of December 29, 2011).

15 See Application, Page 12, lines 1-3 and RCP, Page 25.

16 *Ibid.*, lines 9-16 and RCP, Page 25.

1 (c) Access to emergency services. "Access to emergency services" includes access to
2 services, such as 911 and enhanced 911, provided by local governments or other public
3 safety organizations. 911 is defined as a service that permits a telecommunications user,
4 by dialing the three-digit code "911", to call emergency services through a Public Safety
5 Access Point ("PSAP") operated by the local government. "Enhanced 911" is defined as
6 911 service that includes the ability to provide automatic numbering information
7 ("ANI"), which enables the PSAP to call back if the call is disconnected, and automatic
8 location identification ("ALI"), which permits emergency service providers to identify
9 the geographic location of the calling party. "Access to emergency services" includes
10 access to 911 and enhanced 911 services to the extent the local government in an eligible
11 carrier's service area has implemented 911 or enhanced 911 systems. Telrite states¹⁷ it
12 will provide access to emergency services provided by local government or public safety
13 officials, including 911 and E911 where available.

9 (d) Toll Limitation for Qualifying Low-Income Consumers. "Toll limitation denotes
10 either toll blocking or toll control for eligible telecommunications carriers that are
11 incapable of providing both services. For eligible telecommunications carriers that are
12 capable of providing both services, 'toll limitation' denotes toll blocking and toll
13 control."¹⁸ In the *Lifeline Reform Order* the FCC relieved ETCs of the obligation to offer
14 toll limitation services if their Lifeline offering does not distinguish in the pricing of toll
15 and non-toll calls.¹⁹ Telrite's wireless prepaid calling plans do not distinguish between
16 non-toll (i.e. local) and toll calls. Telrite's prepaid plans include a specific number of
17 minutes that cannot be exceeded. Therefore, customers cannot incur any charges for
18 excessive toll calling or be disconnected for non-payment.

16 . 11. In its application, Telrite states it has the ability to provide all the supported services
17 and functionalities required in the proposed ETC designated service area to all subscribers taking
18 service under its Lifeline plan through arrangements with its underlying carrier. Based on the
19 above information and explanations, Staff believes that Telrite meets this ETC designation criteria.

20 B. ADVERTISING OF SUPPORTED SERVICES

21 12. 47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible
22 telecommunications carrier to advertise the availability of such services and the corresponding
23 charges using media of general distribution. Telrite states it will advertise the availability of its
24 Lifeline services and the charges for its Lifeline services using media of general distribution.²⁰
25 Specifically, Telrite will advertise its Lifeline program through community outreach events with

26 ¹⁷ See Application, Page 13, lines 7-13 and RCP, Page 25.

27 ¹⁸ 47 C.F.R. § 54.400(d).

28 ¹⁹ *Lifeline Reform Order*, ¶238.

²⁰ Application, Page 5, lines 16-19 and Page 14, lines 15-23 and Response to Staff Data Request STF 2.4.

1 local churches, charities, and community groups, televising public service announcements²¹ and
2 will also market through its website.²² Telrite will announce and advertise telecommunications
3 services as an ETC where it provides service in its Service Area and will publicize the availability
4 of Lifeline services in a manner reasonably calculated to reach those likely to qualify for those
5 services.²³ Advertisements will be both English and Spanish.²⁴ Telrite submitted examples of
6 prior relevant advertisements to Staff. In addition, Telrite submitted examples of its
7 advertisements in Exhibit C of its RCP to the FCC.

8 13. Based on the information above and Telrite's advertising materials provided to
9 Staff, Staff concludes that Telrite will advertise the availability of its supported services and the
10 corresponding charges using media of general distribution as required by 47 U.S.C. §
11 214(e)(1)(B). Staff believes that Telrite meets this ETC designation criteria.

12 C. ADDITIONAL ETC REQUIREMENTS

13 14. In addition to the requirements listed above, the FCC adopted, in the Lifeline
14 Reform Order, comprehensive reforms to the low-income program to revise and modernize the
15 Lifeline service requirements and implement measures to address fraud, waste, and abuse within
16 the system. Below are the additional requirements and Telrite's response to each requirement.

17 C.1 A Commitment and Ability to Provide Supported Services

18 15. In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

19 (i) Certify that it will comply with the service requirements applicable to the
20 support that it receives; and

21 (ii) Submit a five-year plan that describes with specificity proposed improvements
22 or upgrades to the applicant's network throughout its proposed service area. Each
23 applicant shall estimate the area and population that will be served as a result of the
24 improvements. Except, a common carrier seeking designation as an eligible

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27 ²¹ Response to Staff Data Request STF 2.4.

²² Response to Staff Data Request STF 1.44

²³ Application, Page 14, lines 17-20.

²⁴ Response to Staff Data Request STF 2.2.

1 telecommunications carrier in order to provide supported services only under
2 subpart E of this part does not need to submit such a five-year plan.²⁵

3 16. Telrite states²⁶ it will comply with the service requirements applicable to the
4 support that it receives. The requirement directing submissions of a formal network improvement
5 plan under 47 C.F.R. § 54.202(a)(1)(ii) does not apply to Telrite because it is seeking only to
6 provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the
7 facilities-based requirements for Telrite.

8 17. Based on the above information, Staff believes that Telrite meets this ETC
9 designation criteria.

10 C.2 Remain Functional in Emergency Situations

11 18. In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC
12 applicant demonstrate its ability to remain functional in emergency situations. Specifically, “an
13 applicant must demonstrate that it has a reasonable amount of back-up power to ensure
14 functionality without an external power source, is able to reroute traffic around damaged facilities,
15 and is capable of managing traffic spikes resulting from emergency situations.”²⁷

16 19. To demonstrate its ability to remain functional in emergency situations, Telrite
17 states²⁸ it provides service in Arizona by reselling the services of its underlying wireless carrier,
18 specifically AT&T, in Arizona. Telrite further states that its underlying wireless carriers’
19 networks have implemented state-of-the-art network reliability standards and have the ability to
20 remain functional in emergency situations such that Telrite’s service reliability compares favorably
21 with that of any facilities-based operator in the wireless telecommunications industry.

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

25
26 ²⁵ *Lifeline Reform Order*, ¶ 386.

27 ²⁶ Application, Page 15, lines 3-14.

28 ²⁷ *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*”), ¶ 25.

²⁸ Application, Page 15, lines 16-24 and Response to Staff Data Request STF 2.7(b).

C.3 Satisfy Consumer Protection and Service Quality Standards

21. In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application.²⁹ The sufficiency of other commitments will be considered on a case-by-case basis.

22. To demonstrate its ability to satisfy consumer protection and service quality standards, Telrite states³⁰ it will satisfy all such standards. Telrite commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards and will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service (the "CTIA Code"). In addition, Telrite commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's USF Order.³¹ Telrite also commits to use its best efforts to resolve customer complaints received by the Commission.

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

C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability

24. In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part. In the *Lifeline Reform Order*³², the FCC provides guidance on specific information to be considered when determining if an applicant meets this requirement:

"...Among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline customers, how long its has been in business, whether the applicant intends to rely exclusively on USF distributions to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state."

...

²⁹ ETC Minimum Requirements Report and Order, ¶ 28.

³⁰ Application, Page 16, lines 1-7.

³¹ FCC 97-157, Universal Service Order ("USF Order") at ¶ 4.

³² See *Lifeline Reform Order*, ¶388.

1 25. Telrite states³³ it has been offering Lifeline service to customers since October,
2 2010. Telrite also offers several other telecommunication services in addition to its Lifeline
3 service. In 2011, the wireline services offered by Telrite produced substantial net income. This
4 revenue was generated from more than 30,000 customers of Telrite's local and long distance
5 service, which Telrite has been providing for over 10 years. In sum, Telrite has access to sufficient
6 funds to run its business and is not solely dependent on reimbursements from USF distributions.

7 26. In response to Staff's inquiry about complaints, at the state and at the FCC level,
8 Telrite discussed three incidents.³⁴ First, Telrite was the subject of one complaint in West Virginia
9 by a customer about an alleged receipt of a handset claimed to not have been ordered by the
10 customers. This complaint was resolved. Second, Telrite is participating in an FCC enforcement
11 bureau inquiry regarding activities of a rogue agent in Missouri. While the investigation has not
12 been formally closed, Telrite states³⁵ that it has provided FCC staff with all requested information,
13 including information demonstrating that Telrite has restored all subsidies to the federal universal
14 service fund attributable to the fraudulent rogue agent activity. Telrite has also reformed and
15 refined its policies, procedures and training to guard against recurrence of such activity in the
16 future. Third, Telrite, as a toll reseller providing interstate and information services to residential
17 and business customers nationwide, is subject to regulatory obligations which include contributing
18 to the federal Universal Service Fund ("USF"), the Telecommunications Relay Service ("TRS")
19 Fund, cost recovery mechanisms for North American Numbering Plan ("NANP") and Local
20 Number Portability ("LNP") administration, and federal regulatory fees. Following Telrite's
21 purchase of Onestar Long Distance, Inc. in 2004, the Universal Service Administrative Company
22 (USAC) referred Telrite to the FCC Enforcement Bureau ("Bureau") for potential enforcement
23 action, alleging that Telrite had failed to comply with the FCC's USF contribution and reporting

24 ...

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27 ³³ RCP, Page 24.

28 ³⁴ Response to Staff Data Request STF 1.54.

³⁵ Response to Staff Data Request STF 2.5(a).

1 rules. The Bureau issued Letters of Inquiry to Telrite dated December 15, 2005,³⁶ June 9, 2006,³⁷
2 and November 8, 2006,³⁸ seeking information about Telrite's compliance with its regulatory
3 obligations. Telrite submitted responses to the Bureau's inquiries, and on July 10, 2006, Telrite
4 admitted that it had failed to accurately report revenue data on its annual Form 499-A filed in
5 March 2006.³⁹ On April 17, 2008, the FCC released a Notice of Apparent Liability ("NAL") for
6 Forfeiture & Order finding Telrite apparently liable for a forfeiture of \$924,212.⁴⁰ Telrite filed a
7 Statement Seeking Reduction of Proposed Forfeiture on June 2, 2008.⁴¹ On April 18, 2012, the
8 FCC released an Order⁴² adopting a Consent Decree between the Bureau and Telrite, in which
9 Telrite agrees to develop and implement a Compliance Plan to help ensure future compliance with
10 the Communications Laws, including the Federal Regulatory Reporting and Contribution Rules,
11 and with the terms and conditions of this Consent Decree. The Order states⁴³ that Telrite has paid
12 all invoiced amounts to the USF, TRS Fund, cost recovery mechanisms for NANP and LNP
13 administration, and regulatory fees. Telrite also agreed to make a voluntary contribution to the
14 United States Treasury in the amount of five hundred and twenty-five thousand dollars (\$525,000).
15 Other than the NAL and the Order discussed above, Telrite states it has not been subject to any
16 enforcement sanctions or ETC revocation proceedings in any state.

17 27. Having reviewed Telrite's financial statements and having found no further other
18 instances of regulatory or administrative enforcement actions by the FCC or other regulatory
19 agency, based on the above information, Staff believes that Telrite meets this ETC designation
20 criteria.

21 _____
22 ³⁶Letter from Hillary S. DeNigro, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, FCC, to
23 Telrite Corporation (Dec. 15, 2005) (Initial LOI).

24 ³⁷Letter from Hillary S. DeNigro, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, FCC, to
25 Michael Geoffroy, Corporate Counsel, Telrite Corporation (June 9, 2006) (Second LOI).

26 ³⁸Letter from Trent Harkrader, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, FCC, to
27 Michael Geoffroy, Corporate Counsel, Telrite Corporation (November 8, 2006) (Third LOI).

28 ³⁹Letter from Michael G. Geoffroy, Corporate Counsel, Telrite Corporation, to Christopher Shields, Enforcement
Bureau, Federal Communications Commission (July 10, 2006).

⁴⁰Telrite Corporation, *Notice of Apparent Liability for Forfeiture and Order*, 23 FCC Rcd 7231(2008) (NAL)(FCC
08-116).

⁴¹Telrite Corporation's Statement Seeking Reduction of Proposed Forfeiture (June 2, 2008).

⁴²See Telrite Corporation, File No. EB-05-1H-2348, Order and Consent Decree, DA 12-612 (rel. Apr. 18, 2012).

⁴³*Ibid*, ¶9.

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C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline Service Plans

28. In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.

29. Telrite provided Staff with its informational tariff⁴⁴ in which it describes the calling plans for Lifeline subscribers, including the number of free minutes in each calling plan, along with the terms and conditions of Lifeline service as provided by Telrite. Based on the information contained in Telrite’s informational tariff, Staff believes that Telrite meets this ETC designation criteria.

D. STEPS TO LIMIT FRAUD, WASTE AND ABUSE OF THE FUSF

30. In the *Lifeline Reform Order*, the FCC adopted various new measures and revised or eliminated other existing measures in order to limit fraud, waste and abuse of the Federal Universal Service Fund (“FUSF”). These measures include establishing uniform eligibility criteria to qualify for Lifeline services, clarifying the restriction of one Lifeline telephone allowed per household, initial certification and annual re-certification of consumer eligibility, establishing a national lifeline accountability database to ensure and enforce the one-per-household requirement, total elimination of toll limitation support for wireless carriers and a tapered elimination of toll limitation support for landline ETCs, elimination of the Link Up subsidy except on federally-recognized tribal lands and establishing additional provisions for USAC audits.

...
...

⁴⁴ Response to Staff Data Request STF 1.54.

1 31. In its RCP, Telrite outlines the steps it will take to limit fraud, waste and abuse of
2 the FUSF and to comply with all applicable Lifeline requirements and implement measures to
3 prevent fraud, waste, and abuse.

4 **E. PUBLIC INTEREST DETERMINATION**

5 32. Under Section 214 of the Act, the FCC and state commissions must determine that
6 an ETC designation is consistent with the public interest, convenience and necessity for rural
7 areas. They also must consider whether an ETC designation serves the public interest consistent
8 with Section 254 of the Act. Congress did not establish specific criteria to be applied under the
9 public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC
10 designation must be analyzed in a manner that is consistent with the purposes of the Act itself,
11 including the fundamental goals of preserving and advancing universal service; ensuring the
12 availability of quality telecommunications services at just, reasonable, and affordable rates; and
13 promoting the deployment of advanced telecommunications and information services to all regions
14 of the nation, including rural and high-cost areas.⁴⁵ Accordingly, before designating a carrier as an
15 ETC, the Commission must make an affirmative determination that such designation is in the
16 public interest, regardless of whether the applicant seeks designation in an area served by a rural or
17 non-rural carrier.

18 33. Telrite states that by designating it as an ETC in Arizona, the public interest will be
19 served as, by offering two free minutes of use of plans and options, Telrite will provide a
20 competitive and affordable Lifeline service to eligible low-income subscribers who might not
21 otherwise have access to basic communication services. This service will also allow Arizona
22 residents access to larger local calling areas (as compared to traditional wireline carriers), the
23 convenience and security afforded by mobile telephone service, the opportunity for customers to
24 control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase
25 additional usage in the event that included usage has been exhausted, 911 and, where available,
26 E911 service in accordance with current FCC requirements. Finally, inclusion of Telrite's wireless
27

28 ⁴⁵ *ETC Minimum Requirements Report and Order*, ¶ 40.

1 service in the Lifeline program will serve the public interest by furthering the provision of
2 communications service to low-income consumers, who, due to the restrictive credit criteria,
3 deposit requirements, and long-term commitments of traditional service providers, are off network
4 and are likely to remain so without any viable alternative. These factors, in addition to the
5 increased competitive choice, show that granting Telrite ETC designation is in the public interest.

6 **F. DESIGNATED SERVICE AREA**

7 34. The Commission must establish a geographic area for the purpose of determining
8 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §
9 214(e)(2); 47 C.F.R. § 54.201(b). Telrite requests that the Commission designate it as an ETC for
10 service areas in Arizona. Through resale of wireless service provided by AT&T in Arizona,
11 Telrite will provide Lifeline service in many zip codes in the State of Arizona, excluding tribal
12 lands.

13 35. There are a number of zip codes that encompass both tribal lands and non-tribal
14 lands. Some of the tribal lands are served by tribally-owned telephone companies and some of the
15 tribal lands are served by non-tribally owned telephone companies. For those zip codes that
16 encompass tribal lands, Telrite requested to serve only the non-tribal areas of the zip code.
17 Attachment 1 is a list of each zip code served by Telrite.

18 **G. REPORTING REQUIREMENT FOR PREPAID WIRELESS**
19 **DEACTIVATIONS**

20 36. Staff recommends that Telrite be required to provide a quarterly report to the ACC,
21 to be filed in docket control as a Compliance item, summarizing the total number of customers
22 with periods of inactivity greater than 60 days, but did not cancel service with Telrite, are no
23 longer qualified for Lifeline service or who voluntarily deactivate service during that quarter. The
24 purpose of this report is to monitor the number of deactivated customers so that Telrite does not
25 continue to receive Lifeline reimbursement per handset for these customers every month from the
26 Universal Service Administrative Company ("USAC"). In compiling the data for these reports,
27 Telrite must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment
28 policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute

1 usage. The quarterly report must also include the total number of Lifeline customers and, as
2 separate items, the number of customers who voluntarily relinquish their Telrite provided Lifeline
3 service, the number of customers who do not annually recertify their eligibility for Lifeline
4 services and the number of customers deactivated for 60 days of inactivity.

5 **LINK UP**

6 37. In its application, Telrite requested Link Up support. Federal Link Up Assistance
7 pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional, wireline
8 telephone or activation fee for a wireless telephone for a primary residence. It also allows
9 participants to pay any remaining amount owed on a deferred schedule, interest-free.

10 38. In the Lifeline Reform Order, the FCC eliminated the Link Up program, effective
11 April 1, 2012, with the exception ETCs serving Tribal lands.⁴⁶ Telrite will not be providing
12 Lifeline service on Tribal lands. Given the FCC's elimination of the Link Up program on non-
13 tribal lands, Telrite's Link Up support request is moot and no longer needs to be addressed by this
14 Commission.

15 **STAFF RECOMMENDATIONS**

16 39. In addition to the conditions set forth by the FCC, Staff recommends Telrite's
17 Application for designation as an ETC be granted subject to the following conditions:

- 18 A. Telrite shall file a tariff, in this docket, setting forth the rates, terms and
19 conditions for its Lifeline service within thirty (30) days of a Commission Order
in this matter;
- 20 B. Telrite shall notify the Commission of any future changes to its rates, terms
21 and/or conditions regarding its Lifeline offerings and file such changes in its
22 tariff and amend its tariff in compliance with A.R.S. § 40-367;
- 23 C. Telrite shall make available Lifeline services to qualifying low-income
24 applicants in its ETC service area no later than ninety (90) days after a
25 Commission decision and concurrently notify the Commission, by making a
26 filing in Docket Control, in this docket, of the commencement date for such
27 services;

28 ⁴⁶ See Lifeline Reform Order, ¶245 and footnote 652.

- 1 D. Telrite shall apprise the Commission of any customer complaints that may arise
2 from its ETC service offerings by making a filing in Docket Control in this
3 docket;
- 4 E. Telrite shall provide a regulatory contact to the Commission by making a filing
5 in Docket Control in this docket;
- 6 F. In the event that Telrite requests to relinquish its ETC status and no longer
7 provide Lifeline services, it must provide notice to both the Commission and its
8 customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
- 9 G. Telrite shall submit in Docket Control an annual report by April 15th of each
10 year, beginning April 15, 2014, that contains its total number of Lifeline
11 subscribers, total amount of Federal USF support received and an affidavit
12 stating that the Lifeline discounts or the equivalent are equal to the amount of
13 total Federal USF support per line. The annual filing shall be submitted as a
14 compliance item in this docket;
- 15 H. Telrite shall submit in Docket Control as a compliance item in this docket, a
16 quarterly report detailing the total number of Lifeline customers, the total
17 number of customers removed from the customer base due to 60-day inactivity,
18 the number of customers removed from the customer base due to annual
19 verification and the total number of customers who voluntarily relinquished
20 Lifeline service. In compiling the data for these reports, Telrite must comply
21 with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment
22 policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines
23 activities that constitute usage. The quarterly report should be submitted as a
24 compliance item in this docket on the 15th of the month following the end of
25 each calendar quarter, beginning July 15, 2013, or with the first complete
26 quarter following the offering of prepaid Lifeline calling plans, whichever is
27 earlier;
- 28 I. In the event of a transfer of control that involves Telrite, a new ETC petition
shall be filed with the Commission. This will ensure ETCs undergoing
reorganization remain financially viable and able to provide the supported
services throughout the designated service areas as originally approved by the
Commission; and
- J. Telrite shall not expand its Lifeline service beyond the designated service area
specified in this application, without acquiring ETC designation from the
Commission to serve the additional area.

CONCLUSIONS OF LAW

1. Telrite Corporation is a telecommunications company as defined in A.R.S. § 40-
201(46) and is a "telecommunications carrier" as defined in 47 U.S.C. § 153(51). Telrite is also a

1 reseller of Commercial Mobile Radio Service as defined in 47 U.S.C. § 20.3 and A.A.C. R14-2-
2 1201(8).

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

4 3. Under 47 U.S.C. § 214(e)(1), a common carrier that is designated as an Eligible
5 Telecommunications Carrier must, throughout its designated service area, offer the services that
6 are supported by the Federal Universal Service Support mechanisms either by using its own
7 facilities or a combination of its own facilities and resale of another carrier's services. The carrier
8 must also advertise the availability of such services and the rates for the services using media of
9 general distribution.

10 4. Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area
11 for the purposes of determining universal service obligations and support mechanisms. Telrite's
12 application applies to the service area consisting of each of the zip codes as listed in Attachment 1,
13 excluding Federally-Recognized Tribal Lands located within the state of Arizona.

14 5. Telrite meets the requirements for ETC designation under 47 U.S.C. § 214 and
15 C.F.R. § 54.201 *et seq.*, subject to Telrite's compliance with the conditions set forth in Finding of
16 Fact No. 39 herein.

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ORDER

IT IS THEREFORE ORDERED that the application of Telrite Corporation for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support for low-income customers in Arizona, for the service area set forth in Attachment 1 attached hereto and incorporated herein by reference, be and hereby is approved, subject to Telrite's compliance with the conditions set forth in Finding of Fact No. 39 above.

IT IS FURTHER ORDERED that if Telrite Corporation does not comply with the requirements of Finding of Fact No. 39, its designation as an ETC may be revoked after due process.

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

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, JODI JERICH, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2013.

JODI JERICH
EXECUTIVE DIRECTOR

DISSENT: _____

DISSENT: _____

SMO:LLM:sms\MAS

1 SERVICE LIST FOR: Telrite Corporation
2 DOCKET NO. T-04288A-11-0405

3 Mr. Michael Patten
4 Attorney for Telrite Corporation
5 Roshka, DeWulf & Patten, PLC
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8 Phoenix, Arizona 85004

9 Mr. Steven M. Olea
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11 Arizona Corporation Commission
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14 Ms. Janice M. Alward
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ATTACHMENT 1

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ATTACHMENT 1

ATTACHMENT 1

Docket No. T-04288A-11-0405

Telrite Corporation						
Coverage Area by Zip Code						
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	

ATTACHMENT 1

Docket No. T-04288A-11-0405

				Telrite Corporation Coverage Area by Zip Code		Tribal Lands Covered	
Zipcode	Zip Postal City	State	Mkt_Name	CSA_Leaf	CSA_Desc		
85042	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85043	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
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	PHXGRS520	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		

Telrite Corporation						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
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.
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	
85128	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	
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	PHXCGR520	CASA GRANDE, AZ 520	
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	

ATTACHMENT 1

Docket No. T-04288A-11-0405

Zipcode	Zip_Postal_City	State	Mkt_Name	Telrite Corporation Coverage Area by Zip Code		Tribal Lands Covered
				CSA_Leaf	CSA_Desc	
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	
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	
85225	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85226	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85227	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85228	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85230	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority
85231	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
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	
85239	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
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	PHXPHX602	PHOENIX, AZ 602	
85245	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85246	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85247	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
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	
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	

Telrite Corporation						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
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	
85271	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85272	Stanfield	AZ	Phoenix_AZ	PHXGR520	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	PHXGR520	CASA GRANDE, AZ 520	
85293	Casa Grande	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	
85294	Casa Grande	AZ	Phoenix_AZ	PHXGR520	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	

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				Telrite Corporation		Coverage Area by Zip Code		Tribal Lands Covered	
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc				
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				
85333	Dateland	AZ	Yuma_AZ	NMXXVUM520	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	NMXXVUM520	YUMA, AZ 520				
85337	Gila Bend	AZ	Yuma_AZ	NMXXVUM520	YUMA, AZ 520				
85338	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602				
85339	Laveen	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	NMXXVUM520	YUMA, AZ 520				
85350	Somerton	AZ	Yuma_AZ	NMXXVUM520	YUMA, AZ 520				
85351	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602				
85352	Wellton	AZ	Yuma_AZ	NMXXVUM520	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	PHXWCB928	WICKENBURG, AZ 928				
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602				
85360	Lake Havasu City	AZ	LakeHavasuCity_AZ	NMXXLHC520	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	NMXXVUM520	YUMA, AZ 520				
85365	Yuma	AZ	Yuma_AZ	NMXXVUM520	YUMA, AZ 520				
85366	Yuma	AZ	Yuma_AZ	NMXXVUM520	YUMA, AZ 520				
85367	Yuma	AZ	Yuma_AZ	NMXXVUM520	YUMA, AZ 520				
85369	Yuma	AZ	Yuma_AZ	NMXXVUM520	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				

				Telrite Corporation		Coverage Area by Zip Code		Tribal Lands Covered	
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc				
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				
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				
85532	Miami	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602				
85547	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.			
85553	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602				
85603	Bisbee	AZ	SierraVista_AZ	NMXXSVT520	SIERRA VISTA, AZ 520				
85605	San Simon	AZ	SierraVista_AZ	NMXXWLC520	WILLCOX, AZ 520				
85606	Cochise	AZ	SierraVista_AZ	NMXXBNS520	BENSON, AZ 520				
85608	Douglas	AZ	SierraVista_AZ	NMXXSVT520	SIERRA VISTA, AZ 520				
85609	Cochise	AZ	SierraVista_AZ	NMXXBNS520	BENSON, AZ 520				
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXXSVT520	SIERRA VISTA, AZ 520				
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85616	Huachuca City	AZ	SierraVista_AZ	NMXXSVT520	SIERRA VISTA, AZ 520				
85617	MC Neal	AZ	SierraVista_AZ	NMXXSVT520	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	NMXXSVT520	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	NMXXSVT520	SIERRA VISTA, AZ 520				
85627	Benson	AZ	SierraVista_AZ	NMXXBNS520	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	NMXXBNS520	BENSON, AZ 520				
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85632	San Simon	AZ	SierraVista_AZ	NMXXWLC520	WILLCOX, AZ 520				

		Telrite Corporation Coverage Area by Zip Code			Tribal Lands Covered
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc
85635	Sierra Vista	AZ	SierraVista_AZ	NMXXSVT520	SIERRA VISTA, AZ 520
85636	Sierra Vista	AZ	SierraVista_AZ	NMXXSVT520	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	NMXXWLC520	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	NMXXSVT520	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
85655	Douglas	AZ	SierraVista_AZ	NMXXSVT520	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	NMXXSVT520	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

Telrite Corporation							Tribal Lands Covered
Coverage Area by Zip Code							
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc		
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		
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	NMXXFLA520	FLAGSTAFF, AZ 520		
86002	Flagstaff	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86003	Flagstaff	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86004	Flagstaff	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86011	Flagstaff	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		Frontier/Navajo
86015	Flagstaff	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86017	Flagstaff	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86018	Williams	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86023	Williams	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86025	Holbrook	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86028	Holbrook	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		
86029	Holbrook	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520		

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Telrite Corporation						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
86032	Winslow	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	
86301	Prescott	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86302	Prescott	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86304	Prescott	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86313	Prescott	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86320	Ash Fork	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	
86322	Camp Verde	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86325	Cornville	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86326	Cottonwood	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86327	Dewey	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86329	Dewey	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86330	Prescott	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, AZ 520	
86331	Clarkdale	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86333	Mayer	AZ	Flagstaff_AZ	NMXXPRE520	PRESOTT, 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	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86427	Fort Mohave	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86429	Bullhead City	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86430	Bullhead City	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86431	Kingman	AZ	LakeHavasucity_AZ	NMXXKGM520	KINGMAN, AZ 520	
86436	Topock	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86438	Bullhead City	AZ	LakeHavasucity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86439	Bullhead City	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86440	Mohave Valley	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86446	Bullhead City	AZ	LastVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	

		Telrite Corporation		Coverage Area by Zip Code		Tribal Lands Covered	
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc		
86506	Ganado	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.	
86512	Chambers	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.	
86555	Douglas	AZ	Sierravista_AZ	NMXXBNS520	BENSON, AZ 520		