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MEMORANDUM



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Arizona Corporation Commission

AZ CORP COMMISSION
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TO: THE COMMISSION

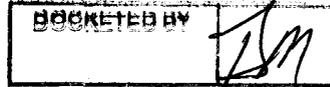
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FROM: Utilities Division

JUN 21 2013

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DATE: June 21, 2013



RE: IN THE MATTER OF THE APPLICATION OF NEXUS COMMUNICATIONS, INC. FOR DESIGNATION AS A WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF ARIZONA (LIFELINE ONLY). (DOCKET NO. T-20871A-12-0508)

1. PROCEDURAL HISTORY

On December 31, 2012, Nexus Communications, Inc. ("Nexus") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(i) of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C §214(e) and Section 54.201 *et seq.* of the Rules of the Federal Communications Commission ("FCC"). In its Application, Nexus requests that the Arizona Corporation Commission ("ACC" or "Commission") grant it designation as a wireless ETC in Arizona for the sole purpose of receiving federal Universal Service Fund ("USF") Lifeline¹ support. Nexus is not requesting high cost support.

On January 4, 2013, Nexus filed a Notice of Errata, replacing the fourth page of Exhibit "A" from the original Application.

On February 19, 2013, the Arizona Local Exchange Carriers Association ("ALECA") filed a motion to intervene.

On March 5, 2013, a Procedural Order granted ALECA's request for intervention in this proceeding.

On May 13, 2013, Nexus filed an amendment to the application to remove phrases regarding the exclusion of Federally-Recognized Tribal Lands and thereby include these areas in its application.

On May 17, 2013, a Stipulation between ALECA and Nexus was filed in the docket.

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

2. BACKGROUND

Nexus Communications, Inc. is an Ohio corporation with its principal place of business at 3629 Cleveland Avenue, Suite C, Columbus, Ohio 43224. Nexus provides Commercial Mobile Radio Service ("CMRS") through the resale of service of other wireless carriers. Nexus currently serves several hundred thousand wireless customers² in the states in which it operates, of which 80% - 90% are Lifeline customers. Nexus is designated as an ETC in twenty-six (26) states,³ of which it provides wireline service in thirteen (13) states⁴ and wireless service in eighteen (18) states.⁵ Nexus also has seventeen (17) wireless ETC applications pending in other jurisdictions, excluding Arizona.⁶ Nexus states⁷ it will provide wireless service through a "virtual network" consisting of services obtained from licensed wireless network operator Verizon Wireless ("Verizon") and does not own or operate any of its own wireless facilities. Nexus' arrangement with its underlying wireless carrier Verizon enables it to offer services wherever the underlying wireless carriers offer 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, Nexus 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, including the corrected page filed January 4, 2013.

On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link Up Reform and Modernization ("Lifeline Reform Order")*,⁸ 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 Federal Universal Service Fund ("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.⁹ 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

² Response to Staff Data Request STF 1.23.

³ RCP, Page 3, footnote 6: Alabama, Arkansas, California, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, North Carolina, Ohio, Oklahoma, Rhode Island, South Carolina, Tennessee, Texas, West Virginia and Wisconsin.

⁴ RCP, Page 3, footnote 7: Alabama, Arkansas, Illinois, Kansas, Louisiana, Michigan, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas and Wisconsin. Although Nexus has been designated a wireline ETC in Florida and Kentucky, it currently only provides services on a resold basis in these states.

⁵ RCP, Page 4, footnote 8: Arkansas, California, Georgia, Iowa, Illinois, Kansas, Louisiana, Maine, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, Ohio, Rhode Island, West Virginia and Wisconsin.

⁶ Response to Staff Data Request STF 1.3, Attachment A: Colorado, Idaho, Kentucky, Massachusetts, Minnesota, Nebraska, New Mexico, North Dakota, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Washington, Wyoming, and Federal ETC designation for Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia and the District of Columbia.

⁷ Application, Page 3, lines 21-22.

⁸ *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*").

⁹ *Ibid.*, at ¶¶ 368-381.

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*.¹⁰

On April 24, 2012, Nexus 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. Nexus submitted its RCP on December 4, 2012, making changes as the result of discussions with FCC Staff. On December 26, 2012, in DA 12-2063, the FCC issued a Public Notice¹¹ approving Nexus’ December 4, 2012 RCP.

3. REQUIREMENTS FOR DESIGNATION AS AN ETC AND NEXUS’ 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.¹² Lifeline service provides basic telephone service, typically by passing on discounts to monthly telecommunications charges. As a wireless reseller of prepaid wireless service, Nexus is proposing to offer qualified customers a free handset and the choice of three different free prepaid calling plans.¹³

¹⁰ *id.* at ¶¶ 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).

¹¹ “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 Telscape Communications, Public Notice from FCC Wireline Competition Bureau, WC Docket Nos. 09-197 and 11-42 (rel. December 26, 2012).

¹² 47 C.F.R. §§ 54.405 and 54.411(a)

¹³ Application, page 7, lines 4-16. Nexus’ offering of 68, 150 or 250 free monthly minutes to Lifeline customers mirrors the plans offered by TracFone (Decision No. 72222).

As indicated above, the FCC granted Nexus forbearance from the facilities 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. Nexus 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*.¹⁴ In that Order, the FCC reduced its former list of nine 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.¹⁵

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 Nexus' response to the provision of each service are as follows:

- (1) Voice grade access to the Public Switched Network. "Voice grade access to the Public Switched Network" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and receive voice communications, 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. Nexus states¹⁶ it meets this requirement through its provision of mobile voice communications service that includes the ability to intercommunicate with the public switched telephone network.
- (2) Local usage. "Local usage" means minutes of use for local exchange service, prescribed by the Federal Communications Commission, provided free of charge to end users. Nexus states¹⁷ it meets this requirement by providing Lifeline calling plans that offer nationwide local calling area, permitting Lifeline subscribers to call anywhere in the United States with no toll charges.

¹⁴ *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 ¶ 3.

¹⁵ *Id.* at ¶ 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).

¹⁶ Application, Page 6, lines 10-14.

¹⁷ Application, Page 6, lines 15-22.

- (3) 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. Nexus states¹⁸ all its customers will have access to emergency calling services at the time Lifeline service is initiated, and such 911 and E911 access will be available from Nexus’ handsets regardless of activation status and availability of minutes.
- (4) 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.”¹⁹ 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.²⁰ Nexus’ wireless calling plans do not distinguish between non-toll (i.e. local) and toll. Nexus’ 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, Nexus 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 Nexus 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. Nexus states²¹ it will advertise the availability and rates for the supported services described above and will comply with the FCC’s revised rules regarding information to be included in advertisements. Nexus intends to advertise its Lifeline

¹⁸ Application, Page 5, lines 14-16; Page 6, lines 21-22; Page 7, lines 19-20; Page 14, lines 1-3; and RCP, Page 16.

¹⁹ 47 C.F.R. § 54.400(d).

²⁰ *Lifeline Reform Order*, ¶238.

²¹ Application, Page 8, lines 21-24 - Page 9, lines 1-5.

services using media of general distribution such as newspapers of general circulation, radio, television, direct mail and Internet advertising, as well as retail marketing, including kiosks and point-of-sale promotional materials located in third-party retail establishments as a means of reaching those consumers that are likely to qualify for Lifeline services. Advertisements will be both English and Spanish.²² Nexus submitted examples of its advertisements in its RCP to the FCC.²³

Based on the information above and Nexus' advertising materials provided in its RCP, Staff concludes that Nexus 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 Nexus meets this ETC designation criteria.

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 Nexus' 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.²⁴

Nexus certifies²⁵ that it does and will continue to comply with the service requirements applicable to the support 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 Nexus 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 Nexus.

²² Response to Staff Data Request STF 1.35.

²³ See Exhibit E of the RCP.

²⁴ *Lifeline Reform Order*, ¶ 386.

²⁵ RCP, page 7.

Based on the above information, Staff believes that Nexus 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.”²⁶

Nexus states²⁷ it purchases wireless network services on a wholesale basis from Verizon, a Tier 1 carrier that is itself subject to various regulatory requirements to remain functional in emergencies. Through Verizon, Nexus provides to its customers the same ability to remain functional in emergency situations as currently provided by Verizon to its own customers, including access to a reasonable amount of backup power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

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

C.3 Satisfy Consumer Protection and Service Quality Standards

In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application...²⁸ 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, Nexus states²⁹ it fully complies with applicable consumer protection requirements and voluntarily complies with the CTIA Consumer Code in all states in which it provides wireless services. Further, Nexus states it will make every effort to resolve complaints received by the Commission and will designate a specific contact person to work with Commission Staff to resolve any complaints or other compliance issues.

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

²⁶ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) (“*ETC Minimum Requirements Report and Order*”), ¶ 25.

²⁷ Response to Staff Data Request STF 1.44.

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

²⁹ Application, Page 9, lines 15-22.

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*³⁰ 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 it 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.”

To demonstrate that Nexus is financially and technically capable of providing Lifeline service, Nexus states³¹ it has been providing telecommunications services since 2001 (twelve years) and received its first ETC designation in June 2006. Two of its senior management team members have a combined total of 43 years of experience in the telecommunications industry. In addition and as noted on Page 2 above, Nexus currently has ETC designation to provide wireline Lifeline services in thirteen (13) states and wireless service in eighteen (18) states. Nexus states that although it currently derives the majority of its revenue from the sale of prepaid wireless services, it does not rely exclusively on disbursements from the Lifeline program to operate and therefore it will not need to rely exclusively on USF support to provide wireless Lifeline services. For example, Nexus derives additional revenue from the sale of wireline and wireless services to non-Lifeline subscribers, and the sale of optional replenishment airtime and text minutes. Further, Nexus has not been subject to any enforcement action at the FCC or in any state and that no ETC designations held by Nexus have been rescinded, revoked or terminated by the FCC or by any state.

Having reviewed Nexus’ financial statements, the technical experience of Nexus’ senior management and based on the above information, Staff believes that Nexus 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

³⁰ See *Lifeline Reform Order*, ¶388.

³¹ Application, Page 10, lines 1-26 through Page 11, lines 1-9.

information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.

Nexus provided Staff with its informational tariff³² 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 Nexus. Based on the information contained in Nexus' informational tariff, Staff believes that Nexus meets this ETC designation criteria.

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 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, Nexus 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.³³ 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.

³² Response to Staff Data Request STF 1.42.

³³ *ETC Minimum Requirements Report and Order*, ¶ 40.

Nexus states that by designating it as a wireless ETC in Arizona, it will serve the public interest and the needs of low-income customers in Arizona by increasing customer choice in the areas it serves. The public interest benefits associated with Nexus' wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and personal security afforded by mobile telephone service, the opportunity for customers to receive a high-value wireless plan and emergency services in accordance with FCC Rules. Additionally, ETC status will promote universal service by allowing Nexus to offer wireless service to many low-income customers who may not be able to otherwise have service. Nexus' Lifeline calling plans are designed to provide service to Lifeline consumers who, due to credit or deposit requirements, may not be able to obtain telephone service from more traditional wireline and wireless service providers.

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). Nexus requests that the Commission designate it as an ETC for service areas in Arizona. Through resale of wireless service provided by Verizon in Arizona, Nexus will provide Lifeline service in many zip codes in the State of Arizona.

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, Nexus requested to serve the non-tribal areas of each wire center and to serve tribal lands within the service areas of Commission regulated telephone companies and cooperatives only after receiving any and all necessary licenses or other forms of approval that might be required by any Tribe and filing a copy of such licenses or other form of approval with the Commission. Attachment 1 of the Recommended Opinion and Order contains the list of zip codes to be served by Nexus.

G. Reporting Requirement for Prepaid Wireless Deactivations

Staff recommends that Nexus 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 Nexus, 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 Nexus 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, Nexus must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the de-enrollment 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 Nexus 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. INTERVENOR

A. ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION

The Arizona Local Exchange Carriers Association is an association of telephone companies and member-owned cooperatives providing local exchange telecommunications services to customers in rural, high cost areas of Arizona. All of ALECA's members are "rural telephone companies" as defined by the Communications Act of 1934, as amended (the "Act") 47 U.S.C. § 153(37). In its Motion to Intervene, ALECA states, "Each ALECA member, including its Tribally-owned members, receives support from the Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each member also provides discounted Lifeline telephone service and receives compensation for the discounts from the FUSF." ALECA states it is concerned that Nexus' offering may unfairly duplicate the similar offerings of its member companies, cause the FUSF requirements to grow to the point where its member companies' FUSF compensation is endangered, and undermine public support for the FCC's universal service programs.

B. JOINT STIPULATION

On May 17, 2013, ALECA and Nexus filed a Stipulation in the docket. In the Stipulation, to address the potential concerns expressed by ALECA, Nexus agreed not to provide Lifeline service to eligible residents residing on federally-recognized tribal lands in Arizona until Nexus obtained any and all necessary licenses or other forms of approval that might be required by any Tribe and file a copy of such licenses or other form of approval with the Commission in this docket and a copy to ALECA's undersigned counsel. In addition, Nexus agreed that its Lifeline enrollment application for Arizona will require an applicant to provide a street address and include a provision that requires an applicant to self-certify under penalty of perjury that they do not reside on federally-recognized tribal lands or to identify the federally-recognized Tribe on the lands of which he or she resides.

C. STAFF CLARIFICATION

ALECA represents telephone companies and cooperatives that are regulated by the Commission as well Tribally-owned telephone companies which are not regulated by the Commission. Therefore, the only federally-recognized tribal lands that are included in Joint Stipulation are those served by Commission regulated telephone companies and cooperatives and for which Nexus obtained any and all necessary licenses or other forms of approval that might be required by the Tribe.³⁴

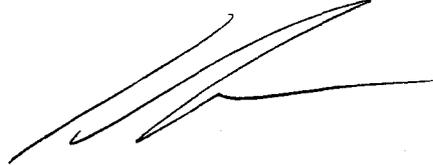
³⁴ In order to provide Lifeline services to eligible consumers residing on federally-recognized tribal lands served by Tribally-owned telephone companies, Nexus would need to petition the FCC for ETC designation in order to receive FUSF reimbursement.

5. STAFF RECOMMENDATIONS

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

- a. Nexus 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;
- b. Nexus shall notify the Commission, through Docket Control, 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;
- c. Nexus 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 in this matter and shall concurrently notify the Commission, by making a filing in Docket Control, in this docket, of the commencement date for such services;
- d. Nexus 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;
- e. Nexus shall provide a regulatory contact to the Commission by making a filing in Docket Control in this docket;
- f. In the event that Nexus 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;
- g. Nexus 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 and the total amount of Federal USF support received as of December 31 of the previous calendar year and include an affidavit stating that the Lifeline discounts or the equivalent are equal to the amount of total Federal USF support received per line. The annual filing shall be submitted as a compliance item in this docket;
- h. Nexus 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, Nexus must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the de-enrollment 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 October 15, 2013, or with the first complete quarter following the offering of prepaid Lifeline calling plans, whichever is earlier;

- i. In the event of a transfer of control that involves Nexus, 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;
- j. Nexus 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; and
- k. Nexus shall not provide Lifeline service to eligible residents residing on federally-recognized tribal lands in Arizona, served by Commission regulated telephone companies and cooperatives, until after Nexus has obtained any and all necessary licenses or other forms of approval that might be required by any Tribe and filed a copy of such licenses or other form of approval with the Commission in this docket.



Steven M. Olea
Director
Utilities Division

SMO:LLM:sms\MAS

ORIGINATOR: Lori Morrison

BEFORE THE ARIZONA CORPORATION COMMISSION

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BOB STUMP
Chairman
GARY PIERCE
Commissioner
BRENDA BURNS
Commissioner
BOB BURNS
Commissioner
SUSAN BITTER SMITH
Commissioner

IN THE MATTER OF THE APPLICATION
OF NEXUS COMMUNICATIONS, INC.
FOR DESIGNATION AS A WIRELESS
ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF ARIZONA
(LIFELINE ONLY).

DOCKET NO. T-20871A-12-0508
DECISION NO. _____
ORDER

Open Meeting
July 17 and 18, 2013
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On December 31, 2012, Nexus Communications, Inc. ("Nexus") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(i) of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C §214(e) and Section 54.201 *et seq.* of the Rules of the Federal Communications Commission ("FCC"). In its Application, Nexus requests that the Arizona Corporation Commission ("ACC" or "Commission") grant it designation as a wireless ETC in Arizona for the sole purpose of receiving federal Universal Service Fund ("USF") Lifeline¹ support. Nexus 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 an ETC is \$9.25.

1 2. On January 4, 2013, Nexus filed a Notice of Errata, replacing the fourth page of
2 Exhibit "A" from the original Application.

3 3. On February 19, 2013, the Arizona Local Exchange Carriers Association filed a
4 motion to intervene.

5 4. On March 5, 2013, a Procedural Order granted ALECA's request for intervention in
6 this proceeding.

7 5. On May 13, 2013, Nexus filed an amendment to the application to remove phrases
8 regarding the exclusion of Federally-Recognized Tribal Lands and thereby include these areas in
9 its application..

10 6. On May 17, 2013, a Stipulation between ALECA and Nexus was filed in the docket.

11 **BACKGROUND**

12 7. Nexus Communications, Inc. is an Ohio corporation with its principal place of
13 business at 3629 Cleveland Avenue, Suite C, Columbus, Ohio 43224. Nexus provides
14 Commercial Mobile Radio Service ("CMRS") through the resale of service of other wireless
15 carriers. Nexus currently serves several hundred thousand wireless customers² in the states in
16 which it operates, of which 80% - 90% are Lifeline customers. Nexus is designated as an ETC in
17 twenty-six (26) states,³ of which it provides wireline service in thirteen (13) states⁴ and wireless
18 service in eighteen (18) states.⁵ Nexus also has seventeen (17) wireless ETC applications pending
19 in other jurisdictions, excluding Arizona.⁶ Nexus states⁷ it will provide wireless service through a
20 "virtual network" consisting of services obtained from licensed wireless network operator Verizon
21

22 ² Response to Staff Data Request STF 1.23.

23 ³ RCP, Page 3, footnote 6: Alabama, Arkansas, California, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky,
Louisiana, Maine, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, North Carolina, Ohio, Oklahoma,
Rhode Island, South Carolina, Tennessee, Texas, West Virginia and Wisconsin.

24 ⁴ RCP, Page 3, footnote 7: Alabama, Arkansas, Illinois, Kansas, Louisiana, Michigan, Mississippi, North Carolina,
Oklahoma, South Carolina, Tennessee, Texas and Wisconsin. Although Nexus has been designated a wireline ETC in
25 Florida and Kentucky, it currently only provides services on a resold basis in these states.

26 ⁵ RCP, Page 4, footnote 8: Arkansas, California, Georgia, Iowa, Illinois, Kansas, Louisiana, Maine, Maryland,
Michigan, Mississippi, Missouri, Nevada, New Jersey, Ohio, Rhode Island, West Virginia and Wisconsin.

27 ⁶ Response to Staff Data Request STF 1.3, Attachment A: Colorado, Idaho, Kentucky, Massachusetts, Minnesota,
Nebraska, New Mexico, North Dakota, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont,
Washington, Wyoming, and Federal ETC designation for Alabama, Connecticut, Delaware, Florida, New Hampshire,
28 New York, North Carolina, Tennessee, the Commonwealth of Virginia and the District of Columbia.

⁷ Application, Page 3, lines 21-22.

1 Wireless (“Verizon”) and does not own or operate any of its own wireless facilities. Nexus’
2 arrangement with its underlying wireless carrier Verizon enables it to offer services wherever the
3 underlying wireless carriers offer service in the State of Arizona. Both non-rural and rural
4 incumbent local exchange carriers (“ILECs”) provide wireline service within these areas. For its
5 proposed designated service area, Nexus provided a list of zip codes in which it will provide
6 service and identified the ILEC(s) serving each zip code in Exhibit A of the Application, including
7 the corrected page filed January 4, 2013.

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

22 9. On April 24, 2012, Nexus submitted its initial Compliance Plan to the FCC in order
23 to benefit from the “blanket forbearance” of the own-facilities requirement used to provide
24

25 _____
26 ⁸ *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*”).

27 ⁹ *Ibid.*, at paras. 368-381.

28 ¹⁰ *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).

1 Lifeline services. Nexus submitted its RCP on December 4, 2012, making changes as the result of
2 discussions with FCC Staff. On December 26, 2012, in DA 12-2063, the FCC issued a Public
3 Notice¹¹ approving Nexus' December 4, 2012 RCP.

4 **REQUIREMENTS FOR DESIGNATION AS AN ETC AND NEXUS' COMPLIANCE**
5 **WITH THE REQUIREMENTS**

6 10. Designation as an ETC makes a carrier eligible to receive federal universal service
7 funds. The requirements for designation of ETCs are specified by federal law in 47 U.S.C. §
8 214(e)(1), which states:

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

17 11. In order to be designated as an ETC, a carrier must offer Lifeline service to all
18 qualifying low-income customers within its service area.¹² Lifeline service provides basic
19 telephone service, typically by passing on discounts to monthly telecommunications charges. As a
20 wireless reseller of prepaid wireless service, Nexus is proposing to offer qualified customers a free
21 handset and the choice of three different free prepaid calling plans.¹³

22 12. As indicated above, the FCC granted Nexus forbearance from the facilities
23 requirement that it provide service using its own facilities or a combination of its own facilities and
24

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

¹² 47 C.F.R. §§ 54.405 and 54.411(a)

¹³ Application, page 7, lines 4-16. Nexus' offering of 68, 150 or 250 free monthly minutes to Lifeline customers
mirrors the plans offered by TracFone (Decision No. 72222).

1 resale of another carrier's service and also any criteria related to facilities build out plans. Nexus
2 would be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other
3 criteria required of ETCs.

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

5 13. On December 23, 2011, the FCC adopted and released an Order on Reconsideration
6 in which the FCC modified, on its own motion, the definition of "voice telephony", as adopted in
7 the *USF/ICC Transformation Order*.¹⁴ In that Order, the FCC reduced its former list of nine
8 supported services to four supported services and amended 47 C.F.R. § 54.101 to specify the
9 "voice telephony services" supported by federal universal service support mechanisms.¹⁵

10 14. 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 Nexus' response to the provision
12 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 Nexus states¹⁶ it meets this requirement through its provision of mobile voice
21 communications service that includes the ability to intercommunicate with the public
22 switched telephone network.

23
24 (b) Local usage. "Local usage" means minutes of use for local exchange service,
25 prescribed by the Federal Communications Commission, provided free of charge to end
26 users. Nexus states¹⁷ it meets this requirement by providing Lifeline calling plans that
27 offer nationwide local calling area, permitting Lifeline subscribers to call anywhere in
28 the United States with no toll charges.

24 ¹⁴ See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and*
25 *Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified*
26 *Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal*
27 *Service Reform-Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket
28 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.

¹⁵ *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).

¹⁶ Application, Page 6, lines 10-14.

¹⁷ Application, Page 6, lines 15-22.

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
 4 user, by dialing the three-digit code "911", to call emergency services through a Public
 5 Safety Access Point ("PSAP") operated by the local government. "Enhanced 911" is
 6 defined as 911 service that includes the ability to provide automatic numbering
 7 information ("ANI"), which enables the PSAP to call back if the call is disconnected,
 8 and automatic location identification ("ALI"), which permits emergency service
 9 providers to identify the geographic location of the calling party. "Access to emergency
 10 services" includes access to 911 and enhanced 911 services to the extent the local
 11 government in an eligible carrier's service area has implemented 911 or enhanced 911
 12 systems. Nexus states¹⁸ all its customers will have access to emergency calling services
 13 at the time Lifeline service is initiated, and such 911 and E911 access will be available
 14 from Nexus' handsets regardless of activation status and availability of minutes.

15 (d) Toll Limitation for Qualifying Low-Income Consumers. "Toll limitation denotes
 16 either toll blocking or toll control for eligible telecommunications carriers that are
 17 incapable of providing both services. For eligible telecommunications carriers that are
 18 capable of providing both services, 'toll limitation' denotes toll blocking and toll
 19 control."¹⁹ In the *Lifeline Reform Order* the FCC relieved ETCs of the obligation to
 20 offer toll limitation services if their Lifeline offering does not distinguish in the pricing
 21 of toll and non-toll calls.²⁰ Nexus' wireless calling plans do not distinguish between
 22 non-toll (i.e., local) and toll. Nexus' prepaid plans include a specific number of minutes
 23 that cannot be exceeded. Therefore, customers cannot incur any charges for excessive
 24 toll calling or be disconnected for non-payment.

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

29 B. ADVERTISING OF SUPPORTED SERVICES

30 16. 47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible
 31 telecommunications carrier to advertise the availability of such services and the corresponding
 32 charges using media of general distribution. Nexus states²¹ it will advertise the availability and
 33 rates for the supported services described above and will comply with the FCC's revised rules
 34 regarding information to be included in advertisements. Nexus intends to advertise its Lifeline

35 ¹⁸ Application, Page 5, lines 14-16; Page 6, lines 21-22; Page 7, lines 19-20; Page 14, lines 1-3; and RCP, Page 16.

36 ¹⁹ 47 C.F.R. § 54.400(d).

37 ²⁰ *Lifeline Reform Order*, ¶238.

38 ²¹ Application, Page 8, lines 21-24 - Page 9, lines 1-5.

1 services using media of general distribution such as newspapers of general circulation, radio,
2 television, direct mail and Internet advertising, as well as retail marketing, including kiosks and
3 point-of-sale promotional materials located in third-party retail establishments as a means of
4 reaching those consumers that are likely to qualify for Lifeline services. Advertisements will be
5 both English and Spanish.²² Nexus submitted examples of its advertisements in its RCP to the
6 FCC.²³

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

11 C. ADDITIONAL ETC REQUIREMENTS

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

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

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

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

20 (ii) Submit a five-year plan that describes with specificity proposed improvements
21 or upgrades to the applicant's network throughout its proposed service area. Each
22 applicant shall estimate the area and population that will be served as a result of the
23 improvements. Except, a common carrier seeking designation as an eligible
24 telecommunications carrier in order to provide supported services only under
25 subpart E of this part does not need to submit such a five-year plan.²⁴

26
27 ²² Response to Staff Data Request STF 1.35.

28 ²³ See Exhibit E of the RCP.

²⁴ *Lifeline Reform Order*, ¶ 386.

1 20. Nexus certifies²⁵ that it does and will continue to comply with the service
2 requirements applicable to the support it receives. The requirement directing submissions of a
3 formal network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii) does not apply to Nexus
4 because it is seeking only to provide supported services under subpart E of this part, i.e. Lifeline
5 only, and the FCC waived the facilities-based requirements for Nexus.

6 21. Based on the above information, Staff believes that Nexus meets this ETC
7 designation criteria.

8 C.2 Remain Functional in Emergency Situations

9 22. In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant
10 demonstrate its ability to remain functional in emergency situations. Specifically, “an applicant
11 must demonstrate that it has a reasonable amount of back-up power to ensure functionality without
12 an external power source, is able to reroute traffic around damaged facilities, and is capable of
13 managing traffic spikes resulting from emergency situations.”²⁶

14 23. Nexus states²⁷ it purchases wireless network services on a wholesale basis from
15 Verizon, a Tier 1 carrier that is itself subject to various regulatory requirements to remain
16 functional in emergencies. Through Verizon, Nexus provides to its customers the same ability to
17 remain functional in emergency situations as currently provided by Verizon to its own customers,
18 including access to a reasonable amount of backup power to ensure functionality without an
19 external power source, the ability to reroute traffic around damaged facilities, and the capability of
20 managing traffic spikes resulting from emergency situations.

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

24 ...

25 ...

26
27 ²⁵ RCP, page 7.

28 ²⁶ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) (“*ETC Minimum Requirements Report and Order*”), ¶ 25.

²⁷ Response to Staff Data Request STF 1.44.

C.3 Satisfy Consumer Protection and Service Quality Standards

25. 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...²⁸

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

26. To demonstrate its ability to satisfy consumer protection and service quality standards, Nexus states²⁹ it fully complies with applicable consumer protection requirements and voluntarily complies with the CTIA Consumer Code in all states in which it provides wireless services. Further, Nexus states it will make every effort to resolve complaints received by the Commission and will designate a specific contact person to work with Commission Staff to resolve any complaints or other compliance issues.

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

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

28. 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*³⁰ 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 it 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. To demonstrate that Nexus is financially and technically capable of providing Lifeline service, Nexus states³¹ it has been providing telecommunications services since 2001 (twelve years) and received its first ETC designation in June 2006. Two of its senior management

²⁸ *Ibid.*, ¶ 28.

²⁹ Application, Page 9, lines 15-22.

³⁰ See *Lifeline Reform Order*, ¶388.

³¹ Application, Page 10, lines 1-26 through Page 11, lines 1-9.

1 team members have a combined total of 43 years of experience in the telecommunications
2 industry. In addition and as noted on Page 2 above, Nexus currently has ETC designation to
3 provide wireline Lifeline services in thirteen (13) states and wireless service in eighteen (18) states.
4 Nexus states that although it currently derives the majority of its revenue from the sale of prepaid
5 wireless services, it does not rely exclusively on disbursements from the Lifeline program to
6 operate and therefore it will not need to rely exclusively on USF support to provide wireless
7 Lifeline services. For example, Nexus derives additional revenue from the sale of wireline and
8 wireless services to non-Lifeline subscribers, and the sale of optional replenishment airtime and
9 text minutes. Further, Nexus has not been subject to any enforcement action at the FCC or in any
10 state and that no ETC designations held by Nexus have been rescinded, revoked or terminated by
11 the FCC or by any state.

12 30. Having reviewed Nexus' financial statements, the technical experience of Nexus'
13 senior management and based on the above information, Staff believes that Nexus meets this ETC
14 designation criteria.

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

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

24 32. Nexus provided Staff with its informational tariff³² in which it describes the calling
25 plans for Lifeline subscribers, including the number of free minutes in each calling plan, along
26 with the terms and conditions of Lifeline service as provided by Nexus. Based on the information
27

28 _____
³² Response to Staff Data Request STF 1.42.

1 contained in Nexus' informational tariff, Staff believes that Nexus meets this ETC designation
2 criteria.

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

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

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

16 **E. PUBLIC INTEREST DETERMINATION**

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

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³³ *ETC Minimum Requirements Report and Order*, ¶ 40.

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

3 36. Nexus states that by designating it as a wireless ETC in Arizona, it will serve the
4 public interest and the needs of low-income customers in Arizona by increasing customer choice in
5 the areas it serves. The public interest benefits associated with Nexus' wireless service include
6 larger local calling areas (as compared to traditional wireline carriers), the convenience and
7 personal security afforded by mobile telephone service, the opportunity for customers to receive a
8 high-value wireless plan and emergency services in accordance with FCC Rules. Additionally,
9 ETC status will promote universal service by allowing Nexus to offer wireless service to many
10 low-income customers who may not be able to otherwise have service. Nexus' Lifeline calling
11 plans are designed to provide service to Lifeline consumers who, due to credit or deposit
12 requirements, may not be able to obtain telephone service from more traditional wireline and
13 wireless service providers.

14 **F. DESIGNATED SERVICE AREA**

15 37. The Commission must establish a geographic area for the purpose of determining
16 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §
17 214(e)(2); 47 C.F.R. § 54.201(b). Nexus requests that the Commission designate it as an ETC for
18 service areas in Arizona. Through resale of wireless service provided by Verizon in Arizona,
19 Nexus will provide Lifeline service in many zip codes in the State of Arizona.

20 38. There are a number of zip codes that encompass both tribal lands and non-tribal
21 lands. Some of the tribal lands are served by tribally-owned telephone companies and some of the
22 tribal lands are served by non-tribally owned telephone companies. For those zip codes that
23 encompass tribal lands, Nexus requested to serve the non-tribal areas of each wire center and to
24 serve tribal lands within the service areas of Commission regulated telephone companies and
25 cooperatives only after receiving any and all necessary licenses or other forms of approval that
26 might be required by any Tribe and filing a copy of such licenses or other form of approval with
27 the Commission. Attachment 1 of the Recommended Opinion and Order contains the list of zip
28 codes to be served by Nexus.

1 **G. REPORTING REQUIREMENT FOR PREPAID WIRELESS**
2 **DEACTIVATIONS**

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

16 **INTERVENOR**

17 **1. Arizona Local Exchange Carriers Association**

18 40. The Arizona Local Exchange Carriers Association is an association of telephone
19 companies and member-owned cooperatives providing local exchange telecommunications
20 services to customers in rural, high cost areas of Arizona. All of ALECA’s members are “rural
21 telephone companies” as defined by the Communications Act of 1934, as amended (the “Act”) 47
22 U.S.C. § 153(37). In its Motion to Intervene, ALECA states, “Each ALECA member, including its
23 Tribally-owned members, receives support from the Federal Universal Service Fund (“FUSF”) in
24 the form of High Cost Support. Each member also provides discounted Lifeline telephone service
25 and receives compensation for the discounts from the FUSF.” ALECA states it is concerned that
26 Nexus’ offering may unfairly duplicate the similar offerings of its member companies, cause the
27 FUSF requirements to grow to the point where its member companies’ FUSF compensation is
28 endangered, and undermine public support for the FCC’s universal service programs.

1 **2. Joint Stipulation**

2 41. On May 17, 2013, ALECA and Nexus filed a Stipulation in the docket. In the
3 Stipulation, to address the potential concerns expressed by ALECA, Nexus agreed not to provide
4 Lifeline service to eligible residents residing on federally-recognized tribal lands in Arizona until
5 Nexus obtained any and all necessary licenses or other forms of approval that might be required by
6 any Tribe and file a copy of such licenses or other form of approval with the Commission in this
7 docket and a copy to ALECA's undersigned counsel. In addition, Nexus agreed that its Lifeline
8 enrollment application for Arizona will require an applicant to provide a street address and include
9 a provision that requires an applicant to self-certify under penalty of perjury that they do not reside
10 on federally-recognized tribal lands or to identify the federally-recognized Tribe on the lands of
11 which he or she resides.

12 **3. Staff Clarification**

13 42. ALECA represents telephone companies and cooperatives that are regulated by the
14 Commission as well Tribally-owned telephone companies which are not regulated by the
15 Commission. Therefore, the only federally-recognized tribal lands that are included in Joint
16 Stipulation are those served by Commission regulated telephone companies and cooperatives and
17 for which Nexus obtained any and all necessary licenses or other forms of approval that might be
18 required by any Tribe.³⁴

19 **STAFF RECOMMENDATIONS**

20 43. In addition to the conditions set forth by the FCC, Staff recommends Nexus'
21 Application for designation as an ETC be granted subject to the following conditions:
22 a. Nexus shall file a tariff, in this docket, setting forth the rates, terms and conditions
23 for its Lifeline service within thirty (30) days of a Commission Order in this matter;
24 b. Nexus shall notify the Commission, through Docket Control, of any future changes
25 to its rates, terms and/or conditions regarding its Lifeline offerings and file such
26 changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
27 c. Nexus shall make available Lifeline services to qualifying low-income applicants in
28 its ETC service area no later than ninety (90) days after a Commission decision in

³⁴ In order to provide Lifeline services to eligible consumers residing on federally-recognized tribal lands served by Tribally-owned telephone companies, Nexus would need to petition the FCC for ETC designation in order to receive FUSF reimbursement.

1 this matter and shall concurrently notify the Commission, by making a filing in
2 Docket Control, in this docket, of the commencement date for such services;

- 3 d. Nexus shall apprise the Commission of any customer complaints that may arise
4 from its ETC service offerings by making a filing in Docket Control in this docket;
- 5 e. Nexus shall provide a regulatory contact to the Commission by making a filing in
6 Docket Control in this docket;
- 7 f. In the event that Nexus requests to relinquish its ETC status and no longer provide
8 Lifeline services, it must provide notice to both the Commission and its customers.
9 Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
- 10 g. Nexus shall submit in Docket Control an annual report by April 15th of each year,
11 beginning April 15, 2014, that contains its total number of Lifeline subscribers and
12 the total amount of Federal USF support received as of December 31 of the previous
13 calendar year and include an affidavit stating that the Lifeline discounts or the
14 equivalent are equal to the amount of total Federal USF support received per line.
15 The annual filing shall be submitted as a compliance item in this docket;
- 16 h. Nexus shall submit in Docket Control, as a compliance item in this docket, a
17 quarterly report detailing the total number of Lifeline customers, the total number of
18 customers removed from the customer base due to 60-day inactivity, the number of
19 customers removed from the customer base due to annual verification and the total
20 number of customers who voluntarily relinquished Lifeline service. In compiling
21 the data for these reports, Nexus must comply with 47 C.F.R. §54.405(e)(3), in
22 which the FCC outlines the deenrollment policy for non-usage and 47 C.F.R.
23 §54.407(c), in which the FCC defines activities that constitute usage. The quarterly
24 report should be submitted as a compliance item in this docket on the 15th of the
25 month following the end of each calendar quarter, beginning October 15, 2013, or
26 with the first complete quarter following the offering of prepaid Lifeline calling
27 plans, whichever is earlier;
- 28 i. In the event of a transfer of control that involves Nexus, 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;
- j. Nexus 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; and
- k. Nexus shall not provide Lifeline service to eligible residents residing on federally-
recognized tribal lands in Arizona, served by Commission regulated telephone
companies and cooperatives, until after Nexus has obtained any and all necessary
licenses or other forms of approval that might be required by any Tribe and filed a
copy of such licenses or other form of approval with the Commission in this docket.

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CONCLUSIONS OF LAW

1. Nexus Communications, Inc. 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). Nexus is also a reseller of Commercial Mobile Radio Service as defined in 47 U.S.C. § 20.3 and A.A.C. R14-2-1201(8).

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

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

4. Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area for the purposes of determining universal service obligations and support mechanisms. Nexus’ application applies to the designated service area consisting of each zip code as listed in Attachment 1.

5. Nexus meets the requirements for ETC designation under 47 U.S.C. § 214 and C.F.R. § 54.201 *et seq.*, subject to Nexus’ compliance with the conditions set forth in Finding of Fact No. 43 herein.

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ORDER

IT IS THEREFORE ORDERED that the application of Nexus Communications, Inc. for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support in Arizona, for the designated service area set forth in Attachment 1 attached hereto and incorporated herein by reference, be and hereby is approved, subject to Nexus Communications, Inc.'s compliance with the conditions set forth in Finding of Fact No. 43 above.

IT IS FURTHER ORDERED that if Nexus Communications, Inc. does not comply with the requirements of Finding of Fact No. 43, 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: NEXUS COMMUNICATIONS, INC.
2 DOCKET NO. T-20871A-12-0508

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14 Director, Utilities Division
15 Arizona Corporation Commission
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18 Ms. Janice M. Alward
19 Chief Counsel, Legal Division
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ATTACHMENT 1

Nexus Communications, Inc.						
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	
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	

Nexus Communications, Inc.						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
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	Phoenix	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85071	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85072	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85074	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85075	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85076	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85078	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85079	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85080	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85082	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85083	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85085	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85086	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85087	New River	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85096	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85097	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85098	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85099	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85117	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85118	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85119	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85120	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85121	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
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	

Nexus Communications, Inc.						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85213	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85214	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85215	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85216	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85217	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85218	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85219	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85220	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85221	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
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	
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	PHXCGR520	CASA GRANDE, AZ 520	
85274	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85275	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85277	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85278	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85280	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85281	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Nexus Communications, Inc.						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85282	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85283	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85284	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85285	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85286	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85287	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85291	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85293	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85294	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85295	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85296	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85297	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85298	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85299	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85301	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85302	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85303	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85304	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85305	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85306	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85307	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85308	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85309	Luke AFB	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85310	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85311	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85312	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85318	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85322	Arlington	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85323	Avondale	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85326	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85327	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85328	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85329	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85331	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85333	Dateland	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85334	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85335	El Mirage	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85336	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85337	Gila Bend	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85338	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85339	Lavean	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85340	Litchfield Park	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85342	Morristown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85343	Palo Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85345	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85346	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85349	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85350	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85351	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85352	Wellton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85353	Tolleson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85354	Tonopah	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85355	Waddell	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85358	Wickenburg	AZ	Phoenix_AZ	PHXWCB928	WICKENBURG, AZ 928	
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85360	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXMLHC520	LAKE HAVASU CITY, NV 520	
85361	Wittmann	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85363	Youngtown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Nexus Communications, Inc.						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85364	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85365	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85366	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85367	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85369	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85372	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85373	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85374	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85375	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85376	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85377	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85378	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85379	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85380	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85381	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85382	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85383	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85385	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
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	Gila River Telecomm, Inc.
85547	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85553	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85603	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85605	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85606	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85608	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85609	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85616	Huachuca City	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85617	Mc Neal	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85618	Mammoth	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85619	Mount Lemmon	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85620	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85622	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85623	Oracle	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85626	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85627	Benson	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85628	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85629	Sahuarita	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85630	Saint David	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85632	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85635	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85636	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85640	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85641	Vail	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85644	Willcox	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85645	Amado	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85646	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85648	Rio Rico	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85650	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85652	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	

Nexus Communications, Inc.						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85653	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85654	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85655	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85658	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85662	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85670	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85701	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85702	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85703	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85704	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85705	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85706	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85707	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85708	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85709	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85710	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85711	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85712	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85713	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85714	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85715	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85716	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85717	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85718	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85719	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85721	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85722	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85723	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85724	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85725	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85726	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85728	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85730	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85731	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85732	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85733	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85734	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85735	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85737	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85738	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85739	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85740	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85741	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85742	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
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	

Nexus Communications, Inc.						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85942	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86002	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86003	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86004	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Frontier/Navajo
86011	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86015	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86017	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86018	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86023	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86025	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86028	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86029	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86032	Winslow	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86301	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86302	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86304	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86313	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86320	Ash Fork	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86322	Camp Verde	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86325	Cornville	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86326	Cottonwood	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86327	Dewey	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86329	Dewey	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86330	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86331	Clarkdale	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86333	Mayer	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86335	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86339	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86340	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86341	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86342	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86351	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86402	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86403	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86404	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86405	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86409	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86412	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86413	Golden Valley	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86426	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86427	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86429	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86430	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86431	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86436	Topock	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86438	Bullhead City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86439	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86440	Mohave Valley	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86446	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86506	Ganado	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86512	Chambers	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86555	Douglas	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	