

Diamond Williams

From: Rowell, Stephen B [Stephen.Rowell@VerizonWireless.com]
Sent: Thursday, August 26, 2010 2:52 PM
To: Filings@psc.state.fl.us
Subject: Cellco Partnership dba Verizon Wireless Petition to amend ETC Designation

Attachments: DOC20100826133410.pdf

100386-TP



DOC20100826
33410.pdf (5 MB)

Attached is an application by Cellco Partnership and its Subsidiaries and Affiliates to Amend ETC Designation in the State of Florida.

- A. Person Responsible for Filing: Stephen Rowell, Assistant General Counsel, Verizon Wireless, One Allied Drive, Little Rock, Arkansas 72202, 501 905 8460, Stephen.Rowell@Verizonwireless.com.
- B. Docket Number and Title: New docket
- C. Party on whose behalf filed: Cellco Partnership, its subsidiaries and affiliates d/b/a Verizon Wireless (Cellco)
- D. Number of pages: 30 (including all exhibits)
- E. Description of the Attached: This is an application and four exhibits asking that the current designation of Alltel Communications, LLC (formerly Alltel Communications, Inc.) be amended into the name of Cellco for the same area where Alltel is currently designated. The FCC granted a similar application on a pro forma basis with respect to the Alltel designated areas in the states of Alabama, North Carolina and Virginia (see Exhibit A).

COM _____
APA _____
ECR _____
GCL _____
RAD 2
SSC _____
ADM _____
OPC _____

-----Original Message-----

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DOCUMENT NUMBER-DATE

07123 AUG 26 2

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

IN RE:)
)
PETITION OF CELLCO PARTNERSHIP) Docket No. 100386-TP
AND ITS SUBSIDIARIES AND)
AFFILIATES TO AMEND ETC)
DESIGNATION IN THE STATE OF)
FLORIDA)

**PETITION TO AMEND ETC DESIGNATION
IN THE STATE OF FLORIDA**

Cellco Partnership d/b/a Verizon Wireless ("Cellco"), on behalf of itself and its subsidiaries and affiliates offering commercial mobile radio services ("CMRS") in the State of Florida (collectively, "Verizon Wireless"), submits this Petition to Amend the Eligible Telecommunications Carrier ("ETC") designation currently held in the name of Alltel Communications, LLC (formerly named Alltel Communications, Inc.) ("Alltel") in the State of Florida to reflect Cellco and its affiliated legal entities as the designated entity.

Alltel was designated as an ETC in Florida by the Federal Communications Commission ("FCC") in 2004 (the "ETC Designation").¹

The amendment requested herein is necessary to reflect the transaction the FCC previously approved whereby Alltel became a wholly-owned indirect subsidiary of Cellco.² As a result of the transaction, the Alltel and Verizon Wireless networks, business operations, and

¹ *In re Federal-State Joint Board on Universal Service; Alltel Communications, Inc. Petitions for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Florida, Georgia, North Carolina, and Virginia*, CC Docket No. 96-45, Order, 19 FCC Rcd 20496 (2004) ("FCC Designation Order").

² *Applications of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC for Consent to Transfer Control of Licenses, Authorizations, and Spectrum Manager and de Facto Transfer of Leasing Arrangements*, WT Docket No. 08-95, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444 (2008) ("Cellco-Alltel Order").

DOCUMENT NUMBER-DATE

07123 AUG 26 09

FPSC-COMMISSION CLERK

subscriber bases have been fully integrated as contemplated and approved by the FCC.³ While Alltel continues to exist as a separate legal entity, it is now a subsidiary of Cellco and collectively operates and does business as Verizon Wireless. As a result of the integration, it is no longer feasible to distinguish the network, business operations or subscribers of one company from another for ETC compliance and reporting purposes. Accordingly, on May 28, 2010, the FCC approved Cellco's petitions for *pro forma* amendment of the ETC designations held by Alltel Communication, LLC, RCC Holdings, Inc., and their affiliated legal entities in Alabama, North Carolina and Virginia to reflect Cellco as the designated entity.⁴ See Exhibit A hereto. Verizon Wireless requests similar relief in this proceeding as that granted by the FCC in Alabama, North Carolina and Virginia.

Verizon Wireless is requesting that the ETC Designation be amended to encompass the same area where Alltel is currently designated (the "Designated Area"). Verizon Wireless is not seeking through the amendment of the existing ETC Designation to expand the Designated Area. Attached as **Exhibit B** is a list of the non-rural telephone company wire centers that are included within the Designated Area.

Verizon Wireless will seek federal high-cost universal service support throughout the Designated Area for all eligible lines served by Verizon Wireless and its subsidiaries and

³See *Cellco-Alltel Order*.

⁴ *In the Matter of Federal-State Board on Universal Service, Cellco Partnership d/b/a Verizon Wireless, Petitions for Pro Forma Amendment of Eligible Telecommunications Carrier Designations in the Commonwealth of Virginia and the States of Alabama and North Carolina*, WC Docket 09-197, CC Docket 96-45, *Order*, 25 FCC Rcd 5955 (2010) ("*Pro Forma Order*") (attached as **Exhibit A**).

affiliates consistent with the universal service support conditions imposed in the FCC's *Cellco-Alltel Order*.⁵

I. COMMISSION AUTHORITY

This Petition is filed in accordance with 47 U.S.C. § 214(e) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 151, *et seq.*, Part 54 of the FCC rules and regulations governing universal service, 47 C.F.R. § 54.1, *et seq.*, and the standards established by Order No. PSC-05-0824-FOF-TL, issued August 15, 2005, in Docket No. 010977-TL.

Section 214(e)(2) of the Act provides state commissions the primary responsibility with respect to ETC designations. At the time Alltel received the ETC Designation this Commission had declined jurisdiction. Due to changes in Florida law, this Commission subsequently determined in Order No. PSC-07-0288, issued April 3, 2007, in Docket Nos. 060581-TP and 060582-TP that it has the authority under Section 214(e)(2) and Section 364.011, Florida Statutes, to designate wireless carriers as competitive ETCs.⁶

Therefore, this Commission has jurisdiction to approve this Petition and to amend the ETC Designation in the name of Verizon Wireless.

II. ELIGIBILITY FOR ETC DESIGNATION

As further demonstrated in the attached Certification of Linda Stevens, Verizon Wireless continues to satisfy all of the eligibility requirements for designation as an ETC under 47 U.S.C. § 214(e)(1) and 47 C.F.R. §§ 54.201-54.202. See **Exhibit C**. Each Verizon Wireless operating

⁵*Cellco-Alltel Order* at 17532 ¶ 197 (Verizon Wireless has voluntarily committed to accept a phase down of high cost universal service support of 20% per year over a five year period).

⁶ *In re: Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located partially in Alltel's licensed areas and for redefinition of those study areas*, Docket No. 060581-TP and *In re: Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located entirely in Alltel's licensed area*, Docket No. 060582-TP, Order No. PSC-07-0288-PAA-TP (April 3, 2007).

entity (1) is a “common carrier” under federal law, (2) offers the services designated for support by the FCC pursuant to Section 254(c) of the Act; (3) offers the supported services using its own facilities; and (4) advertises the availability of the supported services and associated charges using media of general distribution.

III. PUBLIC INTEREST

Amending the ETC Designation is in the public interest, convenience and necessity for the same reasons stated in the *FCC Designation Order*. As the FCC recognized in the *Pro Forma Order*, Verizon Wireless will continue to serve the same service areas the FCC considered in its earlier analysis.⁷ And in previously designating Alltel as a competitive ETC in Florida, the FCC specifically concluded that the ETC Designation would serve the public interest.⁸ Likewise, this Commission has similarly determined that the designation of a competitive wireless ETC will benefit consumers and the public interest.⁹

Additionally, approving this Petition is in the public interest for the same reasons cited by the FCC in approving Cellco’s acquisition of Alltel. The FCC determined that Cellco’s

⁷ *Pro Forma Order* ¶ 2.

⁸ See *FCC Designation Order*, ¶ 15 (“[D]espite only seeking designation in areas served by non-rural carriers, ALLTEL has made the same or similar commitments to those made by ETCs in rural areas in the *Virginia Cellular Order* and the *Highland Cellular Order*, including setting forth a specific plan for responding to requests for service, agreeing to provide the Commission with data on how high-cost support funds were used, and committing to inform customers of its services, including Lifeline and Link-up, through a variety of media. In addition, ALLTEL has also made service quality commitments comparable to those made in the *Virginia Cellular Order* and the *Highland Cellular Order*, including compliance with the Cellular Telecommunications Industry Association (CTIA) Code for Wireless Service and a commitment to provide the Commission with consumer complaint data. Certainly, if ALLTEL is willing to meet these requirements in areas served by non-rural carriers, it would be hard to find that ALLTEL’s application in the present case fell short of meeting the public interest standard.”) (internal footnotes omitted).

⁹ See, e.g., *In Re: Petition for Designation as an Eligible Telecommunications Carrier (ETC) by T-Mobile South LLC*, Docket No. 090510-TP, Order No. PSC-10-0478-PAA-TP, pp. 4-5 (July 29, 2010).

acquisition of Alltel will “result in transaction-specific public interest benefits,”¹⁰ including increased wireless footprint and network coverage; expanded and improved services and features, particularly in rural areas; expanded roll-out of broadband and next-generation services; improvements in service quality; efficiencies and economies of scale and scope; and strengthened competition.¹¹ The FCC also noted Cellco’s commitments to “expeditiously integrate” Alltel’s network into the Verizon Wireless network, which would provide concrete benefits to Alltel customers, particularly in rural areas.¹² The requested amendment of the ETC Designation is necessary to reflect this network integration approved by the FCC, because the integration necessitates unified booking and reporting of customer account and network expenditure information for competitive ETC purposes.

IV. LIFELINE AND LINK UP

Granting this Petition will ensure that Verizon Wireless is able to offer Lifeline/Link Up assistance to new and current subscribers in the Designated Area. Verizon Wireless’ Lifeline/Link Up service offering provides another competitive choice to qualified subscribers within the Designated Area. Therefore, Lifeline/Link Up consumers will benefit from competitive options in the same way other consumers benefit from competition.

V. USE OF SUPPORT

As reflected in the Certification of Mark R. Smith, Executive Director – Finance, Verizon Wireless certifies, as required by Section 254(e) of the Act, to use high-cost support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” See **Exhibit D**. Verizon Wireless acknowledges that it must, under Sections 54.313

¹⁰ *Cellco-Alltel Order*, 23 FCC Rcd at 17515 ¶ 156.

¹¹ *Cellco-Alltel Order*, 23 FCC Rcd at 17498-515 ¶¶ 122-156.

¹² *Cellco-Alltel Order*, 23 FCC Rcd at 17500-01 ¶¶ 124-125.

and 54.314 of the FCC's rules, certify annually that it is in compliance with this requirement. Verizon Wireless will continue to provide annual reports on its progress toward meeting network improvement objectives and comply with the regulatory requirements generally applicable to all competitive ETCs in Florida.

VI. VI. LIST OF EXHIBITS

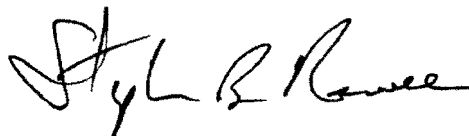
- Exhibit A FCC Pro Forma Order
- Exhibit B Designated Area
- Exhibit C Certification of Linda Stevens
- Exhibit D Certification of Mark R. Smith

CONCLUSION

Approval of this Petition is consistent with the acquisition approved by the FCC in the *Cellco-Alltel Order*, is necessary to reflect the network and business integration described above, and will promote competition among ETC providers. Approval would further be consistent with the FCC's May 28, 2010 *Pro Forma Order*.

Based on the foregoing, Cellco Partnership d/b/a Verizon Wireless and its subsidiaries and affiliates respectfully requests that the Commission expeditiously consider this Petition and issue an Order amending the ETC Designation in the name of Verizon Wireless.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. L. R. Rowe". The signature is written in a cursive, somewhat stylized font.

Dated: August 26, 2010

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Florida Bar No. 0789917

*COUNSEL FOR CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS AND ITS
SUBSIDIARIES AND AFFILIATES*

2655334v1

EXHIBIT A

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	WC Docket No. 09-197
)	
Cellco Partnership d/b/a Verizon Wireless)	CC Docket No. 96-45
)	
Petitions for Pro Forma Amendment of Eligible)	
Telecommunications Carrier Designations in the)	
Commonwealth of Virginia and the States of)	
Alabama and North Carolina)	

ORDER

Adopted: May 28, 2010

Released: May 28, 2010

By the Chief, Wireline Competition Bureau:

1. On December 3, 2009, Cellco Partnership d/b/a Verizon Wireless and its affiliates (Cellco) filed requests for pro forma amendments of the eligible telecommunications carrier (ETC) designations held by Cellco in the name of ALLTEL Communications, Inc. and its affiliated legal entities (Alltel) in the commonwealth of Virginia and the state of North Carolina, and held by both Alltel and RCC Holdings, Inc. and its affiliated legal entities (RCC) in the state of Alabama.¹ The Bureau released a public notice seeking comment on the Cellco Petitions.²

¹ Petition of Cellco Partnership for Pro Forma Amendment of ETC Designations in the State of Alabama, WC Docket No. 09-197, CC Docket No. 96-45 (filed Dec. 3, 2009) (Cellco Alabama Petition); Petition of Cellco Partnership for Pro Forma Amendment of ETC Designations in the State of North Carolina, WC Docket No. 09-197, CC Docket No. 96-45 (filed Dec. 3, 2009) (Cellco North Carolina Petition); Petition of Cellco Partnership for Pro Forma Amendment of ETC Designations in the Commonwealth of Virginia, WC Docket No. 09-197, CC Docket No. 96-45 (filed Dec. 3, 2009) (Cellco Virginia Petition) (collectively, Cellco Petitions).

² *Comment Sought on Petitions of Cellco Partnership for Pro Forma Amendment of ETC Designations in Alabama, North Carolina and Virginia*, WC Docket No. 09-197, Public Notice, 24 FCC Rcd 14742 (Wireline Comp. Bur. 2009). The following parties filed comments in connection with the petitions: Haynesville Fiber Transport, Inc. d/b/a Camellia Communications, Comments, WC Docket No. 09-197 (filed Jan. 29, 2010) (Camilla Comments); Verizon/Alltel Management Trust, Comments, WC Docket No. 09-197 (filed Jan. 28, 2010) (Management Trust Comments), Cellco Partnership, Reply Comments, WC Docket No. 09-197 (filed Feb. 26, 2010) (Cellco Reply Comments); Rural Cellular Association, Reply Comments, WC Docket No. 09-197 (filed Feb. 26, 2010) (RCA Reply Comments). Commenters on the Cellco Petitions ask the Commission to clarify: (1) the process used to calculate disbursements pursuant to the *Interim Cap Order*; (2) details of the divestiture areas agreed to in the *Merger Order*; and (3) the procedures adopted to implement the phase-down of high-cost support as provided in the *Merger Order*. See generally Camilla Comments; Cellco Reply Comments, RCA Reply Comments; see also *Applications of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC for Consent to Transfer Control of Licenses, Authorizations, and Spectrum Manager and De Facto Transfer Leasing Arrangements and Petition for Declaratory Ruling That the Transaction Is Consistent with Section 310(b)(4) of the Communications Act*, WT Docket No. 08-95, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444 (2008) (*Merger Order*); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Order, 23 FCC Rcd 8834, Appendix B, para. 31, Exhibits 2 and 3 (2008) (*Interim Cap Order*). We find that the issues raised by the Commenters are outside of the scope of the instant requests for pro forma amendment of the subject ETC designations and are more appropriately addressed in other proceedings.

Exhibit A

2. The Commission previously designated Alltel as an ETC in Alabama, Virginia and North Carolina, and RCC as an ETC in Alabama. Cellco proposes to serve the same service areas that the Commission previously considered in its analyses. On November 8, 2008, Alltel and RCC became wholly-owned indirect subsidiaries of Cellco.³

3. We approve Cellco's requested pro forma amendments. Accordingly, the designated service areas of Alltel and RCC shall reflect Cellco as the ETC designated entity. We do not address the ETC designation and correlating high-cost support of the divested properties currently held in trust in accordance with the *Merger Order*.⁴ In the service areas not subject to state commission approval or where state concurrence has been previously issued, Cellco's pro forma amendments shall be effective upon release of this order. In the service areas where state commission approval is still pending, the pro forma amendments shall be effective on the date that the state commission concurs with the Commission's redefinition.

4. Accordingly, IT IS ORDERED that, pursuant to the authority contained in section 214(e)(6) of the Communications Act, 47 U.S.C. § 214(e)(6), and the authority delegated in sections 0.91 and 0.291 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.291, the petitions of Cellco Partnership d/b/a Verizon Wireless for pro forma amendment to the eligible telecommunications carrier designations held by ALLTEL Communications, Inc. and its affiliated legal entities in Alabama, Virginia, and North Carolina, and RCC Holdings, Inc. and its affiliated legal entities in Alabama, ARE GRANTED.

5. IT IS FURTHER ORDERED that a copy of this order SHALL BE transmitted to the Virginia State Corporation Commission, the Alabama Public Service Commission, the North Carolina Utilities Commission, and the Universal Service Administrative Company.

6. IT IS FURTHER ORDERED that, pursuant to section 1.102(b)(1) of the Commission's rules, 47 C.F.R. § 1.102(b)(1), this order SHALL BE EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION



Sharon E. Gillett
Chief
Wireline Competition Bureau

³ See generally *Merger Order*, 23 FCC Rcd 17444. Among other things, the Commission conditioned its approval of the merger on Cellco's commitment to divest properties in 105 markets and phase out its universal service high-cost support in equal 20 percent increments over a period of five years. *Id.* at 17454, 17455, 17515-16, 17529-32, paras. 15, 19, 157-59, 192-97, Appendix B.

⁴ Until such time as the divestitures set forth in the *Merger Order* have been completed, the divestiture properties shall retain their existing ETC designation under the study area codes created specifically for those properties. See *Merger Order*, 23 FCC Rcd at 17551, Appendix B; see also Management Trust Reply Comments at 2.

EXHIBIT B

DESIGNATED AREA

LEC SAC	Non-Rural Telephone Company (Non-Rural LEC)	CLLI Code
215191	BELLSOUTH	ARCHFLMA
215191	BELLSOUTH	BGPIFLMA
215191	BELLSOUTH	BKVLFLJF
215191	BELLSOUTH	BLDWFLMA
215191	BELLSOUTH	BRSNFLMA
215191	BELLSOUTH	CDKYFLMA
215191	BELLSOUTH	CFLDFLMA
215191	BELLSOUTH	CHPLFLJA
215191	BELLSOUTH	CNTMFLLE
215191	BELLSOUTH	CSCYFLBA
215191	BELLSOUTH	DNLNFLWM
215191	BELLSOUTH	FMTNALMT
215191	BELLSOUTH	FRBHFLFP
215191	BELLSOUTH	FTGRFLMA
215191	BELLSOUTH	GCSPFLCN
215191	BELLSOUTH	GCVLFLMA
215191	BELLSOUTH	GLBRFLMC
215191	BELLSOUTH	GSVLFLMA
215191	BELLSOUTH	GSVLFLNW
215191	BELLSOUTH	HAVNFLMA
215191	BELLSOUTH	HLNVFLMA
215191	BELLSOUTH	HWTHFLMA
215191	BELLSOUTH	ISLMFLMA
215191	BELLSOUTH	JAY FLMA
215191	BELLSOUTH	JCBHFLAB
215191	BELLSOUTH	JCBHFLMA
215191	BELLSOUTH	JCBHFLSP
215191	BELLSOUTH	JCVLFLAR
215191	BELLSOUTH	JCVLFLBW
215191	BELLSOUTH	JCVLFLCL
215191	BELLSOUTH	JCVLFLFC
215191	BELLSOUTH	JCVLFLIA
215191	BELLSOUTH	JCVLFLJT
215191	BELLSOUTH	JCVLFLLF
215191	BELLSOUTH	JCVLFLNO
215191	BELLSOUTH	JCVLFLOW
215191	BELLSOUTH	JCVLFLRV
215191	BELLSOUTH	JCVLFLSJ
215191	BELLSOUTH	JCVLFLSM
215191	BELLSOUTH	JCVLFLWC
215191	BELLSOUTH	KYHGFLMA
215191	BELLSOUTH	KYLRFLLS
215191	BELLSOUTH	KYLRFLMA
215191	BELLSOUTH	KYWSFLMA
215191	BELLSOUTH	LKCYFLMA
215191	BELLSOUTH	LYHNFLOH
215191	BELLSOUTH	MCNPFLMA
215191	BELLSOUTH	MDBGFLPM
215191	BELLSOUTH	MLTNFLRA
215191	BELLSOUTH	MNDRFLAV
215191	BELLSOUTH	MNDRFLLO
215191	BELLSOUTH	MNDRFLW
215191	BELLSOUTH	MNSNFLMA
215191	BELLSOUTH	MRTHFLVE

DESIGNATED AREA

LEC SAC	Non-Rural Telephone Company (Non-Rural LEC)	CLLI Code
215191	BELLSOUTH	MXVLFLMA
215191	BELLSOUTH	NKLRFLMA
215191	BELLSOUTH	NWBYFLMA
215191	BELLSOUTH	OLTWFLLN
215191	BELLSOUTH	ORPKFLMA
215191	BELLSOUTH	ORPKFLRW
215191	BELLSOUTH	PACEFLPV
215191	BELLSOUTH	PCBHFLNT
215191	BELLSOUTH	PLTKFLMA
215191	BELLSOUTH	PMPKFLMA
215191	BELLSOUTH	PNCYFLCA
215191	BELLSOUTH	PNCYFLMA
215191	BELLSOUTH	PNSCFLBL
215191	BELLSOUTH	PNSCFLFP
215191	BELLSOUTH	PNSCFLHC
215191	BELLSOUTH	PNSCFLPB
215191	BELLSOUTH	PNSCFLWA
215191	BELLSOUTH	PNVDFLMA
215191	BELLSOUTH	SGKYFLMA
215191	BELLSOUTH	STAGFLBS
215191	BELLSOUTH	STAGFLMA
215191	BELLSOUTH	STAGFLSH
215191	BELLSOUTH	SYHSFLCC
215191	BELLSOUTH	TRENFLMA
215191	BELLSOUTH	VERNFLMA
215191	BELLSOUTH	WELKFLMA
215191	BELLSOUTH	WWSPFLHI
215191	BELLSOUTH	WWSPFLSH
215191	BELLSOUTH	YNFNFLMA
215191	BELLSOUTH	YNTWFLMA
215191	BELLSOUTH	YULEFLMA
210328	VERIZON FLORIDA	ABDLFLXA
210328	VERIZON FLORIDA	ALFAFLXA
210328	VERIZON FLORIDA	ALTRFLXA
210328	VERIZON FLORIDA	ANMRFLXA
210328	VERIZON FLORIDA	BARTFLXA
210328	VERIZON FLORIDA	BAYUFLXA
210328	VERIZON FLORIDA	BBPKFLXA
210328	VERIZON FLORIDA	BHPKFLXA
210328	VERIZON FLORIDA	BRBAFLXA
210328	VERIZON FLORIDA	BRJTFLXA
210328	VERIZON FLORIDA	BRNDFLXA
210328	VERIZON FLORIDA	BRTNFLXX
210328	VERIZON FLORIDA	BYSHFLXA
210328	VERIZON FLORIDA	CLWRFLXA
210328	VERIZON FLORIDA	CNSDFLXA
210328	VERIZON FLORIDA	CRWDFLXA
210328	VERIZON FLORIDA	CYGRFLXA
210328	VERIZON FLORIDA	DNDNFLXA
210328	VERIZON FLORIDA	DUNDFLXA
210328	VERIZON FLORIDA	ENWDFLXA
210328	VERIZON FLORIDA	FHSDFLXA
210328	VERIZON FLORIDA	FRSTFLXA
210328	VERIZON FLORIDA	GNDYFLXA

DESIGNATED AREA

LEC SAC	Non-Rural Telephone Company (Non-Rural LEC)	CLLI Code
210328	VERIZON FLORIDA	HDSNFLXA
210328	VERIZON FLORIDA	HGLDFLXA
210328	VERIZON FLORIDA	HNCYFLXA
210328	VERIZON FLORIDA	HNCYFLXN
210328	VERIZON FLORIDA	HYPKFLXA
210328	VERIZON FLORIDA	INLKFLXA
210328	VERIZON FLORIDA	INRKFLXX
210328	VERIZON FLORIDA	KYSTFLXA
210328	VERIZON FLORIDA	LGBKFLXA
210328	VERIZON FLORIDA	LKALFLXA
210328	VERIZON FLORIDA	LKLDFLXA
210328	VERIZON FLORIDA	LKLDFLXE
210328	VERIZON FLORIDA	LKLDFLXN
210328	VERIZON FLORIDA	LKWFLXA
210328	VERIZON FLORIDA	LKWFLXE
210328	VERIZON FLORIDA	LLMNFLXA
210328	VERIZON FLORIDA	LNLKFLXA
210328	VERIZON FLORIDA	LRGOFLXA
210328	VERIZON FLORIDA	LUTZFLXA
210328	VERIZON FLORIDA	MLBYFLXA
210328	VERIZON FLORIDA	MNLKFLXA
210328	VERIZON FLORIDA	MYCYFLXA
210328	VERIZON FLORIDA	NGBHFLXA
210328	VERIZON FLORIDA	NPRCFLXA
210328	VERIZON FLORIDA	NRPTFLXA
210328	VERIZON FLORIDA	NRSDFLXA
210328	VERIZON FLORIDA	OLDSFLXA
210328	VERIZON FLORIDA	OSPRFLXA
210328	VERIZON FLORIDA	PKCYFLXA
210328	VERIZON FLORIDA	PLMTFLXA
210328	VERIZON FLORIDA	PLSLFLXA
210328	VERIZON FLORIDA	PNCRFLXA
210328	VERIZON FLORIDA	PNLSFLXA
210328	VERIZON FLORIDA	POINFLXA
210328	VERIZON FLORIDA	PRSHFLXA
210328	VERIZON FLORIDA	PSDNFLXA
210328	VERIZON FLORIDA	PTCYFLXA
210328	VERIZON FLORIDA	RSKNFLXA
210328	VERIZON FLORIDA	SARKFLXA
210328	VERIZON FLORIDA	SEKYFLXA
210328	VERIZON FLORIDA	SGBEFLXA
210328	VERIZON FLORIDA	SKWYFLXA
210328	VERIZON FLORIDA	SLSPFLXA
210328	VERIZON FLORIDA	SMNLFLXA
210328	VERIZON FLORIDA	SNSPFLXA
210328	VERIZON FLORIDA	SPBGFLXA
210328	VERIZON FLORIDA	SPBGFLXS
210328	VERIZON FLORIDA	SPRGFLXA
210328	VERIZON FLORIDA	SRSTFLXA
210328	VERIZON FLORIDA	SSDSFLXA
210328	VERIZON FLORIDA	STGRFLXA
210328	VERIZON FLORIDA	SWTHFLXA
210328	VERIZON FLORIDA	TAMPFLXE
210328	VERIZON FLORIDA	TAMPFLXX

DESIGNATED AREA

LEC SAC	Non-Rural Telephone Company (Non-Rural LEC)	CLLI Code
210328	VERIZON FLORIDA	THNTFLXA
210328	VERIZON FLORIDA	TMTRFLXA
210328	VERIZON FLORIDA	TRSPFLXA
210328	VERIZON FLORIDA	UNVRFLXA
210328	VERIZON FLORIDA	VENCFLXA
210328	VERIZON FLORIDA	VENCFLXS
210328	VERIZON FLORIDA	WIMMFLXA
210328	VERIZON FLORIDA	WLCHFLXA
210328	VERIZON FLORIDA	WLCRFLXA
210328	VERIZON FLORIDA	WNHNFLXC
210328	VERIZON FLORIDA	WSSDFLXA
210328	VERIZON FLORIDA	YBCTFLXA
210328	VERIZON FLORIDA	ZPHYFLXA

EXHIBIT C

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

IN RE:)
)
PETITION OF CELLCO PARTNERSHIP) Docket No. _____
AND ITS SUBSIDIARIES AND)
AFFILIATES TO AMEND ETC)
DESIGNATION IN THE STATE OF)
FLORIDA)

CERTIFICATION OF LINDA STEVENS

I, the undersigned, Linda Stevens, do hereby certify as follows:

1. I am the Associate Director – Finance for Cellco Partnership d/b/a Verizon Wireless (“Cellco”). In this capacity, I am responsible for overseeing compliance with the eligible telecommunications carrier (“ETC”) obligations and requirements for Cellco Partnership d/b/a Verizon Wireless and each of its subsidiaries and affiliates in Florida, including Alltel Communications, LLC (collectively, “Verizon Wireless”).

2. This Certification is submitted in support of the Petition to Amend ETC Designation in the State of Florida filed by Verizon Wireless (“Petition”).

3. I have reviewed the Petition and certify that the facts stated therein, of which I have personal knowledge, are true and correct to the best of my knowledge, information and belief.

A. Verizon Wireless’ Acquisition of Alltel

4. On January 9, 2009, Cellco acquired Alltel Communications, LLC (“Alltel”) and each of its subsidiaries and affiliates. Alltel is now a wholly-owned, indirect subsidiary of Cellco. Cellco and each of its subsidiaries and affiliates in Florida, including Alltel, operate collectively under the Verizon Wireless name and the facilities and subscribers of each entity are integrated into the Verizon Wireless operations.

5. Verizon Wireless' acquisition of Alltel was conditioned on the phase-down of receipt of federal high-cost universal service fund support ("USF") over a five year period. High-cost USF support will be reduced 20% per year over a five year period.¹ The phase-down of high-cost USF will not affect Verizon Wireless' ability to provide Lifeline/Link Up assistance discounts to qualified, low-income consumers during the phase down.

B. Verizon Wireless Will Continue to Satisfy the ETC Requirements

6. To qualify for ETC designation under 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201, a carrier must meet the following requirements:

- (a) The company is a "common carrier" under federal law;
- (b) The company offers, or will be able to offer, the supported services or functionalities using its own facilities, or a combination of its own facilities and resale of another carrier's services;
- (c) The company will advertise the availability and charges for the supported services using media of general distribution; and
- (d) The company will provide the supported services throughout its designated ETC service area upon reasonable request.

7. In addition to the ETC requirements set forth above, the Commission has also adopted the same annual ETC reporting requirements as those adopted by the Federal Communications Commission ("FCC") at 47 C.F.R. § 54.209.²

¹ *Applications of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC for Consent to Transfer Control of Licenses, Authorizations, and Spectrum Manager and de Facto Transfer of Leasing Arrangements*, WT Docket No. 08-95, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444, 17531-32 ¶¶ 196-97 (2008).

² *In re: State certification of rural telecommunications carriers pursuant to 47 C.F.R. 54.314*, Docket No. 010977-TL, Order No. PSC-05-0824-FOF-TL (Aug. 15, 2005) ("*Order No. PSC-05-0824-FOF-TL*"). Although the Commission's Order discusses the annual ETC reporting requirements in the context of certifying a rural local exchange carrier's ("LEC") receipt of high-cost USF support under 47 C.F.R. § 54.314, the ordering clause appears to extend the annual reporting obligations to "all Florida Commission-designated ETCs," not just to ETCs serving a rural LEC service area.

8. The FCC determined in the *FCC Designation Order* that Alltel satisfied each of the applicable ETC designation requirements. As established below, Verizon Wireless will continue to satisfy each of the applicable ETC designation and annual reporting requirements in Florida.

C. Verizon Wireless is a Common Carrier

9. As a Commercial Mobile Radio Service provider, Verizon Wireless is defined as a common carrier under federal law.³

D. Verizon Wireless Will Continue to Provide Each of the Supported Services

10. Verizon Wireless will continue to provide the supported services using its own network infrastructure consisting of antennas, cell-sites, towers, trunking, mobile switching and interconnection facilities. Verizon Wireless provides each of the nine supported services or functionalities set forth in 47 C.F.R. § 54.101(a)(1)-(9) throughout the Designated Area as follows:

Voice-grade access to the public switched telephone network

11. Verizon Wireless provides voice-grade access (*i.e.*, the ability to make and receive calls with a minimum bandwidth of 300 to 3500 Hertz) to the public switched telephone network pursuant to 47 C.F.R. § 54.101(a)(1).⁴

Local Usage

12. Each of Verizon Wireless' generally available voice service offerings includes local usage pursuant to 47 C.F.R. § 54.101(a)(2).⁵ Unlimited local usage is not required of any

³47 C.F.R. § 20.9(a)(7).

⁴*Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, 12 FCC Rcd 8776, ¶¶ 63-64 (1997) ("*First Report and Order*"); *see* 47 C.F.R. § 54.101(a)(1).

⁵47 C.F.R. § 54.101(a)(2).

ETC⁶ and the FCC has determined that a wireless carrier's inclusion of local usage in a variety of service offerings satisfies the Section 54.101(a)(2) obligations.⁷

DTMF signaling or its functional equivalent

13. Verizon Wireless utilizes out-of-band digital signaling and in-band multi-frequency signaling, which is the functional equivalent of dual-tone multi-frequency signaling (DTMF), in satisfaction of 47 C.F.R. § 54.101(a)(3).⁸

Single-party service or its functional equivalent

14. Verizon Wireless offers the functional equivalent of single-party service by providing a dedicated message path for the length of a user's particular transmission in satisfaction of 47 C.F.R. § 54.101(a)(4).⁹

Access to emergency services

15. Verizon Wireless provides access to emergency services in satisfaction of 47 C.F.R. § 54.101(a)(5). Verizon Wireless has deployed Phase I and Phase II E911 service for all facilities serving Verizon Wireless customers within the Designated Area.

Access to operator services

16. Verizon Wireless will provide all of its customers with access to operator services, provided either by Verizon Wireless or other entities (e.g. LECs, IXC, etc.), in satisfaction of 47 C.F.R. § 54.101(a)(6).¹⁰

⁶*In the Matter of Federal-State Joint Board of Universal Service*, CC Docket No. 96-45, *Order and Order on Reconsideration*, 18 FCC Rcd 15090, ¶ 14 (2003) (“July 2003 Order”).

⁷*Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion and Order*, 19 FCC Rcd 1563, ¶ 20 (2004) (“Virginia Cellular”).

⁸*First Report and Order*, ¶ 71.

⁹47 C.F.R. § 54.101(a)(4); *First Report and Order*, ¶ 62.

¹⁰*First Report and Order*, ¶ 75; 47 C.F.R. § 54.101 (a)(6).

Access to interexchange service

17. Verizon Wireless provides each of its customers with access to interexchange service in satisfaction of 47 C.F.R. § 54.101(a)(7). On most of Verizon Wireless' rate plans, interexchange calls can be made without incurring an additional toll charge.

Access to directory assistance

18. Verizon Wireless provides all of its customers with access to directory assistance by dialing either "411" or "Area Code + 555-1212" in satisfaction of 47 C.F.R. § 54.101(a)(8).

Toll limitation for qualifying low-income consumers

19. Verizon Wireless' Lifeline service offering includes the ability to make long distance calls without incurring a separate toll charge in satisfaction of 47 C.F.R. § 54.101(a)(9).

E. Verizon Wireless Will Continue to Advertise the Availability of the Supported Services and Associated Charges

20. Verizon Wireless advertises the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the Designated Area of both the available services and the associated rates. Verizon Wireless advertises its services through a variety of advertising media, including newspapers, television, radio, public exhibits and displays and the Verizon Wireless website (www.verizonwireless.com).

21. In compliance with 47 C.F.R. § 54.405(b), Verizon Wireless will also continue to publicize the availability of Lifeline and Link Up assistance in a manner designed to reach those likely to qualify for the assistance, including advertising on its website and in local newspapers in the Designated Area.

F. Verizon Wireless Will Continue to Satisfy the Annual ETC Reporting Requirements Adopted by the Commission

22. Verizon Wireless will also continue to satisfy the annual ETC reporting requirements adopted by the Commission in Order No. PSC-05-0824-FOF-TL, which are the same as those adopted by the FCC at 47 C.F.R. § 54.209.

23. Currently, Verizon Wireless annually files the information and certifications required under 47 C.F.R. § 54.209 with the FCC. Upon approval of this petition, Verizon Wireless will begin filing the required information and certifications with the Commission as required of all Commission-designated ETCs in Florida, including the submission of its service improvement plan, emergency functionality plan and other reports required to be submitted with an ETC's first annual compliance filing.¹¹

G. Commitment and Ability to Provide the Supported Services

24. Verizon Wireless will continue to offer and provide service in response to all reasonable requests for service pursuant to the six-step process set forth in 47 C.F.R. § 54.202(a). Verizon Wireless will provide service on a timely basis to requesting customers within its existing coverage areas.

25. If a request comes from a customer residing within the Designated Area, but outside of Verizon Wireless' current coverage area, it will provide service within a reasonable period of time, if service can be provided at reasonable cost pursuant to the six-step process set forth in 47 C.F.R. § 54.202(a) as follows:

1. Modifying or replacing the customer's wireless handset equipment.
2. Deploying a roof-mounted antenna or other network equipment at the customer's premises.
3. Adjusting the nearest cell site.

¹¹ See Order No. PSC-05-0824-FOF-TL, pp. 3-4 footnotes 3 and 7.

4. Adjusting the network or customer equipment.
5. Reselling services of another carrier, including via a roaming arrangement.
6. Employing, leasing or constructing an additional cell site, cell-extender, repeater, or similar equipment.

26. Verizon Wireless will also continue to annually report unfulfilled requests for service within the Designated Area and describe in detail how it attempted to provide service consistent with 47 C.F.R. § 54.209(a) and Order No. PSC-05-0824-FOF-TL.

H. Service Improvement Plan

27. Verizon Wireless will continue to implement and report progress in connection with the service improvement plan Alltel previously filed with the FCC and which will be filed with this Commission upon approval of this Petition (the "Plan"). The Plan describes projected capital expenditures and service improvements to Verizon Wireless' telecommunications facilities that serve the Designated Area. The Plan also describes operating expenses Verizon Wireless will continue to incur for the upgrading and maintaining of its network facilities serving the Designated Area. The Plan remains flexible and subject to change in response to general consumer demand, changes in technology, network integration and other appropriate factors. The priority under which each cell site or other infrastructure is to be constructed or deployed is also subject to change depending upon requests for service and other market factors.

28. Verizon Wireless will continue to file an annual report detailing its progress toward completion of service improvement projects consistent with 47 C.F.R. § 54.209(a) and Order No. PSC-05-0824-FOF-TL.

I. Ability to Remain Functional in Emergency Situations

29. Verizon Wireless' network serving the Designated Area is designed to remain functional in emergency situations. Verizon Wireless has adequate amounts of back-up power to

provide 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.

30. Verizon Wireless has deployed fixed and portable back-up power generators at various locations throughout its network that can be deployed in emergency situations. These back-up power generators are capable of keeping a cell site up and running until power is restored to the cell site, a portable generator is moved to the site, system changes are made to reroute traffic or a cell site on wheels (“COW”) is deployed. Verizon Wireless tests its back-up power generators regularly to ensure functionality. Verizon Wireless is capable of and will reroute traffic around damaged or out-of-service facilities by changing call routing translations as needed. Verizon Wireless is also able to deploy COWs as temporary cell sites when existing facilities are damaged or out of service for longer periods of time. Further, by changing call routing translations or deploying COWs, Verizon Wireless is able to manage traffic spikes throughout its network. As a long-term solution for managing increased traffic levels and traffic spikes, Verizon Wireless increases capacity at its cell sites, switches, and transport facilities.

31. Pursuant to 47 C.F.R. § 54.209 and Order No. PSC-05-0824-FOF-TL, Verizon Wireless will continue to annually certify that it maintains the ability to function in emergency situations and will continue to report service outages as required.

J. Consumer Protection and Service Quality

32. Verizon Wireless will continue to comply with applicable consumer protection and service quality standards. In satisfaction of these requirements, Verizon Wireless is required to adhere to the CTIA Consumer Code for Wireless Service. *See* 47 C.F.R. § 54.202(a) and Order No. PSC-05-0824-FOF-TL, p.4.

33. Verizon Wireless abides by the CTIA Consumer Code¹² for its entire wireless operation across the country, not simply those states in which it seeks ETC status. To maintain CTIA Consumer Code compliance, a wireless carrier is required to (1) disclose rates and terms of conditions of service; (2) make maps available showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer complaints received from government agencies; and (10) abide by policies for protection of consumer privacy. Verizon Wireless' voluntary commitment to the CTIA Consumer Code is powerful evidence of its determination to protect consumer interests and achieve the highest quality of service.¹³

34. Verizon Wireless will continue to annually certify its compliance with applicable consumer protection and service quality standards and annually report the number of customer complaints per thousand handsets pursuant to 47 C.F.R. § 54.209(a) and Order No. PSC-05-0824-FOF-TL.

¹²See <http://files.ctia.org/pdf/ConsumerCode.pdf>.

¹³ At the time of adoption, FCC Commissioner Abernathy lauded the wireless industry's voluntary initiative to establish consumer protection and service quality standards under the CTIA Consumer Code: "This code exists because competition is driving wireless carriers to better serve consumers and increase customer loyalties. At the end of the day, the industry's willingness to adopt a voluntary code of conduct avoids the need for costly regulatory oversight while delivering greater value to wireless customers. I believe the Code will ensure that consumers will understand wireless service and rate plan options thus allowing more informed choices when purchasing wireless services. This is a win-win for consumers." *Statement of Commissioner Kathleen Q. Abernathy In Response to CTIA Consumer Code for Wireless Service* (September 9, 2003) (http://fjallfoss.fcc.gov/edocs_public/attachmatch/DOC-238760A1.pdf).

K. Comparable Local Usage Plan

35. Verizon Wireless will continue to provide a comparable local usage plan pursuant to 47 C.F.R. § 54.202(a). A description of Verizon Wireless' current generally available rate plans is available at www.verizonwireless.com.

36. All of Verizon Wireless' generally available service offerings include local calling areas that are substantially larger than those offered by the incumbent LECs (including nationwide calling in most Verizon Wireless rate plans). Thus, consumers have the opportunity to select a rate plan that best meets their needs based on the amount of local usage (minutes of use) available within the larger local calling area of each plan.

37. Verizon Wireless will continue to annually certify that it is offering a comparable local usage plan pursuant to 47 C.F.R. § 54.209(a) and Order No. PSC-05-0824-FOF-TL.

L. Equal Access

38. Verizon Wireless acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the Designated Area. Consistent with 47 C.F.R. § 54.209(a) and Order No. PSC-05-0824-FOF-TL, Verizon Wireless will continue to file an annual certification acknowledging this requirement.

M. Amending the ETC Designation Will Serve the Public Interest

39. Designation of wireless ETCs affords consumers the unique advantages of mobility. The FCC has recognized the unique advantages of mobility when it stated:

[T]he mobility of telecommunications assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other critical community locations. In addition, the availability of a wireless universal service offering provides access to emergency services that can mitigate

the unique risks of geographic isolation associated with living in rural communities.¹⁴

40. This Commission has also recognized that the designation of wireless ETCs promotes competition and benefits consumers in rural and high cost areas by increasing consumer choice and service offerings, including the potential for customers to be subject to fewer toll calls and for access to advanced services like those available in more urban areas.¹⁵

41. Amending the ETC Designation will continue to provide Florida consumers with the tangible benefits previously identified by the Commission and will allow all Verizon Wireless subscribers within the Designated Area to benefit from Verizon Wireless' assumption of universal service obligations and investment of federal high-cost universal service support in its integrated network. Access to federal universal service support will continue to enable Verizon Wireless to improve service quality and coverage in areas that it currently serves and to expand its services into areas that would not be economically feasible to serve absent explicit universal service support. This will continue to provide consumers with more competition and make it more likely that high cost areas of the State will have access to essential telecommunications services and infrastructure.

42. Verizon Wireless will also continue to offer qualifying, low-income consumers a choice in their Lifeline/Link Up provider. The mobility of wireless service provides qualifying Lifeline customers an alternative means of communications that they may not currently enjoy.

43. Improving and expanding the choices available to consumers will not only strengthen inter-modal wireless/wireline competition but also increase intra-modal wireless

¹⁴*Virginia Cellular*, ¶ 29.

¹⁵ *In re: petition for designation as eligible telecommunications carrier (ETC) by T-Mobile South LLC*, Docket No. 09051-TP, Order No. PSC 10-0478-PAA-TP, p. 5 (July 28, 2010).

competition to the benefit of telecommunications customers throughout Florida. Increased competition in rural and high cost areas provides incentives to incumbent service providers to achieve new operating efficiencies and introduce additional choices, higher quality and better value to their customers.

N. Lifeline and Link Up

44. Granting this Petition will also ensure that Verizon Wireless is able to offer Lifeline/Link Up assistance to new and current subscribers of any of its subsidiaries and affiliates serving the Designated Area in Florida. Amending and consolidating the ETC Designations will allow Verizon Wireless to continue providing Lifeline/Link Up assistance to all qualified, low-income subscribers throughout the entire Designated Area.

45. In addition, so long as Verizon Wireless is designated as an ETC in Florida, it will continue Alltel's past practice of voluntarily providing a \$3.50 per month additional discount to qualified Lifeline subscribers and further providing Transitional Lifeline assistance to Lifeline subscribers who no longer qualify for federal Lifeline assistance.

I certify that the foregoing is true and correct to the best of my knowledge, information and belief.

STATE OF GEORGIA)
) ss.
COUNTY OF FULTON)



Subscribed and sworn to before me
this 23 day of August, 2010.



Notary Public

**SANDRA F. BROCK
NOTARY PUBLIC
FULTON COUNTY, GEORGIA
MY COMMISSION EXPIRES
SEPTEMBER 8, 2012**


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EXHIBIT D

HIGH-COST CERTIFICATION


1. I am Executive Director - Finance for Cellco Partnership d/b/a Verizon Wireless and each of its subsidiaries and affiliates in Florida, including Alltel Communications, LLC (collectively, "Verizon Wireless") and I am authorized to make this certification on behalf of Verizon Wireless.

2. Pursuant to 47 U.S.C. § 214(e) and 47 C.F.R. § 54.7, Verizon Wireless will use all of the federal high-cost universal service support it receives only for the provision, maintenance, and upgrading of services and facilities for which the support is intended.



Mark R. Smith
Executive Director - Finance

Subscribed and sworn to before me
this 19 day of August, 2010.



Notary Public

SANDRA F. BROCK
NOTARY PUBLIC
FULTON COUNTY, GEORGIA
MY COMMISSION EXPIRES
SEPTEMBER 8, 2012