

September 18, 2003

HAND DELIVERED

Ms. Lynda Dorr, Secretary to the Commission
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, Wisconsin 53707-7854

Re: Application of ALLTEL Communications, Inc., ALLTEL Wireless of Wisconsin RSA #1, LLC and ALLTEL Wireless of Wisconsin RSA #7, LLC for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 7131-TI-101)
Application of NPCR, Inc., d/b/a Nextel Partners for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8081-TI-101)
Application of Metro Southwest PCS, LLP for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8123-TI-100)
Application of Brown County MSA Cellular Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8159-TI-100)
Application of Wisconsin RSA #3 Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8194-TI-101)
Application of Wisconsin RSA #4 Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8195-TI-101)
Application of Wisconsin RSA #10 Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8201-TI-101)
Application of Nsighttel Wireless, LLC for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8202-TI-101)
Application of Midwest Wireless Wisconsin, LLC for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8203-TI-100)
Application of Wausau Cellular Telephone Company Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin (Docket No. 8250-TI-100)

Dear Ms. Dorr:

On behalf of the members of the Wireless Division of the Wisconsin State Telecommunications Association (“WSTA”)¹, the Wireless Council of the WSTA is writing in support of the ten pending Applications for Designation as an Eligible Telecommunications Carrier in Wisconsin that were noticed for public comment on September 12, 2003.

In each of the Notice Requesting Comments (“Notices”), the Commission has requested comment on seven issues. The members of the Wireless Division of the WSTA remind the Public Service Commission of Wisconsin (“PSC”) that these issues are the same, or very similar, to the issues that were raised in the US Cellular docket, *Application of United States Cellular Corporation for Designation as an Eligible Telecommunications Carrier in Wisconsin*, Docket No. 8225-TI-102. The facts and details of these applications are not materially different from the facts and details in the US Cellular case. In addition, it is also important to note that during the time which has passed since the Commission issued Notices of Investigation in all of these dockets, only one intervener has come

¹ The Wireless Division of the WSTA members include: Airadigm Communications, ALLTEL, Dobson Cellular Systems, Midwest Wireless, New-Cell, Inc., Nextel Communications, Verizon Wireless, Wisconsin R.S.A. #1, Wisconsin R.S.A. #6, and Wisconsin R.S.A #7.

forward to participate in any of these proceedings (Interstate Telecom Consulting in the Midwest Wireless docket). Finally, it is extremely important to remind the Commission that since approving US Cellular as an ETC, that company is projected to receive substantial federal Universal Service Fund (“USF”) support. Should the Commission continue holding other carriers’ ETC applications in abeyance, the Commission is denying those carriers access to vital federal support necessary for network and infrastructure improvements and upgrades while seeming to extend preferential treatment to only one carrier.

Competition, universal service, and technological neutrality are important objectives of both the federal Act and Wisconsin law. *See, e.g.*, Wis. Stat. § 196.03(6). The Federal Communications Commission (“FCC”) and a number of state commissions, *including this state commission*, have recognized that designation of wireless providers as ETCs in areas served by rural telephone companies will increase customer choice, provide additional options for universal service, and promote the development of new technologies in rural areas. The FCC has observed that the competition that will likely result from designation of an additional ETC will provide an incentive to the incumbents to improve their networks to remain competitive.

In light of these facts, granting the carriers who have filed for ETC designation their request is in the public interest and should be granted expeditiously.

Sincerely,

Edward Coates
Chairperson
Wireless Council of the WSTA

EC: lv

cc: Service List