

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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	7131-TI-101
Application of NPCR, Inc., d/b/a Nextel Partners for Designation as an Eligible Telecommunications Carrier in Wisconsin	8081-TI-101
Application of Metro Southwest PCS, LLP for Designation as an Eligible Telecommunications Carrier in Wisconsin	8123-TI-100
Application of Brown County MSA Cellular Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin	8159-TI-100
Application of Wisconsin RSA #3 Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin	8194-TI-101
Application of Wisconsin RSA #4 Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin	8195-TI-101
Application of Wisconsin RSA #10 Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin	8201-TI-101
Application of Nsighttel Wireless, LLC for Designation as an Eligible Telecommunications Carrier in Wisconsin	8202-TI-101
Application of Midwest Wireless Wisconsin, LLC for Designation as an Eligible Telecommunications Carrier in Wisconsin	8203-TI-100
Application of Wausau Cellular Telephone Company Limited Partnership for Designation as an Eligible Telecommunications Carrier in Wisconsin	8250-TI-100

# **COMMENTS BY THE SMALL COMPANY COMMITTEE OF THE WISCONSIN STATE TELECOMMUNICATIONS ASSOCIATION**

## **INTRODUCTION**

The following Comments are submitted to the Public Service Commission of Wisconsin (the "Commission") by the Small Company Committee of the Wisconsin State Telecommunications Association, which includes the incumbent local exchange carriers listed on Attachment A (collectively the "Small Company Committee").

These Comments address whether to grant the wireless applicants listed above (collectively the "Applicants") designation as Eligible Telecommunications Carriers ("ETCs") in Wisconsin. For the reasons set forth in these Initial Comments, the Commission ***should deny*** the application of the Applicants for designation as ETCs for receipt of funding from the federal universal service fund ("Federal USF"). As an alternative minimum, the Commission should order a contested case proceeding to further evaluate the Applicants applications.

## **COMMENTS**

The Small Company Committee members serve some of the most sparsely populated areas of the state of Wisconsin. It is essential for the businesses and residents of these areas to have the same quality of telecommunications service as urban areas. Due to the existence of cellular shadows (areas in which cellular service is not available), the Applicants do not provide such quality service. If the Commission designates the Applicants as ETCs, the public interest will not be served because customers will not be receiving the quality of service that is expected by them when the Commission approves an essential telecommunications service. Further, the goals of the Federal USF program will not be available to customers that subscribe to wireless service. Those customers should be able to expect:

- Quality services at just, reasonable, and affordable rates;
- Access to advanced telecommunications and information services; and
- Access for low-income consumers to telecommunications and information services.

We believe the Applicants applications provide no assurances that such services will be available. Have the Applicants presented any plan to assure that the quality, rates, advanced services, and reasonable lifeline and link-up programs will be available? For a consumer in the areas generally served by small telephone companies to have the quality, affordability, advanced services, and reasonable lifeline assistance as required by the Federal USF statutes, he/she will need to subscribe to service from a local wireline telecommunications provider. As important, if waivers are granted to the Applicants from the requirements of PSC 160.13 or 160.03 will they also be waived for all rural ETCs?

In addition, the Small Company Committee has reviewed the Comments of the WSTA ILEC Division and fully supports those comments.

Sincerely,

Michael D. Jensen  
Chairman  
WSTA Small Company Committee

**MEMBERS OF THE WISCONSIN STATE TELECOMMUNICATIONS  
ASSOCIATION SMALL COMPANY COMMITTEE**

**ATTACHMENT A**

<b><u>NAME</u></b>	<b><u>ACCESS LINES</u></b>
Amery Telephone Company	7,284
Citizens Telephone Cooperative, Inc.	2,564
State Long Distance Telephone Company	11,345
Richland-Grant Telephone Cooperative, Inc.	2,967
Wittenberg Telephone Company	2,670
Lakefield Telephone Company	1,861
Northeast Telephone Company	9,749
Manawa Telephone Company	2,711
Tri-County Telephone Cooperative, Inc.	4,244
Wood County Telephone Company	30,300
<b>TOTAL</b>	<b>75,695</b>