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September 7, 2011

E FILING

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Re: In the Matter of the Request of WWC License LLC for Certification Regarding its Use of
Federal Universal Service Support
Docket TC11-063 GPNA File No. 0595.0029

Dear Ms. Van Gerpen:

Enclosed for filing in the above-captioned matter, please find the Supplemental Certification of Mark R. Smith and Revised Confidential Exhibit B-4.

On May 31, 2011, WWC License LLC d/b/a Verizon Wireless ("WWC") filed its annual Request for Certification and Eligible Telecommunications Carrier ("ETC") Report with the Commission. WWC respectfully requests that the Commission consider this letter and enclosures as supplementing WWC's annual certifications and ETC report in this docket.

By way of background, the Commission will recall that before 2009, WWC was a wholly-owned subsidiary of Alltel Corporation. On January 9, 2009, Cellco Partnership d/b/a Verizon Wireless ("Cellco") acquired Alltel Corporation and each of its subsidiaries such that WWC became a wholly-owned indirect subsidiary of Cellco. As a condition of its acquisition of Alltel Corporation, Cellco was required to divest certain WWC customers and network assets in South Dakota.¹ On June 22, 2010, the WWC customers and network assets required to be divested were transferred to AT&T Mobility, LLC. WWC continues to exist after the divestiture and holds assets and customers in markets that were not required to be divested. Through its

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 (2008) ("*Cellco-Alltel Order*").

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affiliation with Cellco and its subsidiaries and affiliates operating in South Dakota, WWC continues to satisfy all of the requirements and obligations applicable to its status as an ETC.

Approximately one month prior to the June 22, 2010 divestiture, WWC submitted its 2010 annual request for certification and ETC report to the Commission in docket TC10-067. Commission Staff then contacted WWC with questions about the effect of the divestiture on WWC's ETC status and the certification process. On September 15, 2010, WWC responded to data requests and also submitted a Supplemental Filing in Support of Certification of WWC License, LLC. In the Supplemental Filing, WWC explained how it continued to satisfy the ETC obligations after the divestiture. On September 3, 2010, Cellco also filed a separate petition in docket TC10-090 requesting amendment and consolidation of the WWC and RCC Minnesota, Inc. d/b/a Verizon Wireless ("RCC") ETC designations under the Cellco name. At the Commission's September 28, 2010 meeting, the Commission approved WWC's annual ETC certification in docket TC10-067 with the understanding that any additional issues concerning WWC's post-divestiture operations in South Dakota could be addressed docket TC10-090. On July 11, 2011, Cellco filed a motion to withdraw the pending petition in docket TC10-090.

Following divestiture of the required WWC assets, the Universal Service Administrative Company ("USAC") assigned WWC a new study area code (SAC 399018) for its post-divestiture South Dakota operations. At the time USAC assigned SAC 399018, it identified the study area name as being "Cellco Partnership d/b/a Verizon Wireless." On March 16, 2011, WWC sought to correct and clarify the record in docket TC10-067 by filing supplemental information concerning its reporting of customer lines and receipt of USF support under SAC 399018. In its March 16, 2011 letter, WWC explained that it began reporting lines to USAC under the new 399018 study area code in September 2010, although it did not begin to receive any federal high-cost universal service fund ("USF") support until January 2011.

Subsequent to the filing of its annual certifications and ETC report in this docket on May 31, 2011, Commission Staff contacted WWC with questions about WWC's filings and the pending withdrawal of the petition in docket TC10-090. Specifically, Staff sought resolution of the following three issues with WWC: (1) Staff identified concerns with the inclusion of Verizon Wireless Legacy Lines previously reported by WWC under SAC 399018; (2) Staff sought assurance that WWC would not report the disputed Verizon Wireless Legacy Lines in the future; and (3) Staff expressed concern with the identification of "Cellco Partnership d/b/a Verizon Wireless" as the study area name associated with SAC 399018.

To address Staff's concerns, WWC agreed to revise each of its previously-filed Form 525 line count reports to exclude the disputed Verizon Wireless Legacy Lines. WWC completed the revised line count filings on September 1, 2011, and amended its federal USF support estimates as described in Revised Confidential Exhibit B-4. WWC also committed to excluding the disputed Verizon Wireless Legacy Lines from its quarterly Form 525 line count reports in the future as described in the Supplemental Certification of Mark R. Smith. In addition, on September 1, 2011, WWC requested that USAC correct its records to identify "WWC License

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LLC” as the name associated with SAC 399018. USAC confirmed by email that it has amended its records as requested.

If you have any questions, please feel free to contact me and I will make WWC representatives available as necessary to explain in more detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Talbot J. Wiczorek". The signature is written in a cursive style with a long horizontal stroke at the end.

Talbot J. Wiczorek

TJW:klw

Enclosures

c: Kara Semmler/Brian Rounds

Rich Coit w/o confidential materials

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE REQUEST OF)
WWC LICENSE, LLC FOR)
CERTIFICATION REGARDING USE OF) TC11-063
FEDERAL UNIVERSAL SERVICE)
SUPPORT)

CERTIFICATE OF SERVICE

The undersigned certifies that on the 7th day of September, 2011, I served a true and correct copy of WWC's letter to SDPUC, Supplemental Certification of Mark Smith and Confidential Revised Exhibit B-4 via electronic mail to:

Ms. Patricia Van Gerpen
Executive Director
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500 E. Capitol Ave.
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Also on this date, a copy of the letter to SDPUC and the Supplemental Certification of Mark Smith (without its confidential Exhibit B-4) was sent electronically to:

RICHARD D. COIT
SDTA
PO BOX 57
PIERRE SD 57501
richcoit@sdtanonline.com


Talbot J. Wiczorek