



2200 IDS Center
80 South 8th Street
Minneapolis MN 55402-2157
tel 612.977.8400
fax 612.977.8650

June 29, 2012

RECEIVED

Matthew A. Slaven
(612) 977-8245
mslaven@briggs.com

JUL 02 2012

VIA US MAIL

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

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

**Re: In the Matter of Connect America Fund
WC Docket 10-90**

Dear Ms. Van Gerpen:

Pursuant to 47 C.F.R. § 54.313(i), please find enclosed courtesy copies of the 2012 Annual Eligible Telecommunications Carrier reports for the designated common carriers and study areas listed below:

Study Area	SAC
WWC License LLC	399018
RCC Minnesota, Inc.	399003

Copies of confidential information redacted from the enclosed copies have been filed under separate cover in TC 12-072 and TC 12-073, respectively.

Sincerely,

/s/ Matthew A. Slaven

MAS/pk
Enclosures

4782190v1

PUBLIC VERSION
CONFIDENTIAL VERSION FILED UNDER SEPARATE COVER

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

In the Matter of
Connect America Fund

)
)
)

WC Docket No. 10-90

RECEIVED

JUL 02 2012

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

WWC LICENSE LLC d/b/a VERIZON WIRELESS

**2012 ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION
AND ANNUAL REPORT FOR THE STATE OF SOUTH DAKOTA**

STUDY AREA CODE (SAC) 399018

July 1, 2012

BRIGGS AND MORGAN, P.A.
Mark J. Ayotte
Matthew A. Slaven
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
(612) 977-8400

VERIZON WIRELESS
Elizabeth Kohler
302 Mountain View Drive, Suite 200
Colchester, VT 05446
(802) 654-5093

I. INTRODUCTION

Pursuant to 47 C.F.R. § 54.313 (2012),¹ WWC License LLC d/b/a Verizon Wireless (“WWC” or the “Company”) submits this 2012 Eligible Telecommunications Carrier (“ETC”) Certification and Annual Report.

II. CONFIDENTIALITY

The data in this report and the attached exhibits represent commercial and financial trade secrets regarding the Company’s network performance, customer specific information and other matters that are highly sensitive due to the competitive nature of the wireless industry. Accordingly, WWC respectfully requests that the Federal Communications Commission (“Commission” or “FCC”) treat this data as confidential and withhold it from public inspection pursuant to 47 C.F.R. §§ 0.457(d)(1) and 0.459.

III. BACKGROUND

The South Dakota Public Utilities Commission (“SDPUC”) designated WWC as an Eligible Telecommunications Carrier in 2001.² At that time, WWC was designated to serve all non-rural telephone company wire centers throughout the State of South Dakota. Expansion of WWC’s designated service area to include the entire study areas of certain rural telephone companies was later approved by the Commission in 2003 and again in 2005.³ WWC

¹ *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*); *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, DA 12-147 (rel. Feb. 3, 2012) (*Clarification Order*); *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Third Order on Reconsideration, FCC 12-52 (rel. May 14, 2012) (third Order on Reconsideration).

² *In the Matter of the Filing by GCC License Corporation for Designation as an Eligible Telecommunications Carrier*, TC98-146, Order Designating GCC License Corporation as an Eligible Telecommunications Carrier in Non-Rural Telephone Company Exchanges (Oct. 18, 2001).

³ *In the Matter of the Filing by GCC License Corporation for Designation as an Eligible Telecommunications Carrier*, TC98-146, Findings of Fact and Conclusions of Law; Notice of Entry of Order (Oct. 18, 2001) (“*Public Interest Order*”); *In the Matter of the Filing by GCC License Corporation for Designation as an Eligible Telecommunications Carrier*, TC98-146, Order Designating Western Wireless as an ETC for Areas Served by Certain Rural Telephone Companies (Jan. 6, 2001); *In the Matter of the Filing by WWC License, LLC d/b/a*

subsequently relinquished its ETC designation in the Golden West Telecommunications Cooperative, Inc. study area 391659 effective November 18, 2010.⁴

On January 9, 2009, Cellco Partnership d/b/a Verizon Wireless ("Cellco") acquired Alltel Corporation and each of its subsidiaries and affiliates, including WWC.⁵

A complete listing of the non-rural telephone company wire centers and rural telephone company study areas and wire centers in which WWC is designated as an ETC by the SDPUC is attached as **Exhibit A** ("Designated Area").⁶

IV. ANNUAL ETC REPORT IN ACCORDANCE WITH SECTION 54.313(a)

47 C.F.R. § 54.313(a) requires a recipient of federal high-cost universal service support to annually report certain information no later than July 1 of each calendar year.⁷ WWC respectfully submits the following information for the period January 1, 2011 through December 31, 2011 in satisfaction of the Commission's annual reporting requirement.

CellularOne for Designation as an Eligible Telecommunications Carrier in Other Rural Areas, TC03-191, Amended Order Designating Western Wireless as an Eligible Telecommunications Carrier; Findings of Fact and Conclusions of Law; and Notice of Entry of Order (Jan. 3, 2005).

⁴ *In the Matter of the Petition of Cellco Partnership and Its Subsidiaries and Affiliates to Amend and Consolidate Eligible Telecommunications Carrier in the Designations in the State of South Dakota and to Partially Relinquish ETC Designations*, TC10-090, Order Approving Partial Relinquishment of ETC Designation (Nov. 18, 2010).

⁵ *In the Matter of 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*, WT Docket No. 08-95, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444 (2008) (*Merger Order*).

⁶ A portion of the WWC Holding Co., Inc. (SAC 399018) Designated Area includes wire centers in which RCC Minnesota, Inc. (SAC 399003) has been designated as a competitive ETC. For administrative purposes, only one designated ETC reports on the common wire centers, so information is reflected in only one ETC Annual Report.

⁷ Pursuant to the *USF/ICC Transformation Order* and *Clarification Order*, in 2012 competitive ETC recipients of federal high-cost universal service support are only required to address the reporting requirements set forth in 47 C.F.R. § 54.313(a)(1) through (a)(8). Other reporting requirements set forth in 47 C.F.R. § 54.313(a) are not required to be addressed until 2013 or have otherwise been deferred to a later reporting period.

A. Service Improvement Plan Progress Report

47 C.F.R. § 54.313(a)(1) requires a high-cost support recipient to file a progress report on its previously filed service quality improvement plan. An ETC designated by a state commission is not required to provide the FCC with a copy of its 2012 state service quality improvement plan, if any.⁸ However, on July 1, 2013, all state-designated ETCs are required to file with the FCC five-year service quality improvement plans that account for the new broadband obligations adopted in the *USF/ICC Transformation Order*.⁹ WWC is a state-designated ETC in South Dakota and, therefore, is not required to file a copy of its 2012 state service quality improvement plan with the Commission in 2012.

B. Network Outages

47 C.F.R. § 54.313(a)(2) requires a high-cost support recipient to annually report network outages within its ETC designated area. 47 C.F.R. § 54.313(a)(2) specifically requires:

Detailed information on any outage in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) at least ten percent of the end users served in a designated service area; or (ii) a 911 special facility, as defined in 47 C.F.R. 4.5(e). (iii) Specifically, the eligible telecommunications carrier's annual report must include information detailing: (A) The date and time of onset of the outage; (B) A brief description of the outage and its resolution; (C) The particular services affected; (D) The geographic areas affected by the outage; (E) Steps taken to prevent a similar situation in the future; and (F) The number of customers affected.

The required information for the time period January 1, 2011 through December 31, 2011 is contained within **Exhibit B**. WWC has compiled and reported information for all outages that meet the above criteria within the Designated Area in South Dakota for the aforementioned time period. Such information includes any outage of at least 30 minutes in duration that potentially

⁸ *Clarification Order*, DA 12-147 at para. 7.

⁹ *Id.*

affected at least ten percent (10%) of its customers served in a service area or a 911 facility. The services affected by an outage were dependent upon the capabilities of the particular facility affected by the outage. Generally, a cell site or switch outage will affect all services provided by the cell site or switch, including voice, data and/or 911 services. The information relating to the number of customers affected by an outage is estimated based on the number of customers with a billing address in each affected wire center.

The steps taken to prevent a similar outage in the future will vary based on a determination of the cause of the outage. Each network outage is examined on a case-by-case basis. For example, when the outage is due to equipment failure, the equipment is replaced or repaired and tested for proper performance, including preventive maintenance. Additionally, the manufacturer or vendor is notified if the failure appears to be in the design or manufacture of the equipment. If the vendor or manufacturer fails or refuses to remedy the deficiency, then a replacement source is determined. Similarly, when the outage is due to weather or other natural occurrence, the probability of a repeat occurrence is considered and evaluated in planning the repair, replacement or rebuild of the equipment or location. Outages due to human error or a faulty process or practice will result in an appropriate reevaluation of the source of error and the need to correct, discipline or replace the person or practice, as applicable. An outage on a leased facility or circuit is escalated and corrected by the third-party facility provider. The outages reported on **Exhibit B** were not determined to require extraordinary measures other than application of the above procedures.

C. Unfulfilled Requests For Service

47 C.F.R. § 54.313(a)(3) requires a high-cost support recipient to annually report the number of requests for service from potential customers within the ETC's designated area that were unfulfilled during the past calendar year. The filing must also detail how the ETC

attempted to provide service to those potential customers. The required information concerning unfulfilled requests for service within the Designated Area in South Dakota from January 1, 2011 through December 31, 2011 is contained in **Confidential Exhibit C**.

D. Complaints Per 1,000 Handsets or Lines

47 C.F.R. § 54.313(a)(4) requires a high-cost support recipient to report annually the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year. The Company received 2.02 complaints per 1,000 handsets associated with SAC 399018 between January 1, 2011 and December 31, 2011.¹⁰

E. Certification Regarding Applicable Service Quality Standards And Consumer Protection Rules

47 C.F.R. § 54.313(a)(5) requires a high-cost support recipient to certify that it is complying with applicable service quality standards and consumer protection rules. The Company's compliance with the CTIA Consumer Code for Wireless Service ("CTIA Consumer Code") satisfies this requirement. The Company certifies that it has complied and will continue to comply with the principles set forth in the CTIA Consumer Code.

F. Certification Regarding Ability to Function in Emergency Situations

47 C.F.R. § 54.313(a)(6) requires a high-cost support recipient to certify that it is able to function in emergency situations as set forth in Section 54.202(a)(2). The following information demonstrates an ability to remain functional in emergency situations in satisfaction of this requirement.

Each cell site is equipped with battery standby power engineered to maintain a standard of eight hours backup with a two-hour minimum standard when restricted by site location. Each

¹⁰ Complaints consist of written complaints from customers submitted to the Commission, the South Dakota Public Utility Commission, the South Dakota Attorney General, the Better Business Bureau or similar third party agencies and oral, written, and e-mail complaints submitted to the Company's Executive Complaint Department.

cell site, unless restricted by site location, also has a permanent standby generator on site, or has the necessary equipment to allow a portable generator to be quickly and safely connected to the site in the event of a commercial power failure. Portable generators are available for transport to an area affected by a commercial power outage. Backup generators are tested on a regular basis to assure functionality. Thus back-up power systems and procedures have been implemented to ensure functionality without an external power source.

In the event of damaged facilities, telecommunications traffic may be rerouted on the network to minimize service disruptions. The network design philosophy also includes redundancy on critical paths and components so that a potential failure of one component does not significantly affect service. The wireless voice and data switching networks are designed to provide continuous service to the customer. The communications between internal switches and external networks, such as the public switched telephone network ("PSTN") and the Internet, are also designed to reduce the possibility of interrupted communications.

The network is comprised of numerous components that are connected using a combination of traditional landline telecommunication networks and microwave radio links. Many of the network's critical locations are supported with diverse circuits, network technologies, and alternative local telecommunications carriers. The impact of a severed fiber optic cable or a faulty T-1 circuit is minimized by this diversity in telecommunications connectivity.

Business procedures have also been adopted to assure minimal service disruptions. These procedures include frequent and thorough preventive maintenance, real-time monitoring of all key system components, the availability of trained maintenance personnel 24 hours a day,

7 days a week to repair or resolve critical failures should they arise, and wide deployment of these personnel and spare parts to permit rapid response and restoration of service.

The network is also designed to manage traffic spikes and minimize call blocking in emergency situations. In order for a traffic spike to result in call blocking, the number of simultaneous calls must exceed the total number of voice paths available at one or more serving cell sites at a given location. Statistical analyses are used to track call blockage in each sector during the busiest hours each month. These statistics are trended and used to predict the required capacity at each cell site. Based on these predictions, capacity is added to each cell site before it reaches overcapacity. In the event unpredictable spikes occur, steps can be taken to increase the call capacity at cell sites as needed, or to deploy temporary "Cells On Wheels" ("COWs") as needed to accommodate the increased demand on the network. These capabilities and systems reasonably minimize call blocking from potential traffic spikes during emergency situations. The Company therefore certifies the ability to function in emergency situations as set forth in Section 54.202(a)(2).

G. Price Plan Offerings

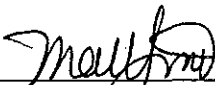
47 C.F.R. § 54.313(a)(7) requires a high-cost support recipient to provide the company's price plan offerings in a format as specified by the Wireline Competition Bureau.¹¹ Information concerning the Company's current generally available price plans (including plans offered to eligible Lifeline consumers) is available at www.verizonwireless.com and www.verizonwireless.com/lifeline.

¹¹ As of the date of filing, the Wireline Competition Bureau has not specified the format for submission of price plan information.

H. Company Information

47 C.F.R. § 54.313 (a)(8) requires a high-cost support recipient to provide the recipient's holding company, operating companies, affiliates, and any branding, as well as universal service identifiers for each such entity by Study Area Codes, as that term is used by USAC. The required ownership information concerning the Company's wireless affiliated recipients of federal high-cost universal service support and the associated Study Area Codes for those wireless affiliates are contained in **Exhibit D**.

June 25, 2012



Mark R. Smith
Assistant Secretary
One Verizon Place
Alpharetta, GA 30004-8511
(678) 339-5121


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

In the Matter of)
Connect America Fund) **WC Docket No. 10-90**
)

CERTIFICATION

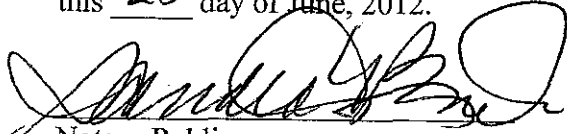
The undersigned, Mark R. Smith, does hereby certify as follows:

1. I serve as Assistant Secretary for WWC License LLC d/b/a Verizon Wireless (“WWC” or the “Company”).
2. This certification is submitted in support of the Company’s 2012 Eligible Telecommunications Carrier Certification and Annual Report.
3. The Company has been designated a competitive ETC in areas identified in **Exhibit A** of its 2012 Eligible Telecommunications Carrier Certification and Annual Report.
4. I have reviewed the Company’s 2012 Eligible Telecommunications Carrier Certification and Annual Report for the State of South Dakota and certify that the facts stated therein, of which I have personal knowledge, are true and correct to the best of my present knowledge, information and belief.
5. Consistent with 47 U.S.C. § 254(e) and 47 C.F.R. §§ 54.7 and 54.314, the Company certifies that all federal high-cost universal service support received was used and will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended.



Mark R. Smith
Assistant Secretary

Subscribed and sworn to before me
this 28 day of June, 2012.



Notary Public

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

SUMMARY OF EXHIBITS

Exhibit A – Designated Service Area for Study Area Code 399018.

Exhibit B – Outage Report.

Confidential Exhibit C – Unfulfilled Requests for Service.

Exhibit D – Company Information.