

**BEFORE THE SOUTH DAKOTA
PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE REQUEST OF)	
WWC LICENSE LLC)	Docket No. TC-_____
FOR CERTIFICATION FOR 2012 REGARDING)	
USE OF FEDERAL UNIVERSAL SERVICE)	
SUPPORT)	

REQUEST FOR CERTIFICATION FOR 2012

STATE OF GEORGIA)
)
COUNTY OF FULTON)

I, Mark R. Smith, being of lawful age and duly sworn, on my oath, state that I am the Assistant Secretary, an officer of WWC License LLC d/b/a Verizon Wireless (“WWC”) and that I am authorized to execute this Affidavit on behalf of WWC, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

1. This Affidavit provides information to demonstrate WWC’s compliance with ETC requirements and provides the information required by A.R.S.D. 20:10:32:52, 20:10:32:54, and 20:10:32:55.

2. The South Dakota Public Utilities Commission (“Commission”) designated WWC as an Eligible Telecommunications Carrier in 2001.¹ 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 2005.² The Universal

¹ *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) (“*Non-Rural ETC Order*”).

² *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, 2003) (“*Rural ETC Order*”); *In the Matter of the Filing by WWC*

Service Administrative Company (“USAC”) assigned SAC 399002 for the WWC ETC designation described above. WWC assets in South Dakota were divested as a result of the Verizon Wireless acquisition of Alltel Corporation.³ This divestiture was effective June 22, 2010. Shortly after divestiture, SAC 399002 was retired, and a new study area code, SAC 399018, was assigned to WWC for all post-divestiture reporting. WWC relinquished its ETC designation in the Golden West Telecommunications Cooperative, Inc. study area, SAC 391659; the Commission approved the notice of relinquishment in an Order dated November 18, 2010.⁴ This filing contains information with respect to SAC 399018, which relates to the same geographic area in which WWC was originally designated, except for the Golden West relinquishment (the “Designated Area”).

3. WWC certifies that all federal high-cost universal service support received in 2011 was used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the federal Telecommunications Act of 1996 and 47 C.F.R. § 54.7. Attached as **Confidential Exhibit A** is a spreadsheet detailing expenditures on capital improvement projects within the Designated Area in 2011, including projects not included in the original 2011 Service Improvement Plan.

License, LLC d/b/a 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) (“Rural Expansion Order”).

³ As of January 9, 2009 Cellco Partnership d/b/a Verizon Wireless acquired Alltel Corporation. *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, File Nos. 003463892, et al., Memorandum Opinion and Order and Declaratory Ruling, FCC 08-258 (rel. Nov. 10, 2008) (“Verizon/Alltel Order”).* In connection with the approval, the Department of Justice and the FCC required Verizon Wireless to divest certain markets including some in South Dakota. A Management Trustee was appointed to manage the divested markets until the divestiture was completed. *Verizon/Alltel Order, ¶¶ 15, 19, 157-163, Appendix B* (discussing FCC and U.S. Department of Justice requirements to divest certain assets and customers in South Dakota).

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).*

4. WWC certifies that any federal high-cost universal service support WWC has received and will receive for the calendar year 2012 will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the federal Telecommunications Act of 1996 and 47 C.F.R. § 54.7. As required by A.R.S.D. 20:10:32:54(1), attached as **Confidential Exhibit B-1** is the detailed 2012 Service Improvement Plan.⁵ Attached as **Confidential Exhibit B-2** is a coverage map consistent with A.R.S.D. 20:10:32:54. The projected expenditures in the 2012 Service Improvement Plan are based on the assumption that WWC will receive the amount of federal high-cost universal service support identified on **Confidential Exhibit B-3**. There are various factors that affect the total amount of support WWC may be expected to receive, including but not limited to, federal policy changes, USAC reconciliations, and other factors beyond WWC's control. If actual receipts are not as estimated in this report, WWC reserves the right to modify its projected capital and operating expenditures in the Designated Area.

5. WWC does not anticipate receiving federal high-cost universal service support for 2013.⁶ Accordingly, WWC does not seek certification pursuant to A.R.S.D. 20:10:32:52 and 47 C.F.R. § 54.314 from the South Dakota Public Utilities Commission for 2013. In the absence of any high-cost universal service support for 2013, WWC is not required to identify any facility construction projects or any operating, maintenance, and provisioning expenses for 2013 for which federal high-cost universal service support will be used.

⁵ WWC's Designated Area includes wire centers in which RCC Minnesota, Inc. d/b/a Verizon Wireless has been designated as a competitive ETC. For administrative purposes, only one designated ETC reports the lines served in a common wire center and the projected receipt and use of universal service support is reflected in only one ETC Annual Certification. Therefore, all information regarding the wire centers within the area of RCC Minnesota's designation is reported in RCC Minnesota's annual Request for Certification filing.

⁶ See *Connect America Fund et al.*, WC Docket No. 10-90 et al., *Order*, DA 12-298 (rel. Feb. 27, 2012) at ¶ 7 (Based on its merger commitments, "Verizon Wireless will not receive high-cost competitive ETC support after 2012").

6. The information required by A.R.S.D. 20:10:32:54(3), relating to any outages of at least 30 minutes in duration affecting at least 10% of the end users served in a designated area or a 911 special facility during calendar year 2011, is provided in attached **Confidential Exhibit C**. The services affected by an outage are dependent upon the capabilities of the particular facility affected by the outage. 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 as of December 31, 2011. Each network outage is examined on a case by case basis. The outage is analyzed for the particular cause of the outage. When the outage is due, for example, to equipment failure, the equipment is replaced or repaired and tested for proper performance. 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. When the outage is due to, for example, weather or other natural occurrence, the probability of a repeat occurrence is considered and evaluated and is considered 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 appropriate re-evaluation of the source of error and the need to either correct, discipline or revise the person or practice, as applicable. The outages reported above were not determined to require extraordinary measures other than application of the above.

7. As required by A.R.S.D. 20:10:32:54(4), attached as **Confidential Exhibit D** is a report of the number of requests for service from potential customers within the Designated Area that were not fulfilled during 2011, including details of how WWC attempted to provide service.

8. As required by A.R.S.D. 20:10:32:54(5), the number of consumer complaints received during calendar year 2011 for the Designated Area and the resolution of those complaints is set forth in the attached **Confidential Exhibit E**.

9. As required by A.R.S.D. 20:10:32:54(6), WWC certifies that it is complying with applicable service quality and consumer protection standards in the CTIA Consumer Code for Wireless Carriers pursuant to the requirements of A.R.S.D. 20:10:32:43.04.

10. As required by A.R.S.D. 20:10:32:54(7), WWC certifies it has the ability to function in emergency situations, including a reasonable amount of back-up power, the ability to reroute traffic around damaged transport facilities, and the capability to manage traffic spikes resulting from emergency situations, all pursuant to the requirements of A.R.S.D. 20:10:32:43.03.

11. As required by A.R.S.D. 20:10:32:54(8), WWC certifies that it is offering a local usage plan comparable to that offered by the incumbent local exchange carriers (“LECs”) in its Designated Area. WWC offers rate plans with substantial local calling areas with varying levels of local usage, as well as plans with unlimited usage. The amount of local usage available in WWC’s generally available rate plans is comparable to that offered by the incumbent LECs.

12. As required by A.R.S.D. 20:10:32:54(9), WWC certifies that it acknowledges the Federal Communications Commission, pursuant to 47 U.S.C. § 332(c)(8), may require it to provide equal access to long distance carriers within its designated area in the event that no other ETC is providing equal access within the area.

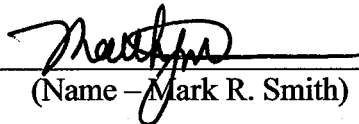
13. Pursuant to the requirements of A.R.S.D. 20:10:32:55, the Company, in calendar year 2011, notified its customers and potential customers of the availability of Lifeline and Link-Up opportunities. Attached **Exhibits F-1 to F-5** identify and provide examples of the Company’s outreach efforts in calendar year 2011 designed to increase participation in the Lifeline and Link-Up assistance programs.

DATED this 30th day of May, 2012.

WWC License LLC

(Company)

By:



(Name - Mark R. Smith)

Its:

Assistant Secretary

(Title)

SUBSCRIBED AND SWORN to before me this 30th day of May, 2012.



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

Notary public in and for the State of

GEORGIA

My Commission Expires:

8 Sept 2012