

# GUNDERSON, PALMER, GOODSSELL & NELSON, LLP

## ATTORNEYS AT LAW

J. CRISMAN PALMER  
G. VERNE GOODSSELL  
JAMES S. NELSON  
DANIEL E. ASHMORE  
TERENCE R. QUINN  
DONALD P. KNUDSEN  
PATRICK G. GOETZINGER  
TALBOT J. WIECZOREK  
MARK J. CONNOT  
JENNIFER K. TRUCANO  
DAVID E. LUST

ASSURANT BUILDING  
440 MT. RUSHMORE ROAD  
POST OFFICE BOX 8045  
RAPID CITY, SOUTH DAKOTA 57709-8045  
TELEPHONE (605) 342-1078 • FAX (605) 342-0480  
www.gundersonpalmer.com  
ATTORNEYS LICENSED TO PRACTICE IN  
SOUTH DAKOTA, NORTH DAKOTA, IOWA, NEBRASKA  
COLORADO, MONTANA, WYOMING & MINNESOTA

THOMAS E. SIMMONS  
TERRI LEE WILLIAMS  
PAMELA SNYDER-VARNS  
SARA FRANKENSTEIN  
AMY K. KOENIG  
JASON M. SMILEY  
SHANE C. PENFIELD  
JONATHAN M. OOSTRA  
WYNN A. GUNDERSON  
*Of Counsel*

September 11, 2006

VIA FAX 605-773-3809

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

FROM: Talbot J. Wieczorek

RE: Western Wireless License LLC  
GPGN File No. 5925.040600 – Certification  
TC06-127

NUMBER OF COPIES TRANSMITTED INCLUDING THIS SHEET: 6

COMMENTS:

ORIGINALS:  Mailed

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NOTE: If you do not receive all pages or have any problems with receiving, please call (605) 342-1078 and ask for Karen L. Webb. Thank you.

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September 11, 2006

**VIA FAX: 605-773-3809**

**Email at: Patty.VanGerpen@state.sd.us**

**and U.S. Mail**

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

RE: In the Matter of Annual Eligible Telecommunications Carriers (ETCs) Use of  
 Federal Universal Support – TC06-127 GPGN File No. 5925.040600

Dear Ms. Van Gerpen:

On Friday, I was informed by Staff Counsel Karen Cremer that the Commission is requesting that materials provided to Staff be provided by the Commission, either through a confidential filing or a direct filing in the ETC Request for Certification filings. In compliance with this request, enclosed you will find a letter dated August 3, 2006 to Harlan Best and a spreadsheet provided with that letter. The original plus ten copies will follow via U.S. Mail.

You will note the letter refers to 2005 and 2007 support numbers. The 2005 numbers appear first on the spreadsheet with the 2007 appearing at the end of the spreadsheet.

We are not requesting confidential treatment of the letter to Mr. Best, but we are requesting confidential treatment of the spreadsheet. It has been marked as confidential. The information is confidential under A.R.S.D. 20:10:1:39(4) and (5) and because of this, Alltel requests confidential treatment of this exhibit pursuant to A.R.S.D. 20:10:01:41 and that the material be held confidential for ten years and then destroyed. This information is confidential as the information is internal and proprietary, can be used adversely by competitors,

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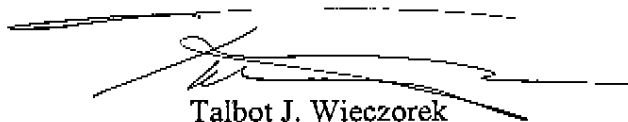
Patricia Van Gerpen  
September 11, 2006  
Page 2

and the development and financial planning constitutes trade secrets as recognized by law. If there are any inquiries as to the confidential treatment, I may be contacted at the above address.

Please note in the electronic version of this letter, the confidential document is provided as a separate electronic document and is the title of the document is "CONFIDENTIAL SPREADSHEET".

Please let me know if you have any questions.

Sincerely,



Talbot J. Wiczorek

TJW:klw  
Enclosures  
c: Suzie Rao w/enclosure  
RaeAnn Kelsch w/enclosure

Alltel Communications, Inc.  
3650 131<sup>st</sup> Ave. SE, Suite 400  
Bellevue, WA 98006  
Phone: 425-586-8700  
Fax: 425-586-8118



**CONFIDENTIAL**

August 3, 2006

Harlan Best  
South Dakota Public Utilities Commission  
State Capital, 500 East Capitol Street  
Pierre, SD 57501-5070

***VIA OVERNIGHT MAIL***

**Re: In the Matter of Annual Eligible Telecommunications Carriers (ETCs) Use of Federal Universal Service Support (Docket No. RM06-001)**

Dear Harlan:

As you requested in your email of August 2, 2006, we are supplementing the original ETC certification filing.

Please find enclosed a spreadsheet that estimates 2007 federal universal service support receipts, itemized by support category. Regarding this estimate, Alltel wishes to reiterate that any amounts ultimately received are subject to fluctuations beyond Alltel's direct control. Factors such as, but not limited to, increases or decreases in Alltel's subscriber counts, variations in the support allocations that Incumbent Local Exchange Carrier's receive on a per line basis<sup>1</sup>, and federal policy changes are all examples of variables that can affect the total amount of support that Alltel receives in any given year. In order to project the amount of support that Alltel anticipates it will receive in 2007, the Company calculated the actual aggregate increase in support over the first 6 months of the year (less one time adjustments) to identify the most appropriate growth factor and then used the following projection methodology: the Company calculated the average support amount received per month in calendar year 2006 (to date), multiplied by 12, and multiplied the result by the pre-determined growth factor.

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<sup>1</sup> Since competitive ETCs receive support based on the ILECs' underlying costs, any changes in ILEC cost reporting can affect the total amount that competitive ETCs receive.

Harlan Best  
Page 2  
August 3, 2006

Additionally, as you requested, please find the actual 2005 federal universal service support receipts itemized by support category. No subsidy information for Pine Ridge (SAC 399001) is included in these calculations.

If you have additional questions, please contact me.

Sincerely,

Suzie Rao

Enclosure