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May 16, 2007

### E-FILING

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

RE: Wireless Alliance, LLC (WALLC) Request for Certification As an Eligible  
Telecommunications Carrier ("ETC") GPGN File No. 7401.040099

Dear Ms. Van Gerpen:

On behalf of Wireless Alliance, LLC ("WALLC"), enclosed you will find the letter requesting state certification of WALLC for federal universal service support, and the Request for Certification executed by David Del Zoppo showing that all support received will be used "only for the provision, maintenance and upgrading of facilities and services for which such support is intended." I would request that the above matter be filed and WALLC be certified.

Please note that various exhibits attached to the Request have been labeled "*Confidential and Proprietary*." The information contained in the exhibits is confidential under A.R.S.D. 20:10:1:39(4) and (5). Because of this, WALLC requests confidential treatment of Exhibits A and B, 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, 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.

If you need any additional information on the Request or attachments, please let me know.

Sincerely,



Talbot J. Wiczorek

TJW:klw  
Enclosures  
c: Steve Otto  
Elizabeth Kochler

**BEFORE THE SOUTH DAKOTA  
PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE REQUEST OF                    )**  
**WIRELESS ALLIANCE, L.L.C.                            )**  
**FOR CERTIFICATION REGARDING USE                    )**  
**OF FEDERAL UNIVERSAL SERVICE SUPPORT        )**

**REQUEST FOR CERTIFICATION**

STATE OF MINNESOTA  
COUNTY OF DOUGLAS

I, David Del Zoppo, being of lawful age and duly sworn, on my oath, state that I am the Senior Vice President, Finance and Accounting, and an officer of Rural Cellular Corporation, which is the managing member of Wireless Alliance, L.L.C. d/b/a Unicel (“Company”) and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

1. Pursuant to A.R.S.D. 20:10:32:52 and A.R.S.D. 20:10:32:54, this Affidavit is to act as an Annual Certification filing and Affidavit in Support of the Certification requirements.
2. The South Dakota Public Utilities Commission designated Wireless Alliance, L.L.C. as an Eligible Telecommunications Carrier in certain non-rural telephone company exchanges and certain rural telephone company study areas in Application No. TC03-193 dated June 6, 2005. Pursuant to the designation order, Finding of Fact number 71 subparts (1), (2), and (3), RCC Minnesota and Wireless Alliance, L.L.C. filed the required compliance documents on July 30, 2005.
3. The Federal Universal Service support funds received by Wireless Alliance, L.L.C., to the extent any are applied for and received, will be used only for the provision, maintenance, and

upgrading of facilities for which the support is intended, as designated by the Federal Communications Commission consistent with Section 254(e) of the Federal Telecommunications Act. These funds will be used to provide the following supported services as designated in 47 C.F.R. § 54.101 which are available throughout RCC' designated service area.

- (a) voice grade access to the public switched network;
- (b) local usage;
- (c) dual tone multi frequency signaling, or its functional equivalent;
- (d) single party service, or its functional equivalent;
- (e) access to emergency services, including 911 and enhanced 911 service;
- (f) access to operator services;
- (g) access to interexchange service;
- (h) access to directory assistance;
- (i) toll blocking for qualifying low-income customers; and
- (j) toll control for qualifying low-income customers.

4. The Company was certified as an ETC until June 6, 2005. The initial certification was for Qwest wire centers and certain RLEC service areas. For all other RLEC wire centers where the company sought certification, certification did not occur until November 14, 2005. Any Universal Service Support received in 2006 has been directed to expand service and expand coverage areas. The expansion of coverage areas and capacities and use of the funds are detailed as set forth in the 2006 Service Improvement Plan update and 2007/2008/2009 Service Improvement Plan attached as Exhibits A and B.

5. The power outages suffered by the Company during the Fiscal Year 2006 are listed and detailed in Exhibit C attached hereto, entitled ETC Outages 2006.

6. Attached as Exhibit D, entitled Requests for Services, is a true and correct copy of the number of requests for service from potential customers within the service area that were not fulfilled during 2006.
7. The number of complaints received during that time during the previous calendar year where the Company was an ETC and resolution of those complaints is set forth is attached in Exhibit E.
8. The Company hereby certifies to the Public Utility Commission of South Dakota, pursuant to the requirements of Administrative Rule 20:10:32:43.03, that it has the ability to remain functional in emergency situations including reasonable back-up power supplies, the ability to reroute traffic, and the ability to manage traffic spikes.
9. The Company hereby certifies to the Public Utility Commission of South Dakota, pursuant to the requirements of ARSD 20:10:32:43.04 and A.R.S.D. 20:10:32:54(5), that it complies with service quality and consumer protection standards in the CTIA Consumer Code for Wireless Carriers.
10. The Company hereby certifies to the Public Utility Commission of South Dakota, pursuant to the requirements of A.R.S.D. 20:10:32:43:06 and A.R.S.D. 20:10:32:54(8), that the FCC, pursuant to 47 U.S.C. 332(c)(8), may require it to provide equal access to long distance carriers within one of its Designated Areas in the event that no other ETC is providing equal access.
11. The Company hereby certifies to the Public Utility Commission of South Dakota, pursuant to the requirements of ARSD 20:10:32:54(7), that it offers rate plans with substantial local calling areas with varying levels of local usage, including plans with unlimited usage. Each rate plan includes, at a minimum, all of the supported services required by FCC Rule

54.101(a)(1)-(9) comparable to the service offerings of the incumbent LECs. Consistent with FCC Rule 54.202(a)(4), the amount of local usage available in RCC's generally available rate plans is comparable to that offered by the incumbent LECs in the Designated Areas.

12. Pursuant to A.R.S.D. 20:10:32:53, attached hereto as Exhibit F is an Affidavit certifying any information required under A.R.S.D. 20:10:32:43.01 to 20:10:32:43.06.

13. Pursuant to A.R.S.D. 20:10:32:55, the Company, in calendar year 2006, notified its customers and potential customers of lifeline and link-up opportunities. Attached as Exhibit G, is a listing of the activities by the Company to notify its customers and potential customers of lifeline and link-up opportunities.

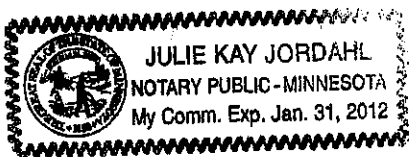
DATED this 14<sup>th</sup> day of May, 2007.

Wireless Alliance, L.L.C. (Company)

By: *Donald Dalrymple* (Name)

Its: *VP* (Title)

SUBSCRIBED AND SWORN to before me this 14 day of May, 2007.



*Julie Kay Jordahl*  
Notary public in and for the State of Minnesota  
My Commission Expires: *Jan. 31, 2012*

## **EXHIBITS**

### **WALLC Request for Certification**

- Exhibit A.           2006 SIP Update - CONFIDENTIAL  
                          2007 SIP Update - CONFIDENTIAL  
                          2008 SIP Update - CONFIDENTIAL  
                          2009 SIP Update – CONFIDENTIAL
  
- Exhibit B.           2007/2008/2009 SIP Wire Center Detail – CONFIDENTIAL  
                          2007 Coverage Map (RCC ETC) – CONFIDENTIAL
  
- Exhibit C.           2006 Outages
  
- Exhibit D.           2006 Requests for Services
  
- Exhibit E.           2006 Consumer Complaints Report
  
- Exhibit F.           Affidavit In Support of Requirements for Previously  
                          Designated ETC pursuant to A.R.S.D. 20:10:32:53
  
- Exhibit G.           2006 Lifeline and Link up Advertising/Outreach Efforts  
  
                          MW Rover 2006 (Unicel lets you stay connected for less!)  
  
                          SD Lifeline Poster (Stay Connected for Less!)  
  
                          SD Billing Message