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July 12, 2017

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PUBLIC SERVICE
COMMISSION

John Lyons
Acting Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 660
Frankfort, KY 40601

RE: Case No. 2017-00261--Shenandoah Personal Communications, LLC

Dear Mr. Lyons:

We are counsel to Shenandoah Personal Communications, LLC in the referenced matter. Enclosed for filing please find an original and ten copies of an Amended Notice of Relinquishment of Eligible Telecommunications Designation. Please return a FILED stamped copy to me via our runner.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "D. Brent", is written over a horizontal line.

Douglas F. Brent

DFB
Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

SHENANDOAH PERSONAL COMMUNICATIONS, LLC,
SUCCESSOR TO WEST VIRGINIA PCS ALLIANCE, L.C.
NOTICE OF RELINQUISHMENT OF ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION

CASE NO.
2017-00261

**AMENDED NOTICE OF RELINQUISHMENT OF ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

Shenandoah Personal Communications, LLC (“Shentel”), by counsel and pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a)-(b), hereby notifies the Kentucky Public Service Commission (the “Commission”) that it intends to relinquish the eligible telecommunications carrier (“ETC”) designation of one of its predecessors-in-interest, West Virginia PCS Alliance, L.C. (hereafter, “NTELOS”) in the Commonwealth of Kentucky (Study Area Code 269010). The impact of this relinquishment will be minimal because NTELOS had no Lifeline customers and consumers have options for alternative service providers in the relevant service area. In support of its notice of relinquishment, Shentel provides the following information.

The Commission designated NTELOS as an ETC in the Commonwealth of Kentucky in Case No. 2006-00312.¹ Thereafter, NTELOS operated as a facilities-based provider of wireless services and participated in the federal High Cost and Low Income Universal Service programs. NTELOS has not requested or received low income support from the Kentucky Universal Service Fund, and was excused from participating in Case No. 2016-00059.²

¹ *In the Matter of: Petition of West Virginia PCS Alliance, L.C. DBA NTELOS for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Telecommunications Act*, Order (October 24, 2006).

² *Inquiry into the State Universal Service Fund*, Case No. 2016-00059, Order (October 6, 2016) (granting NTELOS' request to withdraw).

As of May 6, 2016, NTELOS and each of its affiliates were acquired by Shenandoah Telecommunications Company in a merger approved by the Federal Communications Commission; notice of the merger was provided to the Commission on May 5, 2016. Since the acquisition, Shentel has provided the same services to customers through its affiliate relationship with Sprint, and former NTELOS customers began migrating to Sprint's billing platform. Subsequently, as part of a larger legal entity restructuring following the merger, NTELOS was merged into Shentel, such that Shentel remains as the surviving entity. Shentel is not designated as an ETC in the Commonwealth of Kentucky.

Pursuant to 47 C.F.R. §54.205(a), the Commission shall permit an ETC to relinquish its designation in any area served by more than one ETC. Requirements for relinquishment of ETC designation in an area served by at least one other ETC include: i) the ETC must provide advance notice to the relevant public service commission; ii) the subscribers served by the relinquishing ETC must continue to be served; and iii) to the extent necessary, sufficient notice must be provided to ensure the construction or purchase of additional facilities to provide such continuing service. As detailed below, Shentel's request complies with each of these requirements.

The former NTELOS service area is served by more than one ETC, including multiple wireless ETCs as well as Windstream Kentucky East, a wireline service provider.³ Because at least one other ETC serves Shentel's service area, federal law provides that the Commission should permit Shentel to relinquish the NTELOS ETC designation. To the best of Shentel's knowledge, potential Lifeline subscribers will have at least one alternative ETC from which to choose. Thus, all eligible low income consumers residing in Shentel's service area and participating in Lifeline will continue to be served by an ETC consistent with 47 U.S.C. § 214(e).

³ Attachment A is a list of Windstream wire centers corresponding with the NTELOS service area.

Finally, to the best of Shentel's knowledge, none of the remaining ETCs will be required to purchase or construct additional facilities to continue to serve consumers within the applicable service area.

Shentel will continue to manage the legacy NTELOS's wireless network through its affiliate relationship with Sprint; as such, Sprint and Shentel will continue to provide service through NTELOS's previous ETC service area, but will not be ETCs. Shentel executed a detailed communications plan to inform customers about the migration to Sprint, which included electronic mail, SMS, social media, and mobile applications.⁴ ETC Virgin Mobile USA's Assurance Wireless service offers Lifeline services to low-income consumers in the Commonwealth of Kentucky, which utilizes the network in the NTELOS ETC service area now operated by Shentel.

For the foregoing reasons, Shentel respectfully requests that the Commission promptly accept the relinquishment of NTELOS's ETC designation (SAC 269010) in Kentucky as soon as practicable.

Respectfully Submitted,



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July 12, 2017

⁴ NTELOS did not serve any Lifeline customers in the Commonwealth of Kentucky as of the completion of the merger so there was no need for the messaging to address Lifeline services.

ATTACHMENT A

Locality	CLLI	ILEC
Ashland	ASLDKYXA	Windstream Kentucky East
Catlettsburg	CTBGKYXA	Windstream Kentucky East
Greenup	GNUPKYXA	Windstream Kentucky East
Grayson	GYSNKYXA	Windstream Kentucky East
Russell	RSSLKYXB	Windstream Kentucky East
South Shore	SSHRKYXA	Windstream Kentucky East