

# Dinsmore&Shohl

AUG 29 2007
PUBLIC AVICE
COMMISSION

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August 28, 2007

via Federal Express

Ms. Beth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Blvd. P. O. Box 615 Frankfort, KY 40601

> Re: Certification of the Carriers Receiving Universal Service High Cost Support, Administrative Case No. 381

Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case is one original and ten (10) copies of the Annual Certification Regarding Use of Federal Universal Service High Cost Support of West Virginia PCS Alliance (d/b/a NTELOS).

Please also note the enclosed additional copy of the document to be file-stamped. Please file-stamp the additional copy and return it to me in the enclosed, self-addressed, pre-paid envelope.

Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

Holly C. Wallace

HCW/rk Enclosures

cc: Anne Sarbin

John E. Selent, Esq.

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PUBLIC COMMONWEALTH OF KENTUCKY
COMMISSION

A CERTIFICATION OF THE CARRIERS )
RECEIVING UNIVERSAL SERVICE ) Administrative Case No. 381
HIGH COST SUPPORT )

## ANNUAL CERTIFICATION OF WEST VIRGINIA PCS ALLIANCE (NTELOS) REGARDING USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

BEFORE THE PUBLIC SERVICE COMMISSION

West Virginia PCS Alliance (d.b.a. "NTELOS"), hereby submits the information requested by the Commission in Administrative Case No. 381 as well as the additional data requested in the NTELOS ETC Designation Order. NTELOS was granted Eligible Telecommunications Carrier designation in Kentucky on October 24, 2006 in Case 2006-00312. The Study Area Code (SAC) for NTELOS is 269010. NTELOS is a Non-Rural, Competitive carrier.

# 1) Certify that ETC will use universal service funds received in 2008 only for the provision, maintenance and upgrading of facilities and services for which such support is intended.

Included as Exhibit A is the Affidavit of Carl Rosberg certifying the use of the federal high cost support that will be received by NTELOS in 2008.

### 2) Provide progress reports on the ETC's five-year service quality improvement plan.

Attached as Exhibit B is the NTELOS five-year plan demonstrating the use of universal service support received for ETC designated areas in Kentucky. NTELOS received \$12,374 for 2006 high-cost universal service support for the Commonwealth of Kentucky.

# 3) Detail the number of requests for service from potential customers within its service areas that were unfulfilled for the past year.

NTELOS had no unfulfilled service requests in its service areas in 2006.

### 4) Detail the number of complaints per 1,000 handsets or lines;

For 2006, NTELOS had an average of 104.21 tickets per 1,000 customers. The ticket counts include not only complaints, but a multitude of other issues and technical questions such as dropped calls, handset issues, multimedia/data/voicemail problems, no signal, outages, roaming issues and sound quality. The high percentage of tickets are the result of an internal process change that required our customer care team to log all inquiries from customers for the issues above as tickets for tracking purposes.

John E. Selent

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COUNSEL TO WEST VIRGINIA PCS ALLIANCE (NTELOS)

# EXHIBIT A AFFIDAVIT OF CARL ROSBERG

### AFFIDAVIT OF CARL ROSBERG IN SUPPORT OF WEST VIRGINIA PCS ALLIANCE, L.C.'s USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

### STATE OF VIRGINIA

### CITY OF WAYNESBORO

### I, *Carl Rosberg*, declare as follows:

- 1.) I am the <u>President Wireless</u> of <u>NTELOS Inc.</u> I am an officer of <u>West Virginia PCS</u>

  <u>Alliance, L.C.</u> and am authorized to give this affidavit on its behalf. This affidavit supports the Kentucky Public Service Commission's ("Commission") certification of the use of federal universal service funds for <u>2008</u> as required by 47 C.F.R. [§ 54.313/§ 54.314]. NTELOS anticipates receiving \$66,000 in high-cost support in 2008.
- 2.) Under 47 C.F.R. [§ 54.313/§ 54.314], the Commission is required to submit an annual certification to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC"), certifying that rural and non-rural incumbent local exchange carriers and/or eligible telecommunications carriers serving lines in the service area of a rural and non-rural incumbent local exchange carrier within the Commonwealth of Kentucky will use federal high-cost universal service support in a manner consistent with section 254(e) of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C. § 254(e). Absent such certification, such carriers will not receive universal service support. In order for carriers to receive federal support beginning January 1 of each year, the Commission's certification must be filed with the FCC and USAC by October 1 of the preceding year.
- 3.) In Administrative Case 381, the Commission directed all carriers to file verified statements under which each carrier in the Commonwealth of Kentucky that is subject to the Commission's jurisdiction and eligible to receive federal high-cost universal service support, must certify to the Commission that federal universal service support funds to be

received by that carrier for the succeeding year will be used only for the provision, maintenance and upgrading of facilities and services for which such support is intended.

4.) NTELOS Inc. hereby certifies that any federal high-cost universal service support West Virginia PCS Alliance, L.C. receives in 2008 will be used for the services and functionalities outlined in 47 C.F.R. § 54.101(a), and that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with section 254(e) of the Act. NTELOS operates under Study Area Code (SAC) 269010 and is a Non-Rural, Competitive carrier.

FURTHER AFFIANT SAYETH NOT.

Carl Rosberg President – Wireless NTELOS Inc.

AD Portey

Subscribed and sworn to before me this  $\frac{9^{4}}{100}$  day of  $\frac{9000}{100}$ ,  $\frac{9000}{100}$ .

Notary Public

My commission expires: 5/31/08



### EXHIBIT B

### NTELOS FIVE-YEAR BUILD PLAN

# WEST VIRGINIA PCS ALLIANCE - 5-YEAR BUILDOUT PLAN IN KENTUCKY

Yearly Totals	Column Totals	South Shore	Russell	Greenup		Catlettsburg	Ashland	Name		
	\$0 \$271,368 \$6	\$0	\$0	\$0	\$0	\$0	\$0	Quality	Signal	2007
	\$271,368	\$4,436	\$43,270	\$5,665	\$14,112	\$10,885	\$192,998	Capacity	2007	
\$893,627	\$622,259	\$40,400	\$74,459	\$20,200	\$60,600	\$223,400	\$203,200	Coverage	2007	
	\$0	\$0	\$0	\$0	\$0	\$0	\$0	Quality	Signal	2008
	\$2,269,970	\$40,710	\$397,069	\$51,988	\$129,504	\$99,890	\$1,550,810	Capacity	2008	
\$2,619,730	\$349,760	\$40,720	\$61,080	\$20,360	\$61,080	\$93,440	\$73,080	Coverage	2008	
	\$0	\$0	\$0	\$0	\$0	\$0	\$0	Quality	Signal	2009
	\$198,868	\$3,567	\$34,786	\$4,555	\$11,346	\$8,751	\$135,864	ty Capacity	2009	
\$550,868	\$352,000	\$41,000	\$61,500	\$20,500	\$61,500	\$94,000	\$73,500	Coverage	2009	
	\$0	\$0	\$0	\$0	\$0	\$0	\$0	Quality	Signal	2010
	138,381	\$2,482	\$24,206	\$3,169	\$7,895	\$6,089	\$94,540	pacity	2010	
\$492,621	\$354,240	\$41,280	\$61,920	\$20,640	\$61,920	\$94,560	\$73,920	Coverage	2010	
	\$0	\$0	\$0	\$0	\$0	\$0	\$0	Quality	Signal	2011
		\$2,038	\$19,881	\$2,603	\$6,484	\$5,001	\$//,64/	apacity	2011	
\$467,894	\$354,240	\$41,280	\$61,920	\$20,640	\$61,920	\$94,560	\$/3,920	Coverage	2011	

Notes

1 - 2007 new coverage sites are budgeted and we are currently targeting activation by end of year.

2 - 2008 new coverage sites have not been approved at this time.

3 - Capacity dollars are estimates based on the need for additional channel cards and carriers. In reality dollars will probably shift between years and markets (for example, we may spend more in 2007 in the Greenup wire center than our estimate but less in Ashland and vice-versa in 2008).

4 - All capacity dollars are estimates and will vary based on actual usage and subscriber growth.

5 - 2008 capacity dollars include costs associated with the EV-DO project which has not yet been approved.

6 - 2009-2011 totals are dependent on 2008 growth and can/will fluctuate based on projects completed in 2008 or pushed to future years.