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Keith Moorman
(859) 244-3231
KMOORMAN@FBTLAW.COM

September 1, 2005

Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602

By Hand Delivery

Re: Administrative Case No. 381

Dear Ms. O'Donnell:

I enclose Nextel Partners' Annual Affidavit and response to the Commission's order dated September 25, 2001 in Administrative Case No. 381, and in response to the Commission's order in Case No. 2003-00143 (which designated Nextel Partners as an ETC in certain rural and non-rural areas of Kentucky). The Annual Affidavit refers to four attachments, which Nextel Partners believe should be kept confidential. Therefore, the attachments are included with the enclosed Petition for Confidential Treatment.

The information being provided will support the Commission's annual certification to the Federal Communications Commission and the Universal Service Administrative Company that Nextel Partners is eligible to receive high cost support in accordance with 47 U.S.C. §254(e).

Should you have any questions, please don't hesitate to let me know.

Yours truly,



Keith Moorman

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of

A CERTIFICATION OF THE CARRIERS) ADMINISTRATIVE CASE
RECEIVING UNIVERSAL SERVICE) NO. 381
HIGH COST SUPPORT)

NPCR, Inc.

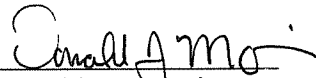
ANNUAL AFFIDAVIT TO COMMISSION'S SEPTEMBER 25, 2001 ORDER

NPCR, Inc. ("Nextel Partners") is committed to providing excellent customer service and the highest level of telecommunications services in rural, insular and high-cost areas at rates that are affordable and competitive with those available in non-rural areas. It is critical that Nextel Partners remain eligible to receive federal high cost support to meet these goals.

The state certification of eligible telecommunications carriers ("ETCs") to receive federal high-cost universal service support is an annual process. In order to receive federal support beginning January 1 of each year, the Kentucky Public Service Commission must file its annual certification with the Universal Service Administrative Company ("USAC") and the Federal Communications Commission ("FCC") on or before October 1 of the previous year. The attached affidavit should be accepted by the Kentucky Public Service Commission for the purpose of certifying Nextel Partners as eligible to receive high cost support in accordance with 47 U.S.C. § 254(e) and 47 C.F.R. §§ 54.313-54.314.

Nextel Partners would be happy to meet with staff to answer any questions they may have regarding the information provided.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Donald J. Manning". The signature is written in a cursive style with a horizontal line underneath it.

Donald J. Manning
Vice President and General Counsel
NPCR, Inc.
4500 Carillon Point
Kirkland, WA 98033
(425) 576-3600

August 30, 2005

47 C.F.R. §§ 54.313(d)(3)(i) and 54.314(d)(1). Nextel Partners requests that the Commission transmit a letter to the FCC and USAC to provide for the certification.

5. Based on USAC's most recent universal service fund projections, Nextel Partners currently estimates that it will receive approximately \$1,460,000 in federal high-cost universal service support for the Company's designated service areas in Kentucky during the January 1, 2006 to December 31, 2006 time period. The actual amount of federal high-cost universal service support received by Nextel Partners may vary from this estimate as universal service funding and subscribership levels change over time.

6. The federal high-cost universal service support the Company receives during 2006 will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended pursuant to Section 254(e) of the Federal Telecommunications Act (the "Act").

7. Nextel Partners will utilize the support it receives to provide the following services or functionalities supported by the federal high-cost universal support mechanisms: single-party voice grade access to the public switched network, local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 911 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, access to directory assistance and toll limitation for qualifying low income customers.

8. As set forth in Section 254 of the Act, Congress articulated its intent that consumers in all regions of the nation, including rural, insular and high-cost areas, have access to telecommunications and information services at rates that are competitive with rates charged for similar services in urban areas.

9. The actual cost to provide service in rural and high-cost areas is influenced by numerous factors, including the costs associated with operating, maintaining and upgrading facilities. To this end, the federal universal service support received by Nextel Partners will offset some of the financial burden associated with owning, operating, maintaining and upgrading facilities in rural and high-cost areas and allow these services to be offered at rates that are competitive with rates for similar services in non-rural areas.

10. Confidential Attachment A contains a listing of Nextel Partners' proposed service improvement projects, the projected geographic coordinates of each project, and the estimated costs of each project. The sites in the list are approved for site acquisition in 2005 and for construction in either late 2005 or early 2006. Confidential Attachment B illustrates where these additional proposed sites will be located. The Company's proposed service improvements have been selected on the basis of Nextel Partners' current judgment of where there is unfulfilled consumer demand and where the Company's network may be expanded or improved to meet this need. If consumer demands change, Nextel Partners may revise proposed service improvement plans accordingly. Nextel Partners' proposed service improvement projects might also be modified depending upon the amount of federal high-cost universal service support the Company receives and the timing of the receipt of such support.

11. Pursuant to the terms of the Order and included with this Certification is documentation detailing Nextel Partners' substantial progress towards meeting its build-out plans. During the 2005 calendar year, Nextel Partners expects to have built (or have under construction) 53 cell sites in the Commonwealth of Kentucky. Confidential Attachment C shows the number of sites that have gone on-air in 2005, as well as those cell sites that are currently

under construction. Confidential Attachment D illustrates the expansion of Nextel Partners' RF coverage within the Commonwealth from year-end 2004 to year-end 2005.

12. Nextel Partners used the high-cost funds it received to construct four cell sites that provide coverage to two rural telephone company study areas within which Nextel Partners sought designation. As illustrated in Confidential Attachment C, three of these sites (Edmonton (on-air), Gradyville (on-air), and Slick Rock (to be completed in September)) expand coverage within or provide coverage to the South Central Rural Telco study area. One site expands coverage in the Logan Telco study area.

13. Since the date Nextel Partners received its ETC designation in the Commonwealth of Kentucky through June 30, 2005, Nextel Partners received a total of 29 complaints for a complaint rate of 0.191760894 per 1,000 handsets. No requests for service from potential customers went unfulfilled since Nextel Partners received its ETC designation in the Commonwealth.

Date: August 30, 2005

NPCR, Inc.

By Donald J. Manning

Its Donald J. Manning
Vice President

Subscribed and sworn to before me
this 30 day of August, 2005.

Jeanne W. Poe
Notary Public
My commission expires: 11/7/06

CONFIDENTIAL DATA

NOTICE

Confidential Attachments A through D referred to in Nextel Partners' Annual Affidavit have been filed with Nextel Partners' September 1, 2005 Petition for Confidential Treatment

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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SEP 01 2005

A CERTIFICATION OF THE CARRIERS)
RECEIVING UNIVERSAL SERVICE HIGH)
COST SUPPORT)

PUBLIC SERVICE
ADMINISTRATIVE COMMISSION
CASE NO. 301

NEXTEL PARTNERS' PETITION FOR
CONFIDENTIAL TREATMENT

NPCR, Inc. d/b/a Nextel Partners ("Nextel Partners"), by undersigned counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petitions the Kentucky Public Service Commission ("PSC") for an Order granting confidential treatment to certain exhibits to Nextel Partners' Annual Affidavit to Commissioner's September 25, 2001 Order. In support of this petition, Nextel Partners states as follows:

1. Nextel Partners is requesting confidential treatment for four documents attached to its Annual Affidavit; specifically: (1) a spreadsheet with information concerning Nextel Partners' proposed service improvement projects, the projected geographic coordinates of each project, and the estimated costs of each project (Confidential Attachment A); (2) a map depicting where additional proposed cell sites will be located (Confidential Attachment B); (3) a map depicting the number of its cell sites that have gone on-air in 2005, as well as those cell sites that are currently under construction (Confidential Attachment C); and (4) a map illustrating the expansion of Nextel Partners' RF coverage within the Commonwealth from year-end 2004 to year-end 2005 (Confidential Attachment D).

2. These exhibits contain proprietary information that would aid competitors of Nextel Partners, and such proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870, et seq.

3. The specific exhibits Nextel Partners proposes to file would reveal proprietary information regarding Nextel Partners' network infrastructure and buildout plans. This information constitutes a trade secret because it is commercial information that, if disclosed, could cause substantial competitive harm to Nextel Partners. This information is either not publicly available or not generally available in this format. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this format, they could use it to the competitive detriment of Nextel Partners.

4. Unlike incumbent telephone companies who are typically subject to a high degree of regulation, wireless providers like Nextel Partners operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

5. This information is not generally disclosed to non-management employees of Nextel Partners, and is protected internally by Nextel Partners as proprietary information.

6. The disclosure of this proprietary information would result in irreparable competitive harm to Nextel Partners by providing its competitors with a non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information, and the Regulations of the PSC contemplate the filing of such information under Confidentiality Order.

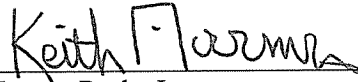
7. Additional grounds for the requested relief are stated in the attached affidavit of Donald J. Manning as an authorized representative of Nextel Partners.

8. The four documents for which confidential treatment is sought (Confidential Attachments A through D), are attached to this filing in a sealed envelope for inspection, and

Nextel Partners, pursuant to the preceding discussion, requests that the documents be deemed confidential by the PSC.

WHEREFORE, Nextel Partners respectfully requests that the PSC enter all necessary Orders granting confidential treatment to Confidential Attachments A through D.

FROST BROWN TODD LLC



James Park, Jr.

Keith Moorman

FROST BROWN TODD LLC

250 West Main Street

Suite 2700

Lexington, KY 40507

Telephone: 859-231-0000

Facsimile: 859-231-0011

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PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of

A CERTIFICATION OF THE CARRIERS) ADMINISTRATIVE CASE
RECEIVING UNIVERSAL SERVICE) NO. 381
HIGH COST SUPPORT)

**AFFIDAVIT OF DONALD J. MANNING IN SUPPORT
OF PETITION FOR CONFIDENTIAL TREATMENT**

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

Donald J. Manning, being first duly sworn on oath, states as follows:

1. I am Vice President and General Counsel of Nextel Partners, Inc. and its subsidiaries, including NPCR, Inc. ("Nextel Partners"). In this capacity I have personal knowledge of the matters set forth in this affidavit and am authorized to make this affidavit on behalf of Nextel Partners.

2. Nextel Partners is requesting confidential treatment for its proposed filing of the following documents: (1) a spreadsheet with information concerning Nextel Partners' proposed service improvement projects, the projected geographic coordinates of each project, and the estimated costs of each project (Confidential Attachment A); (2) a map depicting where additional proposed cell sites will be located (Confidential Attachment B); (3) a map depicting the number of its cell sites that have gone on-air in 2005, as well as those cell sites that are currently under construction (Confidential Attachment C); and (4) a map illustrating the expansion of Nextel Partners' RF coverage within the Commonwealth from year-end 2004 to year-end 2005 (Confidential Attachment D).

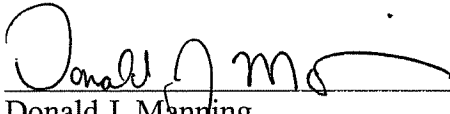
3. These exhibits contain proprietary information that would aid competitors of Nextel Partners, and such trade secret information is subject to protection from disclosure pursuant to Kentucky law. *See* KRS 61.870, et seq.

4. The specific exhibits Nextel Partners proposes to file would reveal proprietary information regarding Nextel Partners' network infrastructure and buildout plans. This information constitutes a trade secret because it is commercial information that, if disclosed, could cause substantial competitive harm to Nextel Partners. This information is either not publicly available or not generally available in this format. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this format, they could use it to the competitive detriment of Nextel Partners.

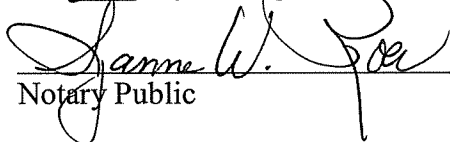
5. Unlike incumbent telephone companies who are typically subject to a high degree of regulation, wireless providers like Nextel Partners operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

6. This information is not generally disclosed to non-management employees of Nextel Partners, and is protected internally by Nextel Partners as proprietary information.

FURTHER YOUR AFFIANT SAYETH NOT.


Donald J. Manning

Subscribed and sworn to before me
this 31 day of August, 2005.


Notary Public

