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JUN 27 2005

PUBLIC SERVICE
COMMISSION

Via Hand Delivery

June 27, 2005

Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re: In The Matter Of: American Cellular Corporation Petition For Designation As A
Competitive Eligible Telecommunications Carrier Pursuant To Section 214(e) Of
The Telecommunications Act of 1996, Case No. 2005-00130

Dear Ms. O'Donnell:

As requested by the Commission Staff's June 10, 2005 Data Requests, enclosed herewith please find for filing with the Commission the original and five (5) copies of American Cellular Corporation's Objections And Responses To The Data Requests Of The Public Service Commission.

Please do not hesitate to contact the undersigned should you have any questions concerning this filing.

Sincerely,

Holland N. McTyeire, V

HNM/jh

Enclosures

cc: Mark J. Ayotte
Matthew A. Slaven

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JUN 27 2005

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the matter of:

AMERICAN CELLULAR CORPORATION)
petition for designation as a competitive)
eligible telecommunications carrier pursuant)
to Section 214(e) of the Telecommunications)
Act of 1996)
_____)

Case No. 2005-00130

AMERICAN CELLULAR CORPORATION'S OBJECTIONS AND RESPONSES
TO THE DATA REQUESTS OF THE PUBLIC SERVICE COMMISSION

RESPONSES TO DATA REQUESTS

American Cellular Corporation (“ACC”) submits these responses to the data requests of the Public Service Commission (“Commission”) dated June 10, 2005. As requested therein, Thomas A. Coates is the person responsible for ACC’s Responses.

REQUEST NO. 1.1 Identify areas in which the Applicant seeks designation as an Eligible Telecommunications Carrier (“ETC”) where there is more than one carrier designated as an ETC.

RESPONSE: ACC does not possess sufficient information to fully respond to this request. The areas in which ACC is seeking designation as an ETC are identified on Exhibit A to the Petition filed on March 29, 2005. The publicly-available information from the Universal Service Administrative Company (“USAC”) has identified the following incumbent telephone company service areas included in ACC’s Petition where a competitive ETC has been designated for all or a portion of the service area: Kentucky ALLTEL – Lexington, South Central Bell – KY, Kentucky ALLTEL – London, and South Central Rural Telephone Coop., Inc. The information available from USAC does not specify the scope of each competitive ETC’s service area. As a result, ACC does not have sufficient information to fully determine whether more than one ETC has been designated in particular portions of these service areas.

REQUEST NO. 1.2 Of those areas in which there is more than one ETC already designated provide an explanation of the additional benefits that will accrue to customers in those areas, if any.

RESPONSE: ACC’s designation as a competitive ETC throughout its requested service area will result in significant public interest benefits to Kentucky consumers. To the extent this request presumes that an applicant for designation as a competitive ETC in an area where there is more than one designated ETC would be evaluated differently than the prior applicants, it is

incorrect. The FCC recently declined to limit the number of ETCs that may be designated in any service area or to adopt any presumption that the designation of additional competitive ETCs would not serve the public interest.

As set forth in ACC's Petition and attached exhibits, the Company offers a wide array of basic and enhanced telecommunications services and a variety of service offerings in Kentucky. ACC offers its customers high-quality wireless telecommunications services at highly competitive rates that are comparable with those available in more urban areas. ACC also offers exceptional customer service as demonstrated by its early adoption of the CTIA Consumer Code for Wireless Service. ACC's service offerings will benefit consumers in rural and high-cost portions of Kentucky who may not have access to wireline or wireless telephone service and will include a larger local calling area than those of the incumbent LECs. ACC's service offerings also benefit consumers by providing access to state-of-the-art network facilities; reduced long-distance rates; competitive pricing; 24-hour customer service; enhanced features, such as voice-mail, caller-ID, call-waiting, and call-forwarding; and high-speed data functions including wireless email and Internet access.

ACC is firmly committed to providing the latest and most efficient cellular technology available, which allows its customers to experience the most advanced products and services on the market today. Since 1993, ACC has undertaken an aggressive program to improve and upgrade its network facilities to provide cutting-edge technology to its subscribers. The Company operates TDMA technology in 100% of its managed network and recently deployed GSM/GPRS technology throughout all of its markets. The Company now offers the most advanced available array of wireless services, utilizing both TDMA and GSM/GPRS and EDGE wireless technologies. The Company continues to lead the way for the telecommunications

industry, now focused on developing 3G services that will provide wireless data services at high speeds.

In addition, ACC has made a substantial commitment to developing a reliable and robust network capable of maintaining essential telecommunications services in times of emergency. To ensure the availability of service in Kentucky, the Company has developed and implemented a Recovery Action Plan for each of its network mobile switching office and attendant facilities. The Company has also allocated and deployed backup equipment and spares including such things as additional microwave facilities, antennas, battery backups and generators.

REQUEST NO. 1.3 Identify those facilities that will be used that are leased from other carriers.

RESPONSE: ACC is a facilities-based carrier which has undertaken to construct, maintain and improve its wireless network in Kentucky. As set forth in the FCC's ETC Rules, an applicant for ETC designation must demonstrate that it provides services using, at least in part, its "own facilities." The term "own facilities" includes facilities leased from other carriers. The fact that ACC may lease certain facilities from other carriers is fully contemplated by the FCC's ETC Rules. ACC currently leases certain interconnection facilities (such as T1 and/or DS3 lines) from other carriers in Kentucky. ACC also leases space for its radio equipment on cell towers owned by third parties. All other network facilities are owned by ACC.

REQUEST NO. 1.4 Provide a list and a description of the service offerings of the Applicant including number of minutes of use, rates and calling scope.

RESPONSE: ACC makes available a variety of calling plans with varying amounts of usage, local calling areas and pricing to enable consumers a choice based on calling needs and desires. Each of the Company's calling plans includes the supported services and functionalities

required by FCC Rule 54.101(a). See attached **Exhibit 1.4** for a listing and description of ACC's generally available service offerings in Kentucky.

REQUEST NO. 1.5 Provide a map depicting the service area boundary for the Applicant's service territory.

RESPONSE: ACC is licensed to provide wireless telecommunications services in Kentucky Rural Service Areas ("RSAs") 4, 5, 6 and 8 as depicted on the map attached as **Exhibit 1.5**.

REQUEST NO. 1.6 Identify any gaps (areas where wireless phone service is unavailable) in any of the areas in which ETC designation is sought.

RESPONSE: ACC does not possess or maintain information regarding the provision of service by other wireless carriers who may provide service within the same areas served by ACC. Accordingly, ACC's response is limited to its own service. As shown on the signal propagation map attached as **Exhibit 1.6**, ACC generally provides service throughout the areas in which it seeks designation as a competitive ETC in this proceeding. The signal quality that an individual customer may experience in a particular location may be affected by a number of environmental factors, including whether the customer's phone is working properly, whether the battery is adequately charged, the type of handset used by the customer, where the phone is located, or whether the signal is being blocked by obstacles such as foliage, terrain or buildings. These types of environmental factors may create gaps where the radio signal being broadcast by either the customer's phone or ACC's network facilities is not sufficient to sustain a call. The FCC has determined that these types of signal coverage gaps cannot preclude the designation of a wireless carrier as a competitive ETC.

REQUEST NO. 1.7 How will toll limitation service for Lifeline customers be provided?

RESPONSE: ACC will provide Lifeline customers the option of electing toll blocking at no additional charge when they commence service.

REQUEST NO. 1.8 How will Lifeline and Link-up services be provided?

RESPONSE: Lifeline and Link-Up are not telecommunications “services,” but rather subsidies provided through the low-income federal universal service funding mechanism. Lifeline assistance provides a qualified, low-income consumer with a monthly discount on his or her telephone bill. Under the FCC’s ETC Rules, this discount must be applied to reduce the cost of a competitive ETC’s lowest tariffed (or otherwise generally available) residential rate. ACC will apply this discount to reduce the cost of its Lifeline service offering in Kentucky. Link-Up provides a qualified, low-income consumer with a one-time discount on the cost of activating Lifeline service. ACC will provide this one-time discount to qualified customers at the time they activate Lifeline service.

REQUEST NO. 1.9 For each rural telephone company serving area in which the Applicant seeks ETC designation, identify the number of customers currently served by the Applicant.

RESPONSE:

Rural Telephone Company	ACC Subscribers
DUO COUNTY TEL. COOP., INC.	3,021 (approx.)
HIGHLAND TELEPHONE COOPERATIVE, INC. – KY	2,782 (approx.)
SOUTH CENTRAL RURAL TEL. COOP. CORP., INC.	4,460 (approx.)

REQUEST NO. 1.10 Are there any areas in the Applicant’s service area in which you do not provide 911 Service? If yes, identify the areas and the reason(s) why.

RESPONSE: ACC provides access to emergency services (including access to 911 services to the extent the local government has implemented 911) everywhere a customer is able to place a call on the Company's network in Kentucky.

REQUEST NO. 1.11 Are there any areas in the Applicant's service area in which you do not provide E911 Service? If yes, identify the areas and the reason(s) why.

RESPONSE: ACC provides access to E911 services in Kentucky in those locations where the local public service answering point ("PSAP") has implemented E911 and has made a request for E911 deployment. Specifically, ACC has received requests and deployed Phase I E911 in the following Kentucky counties: Adair, Anderson, Barren, Bath, Boyle, Bracken, Casey, Clinton, Cumberland, Fleming, Garrard, Green County (Greensburg), Hardin, Hart, Larue, Laurel, Lewis, Lincoln, Madison, Mason (City of Maysville), Marion, McCreary, Menifee, Mercer, Metcalfe, Monroe, Montgomery, Nelson, Nicholas, Pulaski, Robertson, Rockcastle, Rowan County (Morehead Police Department), Russell, Spencer, Taylor, Washington and Wayne. ACC has also received bona fide requests for Phase II E911 in the following Kentucky counties: Adair, Barren, Bath, Boyle, Bracken, Casey, Clinton, Cumberland, Fleming, Garrard, Green County (Greensburg), Hardin, Hart, Larue, Laurel, Lewis, Lincoln, Madison, Mason (City of Maysville), Marion, McCreary, Menifee, Mercer, Metcalfe, Monroe, Nelson, Nicholas, Pulaski, Robertson, Rockcastle, Rowan County (Morehead Police Department), Russell, Spencer, Taylor, Washington and Wayne. ACC completed deployment of Phase II E911 in Boyle County in June 2005. ACC is currently in the process of deploying Phase II E911 in response to the remaining Phase II requests.

REQUEST NO. 1.12 On February 28, 2005, the Federal Communications Commission ("FCC") issued a press release summarizing its adoption of additional

requirements for ETC proceedings. (See Appendix A). The FCC has encouraged states to adopt these same requirements. As described in the press release, provide the information described in (1) Eligibility Requirements.

RESPONSE: ACC objects to this request as seeking information that is neither admissible nor reasonably calculated to lead to the discovery of information relevant to the matters presented in this proceeding. As set forth in the FCC's March 17, 2005 *Report and Order*, the FCC's new ETC application requirements do not apply to applications filed with state regulatory commissions pursuant to 47 U.S.C. § 214(e)(2) but, rather, only apply to applications filed with the FCC pursuant to its authority under 47 U.S.C. § 214(e)(6). In addition, the FCC's new ETC application requirements were not intended to apply to applications pending prior to the effective date of the FCC's rules (*i.e.*, June 24, 2005). As a result, the FCC issued on June 14, 2005 an Order designating NTELOS as a competitive ETC in Virginia pursuant to the FCC's existing ETC application requirements and criteria, rather than applying its new ETC application requirements. Subject to this objection and without waiving same, ACC answers as follows.

(1) As certified in its Petition, ACC will utilize all federal high-cost universal service support it receives on or after the date of its designation as a competitive ETC only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to 47 U.S.C. § 254(e). This will include the ongoing deployment, maintenance and upgrading of network facilities which will improve service quality, coverage and capacity over time.

Due to frequent changes in consumer demand, regulatory requirements and technology improvements in the wireless telecommunications industry, however, it is difficult to predict

today where and how these improvements will occur. It is uncommon for any carrier to definitively plan for facility construction or other service improvements more than twelve months in advance. Long term planning in this context is also difficult due to the present uncertainty surrounding ACC's ETC designation. The FCC has long recognized that it is unreasonable to expect a new entrant to develop long-term business plans while the carrier's designation as an ETC remains uncertain.

Therefore, ACC cautions the Commission against adopting a five-year service improvement plan requirement for Kentucky ETCs. There is no compelling reason to adopt such a requirement. In fact, such a requirement would be unduly burdensome for all ETCs, both incumbent and competitive ETCs, within the State. All carriers, regardless of their technology, will have substantial difficulty creating a five-year service improvement plan. For example, neither wireless nor wireline carriers typically develop capital expenditure plans five years in advance, and will have difficulty doing so with any degree of confidence. The telecommunications industry is in a period of rapid technological change, both with regard to the technologies being used and the services being provided. Consumer demand for specific services is difficult to predict and is subject to rapid change. The business and investment climate is uncertain, and no company knows what capital will be available for investment three, four, or five years in the future. Moreover, no one knows how federal universal service support will be calculated and distributed in upcoming years, much less how much any particular carrier will receive.

A requirement to prepare detailed service improvement plans five years in advance will also result in administrative waste. The budgeting process that a carrier undertakes for just one upcoming year can take literally hundreds of hours to research, create, review, and approve. As

market dynamics and estimated support change from year-to-year, plans developed for multiple years in advance will have to be scrapped and recreated, and the initial costs will have been unnecessarily incurred.

As a result, ACC is currently only able to address its expectations for the first year following designation as a competitive ETC in Kentucky. During that time period, ACC intends to utilize the federal universal service support it receives to deploy, maintain and upgrade network facilities in the designated areas, which will improve service quality, coverage and capacity within its requested service areas. As discussed in its Petition, ACC has recently upgraded its network facilities in Kentucky to advanced GSM technology. The Company intends to continue making network improvements and currently estimates that it will construct 8 new cell sites in the first year following designation as an ETC. ACC also intends to use universal service support to purchase or lease additional facilities and other resources to improve access to emergency services and emergency capacities within the requested service areas. To further the provision of universal service, ACC will also utilize a portion of the high-cost universal service support it receives to implement and publicize the Company's Lifeline service offering.

The timing and scope of ACC's proposed improvements may be adjusted depending upon the amount of federal universal service support it receives and the timing of its receipt of such support. Deployment of ACC's proposed improvements and completion of other upgrades is based on its most recent estimate of the per-line support available and the number of current subscribers in the requested service areas. Should ACC's per-line support amount or the number of its subscribers decline, it may require more time to complete certain service improvements.

Conversely, should per-line support levels or subscribership levels increase, ACC may be able to proceed with its service improvements more rapidly.

(2) As discussed in its Petition, ACC is committed to providing and maintaining essential telecommunications services in times of emergency. To ensure the availability of service in Kentucky, the Company has developed and implemented a Recovery Action Plan for each of its network mobile switching office and attendant network facilities. The Company has also allocated and deployed backup equipment and spares, including such things as additional microwave facilities, antennas, battery backups and generators.

(3) As discussed in its Petition, ACC is firmly committed to providing exceptional customer service and was an early adopter of the CTIA Consumer Code for Wireless Service.

(4) This requirement is unnecessary, not competitively neutral, and administratively unenforceable because the term “comparable” defies definition when comparing such diverse service offerings as those typically offered by a landline and wireless or other telecommunications carrier. The Commission should instead recognize, as the FCC did in *Virginia Cellular* and elsewhere, that a carrier that offers a “variety of local usage plans,” including a choice of features (*e.g.*, mobility, caller ID, voicemail, 3-way calling, bundled long distance, etc.) and a choice of calling scopes (*e.g.*, local, regional and national), satisfies the obligation of providing “comparable” local usage.

(5) Under 47 U.S.C. § 332(c)(8), the FCC – not a State regulatory commission – has the sole authority to require a wireless carrier to provide equal access. As a result, it will be the FCC that considers this issue in the highly unlikely event that an incumbent ETC seeks to relinquish its ETC designation. An “acknowledgment” that the FCC may require ACC to provide equal access is, therefore, unnecessary.

REQUEST NO. 1.13 Refer to Appendix A, Item (2), “Public Interest Determinations.” Describe how public interest standards will be met.

RESPONSE: See Response to Request 1.2.

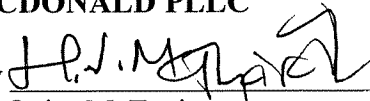
REQUEST NO. 1.14 The application at page 17 describes the steps to be taken when a customer requests service and the request cannot be served by existing network facilities. With regard to the fifth step, what mechanisms are in place to provide resold service to customers?

RESPONSE: ACC is a facilities-based service provider and has not previously needed to enter into an agreement for the resale of another telecommunications carrier’s services in Kentucky. In the unlikely event that ACC is unable to satisfy a reasonable request for service through its own network facilities, the Company will evaluate the option of providing service through resale in order to satisfy that request. Pursuant to federal law, a local exchange carrier may not prohibit or impose unreasonable or discriminatory conditions or limitations on the resale of its telecommunications services. Similarly, ACC would be able to pursue a resale arrangement with another wireless carrier to offer resold wireless service. The availability of this option may vary on a case-by-case basis.

Dated: June 27, 2005

AS TO OBJECTIONS

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GSM OUTLOOK: GSM LOCAL PLANS

Svc Name /Description	MRC	Anytime Minutes	Home Calling Area	Off-Peak Minutes	Toll	Roaming	Coverage
GSM Local 250 (Standalone and Host)	\$30.00	250	GSM Local (All Dobson/ACC GSM Networks)	None	\$.15	\$.50 Roaming on all other GSM Networks, Includes Toll	\$.50
GSM Local 250 Partner	\$20.00	None	GSM Local (All Dobson/ACC GSM Networks)	Shares with the GSM Local 200 Host	\$.15	\$.50 Roaming on all other GSM Networks, Includes Toll	\$.50
GSM Local 600 (Standalone and Host)	\$40.00	600	GSM Local (All Dobson/ACC GSM Networks)	Unlimited Off-Peak	No Toll Charges	\$.35 Roaming on all other GSM Networks, Includes Toll	\$.35
GSM Local 600 Partner	\$20.00	None	GSM Local (All Dobson/ACC GSM Networks)	Shares with the GSM Local 600 Host	No Toll Charges	\$.35 Roaming on all other GSM Networks, Includes Toll	\$.35
GSM Local Unlimited PLUS (Standalone and Host)	\$50.00	Unlimited Plus 100 Off Network minutes Included	GSM Local (All Dobson/ACC GSM Networks)	N/A	No Toll Charges	\$.35 Overage Roaming on all other GSM Networks, Includes Toll(After the 100 Minutes are used)	N/A
GSM Local Unlimited Plus Partner	\$45.00	Shares the Unlimited Bucket and the 100 additional Minutes	GSM Local (All Dobson/ACC GSM Networks)	N/A	No Toll Charges	\$.35 Overage Roaming on all other GSM Networks, Includes Toll(After the 100 Minutes are used)	\$.35

Additional Service Minutes for the GSM LOCAL UNLIMITED plans are as follows:

100 additional Off Network Minutes for \$20.00

300 additional Off Network Minutes for \$50.00

GSM Promotional Plans

Svc Name /Description	MR C	Anytime Minutes	Home Calling Area	Off-Peak Minutes	Toll	Roaming	Overage
GSM Promotional 750 (Stand Alone Only) ACC Properties	\$40.00	1,000	GSM Promotional (All GSM Partner Networks)	N/A – None included in the package	No Toll Charges	No Roaming Charges	\$.35

GSM National Plans

Svc Name /Description	MRC	Anytime Minutes	Home Calling Area	Off-Peak Minutes	MTM Calling	Toll	Roaming	Overage
GSM National 300 (Stand Alone and Host)	\$35.00	300	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited on Dobson Network	No Toll Charges	No Roaming Charges	\$.35
GSM National 450 (Stand Alone and Host)	\$40.00	450	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited on Dobson Network	No Toll Charges	No Roaming Charges	\$.35
GSM National 600 (Stand Alone and Host)	\$50.00	600	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited on Dobson Network	No Toll Charges	No Roaming Charges	\$.35
GSM National 900 (Stand Alone and Host)	\$60.00	900	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited in Home Calling Area	No Toll Charges	No Roaming Charges	\$.35
GSM National 1,250(Stand Alone and Host)	\$80.00	1,250	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited in Home Calling Area	No Toll Charges	No Roaming Charges	\$.35
GSM National 1,700 (Stand Alone and Host) + 200 Bonus Minutes	\$100.00	1,700	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited in Home Calling Area	No Toll Charges	No Roaming Charges	\$.35
GSM National – 2,500(Stand Alone and Host) + 200 Bonus Minutes	\$150.00	2,500	GSM National (All GSM Partner Networks)	Unlimited, in Home Calling Area	Unlimited in Home Calling Area	No Toll Charges	No Roaming Charges	\$.35
GSM National	\$200.00	3,500	GSM	Unlimited,	Unlimited,	No Toll	No	\$.35

3,500 (Stand Alone and Host) + 200 Bonus Minutes			National (All GSM Partner Networks)	in Home Calling Area	in Home Calling Area	Charges	Roaming Charges	
GSM National Partner	\$9.99	Partner for GSM National Plans with MRC \$60 or greater	Partner on all GSM National Plans	Shares with Applicable Host Plan	Shares with Applicable Host Plan	No Toll Charges	No Roaming Charges	\$.35
GSM National Partner	\$20.00	Partner for the \$35, \$40 and \$50 GSM National Plans	Partner on all GSM National Plans	Shares with Applicable Host Plan	Shares with Applicable Host Plan	No Toll Charges	No Roaming Charges	\$.35

TDMA OUTLOOK:

Svc Name /Description	MRC	Anytime Minutes	Home Calling Area	Off-Peak Minutes	Toll	Roaming	Overage
TalkUSA 250 (Host and Standalone)	\$40.00	250	Entire TDMA Domestic Network	Unlimited on Dobson/ACC networks	N/A	N/A	\$.35
TalkUSA 400 (Host and Standalone)	\$50.00	400	Entire TDMA Domestic Network	Unlimited on Dobson/ACC networks	N/A	N/A	\$.35
TalkUSA 600 (Host and Standalone)	\$70.00	600	Entire TDMA Domestic Network	Unlimited on Dobson/ACC networks	N/A	N/A	\$.35
TalkUSA Partner	\$20.00	Shares with Host	Entire TDMA Domestic Network	Shares with Applicable Host Plan	N/A	N/A	\$.35

All Off-Peak Times for all new rate plans will be from 9:00 pm until 6:00 am Monday through Friday and from 9:00 pm Friday until 6:00 am on Monday.

GSM Communicator (Blackberry):

\$50.00 per month, unlimited data transmission on the Dobson Network, \$.05 per Kb while roaming. The GSM Communicator will require a GSM voice service which will default at \$0.00 MRC with no included minutes, all minutes whether on the Dobson network or on a partner network will be billed at \$.50 per minute. This \$.50 per minute will be inclusive of any toll charges.

GSM Mobile Internet:

Plan Name	Access	Included Usage	Additional Usage Charge
GSM Mobile Internet 10 MB	\$30.00	10 MB	\$.003 per Kb
GSM Mobile Internet 40 MB	\$60.00	40 MB	\$.003 per Kb
GSM Mobile Internet Unlimited	\$80.00	Unlimited	N/A

Geographic Areas for Cellular Operating Licenses in Kentucky

Cellular operating licenses are granted by the FCC for Rural Service Areas (RSAs) and Metropolitan Statistical Areas (MSAs).

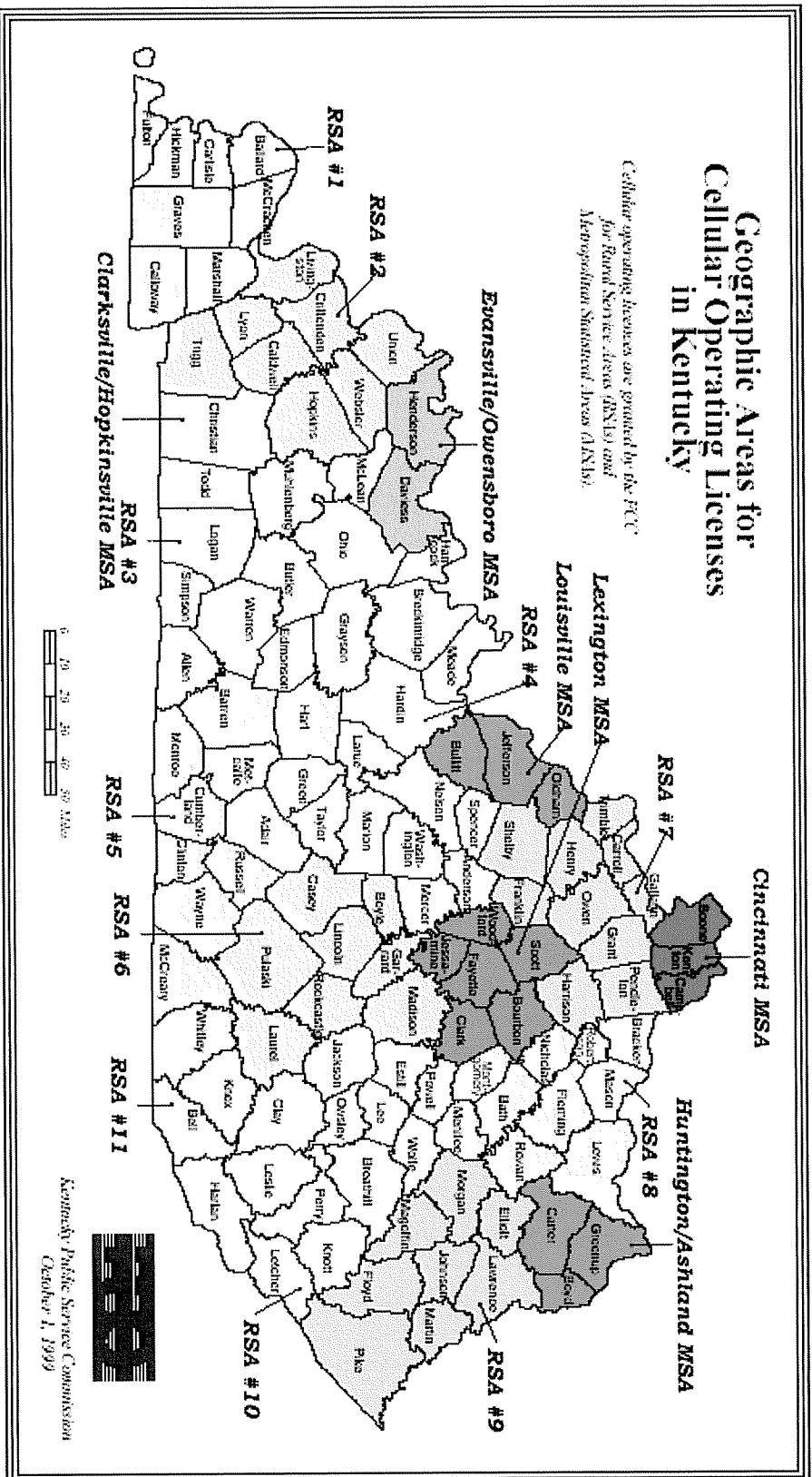


EXHIBIT 1.5

**American Cellular Corporation
Corporate Development Department
Kentucky 4, 5, and 6 Signal Propagation**

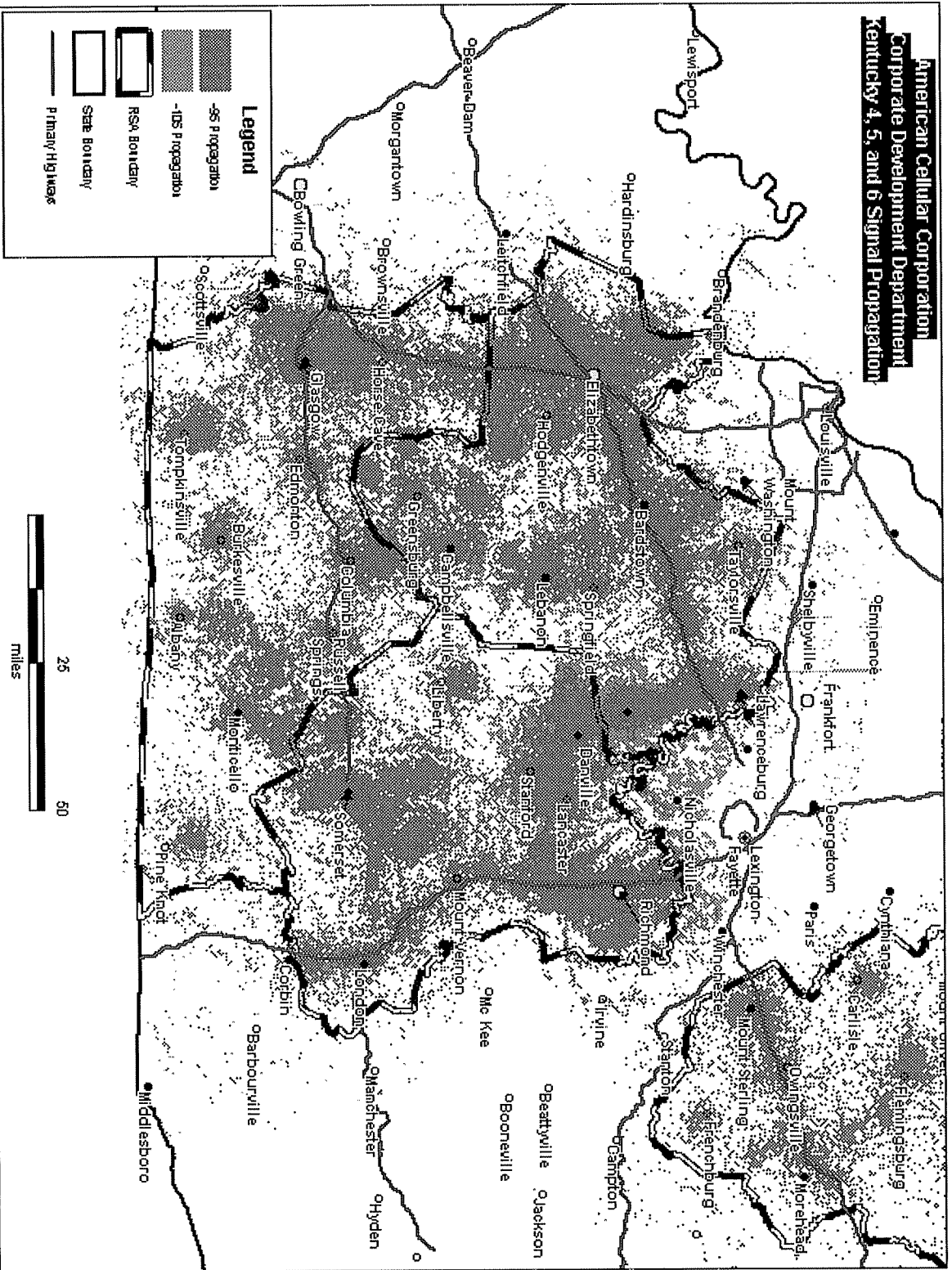


EXHIBIT 1.6

**American Cellular Corporation
Corporate Development Department
Kentucky 8 Signal Propagation**

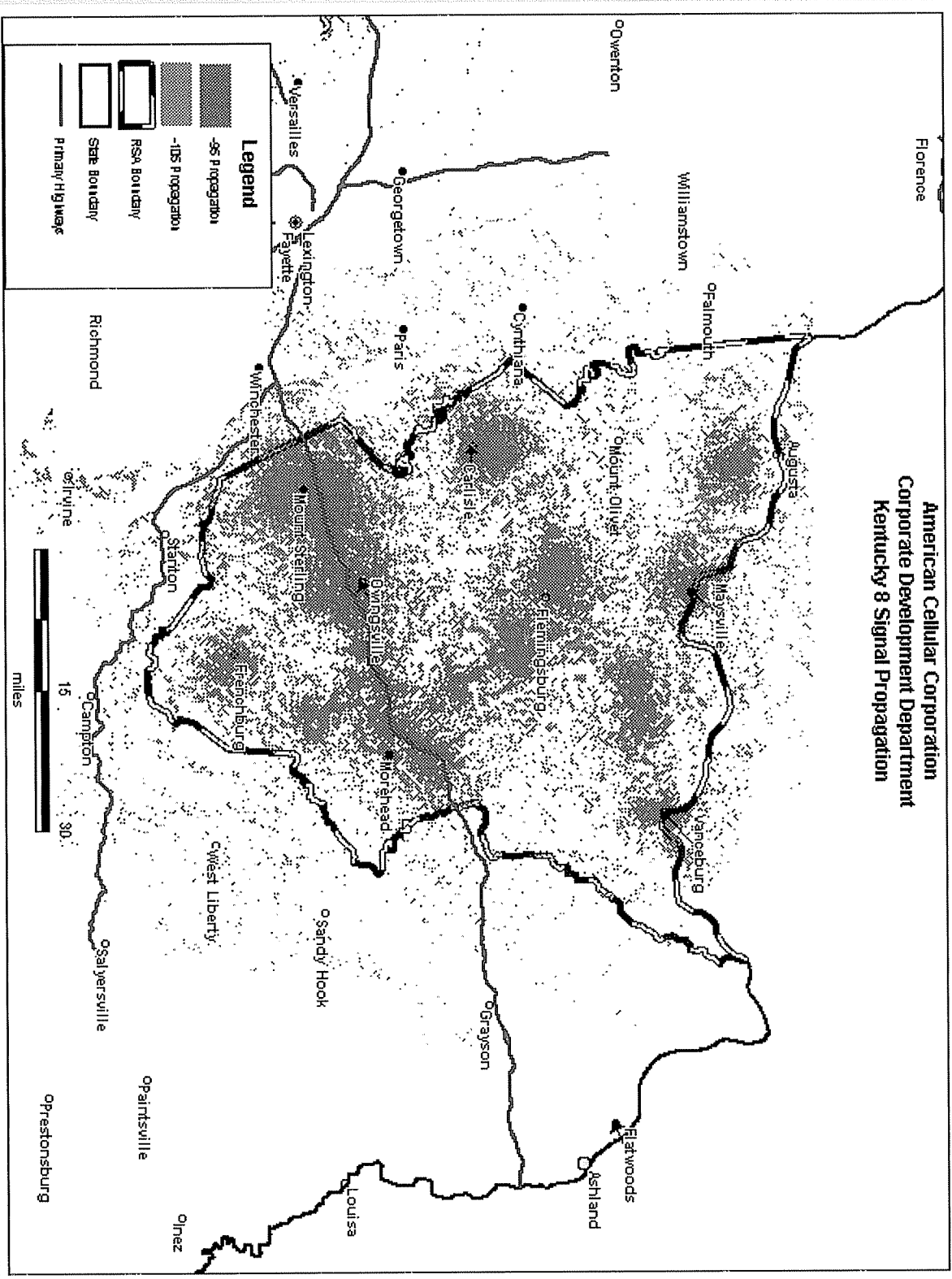


EXHIBIT 1.6