

John E. Selent
502-540-2315
john.selent@dinslaw.com

August 24, 2005

VIA HAND DELIVERY

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

RECEIVED

AUG 25 2005

PUBLIC SERVICE
COMMISSION

Re: In the Matter of:

- (i) ***Petition of Bluegrass Wireless LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2005-00017;***
- (ii) ***Petition of Kentucky RSA #4 Cellular General Partnership for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2005-00018;***
- (iii) ***Petition of Kentucky RSA #3 Cellular General Partnership for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2005-00019; and***
- (iv) ***Petition of Cumberland Cellular Partnership for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2005-00020***

Hon. Beth O'Donnell

August 24, 2005

Page 2

Dear Ms. O'Donnell:

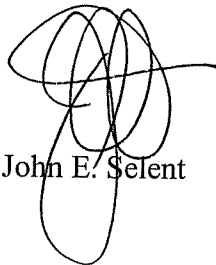
Enclosed for filing in the above-styled cases is an original and ten copies of a joint motion of the four petitioners asking the Public Service Commission of the Commonwealth of Kentucky to send a letter to the Federal Communications Commission and Universal Service Administrative Company so that the petitioners can timely receive substantial ETC funds. (A draft of this letter is enclosed, and one has been forwarded to Mr. J.E.B. Pinney electronically, by e-mail, for the Commission's convenience.)

The motion asks the Public Service Commission to act **before** September 6, 2005, for the reasons set forth in the motion.

Thank you, and if you have any question, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



John E. Seient

JES/bmt
Enclosures

cc: J.E.B. Pinney (w/enclosures) *(via hard copy and electronic transmission)*
Ron Smith (w/enclosures)
Mark Freeman (w/enclosures)

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COMMONWELATH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

AUG 25 2005

PETITION OF BLUEGRASS WIRELESS)
LLC FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE COMMONWEALTH OF KENTUCKY)

CASE NO.
2005-00017

PUBLIC SERVICE
COMMISSION

PETITION OF KENTUCKY RSA #4)
CELLULAR GENERAL PARTNERSHIP)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE COMMONWEALTH OF KENTUCKY)

CASE NO.
2005-00018

PETITION OF KENTUCKY RSA #3)
CELLULAR GENERAL PARTNERSHIP)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE COMMONWEALTH OF KENTUCKY)

CASE NO.
2005-00019

PETITION OF CUMBERLAND CELLULAR)
PARTNERSHIP FOR DESIGNATION AS AN)
ELIGIBLE TELECOMMUNICATIONS)
CARRIER IN THE COMMONWEALTH OF)
KENTUCKY)

CASE NO.
2005-00020

JOINT MOTION OF THE FOUR PETITIONERS
TO SEND LETTER FOR ETC FUNDS
TO FCC AND UNIVERSAL SERVICE
ADMINISTRATIVE COMPANY

Bluegrass Wireless LLC, Kentucky RSA #3 Cellular General Partnership, Kentucky RSA #4 Cellular General Partnership, and Cumberland Cellular Partnership (collectively, "Bluegrass Cellular") hereby move the Public Service of the Commonwealth of Kentucky to send the attached letter to the Office of the Secretary of the Federal Communications Commission in Washington, DC and to the Universal Service Administrative Company, also in Washington, DC, along with the attachments to that letter. (Those attachments consist of (1) the one order of

the Public Service Commission of the Commonwealth of Kentucky (the "Commission") granting ETC status to each of the four Bluegrass Cellular entities identified herein and (2) the high-cost certifications for each of these four companies, for a total of five (5) attachments.

As grounds for this motion, Bluegrass Cellular states as follows.

The attached letter, which must be signed and sent by the Commission, so that it is received by September 6, 2005 by its addressees, is necessary so that Bluegrass Cellular may begin timely to receive its ETC funds. The order in these matters has already certified Bluegrass Cellular as being in compliance with 47 U.S.C. § 254(e), just as does the attached letter; but, Bluegrass Cellular's FCC legal counsel has advised it that the attached letter is nonetheless necessary. (See the Commission's order of July 8, 2005, which determined that:

5. Bluegrass Cellular is hereby certified as complying with the FCC's criteria, in accordance with 47 U.S.C. § 254(e) [emphasis supplied], and therefore eligible to receive Universal Service Fund support for the current certification period.[]]

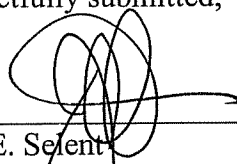
These ETC funds are **substantial** and it is in the best interest of Bluegrass Cellular and its customers that Bluegrass Cellular receive these funds. With these funds, Bluegrass Cellular will be able to provide, maintain, and upgrade its wireless telecommunication's infrastructure in its service territories in rural Kentucky. If the attached letter is not timely received by September 6, 2005, Bluegrass Cellular will not receive ETC funds in the range of **seven** figures for the applicable time period. To put it bluntly, this is a lot of money, and will buy a lot of telecommunication infrastructure with which Bluegrass Cellular can better serve rural Kentucky.

For these reasons, the motion of Bluegrass Cellular should be **GRANTED** and the attached letter should be forwarded, along with the five (5) attachments thereto, so that they are received by the Federal Communications Commission and the Universal Service Administrative

Company by September 6, 2005. (Prepaid Federal Express envelopes, along with prepaid envelopes for carbon copying Bluegrass Cellular's counsel with the attached letter, and its attachments, are enclosed.)

In conclusion, Bluegrass Cellular very much appreciates the Commission's accommodation in this most urgent matter.

Respectfully submitted,



John E. Selent
Holly C. Wallace
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
(502) 540-2300
(502) 585-2207 (facsimile)
john.selent@dinslaw.com
holly.wallace@dinslaw.com
Counsel to Applicant

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served, via United States mail, first class, postage pre-paid, this ~~24th~~ day of August, 2005 on the following:

Brian Harman
Alltel Kentucky, Inc.
229 Lees Valley Road
Shepherdsville, KY 40165

J. D. Tobin, Jr.
Brandenburg Telephone Company, Inc.
200 Telco Drive
Brandenburg, KY 40108

William W. Magruder
Duo County Telephone
Cooperative Corporation, Inc.
P.O. Box 80
2150 N. Main Street
Jamestown, KY 42629

F. L. Terry
Highland Telephone Cooperative, Inc.
7840 Morgan County Highway
Sunbright, TN 37872

Steve Mowery
Kentucky Alltel, Inc. - London
Kentucky Alltel, Inc. - Lexington
230 Lexington Green Circle
Lexington, KY 40588-1650

Michael A. Pandow
Lewisport Telephone Company, Inc.
30 Pell Street
Lewisport, KY 42351-0439

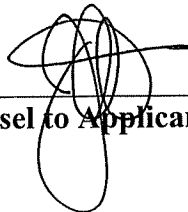
Greg Hale
Logan Telephone Cooperative, Inc.
10725 Bowling Green Road
Auburn, KY 42206

F. Thomas Rowland
North Central Telephone Cooperative, Inc.
872 Highway 52 By-Pass
Lafayette, TN 37083-0070

Forrest Wilson
South Central Rural Telephone
Cooperative Corporation, Inc.
1399 Happy Valley Road
Glasgow, KY 42141

Dorothy Chambers
BellSouth Telecommunications, Inc.
P.O. Box 32410
601 W. Chestnut Street, Room 407
Louisville, KY 40232-2410

Steve Mowery
230 Lexington Green Circle
Lexington, KY 40588-1650



Counsel to Applicant

[Kentucky Public Service Commission Letterhead]

August 24, 2005

VIA FEDERAL EXPRESS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

VIA FEDERAL EXPRESS

Ms. Lisa Zaina, President
Universal Service Administrative Company
2000 L Street, N.W.
Washington, D.C. 20037

***Re: CC Docket No. 96-45, USF Certification as Required by 47 C.F.R.
Sections 54.313, 54.314***

Dear Ms. Dortch and Ms. Zaina:

Pursuant to 47 C.F.R. Sections 54.313 and 54.314 and on the basis described below, the Kentucky Public Service Commission (the "Kentucky Commission") has received an affidavit from a representative of Bluegrass Wireless, LLC, RSA #3 Cellular General Partnership, RSA #4 Cellular General Partnership and Cumberland Cellular General Partnership (collectively, "Bluegrass Cellular") certifying that federal high-cost support funds will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as required by 47 U.S.C. Section 254(e).

The Kentucky Commission granted Bluegrass Cellular's petition for ETC designation on July 8, 2005. A copy of the order is enclosed, as is a copy of the certification received from Bluegrass Cellular. The Kentucky Commission certifies Bluegrass Cellular's compliance with 47 U.S.C. Section 254(e) and 47 C.F.R. Sections 54.313 and 54.314 based entirely on the corporate e-mailed officer certification.

This certification is timely provided within 60 days of the ETC grant to permit Bluegrass Cellular to receive high-cost support retroactive to the date of its grant as provided in 47 C.F.R. Sections 54.313 and 54.314, as amended in the FCC's Report and Order, FCC 05-46 (released March 17, 2005). Accordingly, this certification applies to support received in calendar year 2005.

Ms. Marlene H. Dortch
Ms. Lisa Zaina
August 24, 2005
Page 2 of 2

If you have any questions regarding this letter, please contact J.E.B. Pinney.

Very truly yours,

KENTUCKY PUBLIC SERVICE COMMISSION

By: Beth O'Donnell
Executive Director

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BLUEGRASS WIRELESS LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN THE) CASE NO. 2005-00017
COMMONWEALTH OF KENTUCKY)

PETITION OF KENTUCKY RSA #4)
CELLULAR GENERAL PARTNERSHIP)
FOR DESIGNATION AS AN ELIGIBLE) CASE NO. 2005-00018
TELECOMMUNICATIONS CARRIER IN THE)
COMMONWEALTH OF KENTUCKY)

PETITION OF KENTUCKY RSA #3)
CELLULAR GENERAL PARTNERSHIP)
FOR DESIGNATION AS AN ELIGIBLE) CASE NO. 2005-00019
TELECOMMUNICATIONS CARRIER IN THE)
COMMONWEALTH OF KENTUCKY)

PETITION OF CUMBERLAND CELLULAR)
PARTNERSHIP FOR DESIGNATION AS AN)
ELIGIBLE TELECOMMUNICATIONS) CASE NO. 2005-00020
CARRIER IN THE COMMONWEALTH OF)
KENTUCKY)

O R D E R

On January 4, 2005, Bluegrass Wireless, LLC, RSA #3 Cellular General Partnership, RSA #4 Cellular General Partnership and Cumberland Cellular General Partnership (collectively "Bluegrass Cellular") filed applications seeking Eligible Telecommunications Carrier ("ETC") status within the territory where they are licensed to operate. These companies are all under common ownership by five telephone cooperatives and one investor-owned telephone company.¹ RSA #3, RSA #4 and

¹ South Central Rural Telephone Cooperative Corporation, Inc., Logan Telephone Cooperative, Inc., Duo County Telephone Cooperative Corporation, Inc., North Central Telephone Cooperative, Inc., and Brandenburg Telephone Company.

Cumberland Cellular operate under the name Bluegrass Cellular. Bluegrass Wireless has not yet begun operations and it is yet to be determined if it will operate under the name Bluegrass Cellular, but it will operate under the same management.

BellSouth Telecommunications, Inc. has been granted intervention in all of these proceedings, but has not participated. The Commission set a procedural schedule in this case that allowed for public comments, data requests, and requests for a hearing. No comments on the application and no requests for a hearing were received within the time allowed by the procedural schedule.

Discussion

47 U.S.C. § 254(e) provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support.” Pursuant to 47 U.S.C. § 214(e)(1), a common carrier designated as an ETC must offer and advertise the services supported by the federal universal service mechanisms throughout the designated service area.

47 U.S.C. § 214(e)(2) provides state commissions with the primary responsibility for performing ETC designations. Pursuant to 47 U.S.C. § 214(e)(6), the Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience, and necessity, so long as the requesting carrier meets the requirements of 47 U.S.C. § 214(e)(1). Before

designating an additional ETC for an area served by a rural telephone company, the Commission must determine that the designation is in the public interest.²

An ETC petition must contain the following: (1) a certification that the petitioner offers or intends to offer all services designated for support by the Commission pursuant to 47 U.S.C. § 254(c); (2) a certification that the petitioner offers or intends to offer the supported services “either using its own facilities or a combination of its own facilities and resale of another carrier’s services;” (3) a description of how the petitioner “advertise[s] the availability of [supported] services and the charges therefore using media of general distribution;” and (4) if the petitioner meets the definition of a “rural telephone company” pursuant to 47 U.S.C. § 3(37), the petitioner must identify its study area, or, if the petitioner is not a rural telephone company, it must include a detailed description of the geographic service area for which it requests an ETC designation from the Commission.

Offering the Services Designated for Support

Bluegrass Cellular has demonstrated through the required certifications and related filings that it now offers, or will offer upon designation as an ETC, the services supported by the federal universal service mechanism. As noted in its petition, Bluegrass Cellular is authorized to provide cellular mobile radiotelephone service (“CMRS”). Bluegrass Cellular certifies that it now provides or will provide throughout its designated service area the services and functionalities enumerated in 47 C.F.R. § 54.101(a). Bluegrass Cellular has also certified that, in compliance with 47 C.F.R §

² 47 U.S.C. § 214(e)(6).

54.405, it will make available and advertise Lifeline service to qualifying low-income consumers.

Offering the Supported Services Using a Carrier's Own Facilities

Bluegrass Cellular states that it intends to provide the supported services using its existing network infrastructure. Bluegrass Cellular currently provides the service using its facilities-based digital network infrastructure and licensed CMRS spectrum in Kentucky.

The Commission finds that Bluegrass Cellular has demonstrated that it satisfies the requirement of 47 U.S.C. § 214(e)(1)(A) that it offer the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.

Advertising Supported Services

Bluegrass Cellular has demonstrated that it satisfies the requirement of 47 U.S.C. § 214(e)(1)(B) to advertise the availability of the supported services and the charges therefore using media of general distribution. In its petition, Bluegrass Cellular states that it currently advertises the availability of its services, and will do so for each of the supported services on a regular basis in newspapers, magazines, television, and radio, in accordance with 47 C.F.R. § 54.201(d)(2).

Non-Rural Study Areas

The Federal Communications Commission ("FCC") previously has found designation of additional ETCs in areas served by non-rural telephone companies to be *per se* in the public interest based upon a demonstration that the requesting carrier

complies with the statutory eligibility obligations of 47 U.S.C. § 214(e)(1).³ The Commission finds that Bluegrass Cellular's public interest showing here is sufficient, based on the detailed commitments Bluegrass Cellular has made to ensure that it provides high quality service throughout the proposed rural and non-rural service areas; that is, if Bluegrass Cellular has satisfied the more rigorous public interest analysis for the rural study areas, it follows that its commitments satisfy the public interest requirements for non-rural areas.

Rural Study Areas

In considering whether designation of Bluegrass Cellular as an ETC in areas served by rural telephone companies will serve the public interest, the Commission must consider whether the benefits of an additional ETC in such study areas outweigh any potential harm. In determining whether designation of a competitive ETC in a rural telephone company's service area is in the public interest, the Commission must weigh: the benefits of increased competitive choice; the impact of the designation on the universal service fund; the unique advantages and disadvantages of the competitor's service offering; any commitments made regarding quality of telephone service; and the competitive ETC's ability to satisfy its obligation to serve the designated service areas within a reasonable time frame.

The Commission finds that Bluegrass Cellular's universal service offering will provide a variety of benefits to customers. For example, Bluegrass Cellular has

³ See, e.g., Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier, Memorandum Opinion and Order, CC Docket No. 96-45, 16 FCC Rcd 39 (2000).

committed to provide customers access to telecommunications and data services where they do not have access to a wireline telephone. In addition, the mobility of Bluegrass Cellular's wireless service will provide benefits such as access to emergency services that can mitigate the unique risks of geographic isolation associated with living in rural communities. Moreover, Bluegrass Cellular states that it offers larger local calling areas than those of the incumbent LECs against which it competes, which could result in fewer toll charges for Bluegrass Cellular's customers.

Public Interest Analysis

In determining whether the public interest is served, the burden of proof is upon the ETC applicant.⁴ Bluegrass Cellular asserts that granting ETC designation to Bluegrass Cellular will provide rural consumers the benefits of competition through increased choices and further the deployment of new telecommunications services. It also asserts that granting the request will not harm consumers. Bluegrass Cellular has satisfied the burden of proof in establishing that its universal service offering in this area will provide benefits to rural consumers.

Designated Service Areas

The Commission finds that Bluegrass Cellular should be certified as an ETC in the requested service areas served by non-rural telephone companies, as listed in application. The Commission also finds that Bluegrass Cellular should be certified as an ETC in the requested service areas served by rural telephone companies, as listed in the application. However, Bluegrass Cellular's service area for each rural telephone

⁴ See Highland Cellular Order, 19 FCC Rcd at 6431, para. 20; Virginia Cellular Order, 19 FCC Rcd at 1574-75, para. 26.

company does not encompass the entire study area of each rural telephone company. Therefore, the study areas of the affected rural carriers must be redefined to smaller study areas such that they will correspond to the wireless carrier's service area. The Commission finds that the study areas of the affected rural telephone companies should be redefined as necessary to match the licensed service area of the applicant. Bluegrass Cellular should petition the FCC for concurrence.

Regulatory Oversight

In the Nextel case,⁵ Nextel committed to, and the Commission required that Nextel, separate and in addition to its annual certification filing under 47 C.F.R. §§ 54.513 and 54.314, submit records and documentation on an annual basis detailing: (1) its progress toward meeting its build-out plans; (2) the number of complaints per 1,000 handsets; and (3) information detailing how many requests for service from potential customers were unfilled for the past year. The Commission finds that Bluegrass Cellular shall be required to file this information and make any other information as it relates to service available to the Commission.

IT IS THEREFORE ORDERED that:

1. Bluegrass Cellular shall be designated an ETC in the geographic areas requested and as listed in Appendix A, attached hereto and incorporated herein.
2. Bluegrass Cellular shall offer universal support services to consumers in its service area.

⁵ Case No. 2003-00143, Petition of NPCR, Inc. d/b/a Nextel Partners for Designation as an Eligible Telecommunications Carrier in the State of Kentucky (Ky. PSC Dec. 16, 2004).

3. Bluegrass Cellular shall offer these services using its own facilities or a combination of its own facilities and resale of another carrier's services, including services offered by another.

4. Bluegrass Cellular shall advertise the availability of and charges for these services using media of general distribution.

5. Bluegrass Cellular is hereby certified as complying with the FCC's criteria, in accordance with 47 U.S.C. § 254(e), and therefore eligible to receive Universal Service Fund support for the current certification period.

6. By September 1, 2006, and by each September 1 thereafter, Bluegrass Cellular shall make its annual certification filing in Administrative Case No. 381⁶ and shall submit additional records as described herein.

7. A copy of this Order shall be served upon the Federal Communications Commission and the Universal Service Administration Company.

Done at Frankfort, Kentucky, this 8th day of July, 2005.

By the Commission

ATTEST:


Executive Director

⁶ Administrative Case No. 381, A Certification of the Carriers Receiving Federal Universal Service High-Cost Support.

Case No. 2005-00017
Case No. 2005-00018
Case No. 2005-00019
Case No. 2005-00020

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NOS. 2005-00017, 2005-00018, 2005-00019,
AND 2005-00020 DATED July 8, 2005

Areas for which Bluegrass Wireless LLC is granted ETC Designation

1. Rural Telephone Company Study Areas

- 260402 Alltel Kentucky, Inc.
- 260398 Brandenburg Telephone Company, Inc.
- 264002 Highland Telephone Cooperative, Inc.
- 269691 Kentucky Alltel, Inc. - London¹
- 260412 Lewisport Telephone Company
- 260413 Logan County Telephone Company
- 264001 North Central Telephone Cooperative, Inc.
- 260418 South Central Rural Telephone Cooperative Corporation, Inc.

2. Non-Rural ILEC Wire Centers

- 265182 BellSouth – KY

BLFSKYMA	CNTWKYMA	HANSKYMA	MRGPKYMA	SHGVKYMA
BLSPKYMA	COTNKYMA	HPVLKYMA	MTEDKYMA	SLGHKYMA
BRMNKYMA	DRBOKYES	HRBGKYES	NEBOKYMA	SPFDKYMA
BRTWKYES	DWSPKYMA	HRFRKYMA	NRVLKYMA	SRGHKYMA
BVDMKYMA	EKTNKYMA	HWVLKYMA	NWHNKYMA	STCHKYMA
BWLGKYMA	ENSRKYMA	ISLDKYMA	OKGVKYES	STNLKYMA
BWLGKYRV	ERTNKYMA	JLLCTNMA	OWBOKYMA	TRENKYMA
CADZKYMA	FDVLKYMA	LBJTKYMA	PMBRKYMA	TYVLKYMA
CBRNKYMA	FKLNKYMA	LFYTKYMA	PLRGKYMA	UTICKYMA
CHPLKYMA	FRDNKYMA	LVMRKYMA	PNTHKYMA	WDDYKYMA
CLHNKYMA	GNVLKYMA	MACEKYMA	PRTNKYES	WHVLKYMA
CLPTKYMA	GRACKYMA	MCDNKYMA	RLVLKYMA	WLBGKYMA
CNCYKYMA	GTHRKYMA	MDVLKYMA	RSTRKYES	WLVLKYMA

¹ RSA#3 Cellular General Partnership only requests designation as an ETC in the wire centers: BBVLKYXA, BESPXYXA, BWVLKYXA, CKSNKYXA, CYVLKYXA, EBNKXYXA, EBRNKYAC, FBSHKYXA, FLLCKYXA, LONDKYXA, MMCVKYXA, MNCHKYXA, ONEDKYXA, PRCYKYXA, SCHLKYXA, SMGVKYXA, SOVLKYXA, AND WHLLKYXA. Subject to concurrence of the FCC, the request is granted.

CNTNKYMA	HABTKYMA	MGTWKYMA	SCRMKYMA	WSPNKYMA
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269690 Kentucky ALLTEL, Inc. - Lexington

ALBYKYXA	CLMAKYXA	GNBGKYXB	LBRTKYXA	SCVLKYXA
BRSDKYXA	CMVLKYXA	HGVLKYXA	LTFDKYXA	SHDNKYXA
BRVLKYXA	EZTWKYXA	HTVLKYXE	MNTIKYXA	SMTRKYXA
CECLKYXA	GLSGKYXA	LBNNKYXA	NANCKYXA	TMVLKYXA

Areas for which Kentucky RSA #4 Cellular General Partnership is granted ETC Designation

1. Rural Telephone Company Study Areas

260402 Alltel Kentucky, Inc.²
 260398 Brandenburg Telephone Company, Inc.
 260418 South Central Rural Telephone Cooperative Corporation, Inc.

2. Non-Rural ILEC Wire Centers

265182 BellSouth – KY

BLFDKYMA	CHPLKYMA	LRBGKYMA	RSTRKYES	TYVLKYMA
BRGNKYMA	HDBGKYMA	MTEDKYMA	SLVSKYMA	WDDYKYMA
BRTWKYES	LBJTKYMA	NWHNKYMA	SPFDKYMA	WSPNKYMA

269690 Kentucky ALLTEL, Inc. - Lexington

BRVLKYXA	CMVLKYXA	GNBGKYXB	LBNNKYXA	SHDNKYXA
CECLKYXA	EZTWKYXA	HGVLKYXA	LRTTKYXA	

² RSA#4 Cellular General Partnership only requests designation as an ETC in the wire center SHPVKYXA. Subject to concurrence of the FCC the request is granted.

Areas for which Kentucky RSA#3 Cellular General Partnership is granted ETC Designation

1. Rural Telephone Company Study Areas

- 260398 Brandenburg Telephone Company, Inc.
- 269691 Kentucky Alltel, Inc. - London³
- 260412 Lewisport Telephone Company
- 260413 Logan County Telephone Company
- 264001 North Central Telephone Cooperative, Inc.

2. Non-Rural ILEC Wire Centers

- 265182 BellSouth – KY

BLSPKYMA	CLPTKYMA	FKLNKYMA	ISLDKYMA	SCRMKYMA
BRMNKYMA	CNCYKYMA	GNVLKYMA	LVMRKYMA	SHGVKYMA
BVDMKYMA	CNTWKYMA	GTHRKYMA	MCDNKYMA	TRENKYMA
BWLGKYMA	DRBOKYES	HRBGKYES	MGTWKYMA	WHVLKYMA
BWLGKYRV	EKTNKYMA	HRFRKYMA	PLRGKYMA	
CLH NKYMA	FDVLKYMA	HWVLKYMA	RLVLKYMA	

- 269690 Kentucky ALLTEL, Inc. - Lexington

LTFDKYXA				
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³ RSA#3 Cellular General Partnership only requests designation as an ETC in the wire centers: BESP KYXA, BWVLKYXA, CKSNKYXA, CYVLKYXA, MMCVKYXA, PRCYKYXA, and SMGVKYXA. Subject to concurrence of the FCC, the request is granted.

Areas for which Cumberland Cellular Partnership is granted ETC Designation

1. Rural Telephone Company Study Areas

- 260401 Duo County Telephone Cooperative, Corporation, Inc.
- 264002 Highland Telephone Cooperative, Inc.
- 269691 Kentucky Alltel, Inc. - London⁴
- 260418 South Central Rural Telephone Cooperative Corporation, Inc.

2. Non-Rural ILEC Wire Centers

- 269690 Kentucky ALLTEL, Inc. - Lexington

ALBYKYXA	CLMAKYXA	MNTIKYXA	TMVLKYXA	
BSVLKYXA	GLSGKYXA	SHDNKYXA		

⁴ Cumberland Cellular only requests designation as an ETC in the wire center PRCYKYXA. Subject to concurrence of the FCC, the request is granted.

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

In the matter of:

**BLUEGRASS WIRELESS LLC'S PETITION FOR)
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN THE) Case No. 2005-00017
COMMONWEALTH OF KENTUCKY)**

HIGH-COST CERTIFICATION

Bluegrass Wireless LLC, pursuant to 47 C.F.R. §§54.313 and 54.314, hereby submits the following high-cost certification in support of its Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky (the "Petition"), and in order to begin receiving high-cost support in its designated eligible telecommunications carrier area.

I, the undersigned Ron Smith, do hereby declare under penalty of perjury as follows.

1. I am the authorized representative of Bluegrass Wireless LLC ("Bluegrass Wireless").
2. Bluegrass Wireless filed its Petition with the Public Service Commission of the Commonwealth of Kentucky on January 4, 2005.
3. All high-cost support provided to Bluegrass Wireless 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 Telecommunications Act of 1996, codified at 47 U.S.C. § 254(e).



Ron Smith
Authorized Representative
Bluegrass Wireless LLC

COUNTY OF JEFFERSON)
)
STATE OF KENTUCKY)

Subscribed and sworn to before me by Ron Smith, on this 7th day of
March, 2005.

My Commission expires: 1/20/06.

Marlene Logg
NOTARY PUBLIC, STATE AT LARGE, KY

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

In the matter of:

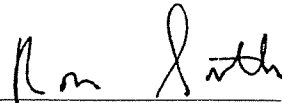
**KENTUCKY RSA #3 CELLULAR GENERAL)
PARTNERSHIP PETITION FOR DESIGNATION AS)
AN ELIGIBLE TELECOMMUNICATIONS CARRIER) Case No. 2005-00019
IN THE COMMONWEALTH OF KENTUCKY)**

HIGH-COST CERTIFICATION

Kentucky RSA #3 Cellular General Partnership, pursuant to 47 C.F.R. §§54.313 and 54.314, hereby submits the following high-cost certification in support of its Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky (the "Petition"), and in order to begin receiving high-cost support in its designated eligible telecommunications carrier area.

I, the undersigned Ron Smith, do hereby declare under penalty of perjury as follows.

1. I am the authorized representative of Kentucky RSA #3 Cellular General Partnership ("RSA #3").
2. RSA #3 filed its Petition with the Public Service Commission of the Commonwealth of Kentucky on January 4, 2005.
3. All high-cost support provided to RSA #3 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 Telecommunications Act of 1996, codified at 47 U.S.C. § 254(e).



Ron Smith
Authorized Representative
Kentucky RSA #3 Cellular General Partnership

COUNTY OF JEFFERSON)
)
STATE OF KENTUCKY)

Subscribed and sworn to before me by Ron Smith, on this 7th day of
March, 2005.

My Commission expires: 1/20/06.

Marilyn Traylor
NOTARY PUBLIC, STATE AT/LARGE, KY

BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the matter of:

KENTUCKY RSA #4 CELLULAR GENERAL)
PARTNERSHIP PETITION FOR DESIGNATION AS)
AN ELIGIBLE TELECOMMUNICATIONS CARRIER) Case No. 2005-00018
IN THE COMMONWEALTH OF KENTUCKY)

HIGH-COST CERTIFICATION

Kentucky RSA #4 Cellular General Partnership, pursuant to 47 C.F.R. §§54.313 and 54.314, hereby submits the following high-cost certification in support of its Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky (the "Petition"), and in order to begin receiving high-cost support in its designated eligible telecommunications carrier area.

I, the undersigned Ron Smith, do hereby declare under penalty of perjury as follows.

1. I am the authorized representative of Kentucky RSA #4 Cellular General Partnership ("RSA #4").
2. RSA #4 filed its Petition with the Public Service Commission of the Commonwealth of Kentucky on January 4, 2005.
3. All high-cost support provided to RSA #4 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 Telecommunications Act of 1996, codified at 47 U.S.C. § 254(e).



Ron Smith
Authorized Representative
Kentucky RSA #4 Cellular General Partnership

COUNTY OF JEFFERSON)
)
STATE OF KENTUCKY)

Subscribed and sworn to before me by Ron Smith, on this 7th day of March, 2005.

My Commission expires: 11/20/06.

Maileene Troly
NOTARY PUBLIC, STATE AT LARGE, KY

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

In the matter of:

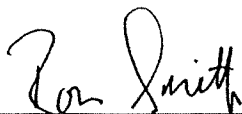
CUMBERLAND CELLULAR PARTNERSHIP)
PETITION FOR DESIGNATION AS AN ELIGIBLE) Case No. 2005-00020
TELECOMMUNICATIONS CARRIER IN THE)
COMMONWEALTH OF KENTUCKY)

HIGH-COST CERTIFICATION

Cumberland Cellular Partnership, pursuant to 47 C.F.R. §§54.313 and 54.314, hereby submits the following high-cost certification in support of its Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky (the "Petition"), and in order to begin receiving high-cost support in its designated eligible telecommunications carrier area.

I, the undersigned Ron Smith, do hereby declare under penalty of perjury as follows.

1. I am the authorized representative of Cumberland Cellular Partnership ("Cumberland Cellular").
2. Cumberland Cellular filed its Petition with the Public Service Commission of the Commonwealth of Kentucky on January 4, 2005.
3. All high-cost support provided to Cumberland Cellular 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 Telecommunications Act of 1996, codified at 47 U.S.C. § 254(e).



Ron Smith
Authorized Representative
Cumberland Cellular Partnership

COUNTY OF JEFFERSON)
)
STATE OF KENTUCKY)

Subscribed and sworn to before me by Ron Smith, on this 7th day of March, 2005.

My Commission expires: 1/20/06.

Marlene Hoyle
NOTARY PUBLIC, STATE AT LARGE, KY