



Steven L. Beshear
Governor

Leonard K. Peters
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
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David L. Armstrong
Chairman

James Gardner
Vice Chairman

John W. Clay
Commissioner

Gerald Robinette
East Kentucky Network, LLC dba Appalachian Wireless
101 Technology Trail
Ivel, KY 41642

June 2, 2009

RE: Case No. 2009-00199
East Kentucky Network, LLC dba Appalachian Wireless
(Telecommunications Act of 1996)

This letter is to acknowledge receipt of initial application in the above case. The application was date-stamped received June 1, 2009 and has been assigned Case No. 2009-00199. In all future correspondence or filings in connection with this case, please reference the above case number.

If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Derouen".

Jeff Derouen
Executive Director

JD/tw



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Louisville, KY 40202

June 2, 2009

RE: Case No. 2009-00199
East Kentucky Network, LLC dba Appalachian Wireless
(Telecommunications Act of 1996)

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If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Derouen".

Jeff Derouen
Executive Director

JD/tw

forth in the Act, the rules of the Commission and the regulations of the FCC. Additionally, AW's designation will serve the public interest.

1. AW's full name and address is East Kentucky Network, LLC d/b/a Appalachian Wireless, 101 Technology Trail, Ivel, Kentucky 41642.

2. AW is a regional frequency Block B cellular telephone carrier providing digital wireless telecommunications services in Eastern Kentucky. AW also is a regional Frequency PCS Block A serving three Kentucky counties, Bell, Harlan and Letcher, PCS Block C serving Leslie County and PCS Block F serving Clay, Laurel, Knox and Whitley Counties in Kentucky. A map showing AW's service area is attached as Exhibit A.

3. The Commission granted AW ETC status in Case No. 2005-00045, *In the matter of: East Kentucky Network, LLC d/b/a Appalachian Wireless for Designation as an Eligible Telecommunications Carrier*.¹ AW seeks supplemental designation as an ETC for both study areas of rural telephone companies as defined in 47 U.S.C. § 153(37), as well as wire centers of non-rural ILECs.² As demonstrated herein, and certified in Exhibit D to this petition, AW satisfies all of the requirements for designation as an ETC in each of the Designated Areas and respectfully requests that the Commission promptly grant its supplemental petition.

I. AW MEETS ALL THE REQUIREMENTS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO SERVE THE SUPPLEMENTAL DESIGNATED AREAS IN THE COMMONWEALTH OF KENTUCKY.

4. Pursuant to 47 U.S.C. § 214(e)(2), the Commission, "consistent with the public interest, convenience and necessity . . . may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so

¹ A list of the areas for which AW has already received ETC status is attached as Exhibit B.

long as [the] requesting carrier meets the requirements of paragraph (1)" of Section 214(e). Wireless telecommunications carriers, such as AW, are eligible to be designated as ETCs. *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59 (1997). AW satisfies the requirements of paragraph (1) of Section 214(e); therefore, the Commission should designate AW as an ETC for the Designated Areas.

A common carrier designated as an eligible telecommunications carrier. . . shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received—

(A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

47 U.S.C. § 214(e)(1). Pursuant to this statute, so long as a telecommunications carrier offers the services supported by the Universal Service Fund using its own facilities or a combination of its own facilities and those of another telecommunications carrier, and advertises the availability of such services, "a State commission shall . . . designate [the] common carrier . . . as an eligible telecommunications carrier for a service area designated by the State commission." 47 U.S.C. § 214(e)(2). The services supported by the Universal Service Fund are: 1) voice grade access to the public switched network, 2) local usage, 3) dual tone multi-frequency signaling or its functional equivalent, 4) single-party service or its functional equivalent, 5) access to emergency services, 6) access to operator services, 7) access to interexchange service, 8) access to directory assistance, and 9) toll limitation for qualifying low-income consumers. *See* 47 C.F.R. § 54.101(a). As demonstrated below, and as set forth in the declaration of Gerald Robinette,

² A list of the rural telephone company service areas and non-rural ILEC wire centers ("Designated Areas") for which AW seeks designation in this supplemental petition is attached as Exhibit C.

General Manager of AW, AW offers all of the services supported by the Universal Service Fund using a combination of its own facilities and those of other telecommunications carriers, and advertises the availability of those services. (See Exhibit D, Declaration of Gerald Robinette). Accordingly, the Commission should grant AW's petition.

A. AW Will Provide Service Using a Combination of its Own and Others' Facilities.

5. AW is a full service wireless carrier that offers all of the services supported by the Universal Service Fund throughout its licensed service area utilizing a combination of its own facilities and facilities leased from other telecommunications carriers.

B. AW Offers All Required Services and Functionalities.

6. AW offers, or will offer upon designation as an ETC in the Designated Areas, all of the services and functionalities required by 47 C.F.R. § 54.101(a) as specified below.

1. Voice grade access to the public switched telephone network.

7. Voice grade access to the public switched telephone network ("PSTN") is defined as "a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz." 47 C.F.R. § 54.101(a)(1). AW services enable customers to transmit voice communications, including placing and receiving calls. AW offers this service at a bandwidth between 300 and 3,000 Hertz. Therefore, AW offers voice grade access to the public switched network within the meaning of 47 C.F.R. § 54.101(a)(1).

2. Local usage.

8. Local usage is defined as "an amount of minutes of use of exchange service,

prescribed by the Commission, provided free of charge to end users." 47 C.F.R. § 54.101(a)(2). AW has a variety of rate plans which provide local usage for its subscribers.³ Moreover, as a designated ETC, AW will continue to comply with any and all minimum local usage requirements required by applicable law.

3. **Dual tone multi-frequency ("DTMF") signaling or its functional equivalent.**

9. Section (a)(3) of 47 C.F.R. 54.101 provides for supported services to include "dual tone multi-frequency signaling or its functional equivalent." Dual tone multi-frequency ("DTMF") is defined as "a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time." *Id.* AW uses out-of-band digital signaling and in-band multi-frequency signaling that is functionally equivalent to DTMF signaling.

4. **Single-party service or its functional equivalent.**

10. Single-party service is defined as "telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission." 47 C.F.R. § 54.101(a)(4). AW provides customers with single-party access for the duration of every phone call. AW does not provide "multi-party" or "party line" services. Accordingly, AW provides single-party service within the meaning of the FCC's regulations.

5. **Access to 911 and E911 emergency service.**

11. "Access to emergency services includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations." 47 C.F.R. § 54.101(5). AW provides universal access to the 911 system for its customers, and has

³ A description of AW's rate plans is attached as Exhibit E to this supplemental petition.

implemented and will continue to implement enhanced 911 ("E911") services consistent with the FCC's Rules and Orders and local public service access point ("PSAP") requests.

6. Access to operator services.

12. Access to operator services is defined as "access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call." 47 C.F.R. § 54.101(6). AW offers all of its customers access to operator services in accordance with FCC regulations.

7. Access to interexchange service ("IXC").

13. Access to interexchange service is defined as "the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network." 47 C.F.R. § 54.101(7). AW customers can use the AW network for interexchange access to place long distance phone calls. Access is provided through interconnection agreements with several interexchange carriers.

8. Access to directory assistance.

14. Access to directory assistance is defined as "access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings." 47 C.F.R. § 54.101(8). All AW customers are able to dial "411" or "555-1212" to access directory assistance.

9. Toll limitation for qualified low-income consumers.

15. Toll limitation for qualifying low-income consumers is defined as "toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, toll limitation denotes both toll blocking and toll control." 47 C.F.R. § 54.400(d). Toll blocking "is

a service provided by carriers that lets consumers elect not to allow the completion of outgoing toll calls from their telecommunications channel." 47 C.F.R. § 54.400(b). "Toll control is a service provided by carriers that allows consumers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle." 47 C.F.R. § 54.400(c).

16. In accordance with the FCC's Rules and AW's status and an ETC, AW already makes toll limitation services available to qualifying low-income consumers. AW presently has approximately 106 customers receiving a toll limitation feature and has approximately 1685 receiving a toll limitation feature for Lifeline Customers. AW will continue to offer these services to consumers who meet the qualifications for Lifeline as specified in 47 C.F.R. § 54.409.

C. AW Will Advertise the Availability of Supported Services.

17. AW advertises the availability of the supported services detailed above, as well as the charges therefore, using media of general distribution in accordance with 47 C.F.R. § 54.201(d)(2). The methods of advertising utilized may include newspapers, magazines, radio, or television as well as other methods that constitute media of general distribution in the Designated Areas of Kentucky. A sample advertisement is attached hereto as Exhibit F.

II. AW REQUESTS ETC STATUS THROUGHOUT EACH OF THE DESIGNATED AREAS.

18. AW requests designation as an ETC throughout each of the supplemental Designated Areas within the Commonwealth of Kentucky, as set forth in Exhibit C. As noted above, these Designated Areas consist of wire centers of two rural telephone companies that have previously had their service areas redefined by wire center by this Commission and the

FCC, as well as wire centers of non-rural ILECs.⁴ Given this Commission and the FCC redefined the service areas of the two rural telephone companies by wire center in 2005, redefinition of these two companies' respective service areas is not required. A map of AW's service area, within which AW provides service to the entirety of the Designated Areas, is attached as Exhibit A.

III. IN ACCORDANCE WITH 47 U.S.C. § 214(e)(2), AW IS ENTITLED TO BE DESIGNATED AS AN ETC IN NON-RURAL WIRE CENTERS.

19. Pursuant to 47 U.S.C. §214(e) and 47 C.F.R. § 54.201(c), AW is entitled to be granted ETC status by the Commission with respect to the non-rural wire centers identified in Exhibit C. "A State commission *shall* upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission." 47 U.S.C. § 214(e)(2). Given AW satisfies the requirements of paragraph (1) of 47 U.S.C. § 214(e) as described above, the Commission should grant AW's petition with regard to the non-rural wire centers identified in Exhibit C.

IV. DESIGNATION OF AW AS AN ETC FOR THE DESIGNATED AREAS SERVED BY A RURAL TELEPHONE COMPANY IN KENTUCKY WOULD SERVE THE PUBLIC INTEREST.

20. With regard to areas served by rural telephone companies as defined in 47 U.S.C. § 153(37), the Commission must determine not only that AW will satisfy the requirements set forth above, but that AW's designation as an ETC in those areas would serve the public interest. As demonstrated below, AW's designation as an ETC would serve the public interest in all of the

⁴ In 2005, the Commission granted AW's petition to redefine the rural service areas of Leslie County Telephone Company, Inc., Mountain Telephone Cooperative, Inc. and Windstream Kentucky East, Inc.–London f/k/a Kentucky ALLTEL, Inc.–London along wire center boundaries. (See Order, *In the matter of: Petition of East Kentucky Network, LLC d/b/a Appalachian Wireless for Designation as an Eligible Telecommunications Carrier*, Case No. 2005-00045, February 17, 2006.) AW subsequently petitioned the FCC to concur with the Commission's redefinition of the carriers' service territories and the FCC granted AW's petition by operation of statute. Accordingly, AW may now seek ETC designation by wire center in the service territories of Leslie County Telephone Company and Windstream Kentucky East–London.

Designated Areas.

21. The FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”⁵ This is particularly applicable in the Designated Areas served by rural telephone companies within the Commonwealth of Kentucky, many of which are not presently served by competitive wireline carriers that could provide an alternative to the ILEC. Designation of AW as an ETC would promote competition and facilitate the provision of advanced communications services to residents of rural Kentucky. Consumers would reap the benefits of wireless service and, where requested by the public service access point, global positioning satellite location assistance for customers calling 911.

22. Designation of AW as an ETC will also provide an incentive to the ILEC in the Designated Areas to improve existing networks to remain competitive, resulting in improved services to consumers. Moreover, AW’s ETC status will benefit consumers by ensuring that quality services are available at just, reasonable, and affordable rates in accordance with the Act.⁶

23. Designation of AW as an ETC will also serve the public interest in all of the Designated Areas because AW will provide all of the supported services required by applicable law, participate in the LifeLine and Link Up programs as required by the FCC, and otherwise comply with all FCC regulations governing universal service programs. Allowing AW access to universal service subsidies will allow AW to bring competition to underserved, high-cost areas of the Commonwealth of Kentucky, and to continue to enhance and expand its network infrastructure to better serve consumers in those areas. Accordingly, designation of AW as an

⁵ See Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order, CC Docket No. 94-45, 16 FCC Rcd 48, 55 (2000).

⁶ See 47 U.S.C. § 254(b)(1).

ETC will serve the public interest.

V. AW MEETS REQUIREMENTS FROM FCC JOINT BOARD ORDER (FCC 05-46) ADOPTED FEBRUARY 25, 2005.

24. AW meets the eligibility requirements outlined for ETC designation in the FCC Joint Board Order, FCC 05-46, adopted February 25, 2005. The eligibility requirements implemented under this order are:

- 1) Provide a five-year plan demonstrating how high-cost universal service support will be used to improve its coverage, service quality, or capacity throughout the service area for which it seeks designation;

East Kentucky Network d/b/a Appalachian Wireless intends to use the additional Universal Service high-cost support to improve its coverage, service quality and capacity throughout its service area for which it seeks supplemental designation as an ETC. Specifically, within the next five years, and contingent upon AW's supplemental designation as an ETC, AW anticipates building approximately ten to fifteen cell sites per year to improve and expand its service in rural Kentucky. In addition, AW intends to use the funds to improve its switch and to increase its capacity in order to handle the additional traffic generated by the new cell sites and the previously unreached subscribership.

AW's construction plans are aggressive, but reasonable. While the plans are approximate in that the demand for service may shift, and the available levels of support may fluctuate as a matter of federal regulatory policy, AW's commitment to use the high-cost support to aggressively build-out in rural high-cost areas is firm, as it has demonstrated in the past. Additionally, AW will continue to report to the Commission on its progress as it presently does on an annual basis.

- 2) Demonstrate its ability to remain functional in emergency situations;

AW will be able to maintain functionality during an emergency situation. Examples of systems in place are backup generators, backup power plants, fully redundant power ring, cell site on wheels (COWs), equipment redundancy and multiples of stock on hand of all things needed to restore and maintain service. In addition, the switch provider, Nortel, has specific Disaster Recovery Procedures.

- 3) Demonstrate that it will satisfy consumer protection and service quality standards;

AW adheres to the CTIA Consumer Code and provides customer service based on the principles of the Code. AW also adheres to all applicable

state and federal laws.

- 4) Offer local usage plans comparable to those offered by the incumbent local exchange carrier (LEC) in the areas for which it seeks designation;

AW offers calling plans that are comparable or superior to the LEC. AW's calling area is larger than the local calling scope provided by the incumbent wireline company. Calling features such as caller ID, voicemail and call waiting are all standard services included with the calling plans.

- 5) Acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations.

AW acknowledges that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations.

25. AW will also provide any other required information that is requested by the Commission or FCC as a part of any current or future rulings.

VI. AW CERTIFICATION OF THE DISPOSITION OF FEDERAL UNIVERSAL SERVICE FUNDING.

26. AW certifies that it will use federal universal support "only for the provision, maintenance and upgrading of facilities and services for which the support is necessary" consistent with Section 254 (e) of the Telecommunications Act of 1996. The Declaration attached hereto as Exhibit D from Gerald Robinette, General Manger of East Kentucky Network, LLC d/b/a Appalachian Wireless, so certifies and fully describes the telecommunications services currently provided by AW.

VII. ANTI-DRUG ABUSE CERTIFICATION.

27. AW certifies that no party to this petition is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, and Sections 1.2001-1.2003 of the Commission's rules, 47. C.F.R. §§ 1.2001-1.2003. *See* Exhibit D.

VIII. CONCLUSION

WHEREFORE, for the reasons set forth above, AW respectfully requests that the Commission:

(1) issue an order as soon as is practicable designating AW as an Eligible Telecommunications Carrier throughout the supplemental designated areas identified in Exhibit C; and

(2) specify in its order that the Commission redefined the service areas of Windstream Kentucky East, Inc. – London and Leslie County Telephone Company, Inc. by wire center in 2005, and therefore AW may be designated an ETC by wire center within the service areas of Windstream Kentucky East, Inc. – London and Leslie County Telephone Company, Inc.

Respectfully submitted,



John E. Selent
Holly C. Wallace
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
(502) 540-2300 (Tel.)
(502) 585-2207 (Fax)

*Counsel to East Kentucky Network, LLC
d/b/a Appalachian Wireless*

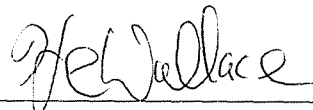
CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served, via U.S. mail, first-class, postage pre-paid, on this 29th day of May, 2009, on the following:

Mary K. Keyer
AT&T Kentucky
601 West Chestnut Street
Louisville, KY 40202

Daniel Logsdon
Windstream Kentucky East
130 West New Circle Road
Suite 170
Lexington, KY 40505

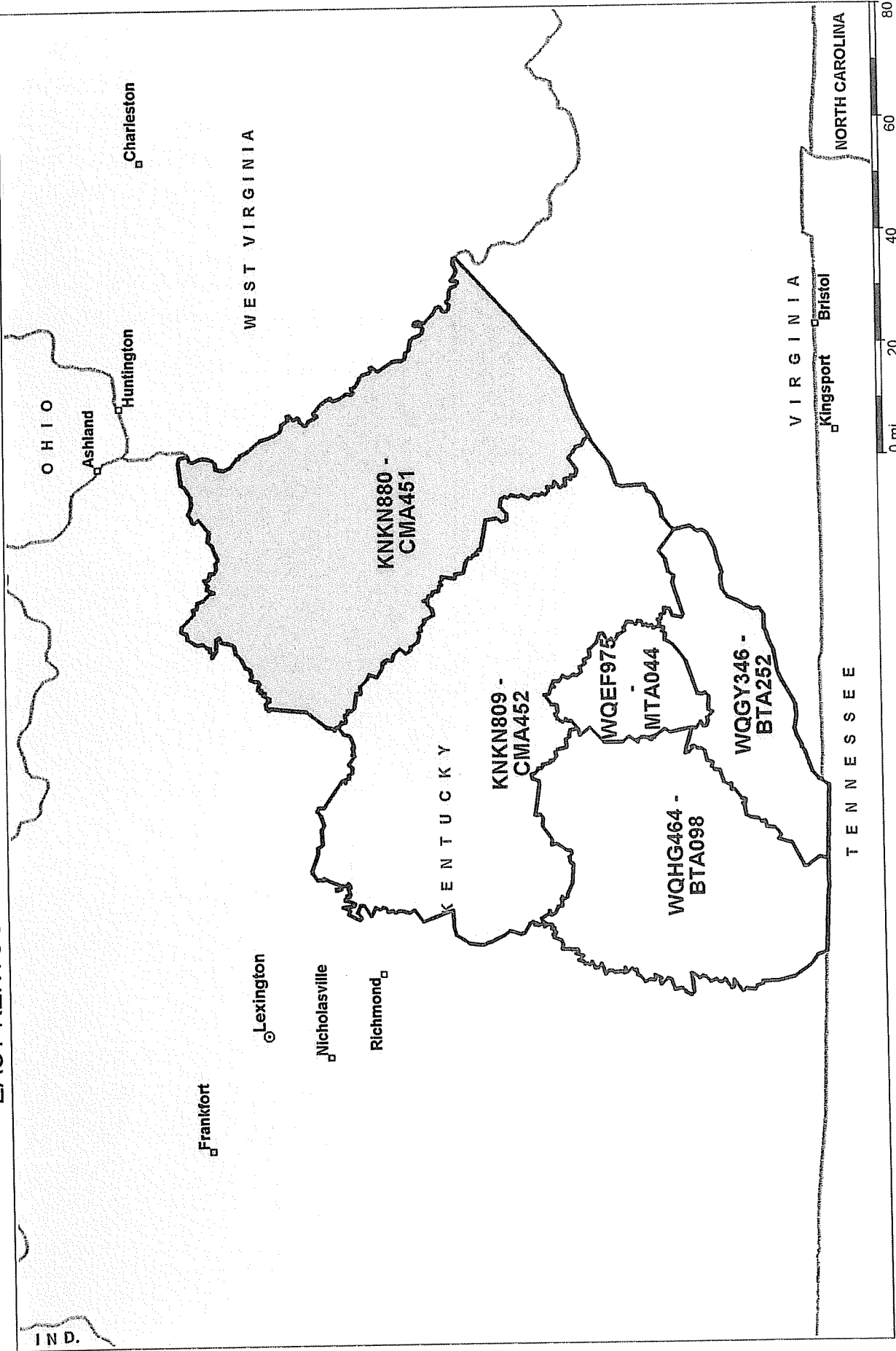
Edward A. Mattingly
Leslie County Telephone Company, Inc.
PO Box 969
22076 Main Street
Hyden, Kentucky 41749-0969



*Counsel to East Kentucky Network, LLC d/b/a
Appalachian Wireless*

EXHIBIT A
Map of Appalachian Wireless's Service Territory

EAST KENTUCKY NETWORK - KENTUCKY FCC LICENSE MARKETS



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 Portions © 1990-2005 InstallShield Software Corporation. All rights reserved. Certain mapping and direction data © 2005 NAVTEQ. All rights reserved. The Data for areas of Canada includes information taken with permission from Canadian authorities.
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EXHIBIT B

List of Areas for which Appalachian Wireless has Already Received ETC Designation

Rural Telephone Company Service Areas

- 260406 Foothills Rural Telephone Company
- 260408 Gearheart Communications Co. Inc. d/b/a Coalfields Telephone Co.
- 260415 Peoples Rural Telephone Cooperative Corporation, Inc.
- 260419 Thacker-Grigsby Telephone Company

Rural Telephone Company Service Areas Redefined by the FCC by Wire Center

- 260411 Leslie County Telephone Company, Inc. (CANOKYXA and BCKHKYXE wire centers only)
- 260414 Mountain Telephone Cooperative, Inc. (JPTHKYXA, HZGRKYXA, EZELKYXA, SNDHKYXA, CMTNKYXA and WLBTKYXA wire centers only)
- 269691 Kentucky Alltel, Inc. London n/k/a Windstream Kentucky East, Inc. - London (IRVNKYXA and JNKNKYXA wire centers only)

Non-Rural ILEC Wire Centers

- 265182 BellSouth Telecommunications, Inc.
 - ALLNKYMA
 - INEZKYMA
 - MCWLKYMA
 - PRBGKYES
 - VIRGKYMA
 - BYVLKYMA
 - JCSNKYMA
 - NEONKYES
 - SWSNKYMA
 - WRFDKYMA
 - ELCYKYES
 - MARTKYMA
 - PNVLKYMA
 - SNTNKYMA
 - WYLDKYES
 - FDCKKYES
 - MCCRKY
 - PKVLKYMA
 - STONKYMA
 - WHBGKYMA
 - FEBRKYMA

EXHIBIT B

**List of Areas for which Appalachian Wireless has Already Received ETC Designation
(contd.)**

269690 Kentucky ALLTEL, Inc. – Lexington n/k/a Windstream Kentucky East, Inc. -
Lexington
 HZRDKYXA
 LTWDKY
 VICCKYXA

EXHIBIT C

List of Areas for which Appalachian Wireless Now Seeks Supplemental ETC Designation

Rural Telephone Company Service Areas Redefined by the FCC by Wire Center

260411 Leslie County Telephone Company, Inc.

BLDSKYXA
HYDNKYXA
STNTKYXA
WOTNKYXA

269691 Windstream Kentucky East, Inc. – London

BBVLKYXA
FLLCKYXA
CMLDKYXA
MNCHKYXA
JNKNKYXA
EVRSKYXA
EBRNKYAC
ONEDKYXA
LONDKYXA

Non-Rural ILEC Wire Centers

269419 BellSouth Telecommunications, Inc. d/b/a South Central Bell Telephone

HRLNKYMA
WLCKKYES
PIVLKYMA
MDBOKYMA
CRBNKYMA
WLBGKYMA
WHBGKYMA
JLLCTNMA
BNLYKYMA
NEONKYES

EXHIBIT D

AFFIDAVIT OF GERALD ROBINETTE

I, the undersigned Gerald Robinette, do hereby declare under penalty of perjury as follows.

1. I am the authorized representative of East Kentucky Network, LLC d/b/a Appalachian Wireless ("AW"). AW's supplemental petition for designation as an eligible telecommunications carrier in additional service areas was prepared under my direction, supervision and control. The factual statements and representations contained therein are true and accurate to the best of my knowledge and belief.

2. AW is a regional frequency Block B cellular telephone carrier providing digital wireless telecommunications services in Eastern Kentucky. AW also is a regional Frequency PCS Block A carrier serving three Kentucky counties, Bell, Harlan and Letcher, a PCS Block C carrier serving Leslie County and a PCS Block F carrier serving Clay, Laurel, Knox and Whitley Counties in Kentucky.

3. AW intends to obtain universal service support funding in certain high-cost areas served by non-rural incumbent local carriers ("ILECs"), specifically BellSouth Telecommunications, Inc. d/b/a South Central Bell, and rural ILECs, specifically Windstream Kentucky East, Inc. – London and Leslie County Telephone Company, Inc. AW will use federal universal support "only for the provision, maintenance and upgrading of facilities and services for which the support is necessary" consistent with Section 254(e) of the Telecommunications Act of 1996. As an ETC, AW will offer a reduced-rate universal service package to subscribers who are eligible for Lifeline support. AW's service offerings will be competitive with the ILECs.

4. AW will be capable of providing all of the service offerings required by and set forth in Section 214(e) of the Communications Act of 1934, as amended, for "eligible telecommunications carriers."

5. AW will market the availability of its local services throughout its service area in the Commonwealth of Kentucky. In this regard, AW's marketing efforts may include printed, radio, television and billboard advertising. AW will continue to expand upon these marketing efforts on a prospective basis as it expands its telecommunications services in Kentucky.

6. AW certifies that it will offer the supported services using a combination of its own facilities and those of other telecommunications carriers.

7. AW requests supplemental ETC designation in the additional service areas identified in Exhibit C to its Petition.

8. High Cost Certification: AW certifies that all high-cost universal service support it receives in Kentucky will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

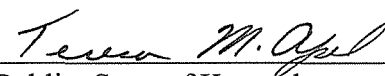
9. Anti-Drug Abuse Certification: To the best of my knowledge and belief, the applicant referred to in the foregoing Petition, including all officers, directors or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) of the applicant as specified by Section 1.2002(b) of the Federal Communications Commission's rules, are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 USC §862.



Gerald Robinette, Authorized Representative
East Kentucky Network, LLC
d/b/a Appalachian Wireless

COUNTY OF Floyd)
)
STATE OF KENTUCKY)

Sworn and subscribed before me, the undersigned authority, on this the 15 day of May, 2009.


Notary Public, State of Kentucky

My Commission expires June 22, 2009

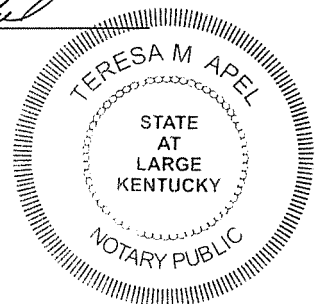


EXHIBIT E

Appalachian Wireless's Rate Plans

GET EVEN GREATER VALUE WITH OUR UNLIMITED NIGHT & WEEKEND MINUTES

Add Additional Phones To The Plan That's Right For You!

NATIONWIDE PLANS

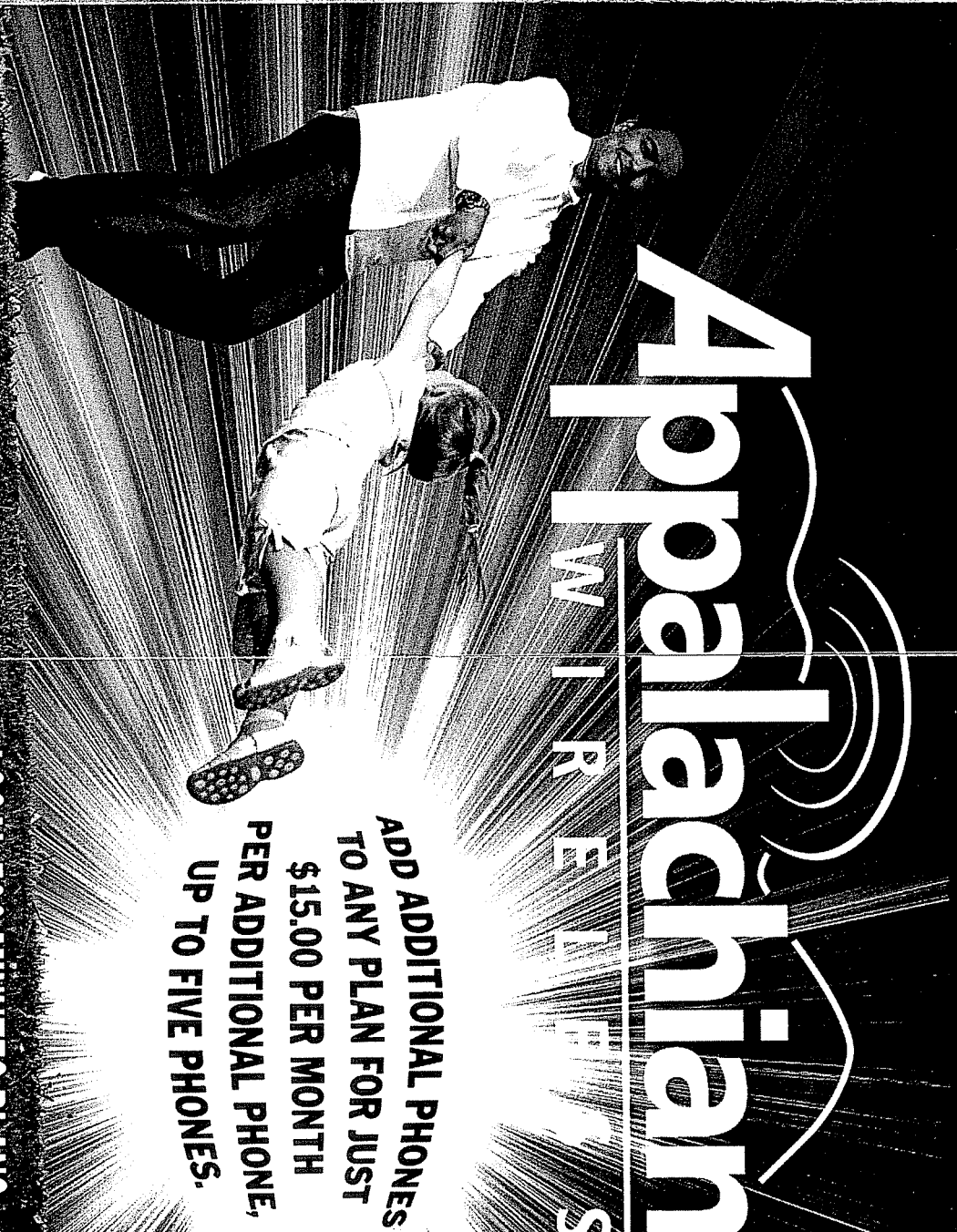
- Travel and call coast-to-coast for one low per minute and monthly rate
- No roaming or long distance fees
- **FREE Mobile-To-Mobile**

PRICE	ANYTIME MINUTES	NIGHTS/ WEEKENDS
\$39.99	450	Unlimited
\$59.99	800	Unlimited*
\$74.99	1750	Unlimited*
\$99.99	2500	Unlimited*

INCLUDED FEATURES

- No Roaming Fees
- No Long Distance Fees
- Call Waiting, Call Forwarding, No-Answer Transfer, 3-way Calling
- Caller ID and Voice Mail (added per customer request)
- An average rate of \$0.40 per minute applies

**Rates of \$59.99 and higher include night and weekend minutes starting at 8pm! Family Talk \$15.00 per month per additional phone. All nationwide plans include free mobile to mobile calling.*



Appalachian

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From Nationwide To Local We Have You Covered.

ADD ADDITIONAL PHONES TO ANY PLAN FOR JUST \$15.00 PER MONTH PER ADDITIONAL PHONE, UP TO FIVE PHONES.

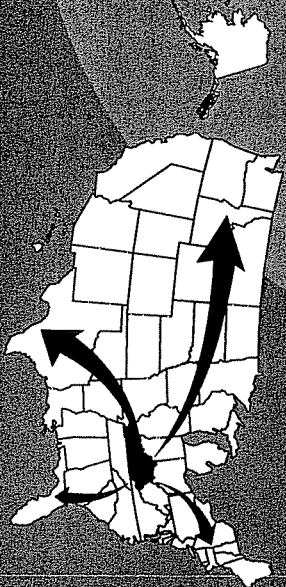
LOCAL 500 MINUTES PLANS

- Ideal for travelling throughout our 20-county service area
- Low per-minute rates for calls made in home area
- **Starting at Only \$24.99**

See your Appalachian Wireless store for details or call us today at 1-800-438-2355. Certain restrictions and service limitations apply. Appalachian Wireless reserves the right to require 50% of usage to be within the home area.

ALL KENTUCKY

Unlimited Minutes Plan®



Unlimited Calling from all of Kentucky to anywhere in the United States.

One Low Monthly Rate

\$89.99

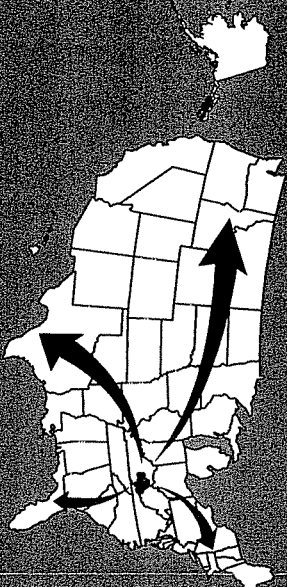
All Kentucky Plan
With this Unlimited Local plan you can call across the U.S. from Kentucky without long distance charges or overage fees.

Coverage Type	Local
Rate per Month	\$89.99
Anytime Minutes	Unlimited Minutes
Nights & Weekends	Unlimited Minutes
Roaming	No Fees on calls from AND to locations within Kentucky. Roaming fees apply for all other calls
Long Distance	Calls to destinations in the United States that are placed in within Kentucky are free of toll charges

See Unlimited Minute Plans Terms & Conditions on the back of this brochure

ALL THE COUNTIES

Including Long Distance Unlimited Minutes Plan



Unlimited Calling from our Home Area to anywhere in the United States.

One Low Monthly Rate

\$69.99

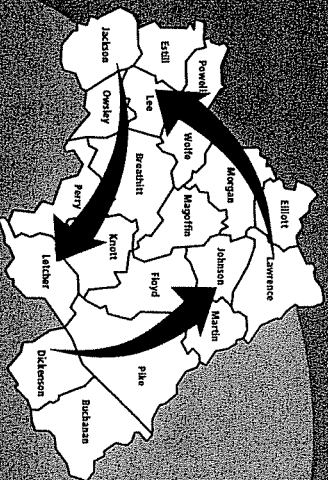
All the Counties Including Long Distance Plan
With this Unlimited Local plan you can call across the U.S. from our Home Area without long distance charges or overage fees.

Coverage Type	Local
Rate per Month	\$69.99
Anytime Minutes	Unlimited Minutes
Nights & Weekends	Unlimited Minutes
Roaming	No Fees on calls from AND to locations within the home area. Roaming fees apply for all other calls
Long Distance	Calls to destinations in the United States that are placed in within the home area are free of toll charges

See Unlimited Minute Plans Terms & Conditions on the back of this brochure

ALL THE COUNTIES

Unlimited Minutes Plan



Unlimited Calling from anywhere in the Home Area to anywhere in the Home Area.

One Low Monthly Rate

\$49.99

All the Counties Plan
This Unlimited Local plan is like an area calling plan on a home phone but with the added bonus of wireless mobility.

Coverage Type	Local
Rate per Month	\$49.99
Anytime Minutes	Unlimited Minutes
Nights & Weekends	Unlimited Minutes
Roaming	No Fees on calls from AND to locations within the home area. Roaming fees apply for all other calls
Long Distance	No charges on calls from AND to locations within the home area. Long Distance charges apply for all other calls

See Unlimited Minute Plans Terms & Conditions on the back of this brochure

EXHIBIT F

Sample Advertisement

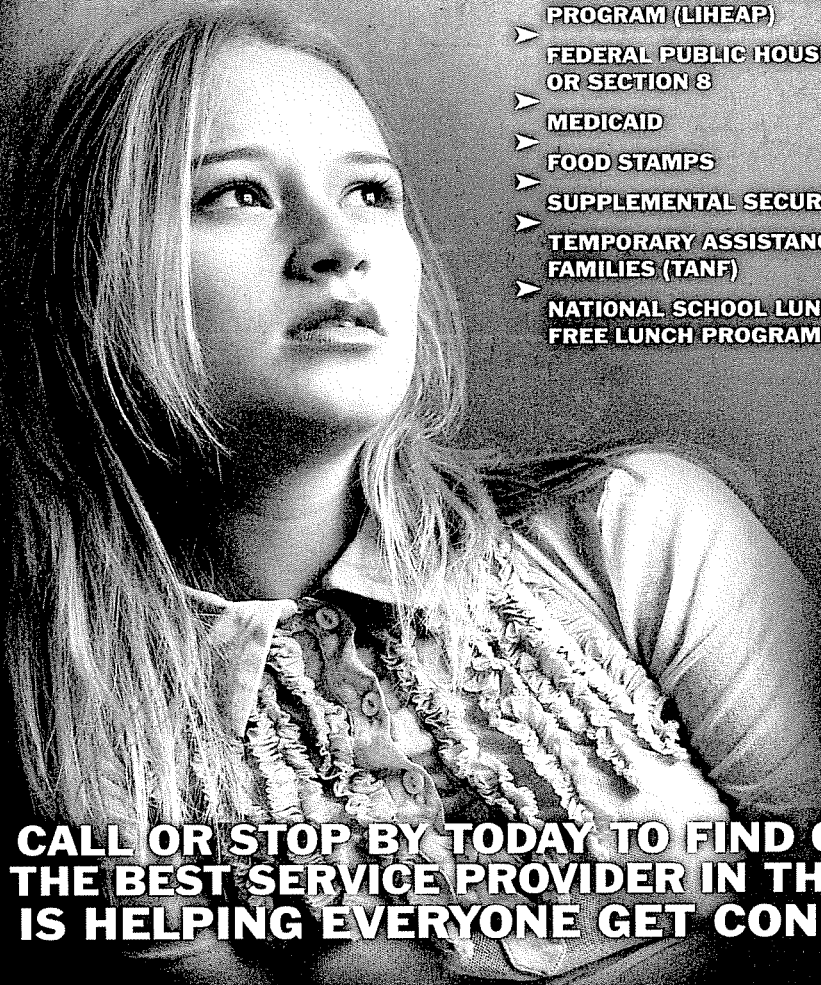
NOTHING SHOULD SEPARATE YOU FROM

YOUR FRIENDS, YOUR FAMILY, OR YOUR LOVED ONES

LEAST OF ALL THE COST OF AFFORDABLE COMMUNICATION.

APPALACHIAN WIRELESS IS COMMITTED TO PROVIDING DEPENDABLE, AFFORDABLE CELLULAR SERVICE TO ALL OF OUR AREA RESIDENTS* YOU MAY EVEN QUALIFY FOR ADDITIONAL DISCOUNTS THROUGH FEDERAL LIFELINE AND LINK UP SERVICES** IF YOU PARTICIPATE IN ONE OF THE FOLLOWING SERVICES:

- LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)
- FEDERAL PUBLIC HOUSING ASSISTANCE OR SECTION 8
- MEDICAID
- FOOD STAMPS
- SUPPLEMENTAL SECURITY INCOME (SSI)
- TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)
- NATIONAL SCHOOL LUNCH PROGRAM'S FREE LUNCH PROGRAM



CALL OR STOP BY TODAY TO FIND OUT HOW THE BEST SERVICE PROVIDER IN THE REGION IS HELPING EVERYONE GET CONNECTED.

* INCLUDING RESIDENTS OF RESERVATIONS AND TRIBAL LANDS.
** SEE WWW.LIFELINESUPPORT.ORG FOR MORE INFORMATION.
ELIGIBLE ONLY TO THOSE WHO DO NOT CURRENTLY HAVE WIRELESS SERVICE.

1-800-438-2355

www.appalachianwireless.com

Appalachian
WIRELESS

YOU ALWAYS GET MORE WITH APPALACHIAN WIRELESS