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August 30, 2010

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PUBLIC SERVICE  
COMMISSION

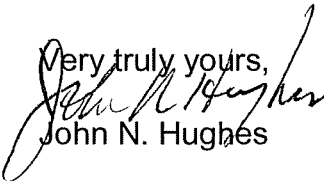
Jeff Derouen  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

Re: Administrative Case 381

Dear Mr. Derouen

Attached is NPCR, Inc.'s annual certification filing in Administrative Case 381, pursuant to the Order of September 25, 2001 and in response to the Order in Case 200300143, which designated NPCR, Inc. as the ETC in certain rural areas of the state. The information provided will support the Commission's annual certification to the Federal Communications Commission and the Universal Service Administrative Company that NPCR, Inc. is eligible to receive high cost support in accordance with 41 U.S.C. 254(e).

The exhibits attached to the filing are submitted with a Petition for Confidentiality. If there are any questions about this matter, please contact me

Very truly yours,  
  
John N. Hughes

Attorney for NPCR, Inc.

Attachments

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

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

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

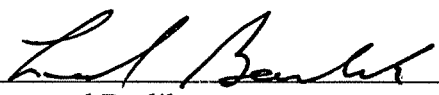
The state certification of eligible telecommunications carriers ("ETCs") to receive federal high-cost universal service support is an annual process. In order to receive federal support beginning January 1 of each year, the Kentucky Public Service Commission must file its annual certification with the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

NPCR, Inc. would be happy to meet with staff to discuss any questions they may have regarding the information provided.

Respectfully submitted,

Dated: August 13, 2010

NPCR, INC.

  
\_\_\_\_\_  
Leonard Barlik  
Vice President Wireless and Wireline Services



submits the following information and respectfully requests that the Commission certify the Company's use of federal high-cost universal service support to the FCC and USAC for calendar year 2011. The Company's eligibility to receive certain high-cost universal service support for the 2011 calendar year is dependent upon the Commission certifying NPCR, Inc.'s eligibility to the FCC and USAC on or before October 1, 2008. *See* 47 C.F.R. §§ 54.313(d)(3)(i) and 54.314(d)(1). NPCR, Inc. requests that the Commission transmit a letter to the FCC and USAC to provide for the certification.

5. Based on the Company's historical universal service support disbursements, the Company currently estimates that it will receive approximately \$1,263,781 in federal high-cost universal service support for the provision of service within its designated Kentucky service areas during calendar year 2011. The actual amount of federal high-cost universal service support received by the Company may vary from this estimate as universal service funding and subscribership levels change over time.

6. The federal high-cost universal service support the Company receives during 2011 will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended pursuant to Section 254(e) of the Federal Telecommunications Act (the "Act"), 47 U.S.C. § 254(e).

7. NPCR, Inc. will utilize the support it receives in calendar year 2011 to provide the following services or functionalities supported by the federal high-cost universal support mechanisms: single-party voice grade access to the public switched network, local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 911 service or Enhanced 911 service, access to operator service, access to

interexchange service, access to directory assistance and toll limitation for qualifying low income customers.

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

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

10. **Confidential Attachment A** provides a description of the Company's proposed uses of support in 2010 & 2011 and the location and cost associated with each site. **Confidential Attachment B** depicts NPCR's Designated Service Area, signal propagation and the location of facilities described in Confidential Attachment A. The Company's proposed use of support may be modified depending upon the amount of federal high-cost universal service support it receives and the timing of the receipt of such support.

11. Pursuant to the terms of the Commission's *ETC Designation Order* and included with this Certification is documentation detailing NPCR, Inc.'s substantial progress towards meeting its service improvement goals. NPCR, Inc.'s capital expenditures have greatly exceeded the amount of high-cost universal service support it has received since ETC designation.

12. From July 1, 2009, through June 30, 2010, NPCR, Inc. received a total of .54 complaints per 1,000 handsets. No requests for service from potential customers went unfulfilled during this same time period.

Date: August 13, 2010

NPCR, INC.

By *Lucretia Barlett*

Its Vice President Wireless and Wireline  
Services

Subscribed and sworn to before me  
this 13 day of August, 2010.



*Michele A. Bohnen*  
Notary Public  
My commission expires: 5-19-2012

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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

**NPCR, INC.'S PETITION FOR  
CONFIDENTIAL TREATMENT**

NPCR, Inc., by undersigned counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petitions the Kentucky Public Service Commission ("PSC") for an Order granting confidential treatment to certain exhibits to NPCR, Inc.'s Annual Certification filed pursuant to the Commission's September 25, 2001 Order in this Docket.<sup>1</sup> In support of this petition, NPCR, Inc. states as follows:

1. NPCR, Inc. is requesting confidential treatment for its filing of the following documents: (1) a spreadsheet describing the Company's proposed service improvement projects and the estimated locations and costs associated with such improvements (Confidential Attachment A); (2) a map depicting the estimated location of cell sites proposed to be constructed by NPCR, Inc. and the expansion of the Company's RF coverage within the Commonwealth of Kentucky from 2010 to 2011 (Confidential Attachment B); and (3) a summary description of the operational and maintenance costs associated with operating a single cell site in Kentucky (Confidential Attachment C).

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<sup>1</sup> By Order dated April 24, 2008, the Commission granted NPCR, Inc.'s petition to expand its ETC designation to all Sprint Nextel affiliates, specifically, Nextel West Corporation, Sprint Spectrum, L.P., and SprintCom, Inc., for those areas in which NPCR, Inc. was previously designated.



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

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

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

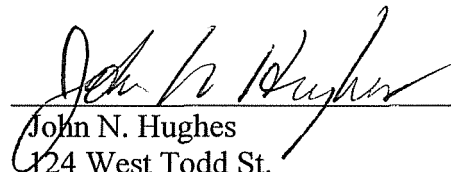
5. This information is not generally disclosed to non-management employees of NPCR, Inc., and is protected internally by the Company as proprietary information.

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

7. Additional grounds for the requested relief are stated in the attached affidavit of Karine M. Hellwig as an authorized representative of NPCR, Inc.

8. The three documents for which confidential treatment is sought (Confidential Attachments A through C), are attached to this filing in a sealed envelope for inspection, and NPCR, Inc., pursuant to the preceding discussion, requests that the documents be deemed confidential by the PSC.

WHEREFORE, NPCR, Inc. respectfully requests that the PSC enter all necessary Orders granting confidential treatment to Confidential Attachments A through C.

  
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John N. Hughes  
124 West Todd St.  
Frankfort, KY 40601  
Attorney for NPCR, Inc.

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

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

**AFFIDAVIT OF KARINE M. HELLWIG IN SUPPORT  
OF PETITION FOR CONFIDENTIAL TREATMENT**

STATE OF KANSAS )  
 ) ss.  
COUNTY OF JOHNSON )

I, Karine M. Hellwig, being first duly sworn on oath, state as follows:

1. I am the Manager of Regulatory Reporting for NPCR, Inc. In this capacity I have personal knowledge of the matters set forth in this affidavit and am authorized to make this affidavit on behalf of NPCR, Inc.

2. NPCR, Inc. is requesting confidential treatment for its proposed filing of the following documents: (1) a spreadsheet describing the Company's proposed service improvement projects and the estimated locations and costs associated with such improvements (Confidential Attachment A); (2) a map depicting the estimated location of cell sites proposed to be constructed by NPCR, Inc. and the expansion of the Company's RF coverage within the Commonwealth of Kentucky from 2010 to 2011 (Confidential Attachment B); and (3) a summary description of the operational and maintenance costs associated with operating a single cell site in Kentucky (Confidential Attachment C).

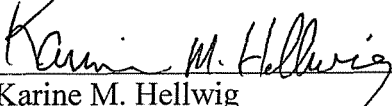
3. These exhibits contain proprietary information that would aid competitors of NPCR, Inc., and such trade secret information is subject to protection from disclosure pursuant to Kentucky law. *See KRS 61.870, et seq.*

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

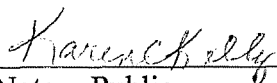
5. Unlike incumbent telephone companies who are typically subject to a high degree of regulation, wireless providers like NPCR, Inc. operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

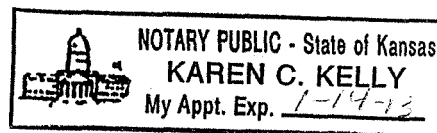
6. This information is not generally disclosed to non-management employees of NPCR, Inc. and is protected internally by the Company as proprietary information.

Respectfully submitted,

  
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Karine M. Hellwig  
Manager, Regulatory Reporting  
NPCR, Inc.

Subscribed and sworn to before me  
this 9 day of August, 2010.

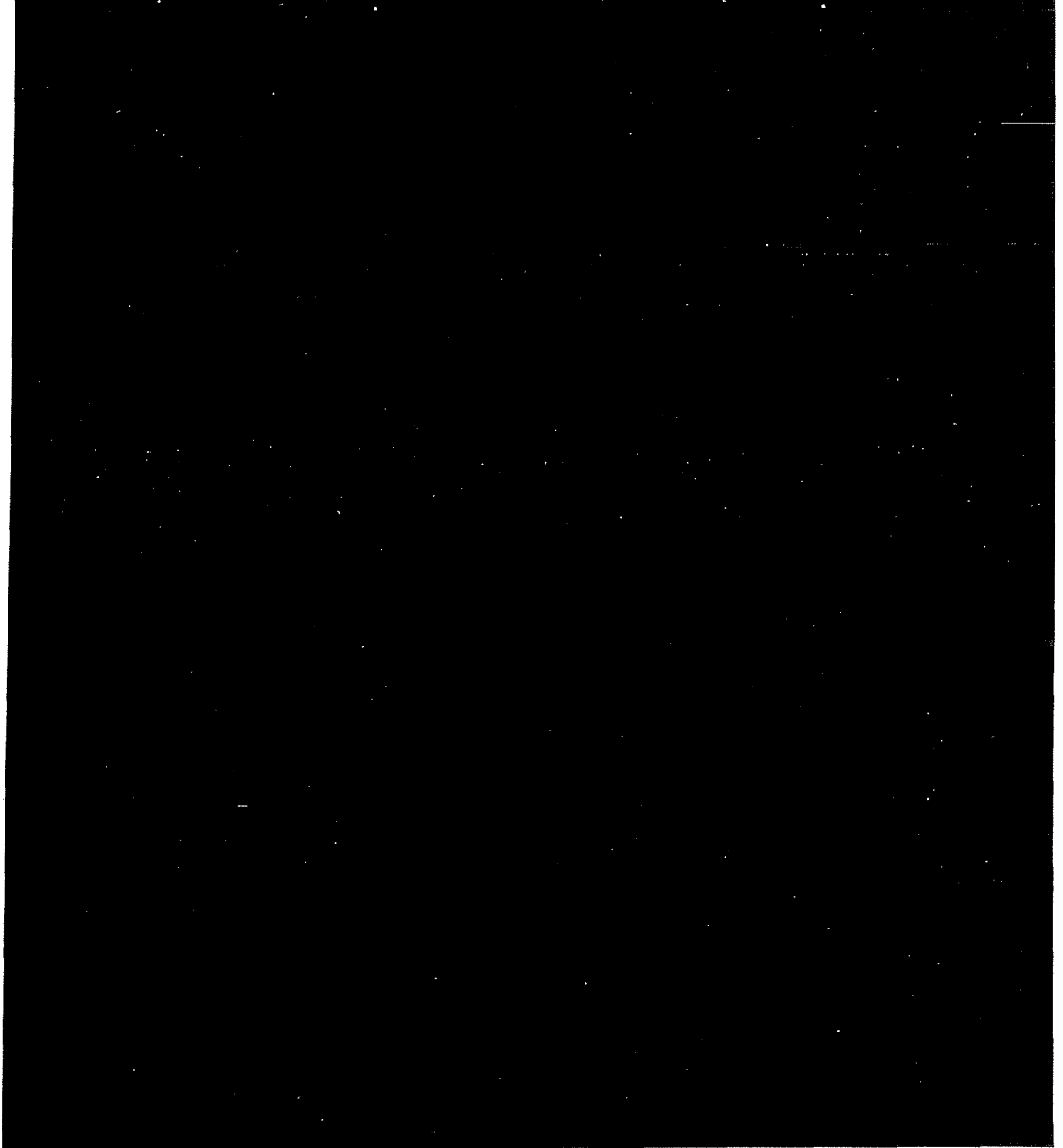
  
\_\_\_\_\_  
Notary Public



NPCR, Inc.  
Kentucky Wireless Receipts and Expenditures  
Forecast, 2011

FORECASTED RECEIPTS	\$1,263,781
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Description of Expense	Location of Expense			Population Served	Estimated Start Date	Estimated Completion Date	Estimated Budget
	City	State	Wire Center				



**Redacted**

NPCR, INC.  
CONFIDENTIAL ATTACHMENT C

Cell Site Operation Costs      Total Annual Amt



\*\*Subject to inflation and escalation