PSC REF#:87261

Public Service Commission of Wisconsin
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BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of NEIT Wireless, LLC, and Bug Tussel Wireless, LLC, for Designation as Eligible Telecommunications Carriers and Petition for Redefinition of Rural Telephone Company Service Area Requirement — 5-TI-1677

FINAL DECISION

This is the final decision in the investigation to determine whether to designate NEIT Wireless, LLC (NEIT), and Bug Tussel Wireless, LLC (Bug Tussel), as Eligible Telecommunications Carriers (ETCs), pursuant to 47 U.S.C. § 214(e)(2) and Wis. Admin. Code § PSC 160.13, in certain parts of the state of Wisconsin. Designation as an ETC makes a provider eligible to receive Universal Service Fund (USF) monies.

Introduction

NEIT and Bug Tussel jointly filed an application for ETC designation in several parts of Wisconsin on April 30, 2007. The Commission issued a Notice of Investigation on July 3, 2007. That Notice requested comments to be filed on or before July 13, 2007. The applicants filed comments, as did CenturyTel, Inc., and TDS Telecommunications Corporation.

The Commission discussed this matter at its open meeting of October 4, 2007. The applicants, CenturyTel, Inc., and TDS Telecommunications Corporation thereafter filed further comments, and the Commission addressed the applicants' joint ETC application further at its November 8, 2007, open meeting. A list of the parties interested in this proceeding may be found in Appendix A.

Bug Tussel and NEIT requested ETC designation for the study areas, wire centers and parts of wire centers shown in the application. That application, and the maps which show the requested areas, can be viewed on the Commission website.[1] A list of wire centers for which ETC status is requested is shown in Appendix B. The territories for which ETC designation is requested are served by a mix of rural and non-rural telecommunications carriers.

Findings of Fact

1. The wireless industry, its customary practices, its usual customer base, and the applicants' desire not to obtain state USF money create an unusual situation.

2. It is reasonable to adopt different ETC eligibility requirements and obligations for the applicants than those specified by Wis. Admin. Code § PSC 160.13.

3. It is reasonable to require the applicants to meet only the federal requirements for ETC status in order to be eligible for ETC designation.

4. It is reasonable to relieve the applicants from ETC obligations other than those imposed under federal law.

5. It is reasonable to require that the applicants not apply for state USF funds and, if either ever does apply for state USF dollars, it is reasonable that all state requirements for and obligations of ETC status shall be applicable to it.

6. The applicants meet the federal requirements for ETC designation.

7. It is reasonable and in the public interest to grant ETC status to the applicants in the areas indicated in their application where the request includes the entire territory of a rural telephone company.

[1] See the Public Service Commission website at: *http://psc.wi.gov* and use the Electronic Regulatory Filing (ERF) system link to find information on docket 5-TI-1677.

8. It is reasonable and in the public interest to grant ETC status to the applicants in the areas in their application where they request ETC status for entire wire centers, whether rural or non-rural.

9. In rural or non-rural areas where the applicants asked for ETC status in only a portion of a wire center, it is reasonable and in the public interest to grant ETC status to the applicants for the entire wire center, provided that the applicants serve all customers requesting service in those areas via resale or other means.

Conclusions of Law

The Commission has jurisdiction and authority under Wis. Stat. §§ 196.02 and 196.218; Wis. Admin. Code ch. PSC 160, 47 U.S.C. §§ 214 and 254; and other pertinent provisions of the Telecommunications Act of 1996, to make the above Findings of Fact and to issue this Order.

Opinion

On December 20, 2002, the Commission granted the United States Cellular Corporation (U.S. Cellular) ETC status as applied for in docket 8225-TI-102. *Application of United States Cellular Corporation for Designation as an Eligible Telecommunications Carrier in Wisconsin*, docket 8225-TI-102, 2002 WL 32081608, (Wisconsin Public Service Commission, December 20, 2002). The instant application is substantively similar to the application of U.S. Cellular. The Commission reaffirms its decision in docket 8225-TI-102 and relies on the opinion issued in the Final Decision in that docket, to approve the application from Bug Tussel and NEIT.

ETC status was created by the Federal Communications Commission (FCC), and codified in 47 U.S.C. § 214(e)(2). Under FCC rules, the state commissions are required to designate

providers as ETCs. 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b). Designation as an ETC is required if a provider is to receive federal universal service funding. ETC designation is also required to receive funding from some, but not all, state universal service programs.

In the year 2000, the Commission promulgated rules covering ETC designations and requirements in Wisconsin. Wis. Admin. Code § PSC 160.13. Those rules govern the process for ETC designation and set forth a minimum set of requirements for providers seeking ETC designation from the Commission. In more recent years, a number of wireless providers, beginning with U.S. Cellular, have requested designation as ETCs, but only for the purpose of receiving federal USF monies. The Commission granted those requests, finding that the circumstances presented created an unusual situation under Wis. Admin. Code § PSC 160.01(2)(b), which allows the Commission to apply different rules under unusual circumstances. The Commission chose, instead, to apply the federal requirements to these wireless providers, contingent on the providers not requesting any funds from the state USF.

The application filed by NEIT and Bug Tussel asks that they be designated as ETCs for federal purposes only. They state that they are not seeking designation as ETCs for state purposes and, therefore, are not required to meet the additional state requirements. Bug Tussel and NEIT request that they be treated in same manner as other wireless ETC applicants. The Commission grants the petition on the same grounds used in the U.S. Cellular and subsequent wireless ETC dockets.

The Commission finds that the applicants have met the requirements for ETC designation; they will offer supported service to all customers in their designated areas and will advertise these services. The applicants submitted certification ensuring compliance with both

the federal requirements and, although they are not required to do so, with several provisions in ETC guidelines issued by the FCC. *In the Matter of the Federal-State Board on Universal Service*, FCC 05-46 (released March 17, 2005) (ETC Guidelines Order).

The Commission finds that designating Bug Tussel and NEIT as additional ETCs is in the public interest. In its determination, the Commission is guided by the Wis. Stat. § 196.03(6) factors to consider when making a public interest determination. The Commission finds that designating Bug Tussel and NEIT as ETCs will increase competition in the designation areas and, so, will increase consumer choice. Further, designation of another ETC may spur incumbent local exchange carrier (ILEC) infrastructure deployment and encourage further efficiencies and productivity gains. Additional infrastructure deployment, additional consumer choices, the effects of competition, the provision of new technologies, a mobility option and increased local calling areas will benefit consumers and improve the quality of life for affected citizens of Wisconsin. As a result, the Commission finds that it is in the public interest to designate Bug Tussel and NEIT as ETCs, subject to the conditions enumerated in this order, in the areas for which they have requested such designation.

Partial Study Areas and Partial Wire Centers

ILEC service territories are typically composed of several exchanges or "wire centers." The FCC calls the entire territory served by a rural ILEC within a state the "study area." When the FCC first defined ETCs in 1996, it called for ETCs to be designated on a wire center basis for non-rural ILECs, and on a study area basis for rural ILECs. Some providers have applied for ETC status for some, but not all, wire centers within a rural ILEC's study area. These requests are more problematic, in that the FCC rules require the FCC and states to agree to redefine the

"study area" to, in effect, split the area and allow ETC designation for just part of the split study area. Finally, the most problematic requests are for ETC status in only a portion of a wire center. The FCC has stated that it will not approve split wire centers, whether those wire centers are rural or non-rural.

Bug Tussel and NEIT have applied for ETC status for the entire study areas of some rural providers, for only some of the full wire centers of other rural companies, and for just part of certain wire centers served by other rural companies. They have also applied for full wire centers and portions of wire centers in non-rural areas. The Commission grants ETC status to Bug Tussel and NEIT in the areas for which they are seeking designation for the entire territory of a rural telephone company, and in the areas for which they are seeking designation in entire non-rural wire centers. Designation for the other two situations, partial rural study areas and partial wire centers of any type, is more complicated.

The Commission conditionally grants ETC status where Bug Tussel and NEIT are asking for ETC designation in some, but not all, full wire centers in the territory of a rural ILEC, to the extent that such wire centers are located within the state. However, the applicants must apply to the FCC for approval of the use of a smaller area in such a designation. 47 C.F.R. § 54.207(c)(1). If the FCC approves use of the smaller area, then applicant's ETC status for the smaller area becomes effective. If the FCC does not approve use of the smaller area, then conditional ETC status for the area is void. In that case, if either of the applicants determines that it then wants to apply for ETC status in the entire territory of the rural company, it may submit a new application requesting such designation.

The more complicated situations are those where the applicants have requested ETC status in partial wire centers. The Commission has, in the past, approved ETC status in partial wire centers and the FCC has approved them. However, in its later orders, the FCC has stated that making designations for a portion of a rural telephone company's wire center is inconsistent with the public interest. FCC 04-37, par. 33 and ETC Guidelines Order, par. 76-78. In light of the FCC position, the Commission has three options. First, it could deny ETC status in the partial exchanges. Second, it could approve the request subject to FCC approval, knowing such approval is highly unlikely. Finally, it could approve the request for the entire wire center, contingent on FCC approval for areas smaller than complete rural study areas and on the applicants agreeing to offer service to customers throughout the wire center. Bug Tussel and NEIT have both stated that they would be willing to become resellers, if necessary, to make service to all customers in each wire center. Given the alternatives and the applicants' statements, the Commission adopts the third option. ETC status is granted for the entirety of the wire centers in question, contingent on NEIT and Bug Tussel obtaining FCC approval, where necessary, and serving all requesting customers, via its own service, resale or other technical means. If the FCC approves use of the smaller area, and the applicants offer service to all portions of all wire centers, then their ETC status for the smaller area becomes effective. If the FCC does not approve use of the smaller area, or the applicants do not offer service to all portions of all wire centers for which they have requested ETC status, whether through resale or other means, then conditional ETC status for those areas is void.

Cream Skimming Analysis

The Commission grants this conditional status after having considered the changing market and the reason why the limitations on ETC designation in rural areas was created. ETC status was restricted in rural areas because of concerns about "cherry picking" or "cream skimming" – the concern that a provider would serve only the lowest cost areas of a service territory or wire center, while extracting support payments based on the costs of larger areas. Nothing in these applications indicates that the applicants are requesting ETC status only in certain wire centers or portions of wire centers in an effort to obtain high-level subsidies for low-cost areas. In fact, the applicants' business plan is to provide service primarily in high-cost areas, and the service maps submitted by the applicants indicate that Bug Tussel and NEIT chose the areas for which they are requesting ETC status on the basis of the areas in which they were licensed to operate, and with the intent of serving those areas presently without cellular service. As a result, Bug Tussel and NEIT appear to be primarily serving those areas with low customer density and higher than average costs – the exact opposite of cream skimming.

Order

1. Bug Tussel and NEIT are granted ETC status in the non-rural wire centers indicated in their application.

2. Bug Tussel and NEIT are granted ETC status in the rural study areas for which they have requested such designation where the request includes the entire territory of a rural telephone company.

3. Bug Tussel and NEIT are granted ETC status in the areas for which they have requested such designation where the request does not include the entire territory of a rural

telephone company but does include full wire centers, conditioned upon the FCC approving the use of the smaller areas. Bug Tussel and NEIT shall request such FCC approval.

4. Where Bug Tussel or NEIT have requested certification in areas smaller than a wire center, the Commission grants ETC status for the entire wire center, conditioned upon the FCC approving the use of the less than complete study areas for wire centers served by rural providers and the applicants holding out to provide service to all requesting customers in the wire center, but outside its FCC wireless license area, via resale or other means. Bug Tussel and NEIT shall request the required FCC approval and obtain necessary state certification to resell services.

5. If the FCC does not approve the use of areas smaller than the entire territory of a rural telephone company when granting ETC status in those areas, then the conditional grant of ETC status in those areas is void.

6. Neither Bug Tussel nor NEIT shall apply for state USF support. If either ever does file for such support, the state eligibility requirements for, and obligations of, ETC status shall immediately apply to it.

7. If NEIT and Bug Tussel do not offer service throughout the service area, then the conditional grant of ETC status in those areas is void.

8. NEIT and Bug Tussel shall each submit a list of wire centers which it will serve, in part, via resale or other means, and shall obtain necessary resale certification.

9. Subject to FCC approval where necessary, Bug Tussel and NEIT are ETCs within the meaning of 47 U.S.C. § 214(e) and Wis. Admin. Code § PSC 160.13. This order constitutes the certification to this effect by the Commission.

Dated at Madison, Wisconsin, December 14, 2007

By the Commission:

Sandra J. Paske

Sandra J. Paske
Secretary to the Commission

PRJ:klh:DL:\documents\utilities\5\dockets\5-TI-1677 Order

See attached Notice of Appeal Rights

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in Wis. Stat. § 227.53. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in Wis. Stat. § 227.01(3), a person aggrieved by the order has the further right to file one petition for rehearing as provided in Wis. Stat. § 227.49. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 9/28/98

APPENDIX A

This docket is not a contested case as defined in Wis. Stat. § 227.01(3), but rather an investigation as defined in Wis. Admin. Code ch. PSC 2. Consequently there are no parties as defined in Wis. Stat. § 227.01(8), to be listed or certified under Wis. Stat. § 227.47. The persons listed below participated in the investigation as parties as that term is defined by Wis. Admin. Code § PSC 2.02(7) and (10) for an investigation docket.

Public Service Commission of Wisconsin
(Not a party but must be served)
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

NEIT WIRELESS, LLC
Bug Tussel WIRELESS, LLC
Niles Berman
Wheeler, Van Sickle & Anderson, S.C.
25 West Main Street
Madison, WI 53703

CENTURYTEL, INC.
TDS TELECOMMUNICATIONS CORPORATION
Bradley D. Jackson
Foley & Lardner
P.O. Box 1497
Madison, WI 53701

APPENDIX B

NEIT WIRELESS, LLC
REQUESTS FOR ETC STATUS

NON-RURAL COMPANIES

Company	Exchange	County
Verizon	Albany	Green
	Belleville	Green
	Bloom City	Richland
	Brodhead	Green
	Cobb	Iowa
	Dodgeville	Iowa
	Hollandale	Iowa, Lafayette
	Ithaca	Richland
	Lime Ridge	Richland, Sauk
	Loganville	Sauk
	Lone Rock	Iowa, Richland, Sauk
	Mineral Point	Iowa, Lafayette
	Plain	Sauk
	Reedsburg	Sauk
	Richland Ctr.	Richland
	Ridgeway	Iowa
	Sauk City	Sauk
	Spring Green	Iowa, Sauk
	Wis. Dells	Sauk
	Witwen	Sauk

RURAL COMPANIES: ETC STATUS SOUGHT IN ENTIRE STUDY AREA

Company	Exchange	County
Belmont Telephone Co.	Belmont	LaFayette
Cuba City Telephone Exchange	Cuba City	Grant
Citizens Telecommunications	Fairplay	Grant
Dickeyville Telephone (TDS)	Dickeyville	Grant
Farmers Telephone (TDA)	Beetown	Grant
	Cassville	Grant
	Lancaster	Grant
	Potosi	Grant
Grantland Telecom (TDS)	Bagley	Grant
	Bloomington	Grant
	Fennimore	Grant
	Mount Hope	Grant
	Woodman	Grant

APPENDIX B (cont.)

NEIT WIRELESS, LLC

Company	Exchange	County
Richland-Grant Tel. Coop.	Blue River	Richland
	Boaz	Richland
	Gays Mills	Crawford
	Sabin	Richland
	Soldiers Gove	Crawford
Vernon Telephone Coop.	DeSoto	Crawford
	Genoa	Vernon
	La Farge	Richland
	Liberty Pole	Vernon
	Readstown	Vernon
	Viola	Richland
	Westby	Vernon
	Yuba	Vernon

RURAL COMPANIES: ETC STATUS SOUGHT IN PORTION OF STUDY AREA

Company	Exchange	County
Black Earth Tel. Co.	Black Earth	Iowa
CenturyTel of Central Wisconsin	Argyle	Green, Lafayette
	Bangor	La Crosse
	Benton	Lafayette
	Darlington	Lafayette
	Gratiot	Lafayette
	Holmen	La Crosse
	Mindoro	La Crosse
	Montfort	Grant, Iowa
	Muscoda	Grant, Iowa, Richland
	Shullsburg	Lafayette
	Wiota	Lafayette
CenturyTel of the Midwest-Kendall	Baraboo	Sauk
	North Freedom	Sauk
CenturyTel of the Midwest –WI	Avoca	Iowa
	Boscobel	Grant
	Elroy	Vernon
	Hazel Green	Grant, Lafayette
	Highland	Iowa, Grant
	Mt. Zion	Crawford
	Platteville	Grant, Lafayette
	Steuben	Crawford
	Wonewoc	Sauk

APPENIX B (cont.)

NEIT WIRELESS, LLC

Company	Exchange	County
Telephone USA of WI (DBA CenturyTel)	Eastman	Crawford
	Prairie du Chien	Crawford
	Seneca	Crawford
	Wauzeka	Crawford

RURAL COMPANIES: ETC STATUS SOUGHT IN PORTION OF STUDY AREA
(Companies for which Commission has NOT granted approval in a prior Order)

Company	Exchange	County
CenturyTel of Monroe County	Cashton	Vernon
	Cataract	La Crosse
	Ontario	Vernon
	Sparta	La Crosse
CenturyTel of Wisconsin	West Salem	La Crosse
Coon Valley Farmers Tel. Co.	Chaseburg	Vernon
	Coon Valley	La Crosse
	Stoddard	Vernon
Hillsboro Tel. Co.	Hillsboro	Vernon
La Valle Coop.	Cazenovia	Richland
	La Valle	Sauk
UTELCO	Albany	Green
	Blanchardville	Green
	Brooklyn	Green
	Brownton	Green
	Juda	Green
	Monroe	Green
	Monticello	Green
	South Wayne	Lafayette
	Woodford	Lafayette

APPENDIX B (cont.)

BUG TUSSEL WIRELESS, LLC
REQUESTS FOR ETC STATUS

NON-RURAL COMPANIES

Company	Exchange	County
AT&T	Algoma	Kewaunee
	Hortonville	Outagamie
	Kewaunee	Kewaunee
	New London	Waupaca
	Omro	Winnebago
	Stevens Point	Portage
	Waupaca	Waupaca
	Winneconne	Winnebago
VERIZON	Adams	Adams
	Arena	Iowa
	Bailey's Harbor	Door
	Belleville	Green
	Bloom City	Richland
	Briggsville	Marquette
	Brillion	Calumet
	Brodhead	Green
	Brooklyn	Green
	Campbellsport	Fond du Lac
	Chilton	Calumet
	Cobb	Iowa
	Dodgeville	Iowa
	Eden	Fond du Lac
	Egg Harbor	Door
	Elkhart Lake	Sheboygan
	Greenbush	Sheboygan
	Hilbert	Calumet
	Hollandale	Iowa
	Ithaca	Richland
	Jacksonsport	Door
	Kiel	Manitowoc
	Lime Ridge	Richland
	Lodi	Columbia
	Lone Rock	Richland
	Lyndon Station	Juneau
	Marshfield	Wood
	Mauston	Juneau
	Mineral Point	Iowa
	Mishicot	Manitowoc
	Monroe Center	Adams

APPENDIX B (cont.)

BUG TUSSEL REQUEST

Company	Exchange	County
Verizon	Montello	Marquette
	New Holstein	Calumet
	North Apple River	Lafayette
	North Warren	Lafayette
	Orfordville	Rock
	Pardeeville	Columbia
	Portage	Columbia
	Richland Center	Richland
	Ridgeway	Iowa
	Sister Bay	Door
	St. Cloud	Sheboygan
	Washington Island	Door
	Westfield	Marquette
	Whitelaw	Manitowoc
	Wisconsin Dells	Adams

RURAL COMPANIES: ETC STATUS SOUGHT IN ENTIRE STUDY AREA

Company	Exchange	County
Amherst Tel. Co.	Amherst	Portage
	Polonia	Portage
	Rosholt	Portage
Black Earth Tel. (TDS)	Black Earth	Dane
Central State Tel. (TDS)	Auburndale	Wood
	Cranmoor	Wood
	Junction City	Portage
	Lindsey	Wood
	Mill Creek	Wood
	Necedah	Juneau
	Pittsville	Wood
	Vesper	Wood
CenturyTel - Fairwater-Brandon	Brandon	Fond du Lac
CenturyTel –Forestville	Brussels	Door
	Forestville	Door
	Sturgeon Bay	Door
CenturyTel – Larson-Readfield	Larsen	Winnebago
	Readfield	Waupaca

APPENDIX B (cont.)

BUG TUSSEL REQUEST

Company	Exchange	County
CenturyTel – Monroe County	Cashton	Monroe
	Cataract	Monroe
	Norwalk	Monroe
	Ontario	Monroe
	Sparta	Monroe
	Wilton	Monroe
Cochrane Coop. Tel. Co.	Cochrane	Buffalo
	Waumandee	Buffalo
Hillsboro Tel. Co.	Cazenovia	Richland
	Hillsboro	Vernon
La Valle Tel. Coop.	Camp Douglas	Juneau
	New Lisbon	Juneau
Manawa Tel. Co.	Manawa	Waupaca
	Ogdensburg	Waupaca
Marquette-Adams Tel. Coop.	Brooks	Adams
	Endeavor	Marquette
	Oxford	Adams
	Packwaukee	Marquette
Mount Horeb Tel. Co.	Mount Horeb	Dane
Nelson Tel. Coop.	Durand	Buffalo
	Gilmanton	Buffalo
	Nelson	Buffalo
Scandinavia Tel. (TDS)	Iola	Waupaca
	Scandinavia	Waupaca
Tenney Tel. (TDS)	Alma	Green
Tri-County Tel. Coop.	Eleva	Trempealeau
	Independence	Trempealeau
	Northfield	Jackson
	Pigeon Falls	Trempealeau
	Pleasantville	Trempealeau
	Strum	Trempealeau
Union Tel. Co.	Almond	Portage
	Coloma	Waushara
	Hancock	Waushara
	Plainfield	Portage
UTELCO (TDS)	Albany	Green
	Blanchardville	Lafayette
	Browntown	Green
	Juda	Green
	Monroe	Green

APPENDIX B (cont.)

BUG TUSSEL REQUEST

Company	Exchange	County
UTELCO (TDS)	Monticello	Green
	South Wayne	Lafayette
	Woodford	Lafayette
Vernon Tel. Coop.	DeSoto	Vernon
	Genoa	Vernon
	La Farge	Vernon
	Liberty Pole	Vernon
	Readstown	Vernon
	Viola	Richland
	Westby	Vernon
	Yuba	Vernon
Wood County Tel. Co.	Nekoosa	Wood
	Port Edwards	Wood
	Rudolph	Wood
	Wisconsin Rapids	Wood

RURAL COMPANIES: ETC STATUS SOUGHT IN PART OF STUDY AREA

Company	Exchange	County
CenturyTel-Central WI	Alma Center	Jackson
	Arcadia	Trempealeau
	Argyle	Lafayette
	Bangor	La Crosse
	Benton	Lafayette
	Black Creek	Outagamie
	Black River Falls	Jackson
	Blair	Trempealeau
	Centerville	Trempealeau
	Darlington	Lafayette
	Denmark	Brown
	Ettrick	Trempealeau
	Fairchild	Jackson
	Fountain City	Buffalo
	Galesville	Trempealeau
	Gratiot	Lafayette
	Hixton	Jackson
	Holmen	LaCrosse
	Kingston	Green Lake
	Luxemburg	Kewaunee
	Markesan	Green Lake

APPENDIX B (cont.)

BUG TUSSEL REQUEST

Company	Exchange	County
CenturyTel-Central WI	Melrose	Jackson
	Merrillan	Jackson
	Mindoro	LaCrosse
	New Franken	Brown
	Nichols	Outagamie
	Osseo	Trempealeau
	Pickett	Winnebago
	Rosendale	Fond du Lac
	Seymour	Outagamie
	Shiocton	Outagamie
	Shullsburg	La Fayette
	Taylor	Jackson
	Trempealeau	Trempealeau
	Wautoma	Waushara
	Whitehall	Trempealeau
	Wiota	Lafayette
CenturyTel-M.W. Kendall	Berlin	Waushara
	Green Lake	Green Lake
	Kendall	Monroe
	Mazomanie	Dane
	Princeton	Green Lake
	Red Granite	Waushara
CenturyTel-M.W.-WI	Avoca	Iowa
	Casco	Kewaunee
	Elroy	Juneau
	Footville	Rock
	Fremont	Winnebago
	Highland	Iowa
	Poy Sippi	Waushara
	Ripon	Fond du Lac
	Tomah	Monroe
	Warrens	Monroe
	Wayside	Brown
	Weyauwega	Waupaca
	Wild Rose	Waushara
	Wonewoc	Juneau
CenturyTel of So. WI	Cambria	Columbia
	Fall River	Columbia
	Randolph	Columbia
	Rio	Columbia

APPENDIX B (cont.)

BUG TUSSEL REQUEST

Company	Exchange	County
CenturyTel of WI LLC	West Salem	LaCrosse
Eastcoast Telecom (TDS)	Cleveland	Manitowoc
	Collins	Manitowoc
	Saint Nazianz	Manitowoc
	Valders	Manitowoc
Mount Vernon Tel. (TDS)	Mount Vernon	Dane
	New Glarus	Green
Richland-Grant Tel. Coop.	Blue River	Richland
	Boaz	Richland
	Sabin	Richland
Stockbridge & Sherwood Tel. (TDS)	Sherwood	Calumet
	Stockbridge	Calumet
	Tisch Mills	Kewaunee