

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of USCOC of)
Greater Missouri, LLC for Designation as an)
Eligible Telecommunications Carrier) Case No. TO-2005-0384
Pursuant To The Telecommunications Act Of)
1996)

**U.S. CELLULAR'S RESPONSES TO THE FIRST SET OF DATA REQUESTS
FROM MISSOURI PUBLIC SERVICE COMMISSION STAFF**

USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular (which is also referred to below as "USCC" for U.S. Cellular Corporation), hereby submits its Responses to the First Set of Data Requests from Missouri Public Service Commission Staff.

DATA REQUESTS

DR-0001.

- (1) Has U.S. Cellular received any requests to provide E-911 service? If so, from which entity? What sort of request (i.e., Phase I, Phase II)?

Response:

In response to this Request, USCC will provide its most recent quarterly E-911 Implementation Report to the FCC ("E-911 Report"). Appendix A to the E-911 Report contains a list of all PSAP entities that have made requests for Phase I or Phase II E-911 service from USCC in Missouri and other states in which it operates.

- (2) Is U.S. Cellular currently able to provide Phase I E-911 service throughout all of its sites on the state of Missouri? If not, please describe where in Missouri U.S. Cellular cannot provide Phase I E-911 service.

Response:

As is shown in the attached E-911 Report, USCC has successfully deployed Phase I and Phase II E-911 in all areas of Missouri in which it has been requested. The only exceptions are requests for Phase I and Phase II E-911 in Crawford and Osage Counties. USCC anticipates timely deployment in those areas in accordance with the time frames set forth in applicable FCC rules.

- (3) Is U.S. Cellular currently able to provide Phase II E-911 service throughout all of its sites in the state of Missouri? If not, please describe where in Missouri U.S. Cellular cannot provide Phase II E-911 service.

Response:

See Response to (2) above.

- (4) Does U.S. Cellular currently offer service throughout its proposed ETC area? How does U.S. Cellular determine if a customer is able to receive U.S. Cellular service?

Response:

U.S. Cellular currently offers service throughout its proposed ETC service area, but can only provide service to consumers who use their phones within the areas where USCC actually provides service. USCC utilizes a sophisticated database that relates geographic areas (based on zip code or city state) to product and service availability. This system is available to all sales and customer service associates. This enables consumers to decide whether USCC's service availability matches the areas within which they wish to use their telephone.

- (5) If U.S. Cellular does not receive ETC status in the state of Missouri, what will happen to its rates for service?

Response:

U.S. Cellular does not understand what Staff means by “what will happen to its rates for service.” However, USCC can state that it anticipates it will continue to develop new rate plans and frequently offer promotional plans to consumers in Missouri. U.S. Cellular believes that over time its rates will continue to decline, as have wireless rates across the country.

If the question is designed to raise a concern that USCC’s rates will rise if it does not receive ETC status, that is not so because U.S. Cellular will have no obligation to extend its service to potential customers upon reasonable request and thus will not incur expenditures related to such extensions. On the other hand, if USCC were to receive ETC status, it will have an obligation to extend its service to all requesting customers upon reasonable request, and will receive high-cost support to finance that obligation.

- (6) Does U.S. Cellular currently compete with the incumbent local exchange carriers (ILEC) in U.S. Cellular’s proposed ETC area? If so, please explain how, and for what ILEC services U.S. Cellular competes.

Response:

Today USCC competes with ILEC service only to a limited extent. Without access to similar subsidies as those available to ILECs, U.S. Cellular has been unable to achieve reliable network coverage in sufficient areas to be a viable competitor for primary telecommunications service. With access to high-cost support, USCC will be able to offer its service to a greater number of consumers over a broader geographic area, and with a more consistent level of service. With better and wider signal coverage, more consumers may find the large local calling areas and array of vertical features to be more advantageous than wireline service, and therefore choose USCC’s wireless service as their primary telephone.

- (7) Page 12 of US Cellular’s Application for ETC status states:

Recognizing the advantages wireless carriers can bring to the universal service program, the FCC has found 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.”

Please state whether or not consumers in U.S. Cellular’s proposed ETC area currently have access to a choice of telecommunications services, innovative services, and new technologies.

Response:

U.S. Cellular believes that consumers in rural Missouri do not have access to a similar array of services at prices comparable to those available in urban areas, which is a principal goal of universal service as set forth in 47 U.S.C. Section 254(b)(3). Consumers in the state's rural areas generally are limited to ILEC service with restrictive local calling areas reaching just a few hundred or a few thousand customers in one exchange or a handful of exchanges. As NECA stated in its 2002 report titled "Trends in Telecommunications Cost Recovery: The Impact on Rural America," rural consumers generally pay significantly higher monthly rates for local service in rural areas of the country than in urban areas. NECA also reported that rural consumers are also much less likely to subscribe to discount long-distance calling plans than are their urban counterparts. Relevant excerpts from this report will be provided. Additionally, high-speed data services at prices comparable to urban areas are sorely lacking in rural areas. High-cost support will help alleviate these concerns in Missouri by enabling more consumers to benefit from USCC's service, with its larger local calling areas, its wide array of usage packages, and the possibility of layering high-speed data service features over the expanded and upgraded infrastructure. Finally, consumers who live in areas with poor wireless signal coverage are denied the benefits of competition because their regulated monopoly carrier has no incentive to improve service or cut prices.

- (8) If known, how many U.S. Cellular customers would be eligible for Lifeline service?

Response:

U.S. Cellular does not know the answer to this question. It cannot determine if a customer is eligible unless that customer presents USCC with proof of Lifeline eligibility. Since USCC is not yet an ETC in Missouri, it has not requested such information from its customers or solicited Lifeline subscribers.

- (9) Has U.S. Cellular had to tell a customer that if that customer ported their telephone number to MMC they currently would lose their Lifeline discount? If yes, how many?

Response:

Ports are initiated by the "new" carrier and processed automatically. As such, if a customer decides to port from U.S. Cellular (old carrier) to MMC (new carrier), USCC would have no knowledge of it until the customer was gone. It would be the responsibility of the new carrier to inform the customer whether or not the customer has a substitute Lifeline offering.

- (10) Who is U.S. Cellular's primary competitor in U.S. Cellular's proposed ETC area?

Response:

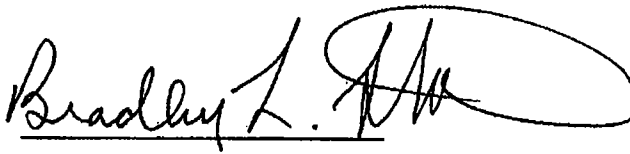
In northern Missouri, U.S. Cellular considers its primary wireless competitor to be Cingular. In southern Missouri, it is ALLTEL.

- (11) Please estimate how many customers live in U.S. Cellular's proposed ETC area that cannot receive U.S. Cellular's service in their homes. Please provide any and all supporting documentation to this answer.

Response:

U.S. Cellular does not have the requested information.

DR-0001

Signature: Bradley L. Stein 

Name: Bradley L. Stein

Position: Director-External Affairs