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ORIGINAL

February 6, 2012

**Via Overnight Delivery**

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pennsylvania 17102

RECEIVED

FEB - 6 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RE: Petition of Keystone Wireless to be Designated as an Eligible Telecommunications Carrier  
REQUEST FOR CONFIDENTIAL TREATMENT**

Dear Secretary Chiavetta,

Enclosed for filing, on behalf of Keystone Wireless, LLC d/b/a Immix Wireless (“Keystone”), are an original and three copies of a petition seeking designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania. The application and its accompanying exhibits contain confidential proprietary information and are marked “Confidential and Proprietary.” **Keystone respectfully requests that the Pennsylvania Public Utility Commission treat the application and its exhibits as confidential and proprietary, and that they be withheld from public inspection.** Also enclosed herewith are an original and three copies of a redacted version of the application (marked “For Public Inspection”) which may be made available for public inspection.

Keystone’s application contains detailed information concerning Keystone’s strategic plan for expanding its network, including cost estimates for construction of new towers, maps depicting placement of those towers and a detailed buildout schedule. This information constitutes “confidential proprietary information” under Section 101 of Pennsylvania’s Right to Know Law, and is therefore exempt from public access pursuant to Section 708(b)(11) of that statute. The information is privileged and confidential and treated as such by Keystone. Access to such information even by Keystone employees is limited to a “need-to-know” basis. The information submitted, if disclosed, will cause substantial competitive harm to Keystone and will give Keystone’s competitors an unfair competitive advantage in that Keystone does not have reciprocal commercial or financial information of its competitors.

Additionally, please find a check in the amount of \$350 in payment of the required filing fee, along with an extra copy of this cover letter to be date stamped and returned in the enclosed, self-addressed, postage-paid envelope. Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,

**Keystone Wireless, LLC**  
**d/b/a Immix Wireless**

By:



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*Counsel for Keystone Wireless, LLC*  
*d/b/a Immix Wireless*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of	)	
	)	
Keystone Wireless, LLC d/b/a Immix Wireless	)	
Petition for Designation as an	)	Docket No. _____
Eligible Telecommunications Carrier	)	
In the Commonwealth of Pennsylvania	)	

**PETITION OF KEYSTONE WIRELESS, LLC d/b/a IMMIX WIRELESS TO BE  
DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

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Dated: February 6, 2012

**RECEIVED**  
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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of	)	
	)	
Keystone Wireless, LLC d/b/a Immix Wireless	)	
Petition for Designation as an	)	Docket No. _____
Eligible Telecommunications Carrier	)	
In the Commonwealth of Pennsylvania	)	

**PETITION OF KEYSTONE WIRELESS, LLC d/b/a IMMIX WIRELESS TO BE DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

1. Keystone Wireless, LLC d/b/a Immix Wireless (“Keystone”), pursuant to Sections 214(e) and 254 of the Communications Act of 1934, *as amended* (“the Act”),<sup>1</sup> and 52 Pa. Code § 69.2501, and by its attorneys, hereby respectfully requests that the Pennsylvania Public Utility Commission (“PA PUC”) designate Keystone as an Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Pennsylvania.

2. Keystone seeks ETC status for the entire study areas of the following rural telephone companies:<sup>2</sup> Buffalo Valley Telephone Company, Frontier Communications of Lakewood, LLC, Pennsylvania Telephone Company, and Sugar Valley Telephone Company. Keystone seeks ETC status in the partial study areas of the following four rural telephone companies: Commonwealth Telephone Company, Conestoga Telephone & Telegraph Company, Mahanoy & Mahantongo Telephone Company, United Telephone Company of Pennsylvania, and Windstream Pennsylvania, Inc. Additionally, Keystone seeks ETC designation in the partial

<sup>1</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996). The 1996 Act amended the Communications Act of 1934. 47 U.S.C. § 151, et seq. (“the Act”); *see also* 47 U.S.C. §§ 214(e) & 254.

<sup>2</sup> 47 U.S.C. § 153(37).

study areas of Verizon North Inc. of Pennsylvania and Verizon Pennsylvania, Inc., both non-rural telephone companies.

3. As demonstrated below, Keystone meets the requirements of the Act, Federal Communications Commission (“FCC”) rules, including those adopted in the recent Connect America Fund (“CAF”) Order,<sup>3</sup> and regulatory requirements adopted by the Commonwealth of Pennsylvania.<sup>4</sup> Because designation of Keystone as an ETC in the Commonwealth of Pennsylvania meets these requirements and will serve the public interest, the PA PUC should grant Keystone ETC status in the requested areas.

#### I. Background.

4. Keystone is a commercial mobile radio service (“CMRS”) licensee providing service using broadband Personal Communications Service (“PCS) spectrum in ten counties in central Pennsylvania.<sup>5</sup> Specifically, Keystone holds broadband PCS licenses covering the following counties: Berks, Centre, Clinton, Lycoming, Montour, Northumberland, Schuylkill,

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<sup>3</sup> *In re Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (November 18, 2011) (*USF/ICC Transformation Order*).

<sup>4</sup> The PA PUC has determined that Petitions for designation as an ETC in the Commonwealth of Pennsylvania will be evaluated under Section 214(e) of the Act, the FCC’s discussion of ETC designations in its May 8, 1997 *Universal Service Report and Order* (*Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, 12 FCC Rcd 8776 (1997) (*First Universal Service Report and Order*)), the standards articulated in the FCC’s 2005 *ETC Order* (*Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (March 17, 2005) (*2005 ETC Order*)), and the FCC’s rules governing ETC designations in 47 C.F.R. §§ 54.101, 54.201-54.203, and 54.205-54.209. See 52 Pa. Code § 69.2501.

<sup>5</sup> Keystone is a “common carrier” for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). Section 20.9(a)(7) of the Commission’s Rules provides that cellular service is a common carrier service. 47 C.F.R. § 20.9(a)(7).

Snyder, Sullivan, and Union.<sup>6</sup> Keystone is a Delaware limited liability company, authorized to conduct business in the Commonwealth of Pennsylvania, with principal offices at 27599 Riverview Center Blvd., Suite 201, Bonita Springs, FL 34134.<sup>7</sup>

5. Keystone intends to obtain Federal high-cost support in order to speed the delivery of advanced wireless services to Pennsylvania’s citizens. In particular, high-cost support will allow Keystone to bring better and more robust service to the rural population located within its licensed service area. Keystone will use high-cost support to improve wireless coverage in [REDACTED] which stands to have a beneficial economic impact on Pennsylvania. Additionally, high-cost support will be used to sustain operation of new network infrastructure that will be deployed using broadband stimulus funding.

**II. Keystone Satisfies All Statutory and Regulatory Prerequisites for Designation as an ETC in the Commonwealth of Pennsylvania.**

6. Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific Federal universal service support.”<sup>8</sup> Pursuant to Section 214(e)(2), State commissions have the primary role in designating common carriers as eligible telecommunications carriers.<sup>9</sup> The PA PUC has affirmatively exercised jurisdiction to determine whether or not a wireless carrier qualifies as an

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<sup>6</sup> A list of Keystone’s FCC licenses is attached as Exhibit A. A map of Keystone’s service area is attached as Exhibit B.

<sup>7</sup> Keystone’s point of contact is Keystone President Robert C. Martin. Exhibit C contains his full contact information. A copy of Keystone’s Certificate of Formation is attached as Exhibit D.

<sup>8</sup> 47 U.S.C. § 254(e).

<sup>9</sup> 47 U.S.C. § 214(e)(2).

ETC in the Commonwealth of Pennsylvania,<sup>10</sup> and has adopted the FCC’s standards on ETC designation.<sup>11</sup> The PA PUC requires that petitioners seeking ETC designation in the Commonwealth of Pennsylvania specifically explain how applicable ETC criteria enumerated by the FCC are satisfied, or set forth specific statements regarding which criteria are inapplicable.<sup>12</sup> As shown below, Keystone satisfies the requirements for ETC designation set out in the Act<sup>13</sup> and the FCC’s Orders<sup>14</sup> and rules.<sup>15</sup>

**A. Keystone Offers All of the Services Supported by the Federal High-Cost Universal Service Program.**

7. In order to be designated as an ETC, a carrier must be a common carrier and must offer and advertise the supported services throughout the designated service area.<sup>16</sup> Section 254(c) of the Act and Section 54.101 of the FCC’s Rules establish “core” designated services

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<sup>10</sup> *Commission Exercise of Jurisdiction to Designate Wireless Carriers As An Eligible Telecommunications Carrier (ETC) Pursuant to 47 U.S.C. §214(e)(2) of the Telecommunications Act of 1996 (TA-96)*, Docket No. M-00960799 (M-2009-2091317), Secretarial Letter (Feb. 26, 2009).

<sup>11</sup> *Final Policy Statement on Commonwealth of Pennsylvania’s Guidelines for Designation and Annual Recertification as an Eligible Telecommunications Carrier (ETC) for purposes of Federal Universal Service Support*, Docket No. M-2010-2164741, Final Policy Statement Order, 3 (2010).

<sup>12</sup> 52 Pa. Code § 69.2501(c).

<sup>13</sup> 47 U.S.C. § 214(e); 47 U.S.C. § 254.

<sup>14</sup> *See USF/ICC Transformation Order; First Universal Service Report and Order; 2005 ETC Order*.

<sup>15</sup> *See* 47 C.F.R. §§ 54.101; 54.201-54.203; 54.205-54.209.

<sup>16</sup> 47 U.S.C. § 214(e)(1).

that are supported by Federal universal service support mechanisms.<sup>17</sup> Prior to December 29, 2011, these core services included:

- 1) voice grade access to the public switched network;
- 2) an amount of local usage free of (additional) charge;
- 3) Dual Tone Multi-Frequency signaling or its functional equivalent;
- 4) single party service;
- 5) access to emergency services;
- 6) access to operator services;
- 7) access to interexchange service;
- 8) access to directory assistance; and
- 9) toll limitation services for qualifying low-income consumers on at least one calling plan.

8. The FCC's recent *USF Order* amended the FCC's definition of supported services.<sup>18</sup> FCC rules now describe the core functionalities of the supported services as "voice telephony service." The functionalities of eligible voice telephony services include: (1) voice grade access to the public switched network or its functional equivalent; (2) minutes of use for local service provided at no additional charge to end users; (3) toll limitation to qualifying low-income consumers; and (4) access to the emergency services 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems. While the FCC does not expect a new description of supported services to result in a lower standard of voice service for consumers, Keystone notes that when the

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<sup>17</sup>See 47 U.S.C. § 254(c); 47 C.F.R. §54.101.

<sup>18</sup> *USF/ICC Transformation Order* at ¶¶77-78; see also *Connect America Fund et al.*, 76 Fed. Reg. 73,830, 73,870 (Nov. 29, 2011). The amended rule went into effect on December 29, 2011.

amended FCC rules went into effect, a few of the current core functionalities were eliminated.<sup>19</sup> Nevertheless, as shown below and in the attached Declaration,<sup>20</sup> Keystone offers all of the “core” services required by the new rule, as well as those previously required.

1) Voice-grade Access to the Public Switched Telephone Network.

9. The FCC has concluded that voice-grade access means the ability to make and receive phone calls, with a minimum bandwidth of 300 to 3000 hertz.<sup>21</sup> Keystone meets this requirement by providing voice-grade access to the public switched telephone network and through interconnection agreements with Verizon and Windstream.

2) Local Usage.

10. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. Local usage is defined as an amount of minutes of use of exchange service, as prescribed by the FCC, provided without an additional charge to end users. The FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has provided further guidance in its ETC Order on how to comply with the FCC’s local usage requirement. The FCC requires an ETC applicant to demonstrate that it offers a local usage plan comparable to the one offered by the incumbent local exchange carrier (“LEC”) in the service areas for which it seeks designation.<sup>22</sup> Keystone

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<sup>19</sup> Due to changes in the marketplace, the FCC has found that, on a going forward basis, the requirements to provide single-party service will be eliminated. Similarly, the FCC will not mandate that ETCs provide operator services or directory assistance. *See USF/ICC Transformation Order* at fn. 114.

<sup>20</sup> *See* Exhibit E.

<sup>21</sup> *See First Universal Service Report and Order* at 8810-11, ¶63-64.

<sup>22</sup> *See 2005 ETC Order* at ¶32; *see also* 47 C.F.R. §54.202(a)(4).

offers a variety of local usage plans.<sup>23</sup> Keystone’s local calling plans include plans that offer a bucket of minutes with the option to purchase additional minutes or other services. All of Keystone’s local usage plans are comparable to the ones offered by the incumbent LECs in the service areas for which Keystone seeks ETC designation.

3) Dual-Tone, Multi-Frequency (DTMF) Signaling, or its Functional Equivalent.

11. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement.<sup>24</sup> The FCC has also recognized that wireless carriers use out-of-band signaling mechanisms, which is an appropriate alternative to DTMF signaling. Keystone currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Keystone therefore meets the requirement to provide DTMF signaling or its functional equivalent.

4) Single-Party Service or its Functional Equivalent.

12. “Single-party service” means that only one party will be served by a subscriber loop or access line as opposed to a multi-party line.<sup>25</sup> The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. Keystone meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

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<sup>23</sup> Descriptions of Keystone’s local calling plans included in its universal service offering are attached as Exhibit F.

<sup>24</sup> 47 C.F.R. § 54.101(a)(3).

<sup>25</sup> See *First Universal Service Report and Order* at 8810, ¶62.

5) Access to Emergency Services.

13. Access to emergency services means the ability to reach a public safety answering point (“PSAP”) by dialing “911.” In order to be designated an ETC, the FCC requires that a carrier provide access to emergency services, which includes access to 911 and enhanced 911 (“E911”) services to the extent the local government in an eligible carrier’s service area has implemented 911 or E911 systems.<sup>26</sup> FCC rules define E911 as 911 service that includes the ability to provide automatic numbering information (“ANI”), which enables a PSAP to call back if a call is disconnected, and automatic location information (“ALI”), which permits emergency service providers to identify the geographic location of a calling party.<sup>27</sup> Keystone currently provides access to 911 and E911 services throughout its entire service area. Keystone commits to providing E911 service to the extent it is requested by local emergency service entities.

6) Access to Operator Services.

14. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.<sup>28</sup> Keystone meets the access to operator services requirement by providing customers with directory assistance services. Keystone also provides access to live operator services through its customer care department during normal business hours.

7) Access to Interexchange Service.

15. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Keystone currently meets this

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<sup>26</sup> 47 C.F.R. § 54.101(5).

<sup>27</sup> *Id.*

<sup>28</sup> *First Universal Service Report and Order* at 8817-18, ¶75.

requirement by providing all of its customers with the ability to make and receive interexchange or toll calls.

8) Access to Directory Assistance.

16. The ability to place a call to directory assistance is a required service offering.<sup>29</sup> Keystone meets this requirement by providing all of its customers with access to directory assistance by dialing “411”.

9) Toll limitation for qualifying low-income consumers.

17. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC does not require an ETC to provide both services as part of the toll limitation service required under Section 54.1 01(a)(9) of the FCC’s Rules. Once designated as an ETC, Keystone will participate in Lifeline, and will provide toll blocking capability in satisfaction of the FCC’s requirement. Keystone will also provide several types of toll control to customers by offering a prepaid toll service in which customers can elect to purchase a single toll call, a bucket of toll minutes or an unlimited toll plan. Keystone currently has the technology to provide both toll blocking and toll control and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.

**B. Keystone Will Offer Supported Services Using Its Own Facilities.**

18. A carrier requesting ETC designation must certify that it offers the supported services “either using its own facilities or a combination of its own facilities and resale of

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<sup>29</sup> *Id.* at 8821.

another carrier’s services.”<sup>30</sup> Keystone will provide the supported services throughout its entire ETC service area using its existing network.

**C. Keystone Will Advertise Its Universal Service Offering.**

19. Pursuant to Section 54.201(d)(2) of the FCC’s Rules, Keystone plans to advertise the availability and price of its universal service offering which comports with the core list of universal service requirements throughout the area in which it is designated as an ETC.<sup>31</sup> The FCC has stated that “[b]ecause ETCs receive universal service support only to the extent that they serve customers, we believe that strong economic incentives exist, in addition to the statutory obligation, to advertise the universal service offerings in the requested service area....”<sup>32</sup> In order to fulfill the statutory obligation and because of strong economic incentives, Keystone will advertise all of its universal service fund (“USF”) supported services, including Lifeline and Link Up, throughout its ETC service area using, at a minimum, its website, social media, print media, radio and television, and direct mail to local government and community agencies and health and human service organizations.

**III. Keystone Meets the Additional Criteria Set out in the FCC’s 2005 ETC Order.**

20. In its *2005 ETC Order*, the FCC revised the minimum requirements for a telecommunications carrier to be designated as an ETC and thus eligible to receive Federal universal service support. The Commonwealth of Pennsylvania has determined that Petitions for

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<sup>30</sup>47 C.F.R. § 54.201(d)(1).

<sup>31</sup> 47 C.F.R. §54.201(d)(2).

<sup>32</sup> *Federal-State Joint Board on Universal Service, Farmers Cellular Telephone, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No.96-45, Memorandum Opinion and Order, DA 03-754, ¶11 (Mar. 12, 2003).

ETC designation should be evaluated under the standards set out in the *2005 ETC Order*.<sup>33</sup>

Specifically, in considering whether a common carrier has satisfied its burden of proof necessary to obtain ETC designation, the *2005 ETC Order* requires that an ETC applicant: (1) demonstrate a commitment and ability to provide services, including providing service to all customers within its proposed service area; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate that it will satisfy consumer protection and service quality standards; (4) offer local usage plans comparable to those offered by the incumbent LEC in the areas for which it seeks designation; and (5) acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act. As demonstrated below, Keystone meets all of the *2005 ETC Order* requirements to be designated as an ETC.

**A. Commitment to Provide Service Throughout its ETC Designated Area.**

21. An ETC applicant must demonstrate its commitment and ability to provide supported services throughout the designated service area: (1) by providing services to all requesting customers within its designated service area; and (2) by submitting a formal network improvement plan that demonstrates how universal service funds will be used to improve coverage, signal strength, or capacity that would not otherwise occur absent the receipt of high-cost support.<sup>34</sup> Keystone's formal network improvement plan is discussed below.

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<sup>33</sup> See 52 Pa Code § 69.2501.

<sup>34</sup> *2005 ETC Order* at ¶21.

**i. Provide Service Upon Reasonable Request.**

22. The FCC has determined that in order to ensure an ETC serves all requesting customers in its designated ETC service area, an ETC applicant must take certain actions.<sup>35</sup> Specifically, if the ETC's network covers a potential customer's premises, the ETC should provide service immediately. However, if a request for service comes from a potential customer within the ETC's designated service area but outside its existing network coverage, the ETC should provide service within a reasonable period of time if service can be provided at a reasonable cost by: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting the nearest cell tower; (4) adjusting network or customer facilities; (5) reselling services from another carrier's facilities to provide service; or (6) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment. If an ETC determines that it cannot serve a customer using one or more of these methods, then the ETC must report the unfulfilled request to the Commission within 30 days after making such determination.

23. Keystone commits to providing service to all requesting customers within its designated service area and reporting its unfulfilled requests pursuant to the FCC requirements cited above. Keystone also commits to reporting annually to the FCC the number of requests for service within Keystone's ETC designated service area that were unfulfilled during the past year and providing details regarding how it attempted to provide the customer with service.<sup>36</sup>

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<sup>35</sup> *Id.* at ¶122.

<sup>36</sup> 47 C.F.R. § 54.209(a)(3); *see also* 2005 ETC Order at ¶69.

**ii. Five-Year Network Upgrade Plan.**

24. As the PA PUC is aware, federal high-cost support for wireless competitive ETCs (“CETCs”) is in a state of flux as the FCC transitions from its “identical support” rule to support based on competitive bidding.<sup>37</sup> Accordingly, Keystone is seeking ETC status under both existing FCC rules and precedent, as well as those rules adopted in the new *USF Order*, which requires mobile wireless providers obtain ETC status in order to be eligible to receive Mobility Fund Phase I and Phase II support.<sup>38</sup>

25. Keystone’s five-year plan is based on an optimistic reading of the FCC’s new CETC rules and the availability of Mobility Fund Phase I, and more importantly, ongoing Phase II support, but could change based on the FCC’s implementation of its new rules if they result in a reduction of anticipated federal support. It remains Keystone’s goal to provide vital mobile telecommunications services in unserved areas of central Pennsylvania, consistent with the FCC’s goal to promote mobile voice and broadband services where Americans live, work, and travel.<sup>39</sup>

26. Keystone will demonstrate its commitment and ability to provide the supported services throughout its designated service area with this submission of a formal network improvement plan that demonstrates how universal service funds will be used to improve coverage, signal strength, or capacity that would not otherwise occur absent the receipt of high-

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<sup>37</sup> See generally *USF/ICC Transformation Order*.

<sup>38</sup> *USF/ICC Transformation Order* at ¶389. The FCC generally proposes adopting the same eligibility requirements for receiving Mobility Fund Phase II support that have been adopted with respect to Phase I. *Id.* at ¶1140.

<sup>39</sup> *Id.* at ¶53.

cost support.<sup>40</sup> The FCC has stated that the ETC applicant's five-year plan must state in detail how high-cost support will be used for service improvements that would not occur absent receipt of universal service support, including: (1) how signal quality, coverage, or capacity will improve due to the receipt of high-cost support throughout the area for which the ETC seeks designation; (2) the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high-cost support; (3) the specific geographic areas where the improvements will be made; and (4) the estimated population that will be served as a result of the improvements.<sup>41</sup> In accordance with these requirements, Keystone has provided this information for each wire center in each service area for which it expects to receive universal service support.<sup>42</sup>

27. **BEGIN CONFIDENTIAL AND PROPRIETARY INFORMATION**

28.

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<sup>40</sup> *2005 ETC Order* at ¶23.

<sup>41</sup> *Id.*

<sup>42</sup> *See* Exhibit G.

29.

**END CONFIDENTIAL AND PROPRIETARY INFORMATION**

30. Keystone’s upgrade and construction schedule is, of course, dependent upon when and if it receives universal service support.<sup>43</sup> Detailed information regarding the amount of investment, the specific geographic areas where the improvements will be made, and the estimated population that will be served as a result of the improvements is included in Exhibit G. Additionally, Keystone has provided a map of the specific geographic areas where the improvements will be made.<sup>44</sup>

31. Keystone has provided to the best of its knowledge an accurate five- year build-out plan. However, the timing of network upgrades and tower construction depends on many variables, and therefore, is subject to change. Although Keystone’s build-out plans will evolve over time and the construction dates are subject to change, Keystone will continue to respond to consumer demand by taking additional steps to ensure quality coverage and service. The information provided in Keystone’s five-year plan is highly confidential and competitively sensitive. Accordingly, Keystone requests confidential treatment of Keystone’s five-year plan and other confidential and competitively sensitive information contained in this Petition.<sup>45</sup>

**B. Ability to Remain Functional in an Emergency.**

32. The FCC requires an ETC applicant to demonstrate its ability to remain functional in emergency situations. Specifically, in order to be designated as an ETC, an applicant must demonstrate it has a reasonable amount of back- up power to ensure functionality without an

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<sup>43</sup> For example, the FCC expects to finish its Phase I Mobility Fund auction in the latter half of 2012. *See Mobility Fund Phase I Auction Scheduled for September 27, 2012; Comment Sought on Competitive Bidding Procedures for Auction 901 and Certain Program Requirements*, AU Docket No. 12-25, Public Notice, DA 12-121 (Feb. 2, 2012).

<sup>44</sup> *See* Exhibit H.

<sup>45</sup> In the cover letter hereto, Keystone demonstrates that the information herein that it wishes to be kept confidential constitutes “confidential proprietary information” under section 101 of Pennsylvania’s Right to Know Law.

external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.<sup>46</sup> To ensure that ETCs continue to comply with this requirement, ETCs designated by the FCC must certify on an annual basis that they are able to function in emergency situations.<sup>47</sup>

33. Keystone is committed to remaining functional and providing service in emergency situations. For example, Keystone has all critical switching facilities backed up with battery and uninterruptible power supply systems, which enable its core facilities to remain operational for an extended period of time during external power outages. All cell sites have battery back-up facilities which enable Keystone's network to remain operational for an extended period of time during external power outages. Further, Keystone maintains a number of mobile generators that may be deployed when and where needed. In order to reroute traffic around damaged facilities, and manage traffic spikes resulting from emergency situations, Keystone's core network traffic routes, including fiber and IP facilities, have full redundancy. Pursuant to the FCC's rules, Keystone will annually certify that it is able to function in an emergency situation and fulfill the annual outage reporting requirement.<sup>48</sup>

**C. Consumer Protection and Service Quality Requirements.**

34. The FCC also requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards. An ETC applicant must make a specific commitment to take objective measures to protect consumers. A commitment to comply with CTIA's Consumer Code for Wireless Service will satisfy this requirement for a wireless

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<sup>46</sup> 2005 ETC Order at ¶25.

<sup>47</sup> *Id.*

<sup>48</sup> 47 C.F.R. §§ 54.209(a)(6), 54.209(a)(2).

applicant seeking ETC designation.<sup>49</sup> Keystone is committed to consumer protection and service quality. Keystone has adopted CTIA's Consumer Code for Wireless Service, and is committed to compliance with CTIA's Code throughout its service area. Additionally, Keystone will report information on consumer complaints per 1,000 handsets or lines on an annual basis.

**D. Local Usage Comparable to the ILEC.**

35. As described above, although it has declined to adopt a specific local usage threshold, the FCC now requires an ETC applicant to demonstrate that it offers a local usage plan comparable to the plan offered by the incumbent LEC in the service areas for which the applicant seeks designation.<sup>50</sup> Keystone currently provides calling plans with local usage that are comparable to those provided by the incumbent LEC ("ILEC").<sup>51</sup>

**E. Equal Access.**

36. While the FCC does not impose a general equal access requirement on ETC applicants, the FCC does require ETC applicants to acknowledge that the FCC may require them to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area.<sup>52</sup> Pursuant to Section

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<sup>49</sup> See *2005 ETC Order* at ¶28. Under the CTIA Consumer Code, wireless carriers agree to: (1) disclose rates and terms of service to consumers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.

<sup>50</sup> *2005 ETC Order* at ¶32.

<sup>51</sup> See Exhibit F.

<sup>52</sup> *2005 ETC Order* at ¶35.

54.202(a)(5) of the FCC’s rules,<sup>53</sup> Keystone acknowledges that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

**IV. Keystone Requests ETC Designation in Complete Wire Centers within its Proposed ETC Service Area.**

37. Keystone seeks ETC designation throughout nine counties in its licensed service area, excluding wire centers of rural telephone companies that Keystone can only partially serve. Specifically, Keystone seeks ETC designation in the complete service area of the following rural telephone companies: (1) Buffalo Valley Telephone Company; (2) Frontier Communications of Lakewood, LLC; (3) Pennsylvania Telephone Company; and (4) Sugar Valley Telephone Company.

38. Keystone seeks ETC designation in the partial study areas of the following rural telephone companies: (1) Commonwealth Telephone Company; (2) Conestoga Telephone & Telegraph Company; (3) Mahanoy & Mahantongo Telephone Company; (4) United Telephone Company of Pennsylvania; and (5) Windstream Pennsylvania, Inc. Because certain wire centers in the study areas of these rural telephone companies fall outside of Keystone’s service area, Keystone seeks ETC designation in the following wire centers of the following rural telephone companies: (1) the Leesport, Tremont, and Valley View wire centers in Commonwealth Telephone Company’s service area; (2) the Birdsboro, Douglassville, Green Hills, Oley, Topton, and Yellow House wire centers in Conestoga Telephone & Telegraph Company’s service area; (3) the Mandata<sup>54</sup> and Trevorton wire centers in Mahanoy & Mahantongo Telephone Company’s service area; (4) the Beech Creek, Howard, Mill Hall, and Zion wire centers in United Telephone

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<sup>53</sup> 47 C.F.R. § 54.202(a)(5).

<sup>54</sup> Specifically, the LCKLPAXR-coded Mandata wire center.

Company of Pennsylvania's service area; and (5) the Hughesville, Muncy, Montgomery, Port Matilda, Turbotville, and Watsonstown wire centers in Windstream Pennsylvania, Inc.'s service area.<sup>55</sup>

39. Additionally, Keystone seeks ETC designation in all wire centers of the following non-rural telephone company affiliates of Verizon that are within Keystone's proposed ETC service area: Verizon North Inc. of Pennsylvania, Verizon North Inc. of Pennsylvania (Contel), Verizon North Inc. of Pennsylvania (Quaker State), and Verizon Pennsylvania Inc.<sup>56</sup>

**V. Grant of this Petition Will Serve the Public Interest.**

40. In its *2005 ETC Order*, the FCC clarified its public interest analysis of an ETC application. Under section 214 of the Act, the Commission must determine that an ETC designation is consistent with the public interest, convenience and necessity.<sup>57</sup> The FCC also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act.<sup>58</sup> Further, the FCC noted that it will analyze the public interest benefits of an ETC applicant in a manner that is consistent with the purposes of the Act, including the fundamental goals of preserving and advancing universal service, ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates, and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.<sup>59</sup> Specifically, the FCC will consider three specific

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<sup>55</sup>See Exhibit B for a map of Keystone's service area.

<sup>56</sup>The Verizon wire centers are listed in Exhibit I.

<sup>57</sup>47 U.S.C. § 214(e)(2).

<sup>58</sup>47 U.S.C. § 254(b)(7).

<sup>59</sup>*2005 ETC Order* at ¶40.

issues when analyzing the public interest benefits of an ETC application: (1) unique advantages and disadvantages of the competitor's service offering through a cost-benefit analysis; (2) potential for cream skimming; and (3) impact on the USF.<sup>60</sup>

**A. Cost-Benefit Analysis.**

41. As part of its overall analysis regarding whether the designation of an ETC will serve the public interest, the FCC will consider the benefits of increased consumer choice and the unique advantages and disadvantages of the competitor's service offering. As stated above, Keystone provides wireless service to consumers in central Pennsylvania. Nearly all of Keystone's service area is considered rural. Keystone's universal service offering will provide quality service, while speeding the delivery of advanced wireless voice and data services to rural Pennsylvanians and providing Pennsylvania consumers with the benefits of increased competition. Based on independent research conducted by Keystone, it is estimated that less than half the population in rural central Pennsylvania currently has high-speed Internet. Keystone's wireless service will provide the benefits of voice and data communications to individuals that currently do not have access to a wireline connection. Keystone expects that its service offering will be competitive with those of the incumbent wireline carriers and other broadband providers within its service area and will help improve broadband adoption rates.

42. Unlike traditional wireline service, Keystone's mobile wireless service affords customers many advantages. For example, Keystone's mobile wireless service affords customers increased flexibility, access to public safety in remote areas, and greater service options. Keystone's universal service offering also provides expanded calling scopes and numerous different calling plans that allow customers to purchase a plan that fit their

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<sup>60</sup> *Id.* at ¶41.

telecommunications needs. Further, the FCC has noted that mobility of telecommunications assists consumers in rural areas who must drive significant distances to their jobs, schools, and critical community locations.<sup>61</sup> By offering the benefits of mobility, Keystone’s wireless universal service offering will provide unique services to consumers in rural Pennsylvania. Recently, the FCC acknowledged “that ensuring universal advanced mobile coverage is an important goal on its own.”<sup>62</sup> As an ETC, Keystone will also offer a basic universal service package to subscribers who are eligible for Lifeline support. As stated earlier, Keystone will offer the “core” or designated services that are supported by Federal universal service support mechanisms.<sup>63</sup> In addition to ensuring that consumers receive the benefits of the core services, designating Keystone as an ETC will allow customers in rural Pennsylvania to choose service based on pricing, service quality, customer service, and service availability.

43. Although Keystone’s universal service build-out plans will evolve over time, as demonstrated in its five-year plan, Keystone will continue to respond to consumer demand by taking additional steps to ensure quality coverage and service, including building and/or leasing space on additional towers. Overall, the benefits of increased consumer choice and the unique advantages provided by Keystone’s service offering show that designating Keystone an ETC will serve the public interest, and outweigh any potential impact on the universal service fund.<sup>64</sup>

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<sup>61</sup> Chairman Julius Genachowski, Federal Communications Commission, *Bringing Broadband to Rural America: Update to Report on a Rural Broadband Strategy*, GN Docket No. 11-16, ¶24 (June 17, 2011).

<sup>62</sup> *USF/ICC Transformation Order* at ¶53.

<sup>63</sup> See 47 U.S.C. § 254(c); 47 C.F.R. § 54.101.

<sup>64</sup> See Section V.C., *infra*.

44. As discussed above and as the PA PUC is certainly aware, the FCC’s new *USF Order* creates an entirely new universal service paradigm for mobile ETCs by establishing a Phase I Mobility Fund to promote mobile broadband<sup>65</sup> and a Phase II Mobility Fund to provide ongoing high-cost support where needed to mobile providers.<sup>66</sup> By establishing these separate Mobility Funds and eliminating the identical support rule,<sup>67</sup> the FCC has removed mobile carriers from the legacy, rate-of-return universal service regime. Accordingly, competitive and cream skimming concerns about designating Keystone as an ETC, redefining the service areas of rural telephone companies, and the resulting impact on the universal service fund have been effectively mooted by the FCC’s recognition of wireless service as a complement<sup>68</sup> to wireline broadband service and the FCC’s proposed use of competitive bidding to determine wireless ETC support levels.<sup>69</sup>

**B. Potential for Cream Skimming Effects.**

45. In areas where an ETC applicant seeks designation below the study area level of a rural telephone company, the FCC will conduct a cream skimming analysis that compares the population density of each wire center in which the ETC applicant seeks designation against that of the wire centers in the study area in which the ETC applicant does not seek designation.<sup>70</sup> Rural cream skimming occurs when competitors serve only the low-cost high revenue customers

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<sup>65</sup> *USF/ICC Transformation Order* at ¶301.

<sup>66</sup> *Id.* at ¶493.

<sup>67</sup> *Id.* at ¶498.

<sup>68</sup> *Id.* at ¶53. *See also Id.* at fn. 826.

<sup>69</sup> *Id.* at ¶1121, *et. seq.*

<sup>70</sup> *2005 ETC Order* at ¶48.

in a rural telephone company's study area.<sup>71</sup> The FCC's cream skimming analysis includes an examination of the population density of wire centers within rural service areas, the extent to which an ETC applicant would be serving only the most densely concentrated areas within a rural service area, and whether the incumbent LEC has disaggregated its support at a smaller level than the service area.<sup>72</sup> As noted above, the FCC's establishment of separate Mobility Funds for mobile carriers and separate support mechanisms, alleviates, if not eliminates, the ability of wireless carriers to target or cream skim the highest support levels. With identical support no longer available, Keystone cannot, as a practical matter, cream skim.

46. Keystone seeks to provide service below the study area level of four rural telephone companies, Conestoga Telephone and Telegraph Company ("Conestoga"), Mahanoy & Mahantongo Telephone Company ("Mahanoy & Mahantongo"), United Telephone Company of Pennsylvania ("United"), Windstream Pennsylvania, Inc. ("Windstream"), and Commonwealth Telephone Company ("Commonwealth"), and, as requested herein, Keystone seeks redefinition of the five rural telephone companies' service areas.

47. Keystone is not seeking to cherry-pick specific portions of these companies' study areas in order to serve low-cost, high-revenue customers. Keystone is unable to provide wireless service to the entire study areas of the four companies because Keystone is constrained by the contours of its CMRS-licensed service area. Keystone has provided detailed population density data for study areas and individual wire centers of the aforementioned rural telephone companies demonstrating that Keystone's proposed ETC area does not raise any cream skimming concerns.

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<sup>71</sup> *Federal-State Joint Board on Universal Service; Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion and Order, 19 FCC Rcd 6438, ¶29 (2004) (*Highland Cellular Order*).

<sup>72</sup> *Id.* at ¶49.

48. Specifically, in Exhibit J, Keystone provides data showing total population, total square mileage, and population density for each individual wire center in and study area of Conestoga, Mahanoy & Mahantongo, United, Windstream and Commonwealth. Under the Coverage column, the wire centers labeled “Entire” are those wire centers in which Keystone provides service to the entire wire center and in which Keystone therefore seeks ETC designation. For the wire centers labeled “Partial,” Keystone is capable of serving some portion of the wire center. Consistent with the *Highland Cellular Order*,<sup>73</sup> Keystone is not seeking ETC designation in those partial wire centers. Lastly, under the Coverage column, the ILEC wire centers labeled “None” are the wire centers where Keystone does not provide service, and therefore does not propose to serve any portion of the wire center.

49. In the Conestoga Telephone & Telegraph Company study area, Keystone seeks to serve six of Conestoga’s ten wire centers, specifically the Birdsboro, Douglassville, Green Hills, Oley, Topton, and Yellow House wire centers. The population density information shows that Keystone is not seeking to serve only the low-cost, high density wire centers of Conestoga’s study area. The total average population density of Keystone’s proposed ETC service territory (319.64) is only slightly higher than the total average population density of Conestoga’s study area (317.33). Keystone does not seek to serve the Boyertown wire center, which has the highest amount of total population and the highest population density of all of Conestoga’s wire centers. By contrast, Keystone seeks to serve two of the four Conestoga wire centers with the lowest population density, including the Oley wire center, which is the least densely populated wire center in Conestoga’s study area. In addition, four of the six Conestoga wire centers that Keystone seeks to serve have population densities that are significantly less than the total

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<sup>73</sup>*Highland Cellular Order* at ¶33.

average population density of Conestoga's study area. Clearly, Keystone is not attempting to cream skim Conestoga's rural study area.

50. In the Mahanoy & Mahantongo study area, Keystone seeks to serve the Trevorton wire center and one of the two Mandata wire centers. Keystone seeks to serve the Mandata wire center coded as LCKLPAXR. The other Mandata wire center, coded MDTAPAXH, has a small 0.6 square mile area outside of the Northumberland County boundary that defines Keystone's service area with a population density of 56.6. The Mandata wire center Keystone seeks to serve has the lowest population density (40.1) of the three Mahanoy & Mahantongo wire centers. Although Trevorton has the highest population density (87.0) out of the three wire centers, the Trevorton wire center still has a relatively low population density with respect to all the wire centers in Keystone's service area. Given the extremely low population densities throughout the Mahanoy & Mahantongo study area, Keystone cannot be accused of cream skinning.

51. In the United Telephone Company of Pennsylvania study area, Keystone seeks to serve the Beech Creek, Howard, Mill Hall, and Zion wire centers. Keystone is not seeking ETC designation in the Richfield wire center because it is only able to partially serve that wire center. The total average population density of Keystone's proposed ETC service territory (55.85) is less than half the total average population density of United's study area (136.4). This data clearly shows Keystone is not seeking to serve only the low-cost, higher density wire centers in United's study area and is not attempting to cream skim in United's service area. Indeed, Keystone seeks to serve all of the geographically contiguous wire centers in United's study area. The wire centers Keystone seeks to serve are all geographically contiguous and all within Centre County. By contrast, the Richfield wire center in Snyder County partially served by Keystone, which Keystone does not seek ETC designation for, is separated from the rest of United's study

area by at least three wire centers of three different ILECs, and a portion of the Richfield wire center is located outside of Snyder County, in Juniata County, Pennsylvania.

52. In the Windstream Pennsylvania Inc. study area, Keystone seeks to serve the Hughesville, Muncy, Montgomery, Port Matilda, Turbotville, and Watsonstown wire centers. Although the total average population density of Keystone's proposed ETC area (108.91) is higher than the total average population density of Windstream's study area (78.72), the average population density of both the entire study area and the portion for which Keystone seeks ETC designation is extremely low. The sparsely populated nature of the entire study area therefore makes comparisons, and any type of cream skimming analysis, virtually meaningless. Keystone is not seeking to serve only the low-cost, high-density wire centers in Windstream's study area. Keystone is seeking ETC designation in only two wire centers with a population density significantly above the study area average, and those wire centers (Muncy and Watsonstown) have population densities (158 and 173.5, respectively) that not only are reflective of a sparsely populated area, they have nowhere near the population density of the most populated wire centers in Windstream's study area, such as Harrison City (672), Export (657), Colver (545) and Delmont (396.7). Keystone is limited by its CMRS license to the area where it may lawfully provide service, and the only Windstream wire centers that fall entirely within that licensed service area are those for which Keystone is seeking ETC designation. The Windstream wire centers that Keystone cannot serve are mostly concentrated in the western portion of the state, far from the area where Keystone operates.<sup>74</sup> Moreover, the only Windstream wire center that Keystone serves a portion of but does not seek ETC designation for is the Lansford wire center,

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<sup>74</sup> A map depicting the entire study areas of each Pennsylvania ILEC is attached hereto as Exhibit K.

the Windstream wire center with one of the highest population densities in the Windstream study area. In the Windstream study area, Keystone’s proposed ETC area clearly does not raise any cream skimming concerns.

53. In the Commonwealth study area, Keystone seeks to serve the Leesport, Tremont, and Valley View wire centers. Although the total average population density of Keystone’s proposed ETC area is higher than the total average population density of Commonwealth’s study area (96.5), the average population density of the wire centers for which ETC designation is sought is 192, denoting by almost any definition a sparsely populated area. Keystone is not seeking to serve only the low-cost, high density wire centers of Commonwealth’s study area. Of the wire centers for which Keystone seeks ETC designation, only the Leesport wire center has a population density more than marginally above the average population density for the study area. While Leesport is one of the more densely populated wire centers in Commonwealth’s study area, it is still a relatively sparsely populated area. More importantly, as discussed above, Keystone is limited by its CMRS license to the area where it may lawfully provide service, and the only Commonwealth wire centers that fall entirely within that licensed service area are those for which Keystone is seeking ETC designation. The Commonwealth wire centers that Keystone cannot serve are mostly concentrated along the northern, eastern and southern borders of the state, far from the central Pennsylvania area where Keystone operates.<sup>75</sup> This data shows that Keystone is not attempting to cream skim.

54. Keystone also submits population density data for the following Pennsylvania rural telephone companies: Buffalo Valley Telephone Company (“Buffalo Valley”), Frontier Communications of Lakewood, LLC (“Frontier”), Pennsylvania Telephone Company (“PTC”),

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<sup>75</sup> See Exhibit K.

and Sugar Valley Telephone Company (“Sugar Valley”).<sup>76</sup> In addition, Keystone submits population density data for the wire centers of Verizon North, Inc. and Verizon Pennsylvania, Inc., non-rural telephone companies, served in whole or in part by Keystone.<sup>77</sup> Keystone proposes to serve as an ETC the entire Buffalo Valley, Frontier, PTC, and Sugar Valley service areas and is not seeking redefinition of these service areas. Density comparisons are therefore not relevant. Keystone provides this information, however, pursuant to the FCC’s *2005 ETC Order*.<sup>78</sup> Verizon is a non-rural telephone company and pursuant to the FCC’s *2005 ETC Order*, the population densities of Verizon’s wire centers in which Keystone seeks to provide service area also not relevant.<sup>79</sup> Keystone, however, also provides this information for comparison purposes.

### **C. Impact on the Fund.**

55. As noted above, the FCC has eliminated the identical support rule<sup>80</sup> and created separate funding mechanisms for mobile ETCs.<sup>81</sup> Further, the FCC has capped ongoing funding for mobile carriers.<sup>82</sup> Accordingly, any support that Keystone is able to garner in either the Phase I or Phase II funding mechanisms should be presumed to be in the public interest and inherently within what the FCC believes are acceptable boundaries concerning overall impact on USF. However, since universal service is transitioning from these legacy mechanisms to

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<sup>76</sup> See Exhibit J.

<sup>77</sup> See Exhibit I.

<sup>78</sup> *2005 ETC Order* at ¶49.

<sup>79</sup> *Id.* at ¶52.

<sup>80</sup> *USF/ICC Transformation Order* at ¶498.

<sup>81</sup> *Id.* at ¶¶301 and 493.

<sup>82</sup> *Id.*

broadband CAF funding, Keystone has still estimated the impact of its request based on the legacy rules.

56. The total monthly per-line support that each competing ILEC currently receives includes high cost, local switching, interstate common line, and long-term support. Keystone calculated the average total ILEC per-line support amount for the ILECs in Keystone’s service area at approximately \$5.44 per customer per line. Keystone, using the now defunct identical support rule, [REDACTED] Based upon this analysis, [REDACTED] [REDACTED] [REDACTED] Grant of Keystone’s ETC request under the FCC’s old rule would have had a nominal impact on the USF and, under the new funding mechanisms, will definitely have even less of an impact on overall universal service funding. Accordingly, the benefits of designating Keystone as an ETC outweigh any potential harm to the sustainability of the fund.

**VI. Anti-Drug Abuse Certification.**

57. Keystone certifies that no party to this Petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.<sup>83</sup>

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<sup>83</sup>See Exhibit E.

**VII. Keystone Requests Redefinition of Service Areas of Certain Rural Telephone Companies.**

58. Section 214(e)(5) of the Act provides that states establish geographic service areas within which competitive ETCs are required to comply with universal service obligations and are eligible to receive universal service support.<sup>84</sup> In the case of an area served by a rural incumbent LEC, the Act states that a company’s service area for the purposes of ETC designation will be the rural incumbent LEC’s study area unless a different definition of service area is established for such company.<sup>85</sup> In order for a carrier to be designated as an ETC in a service area that is different from an incumbent rural telephone company’s service area, an ETC applicant must request redefinition of the rural telephone company’s service area in accordance with section 214(e)(5) of the Act.<sup>86</sup>

59. The Act requires that a state commission take into consideration the Federal-state Joint Board on universal service’s recommendations when redefining a rural telephone company’s study area.<sup>87</sup> In a 1996 *Recommended Decision*, the Joint Board outlined its concerns for redefining a rural telephone company’s service area.<sup>88</sup> These concerns include: (1)

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<sup>84</sup> 47 U.S.C. § 214(e)(5). FCC rules define the term *service area* as a geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms. 47 C.F.R. § 54.207(a).

<sup>85</sup> *Id.*; see also 47 C.F.R. § 54.207; 2005 *ETC Order* at ¶73.

<sup>86</sup> 47 U.S.C. § 214(e)(5). In the case of a service area served by a rural telephone company, *service area* means such company’s “study area” unless and until the Commission and the states, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c) of the Act, establish a different definition of service area for such company. 47 C.F.R. § 54.207(b).

<sup>87</sup> 47 U.S.C. § 214(e)(5).

<sup>88</sup> See *Federal-State Joint Board on Universal Service*, Recommended Decision, CC Docket No. 96-45, 12 FCC Rcd 97, 179-80 ¶ 172 (1996) (1996 Recommended Decision).

minimizing rural “cream skimming;” (2) recognizing that the Act places rural telephone companies on a different competitive footing from other carriers; and (3) recognizing the administrative burden of requiring rural telephone companies to calculate costs at something other than a study area level.<sup>89</sup> The special status of rural telephone companies and cream skimming concerns has been discussed in the cream skimming section above. Further, since the FCC has eliminated the identical support rule,<sup>90</sup> there is no longer an administrative burden on rural telephone companies to calculate their costs at something other than the study area level.

60. Keystone requests that the PA PUC redefine the service areas of five rural telephone companies, Commonwealth Telephone Company, Conestoga Telephone & Telegraph Company, Mahanoy & Mahantongo Telephone Company, United Telephone Company of Pennsylvania, and Windstream Pennsylvania, Inc., because Keystone is not able to serve the entire service area of each of these companies. Specifically, Keystone requests the PA PUC redefine the five companies’ study areas to include each wire center that Keystone is able to serve in its entirety as a separate service area. The request is based on Keystone’s licensed service area, and, as demonstrated in Section V.B., *supra*, is not an attempt to pick and choose the lowest cost, high-density areas.

**A. Commonwealth Telephone Company.**

61. Keystone seeks redefinition of Commonwealth Telephone Company’s service area. Specifically, Keystones requests the PA PUC redefine Commonwealth Telephone Company’s service area to include a separate service area consisting of the following wire centers: Leesport, Tremont, and Valley View.

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<sup>89</sup> *See Id.* at ¶172-174.

<sup>90</sup> *Id.* ¶498.

**B. Conestoga Telephone Company.**

62. Keystone seeks redefinition of Conestoga Telephone Company's service area. Specifically, Keystones requests the PA PUC redefine Conestoga Telephone Company's service area to include a separate service area consisting of the following wire centers: Birdsboro, Douglassville, Green Hills, Oley, Tipton, and Yellow House.

**C. Mahanoy & Mahantongo Telephone Company**

63. Keystone seeks redefinition of the Mahanoy & Mahantongo Telephone Company's service area. Specifically, Keystone requests that the PA PUC redefine the Mahanoy & Mahantongo Telephone Company's service area to include a separate service area consisting of the following wire centers: Mandata (LCKLPAXR) and Trevorton.

**D. United Telephone Company of Pennsylvania.**

64. Keystone seeks redefinition of United Telephone Company of Pennsylvania's service area. Specifically, Keystones requests the PA PUC redefine United Telephone Company of Pennsylvania's service area to include a separate service area consisting of the following wire centers: Beech Creek, Howard, Mill Hall, and Zion.

**E. Windstream Pennsylvania, Inc.**

65. Keystone seeks redefinition of Windstream Pennsylvania's service area. Specifically, Keystones requests the PA PUC redefine Windstream Pennsylvania's service area to include a separate service area consisting of the following wire centers: Hughesville, Muncy, Montgomery, Port Matilda, Turbotville, and Watsonstown.

**VIII. Conclusion.**

66. Keystone requests that the PA PUC grant Keystone’s ETC Petition and allow it to qualify for Federal high-cost universal service support. Keystone meets the requirements of Sections 254 and 214 of the Act, FCC Rules implementing the Act, and applicable Pennsylvania law. Under the FCC’s new rules, mobile carriers must be designated ETCs in order to be eligible for Phase I and Phase II Mobility Fund support.<sup>91</sup> It would be patently unfair for the PA PUC to deny Keystone’s request for ETC status in light of the FCC’s new rules, and thereby eliminate any chance for Keystone to bid on Phase I and Phase II funding. It would be equally unfair to delay acting on such request based on perceived uncertainty regarding the FCC’s USF/ICC Transformation Order. Unlike other petitions before the PA PUC, Keystone’s petition is not seeking authority to provide “Lifeline only” service, and issues of interpretation related to the provision of such service do not apply. In its USF/ICC Transformation Order, the FCC “urge[s] the states” to “make every effort to process [applications requesting new designations as ETCs] in a timely fashion”<sup>92</sup> and Keystone urges the PA PUC to act in accordance with this request for timely action.

67. Additionally, the PA PUC should grant Keystone’s request for redefinition of the study areas of Commonwealth Telephone Company, Conestoga Telephone & Telegraph Company, Mahanoy & Mahantongo Telephone Company, United Telephone Company of Pennsylvania, and Windstream Pennsylvania, Inc. As shown above, Keystone’s ETC application is consistent with the public interest, convenience, and necessity. Therefore, the PA PUC should grant Keystone ETC status and allow it to qualify for universal service support within its

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<sup>91</sup> See *USF/ICC Transformation Order* at ¶¶389 and 1140.

<sup>92</sup> *Id.* at ¶390.

proposed service area. Keystone submits that an expedited grant of this application is in the public interest, convenience, and necessity and consistent with Sections 214 and 254 of the Act.

Respectfully submitted,

**Keystone Wireless, LLC**  
**d/b/a Immix Wireless**

By: 

Caressa D. Bennet  
Pennsylvania Bar Number 50186  
Marjorie Spivak  
Pennsylvania Bar Number 50537  
Bennet & Bennet, PLLC  
4350 East West Highway  
Suite 201  
Bethesda, MD 20814  
(202) 371-1500

*Counsel for Keystone Wireless, LLC*  
*d/b/a Immix Wireless*

February 6, 2012

**EXHIBITS**

**EXHIBIT A** – List of Keystone FCC Licenses

**EXHIBIT B** – Map of Keystone Service Area

**EXHIBIT C** – Keystone Point of Contact Information

**EXHIBIT D** – Certificate of Formation

**EXHIBIT E** – Declaration

**EXHIBIT F** – *Local Calling Plan Descriptions Included in Universal Service Offering*

**EXHIBIT G** – Keystone 5-Year Plan Tower Sites

**EXHIBIT H** – Map of Keystone 5-Year Plan Tower Sites

**EXHIBIT I** - Non-Rural Wire Center Population Density Data

**EXHIBIT J** - Rural Wire Center Population Density Data

**EXHIBIT K** – Map Depicting Wire Centers of All Pennsylvania ILECs

**Keystone Wireless FCC Licenses**

Keystone is a commercial mobile radio service (“CMRS”) licensee providing service using broadband Personal Communications Service spectrum in ten counties in central Pennsylvania. Below is a list of Keystone’s CMRS licenses:

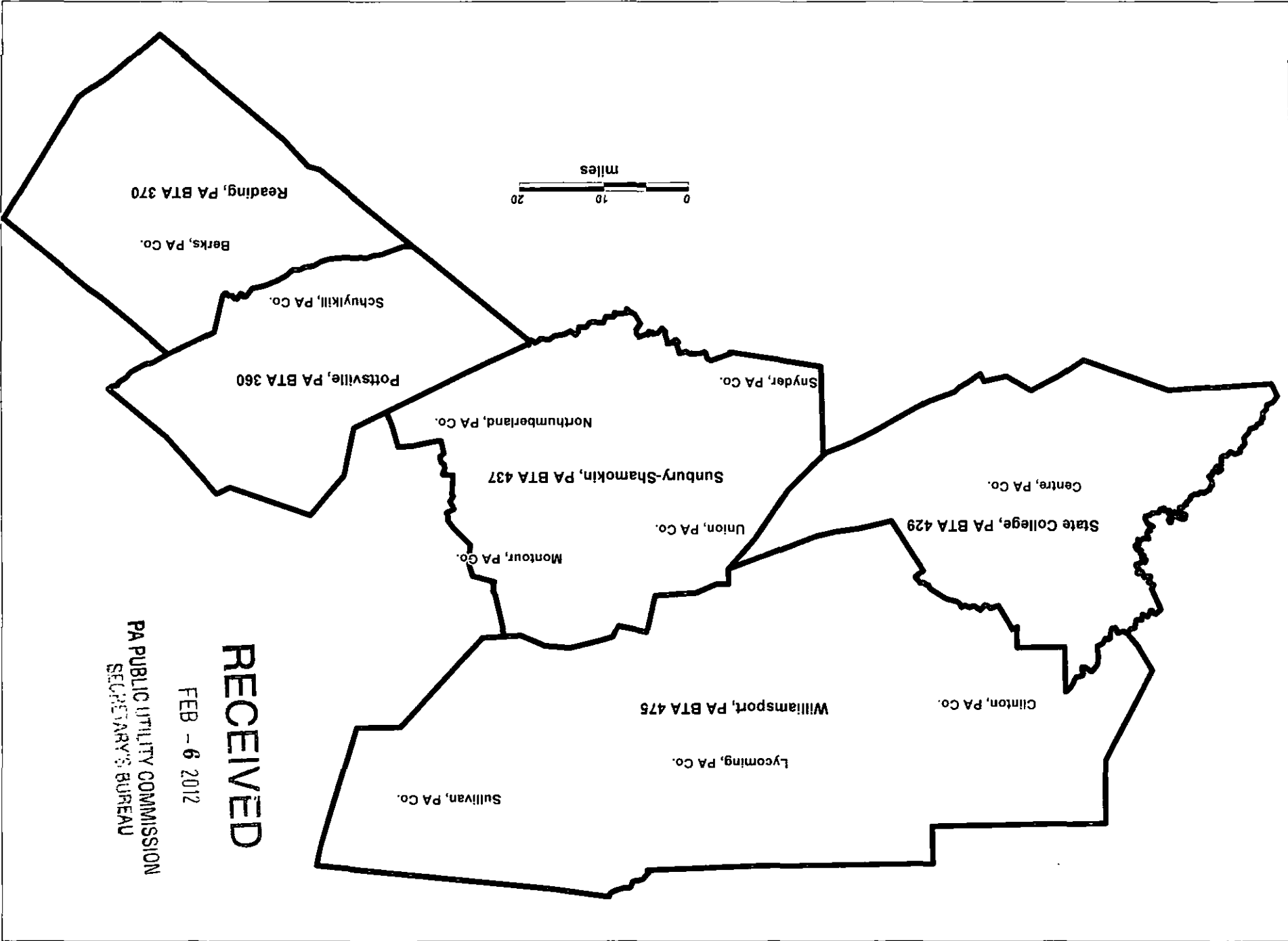
<b>Call Sign</b>	<b>Block</b>	<b>Spectrum</b>	<b>BTA</b>	<b>Market</b>
KNLG701	D	10 MHz	370	Reading
KNLG703	D	10 MHz	475	Williamsport
KNLF905	D	10 MHz	360	Pottsville
KNLG945	D	10 MHz	437	Sunbury
WPOJ725	C	30 MHz	360	Pottsville
WPOJ726	C2	15 MHz	370	Reading
WPOJ727	C	30 MHz	429	St College
WPOJ728	C	30 MHz	437	Sunbury
WPOJ729	C	30 MHz	475	Williamsport

WPOJ726 is a partitioned C license (C2)

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December 22, 2011

County Boundary  
BTA Boundary

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**Keystone Contact Information**

Keystone Wireless is a Delaware limited liability company, authorized to conduct business in the Commonwealth of Pennsylvania, with principal offices at 27599 Riverview Center Blvd., Suite 201, Bonita Springs, FL 34134. Robert C. Martin is the President of Keystone Wireless and can be contacted at the following address:

Robert C. Martin  
President, Keystone Wireless  
27599 Riverview Center Blvd.  
Suite 201  
Bonita Springs, FL 34134  
Phone: 239-335-1325  
Email: bmartin@pcmgt.com

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# Delaware

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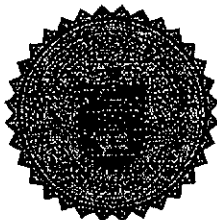
*The First State*

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "KEYSTONE WIRELESS, LLC", FILED IN THIS OFFICE ON THE TWELFTH DAY OF JULY, A.D. 2002, AT 12:59 O'CLOCK P.M.

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*Harriet Smith Windsor*  
Harriet Smith Windsor, Secretary of State

3547005 8100

AUTHENTICATION: 1881405

020448274

DATE: 07-12-02

Jul-12-2002 11:30

From-GOULD & RATNER

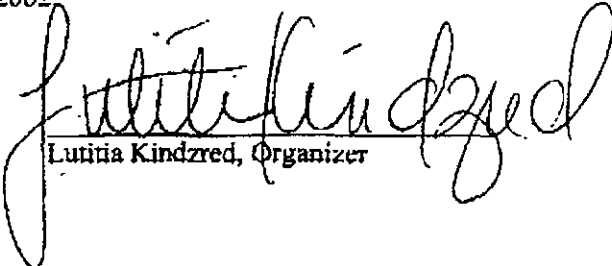
312-236-3241

STATE OF DELAWARE  
SECRETARY OF STATE  
DIVISION OF CORPORATIONS-081  
FILED 12:59 PM 07/12/2002  
020448274 - 3547005

**STATE OF DELAWARE  
CERTIFICATE OF FORMATION  
OF  
KEYSTONE WIRELESS, LLC**

- FIRST: The name of the limited liability company is Keystone Wireless, LLC.
- SECOND: The address of its registered office in the State of Delaware is 9 East Lookerman Street in the City of Dover, County of Kent. The name of its Registered Agent at such address is The National Registered Agents, Inc.
- THIRD: The latest date on which the limited liability company is to dissolve is December 31, 2051.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation of Keystone Wireless, LLC, this 12th day of July, 2002.

  
Lutitia Kindzred, Organizer


**Declaration of Robert C. Martin**

1. I, Robert C. Martin, am the President of Keystone Wireless, LLC ("Keystone") and authorized representative in charge of Keystone's Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the Commonwealth of Pennsylvania ("Petition"). This Declaration is filed in support of the Petition.
2. I have reviewed the foregoing Petition, and hereby state that the facts set forth therein and herein are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).
3. As explained in the Petition, Keystone meets the requirements for ETC designation in Pennsylvania. As fully described in the Petition, Keystone currently offers and is able to provide within its licensed service area the services and functionalities supported by the federal high-cost universal service program identified in 47 C.F.R. § 54.101(a). Keystone will offer supported services using its own facilities, and will advertise the availability of the supported services throughout its designated service area.
4. Keystone, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in Section 1.2002(b) of the Federal Communications Commission's ("FCC") rules, is not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

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Robert C. Martin  
President, Keystone Wireless, LLC  
Keystone's Authorized Representative

2/3/2012  
Date



# Unlimited Plans

Individual Plans • Family Plans • i-Pay Unlimited Plans • Optional Features



**NO CREDIT REQUIRED  
NO CONTRACT**



Monthly	Minutes	Unlimited Text Messaging	Unlimited Directory Assistance	Unlimited Picture Messaging	Unlimited Data
30.00	UNLIMITED	UNLIMITED	UNLIMITED	X	X
50.00	UNLIMITED	UNLIMITED	UNLIMITED	UNLIMITED	UNLIMITED

## HOW DO I KEEP MY PHONE SERVICE ACTIVE?

**IMMIX WIRELESS OFFERS SEVERAL FLEXIBLE ACCOUNT REFILL OPTIONS:**

- 1 Auto-Refill (Most Convenient) Select Auto-Refill for monthly automatic deductions. Update and manage your information from your Account.
- 2 Make a Payment every 30 days at [www.immix.com](http://www.immix.com).
- 3 Make a Payment at any Immix Wireless retail location.
- 4 Make a Payment by calling 611 from your Immix Wireless phone.

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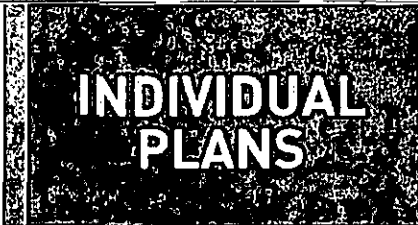
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# Individual Plans

[Individual Plans](#) • [Family Plans](#) • [i-Pay Unlimited Plans](#) • [Optional Features](#)



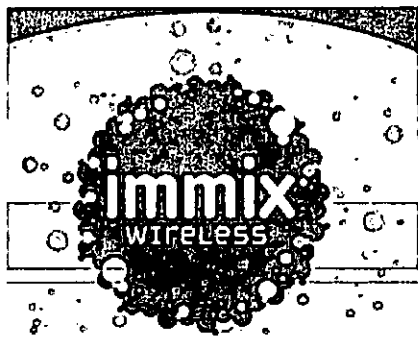
Immix Wireless has partnered with virtually every GSM carrier in the nation to provide unmatched, solid coverage throughout the U.S. No extra fees to worry about, it's all included in your plan.

**INCLUDED FEATURES:**

Advance Voicemail	✓
3 Way Calling	✓
Caller ID	✓
Call Waiting	✓
Call Forwarding	✓

Monthly Price	Minutes	Unlimited Text Messaging	Unlimited Long Distance	Unlimited Mobile to Mobile	Unlimited Nights and Weekends 9 PM - 6 AM	Extended Nights and Weekends 7 PM - 7 AM	Overage Minutes
19.99	100	✓	✓	\$4.99/month	✗	✗	\$0.50/min
29.99	500	✓	✓	\$4.99/month	✗	✗	\$0.50/min
39.99	1200	✓	✓	✓	✓	\$4.99/month	\$0.39/min
49.99	1500	✓	✓	✓	✓	\$4.99/month	\$0.39/min
59.99	1800	✓	✓	✓	✓	\$4.99/month	\$0.39/min
99.99	2500	✓	✓	✓	✓	\$4.99/month	\$0.39/min

✓ = INCLUDED    ✗ = NOT INCLUDED or NOT AVAILABLE



# Family Plans

Individual Plans • Family Plans • i-Pay Unlimited Plans • Optional Features



Share the minutes with up to five additional users. With Nationwide coverage you can use your phone anywhere in the United States without an additional fee! Immixon Wireless has partnered with virtually every GSM carrier in the nation to provide unmatched, solid coverage throughout the U.S.

**INCLUDED FEATURES:**

Advance Voicemail	✓
3 Way Calling	✓
Caller ID	✓
Call Waiting	✓
Call Forwarding	✓

Family Plans (Two Lines)								
Monthly	Shared Minutes	Unlimited Text Messaging	Unlimited Long Distance	Unlimited Mobile to Mobile	Unlimited Nights and Weekends 9 PM - 6 AM	Extended Nights and Weekends 7 PM - 7 AM	Add Another Line*	Overage Minutes
59.98	1200	✓	✓	✓	✓	\$5.00/month	\$9.99/month	\$0.39/min
64.98	1500	✓	✓	✓	✓	\$5.00/month	\$9.99/month	\$0.39/min
74.98	1800	✓	✓	✓	✓	\$5.00/month	\$9.99/month	\$0.39/min
114.98	2500	✓	✓	✓	✓	\$5.00/month	\$9.99/month	\$0.39/min

\*Add up to 3 additional lines permitted

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**EXHIBIT G**

REDACTED – FOR PUBLIC INSPECTION

**EXHIBIT H**

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**Non-Rural Wire Center Population Density Data**

Keystone seeks ETC designation in all wire centers of the non-rural telephone companies Verizon North, Inc. and Verizon Pennsylvania, Inc. that are within Keystone’s proposed ETC service area:

**Verizon North Inc. – PA**

Served	Wire Center	Exchange	2010 Pops	Square Miles	Pop Density
ENTIRE	BERVPAXB	BERNVILLE	11220	92.95	120.7
PARTIAL	FYTWPA XF	FRYSTOWN	6549	59.84	109.4
PARTIAL	JNTWPAXJ	JONESTOWN	373	3.7	100.8
ENTIRE	ROBSPAXR	ROBESONIA	5172	22.55	229.4
PARTIAL	WMLSPAXW	WOMELSDORF	5045	20.34	248.0

**Verizon North Inc. – PA (Contel)**

Served	Wire Center	Exchange	2010 Pops	Square Miles	Pop Density
ENTIRE	BRSPAXB	BEAVER SPRINGS	6133	109.78	55.9
ENTIRE	MDBGPAXM	MIDDLEBURG	6338	53.13	119.3
PARTIAL	MNZVPAXM	MANTZVILLE	3860	49.01	78.8
ENTIRE	MPLMPAXM	MOUNT PLEASANT MILLS	1496	18.59	80.5
ENTIRE	MSBGPA XM	MCKEANSBURG	3503	43.24	81.0
ENTIRE	SHDMPAXS	SELINGROVE	5574	18.87	295.4
ENTIRE	SLGVPAXS	SELINGROVE	20467	121.7	168.2

**Verizon North Inc. – PA (Quaker St.)**

Served	Wire Center	Exchange	2010 Pops	Square Miles	Pop Density
ENTIRE	AUBNPAXA	AUBURN	2443	28.95	84.4
ENTIRE	BKSDPAXB	BROOKSIDE	920	102.18	9.0
ENTIRE	BRBSPAXB	LOYALSOCK	424	33.49	12.7
ENTIRE	FDBGPA XF	FRIEDENSBURG	5856	26.56	220.5
PARTIAL	KMTNPAXK	KEMPTON	3377	54.37	62.1
ENTIRE	LYLCPAXL	LOYALSOCK	5531	83.23	66.5
ENTIRE	LYLCPAXS	LOYALSOCK	3068	15.86	193.4
ENTIRE	PNGVPAXP	PINE GROVE	9338	70.29	132.8
ENTIRE	RLTNPA XR	TROUT RUN	653	55.99	11.7

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ENTIRE	TRRNPAXT	TROUT RUN	3725	199.06	18.7
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**Verizon Pennsylvania, Inc.**

Served	Wire Center	Exchange	2010 Pops	Square Miles	Pop Density
PARTIAL	ASLDPAAL	ASHLAND	8452	30.95	273.1
ENTIRE	BLLFPABE	BELLEFONTE	23373	187.96	124.4
ENTIRE	BOALPABO	BOALSBURG	6701	37.45	178.9
ENTIRE	CTHLPACH	CENTRE HALL	4679	58.58	79.9
PARTIAL	DAVLPADA	DANVILLE	16064	85.25	188.4
PARTIAL	EYBGPAEL	ELYSBURG	7262	59.85	121.3
ENTIRE	FAVLPAFR	FRACKVILLE	6425	19.58	328.1
ENTIRE	FLWDP AFL	FLEETWOOD	11985	26.09	459.4
ENTIRE	GIVLPAGR	GIRARDVILLE	1786	2.86	624.5
ENTIRE	HMBGPAHB	HAMBURG	14513	69.8	207.9
ENTIRE	HPVLP AHE	WILLIAMSPORT	3340	18.71	178.5
ENTIRE	JRSHPAJS	JERSEY SHORE	13395	162.53	82.4
ENTIRE	KLMTPAKU	KULPMONT	4963	13.36	371.5
PARTIAL	KZTNPAKZ	KUTZTOWN	14554	40.56	358.8
ENTIRE	LCHNPAES	LOCK HAVEN	15051	121.34	124.0
ENTIRE	LRDLPALB	READING	26035	20.76	1254.1
ENTIRE	MCADPAMC	MCADOO	3784	13.96	271.1
ENTIRE	MHCYPAMC	MAHANOEY CITY	7263	21.43	338.9
ENTIRE	MLHMPAMI	MILLHEIM	4546	112.49	40.4
ENTIRE	MLTNPAMI	MILTON	10849	37.19	291.7
PARTIAL	MLVLPAMI	MILLVILLE	1040	25.62	40.6
ENTIRE	MNVIPAMI	MINERSVILLE	9655	42.88	225.2
PARTIAL	MTCRPAMC	MOUNT CARMEL	7905	14.55	543.3
ENTIRE	MUVLP AES	WILLIAMSPORT	5709	8.03	711.0
ENTIRE	NRLDAAA	NORTHUMBERLAND	7551	28.21	267.7
ENTIRE	NWPHPANP	NEW PHILADELPHIA	3512	36.78	95.5
ENTIRE	ORBGAOR	ORWIGSBURG	7240	28.82	251.2
PARTIAL	OSMLPAES	OSCEOLA MILLS	526	16.71	31.5
PARTIAL	PHBGPA PH	PHILIPSBURG	6209	131.72	47.1
ENTIRE	PLSGPAPG	BELLEFONTE	3363	13.08	257.1
ENTIRE	PTTVPAPO	SAINT CLAIR	22767	19.1	1192.0
PARTIAL	PTTWPAPT	POTTSTOWN	1679	7.31	229.7
ENTIRE	RDNGPARE	READING	99529	24.77	4018.1

ENTIRE	RENVPAE	RENOVO	3432	509.77	6.7
ENTIRE	SCHNPASC	SCHUYLKILL HAVEN	9579	17.23	555.9
ENTIRE	SHLNPASH	READING	38118	36.85	1034.4
ENTIRE	SHMKPASH	SHAMOKIN	19457	67.25	289.3
ENTIRE	SHNDPASH	SHENANDOAH	7630	10.2	748.0
ENTIRE	SLWBPASL	READING	27789	20.07	1384.6
ENTIRE	SNBPASU	SUNBURY	15781	65.82	239.8
PARTIAL	SNSPPASS	READING	40110	36.71	1092.6
ENTIRE	SPMLPASM	SPRING MILLS	2297	44.16	52.0
ENTIRE	STCGPAES	STATE COLLEGE	80631	69.26	1164.2
ENTIRE	SWSHPASS	SNOW SHOE	3450	187.76	18.4
ENTIRE	TAMQPATA	TAMAQUA	11491	56.85	202.1
ENTIRE	WLPTPAWI	WILLIAMSPORT	54397	87.51	621.6
ENTIRE	WLRCPAWO	WOOLRICH	5252	115.05	45.6
ENTIRE	WSHVPAWA	WASHINGTONVILLE	4444	63.41	70.1

**Rural Wire Center Population Density Data**

Below is population density information for wire centers of five rural telephone companies where Keystone is seeking ETC designation below the study area level.

**(1) Commonwealth Telephone Company**

Keystone seeks ETC designation in the Leesport, Tremont, and Valley View wire centers.

Commonwealth Telephone Company					
Exchange	Wire Center	2010 Pops	Square Miles	Pop Density	Coverage
ATGLEN	ATGLPAXA	8369	43.09	194.2	None
BANGOR	BNGRPAXB	17368	53.91	322.2	None
BANGOR	RMNHPAXR	750	7.30	102.7	None
BENTON	BNTNPAXB	5501	100.61	54.7	None
BLOSSBURG	BLBGPAXB	2149	39.44	54.5	None
BROOKLYN	BRKLPAXB	1058	25.77	41.0	None
CENTER MORELAND	CTMRPAXC	3163	30.52	103.6	None
CLARKS SUMMIT	CLSMPAXC	24707	75.20	328.6	None
CONYNGHAM-DRUMS	CNYNPAXC	14631	69.55	210.4	None
COOPERSBURG	CPBGPAXC	7567	10.73	705.4	None
COVINGTON	CVTNPAXC	1454	36.99	39.3	None
DALLAS	DLLSPAXD	15756	44.87	351.2	None
DALTON	DLTNPAXD	3778	25.87	146.0	None
DUSHORE	DSHRPAXD	3006	117.96	25.5	None
EAGLES MERE	EGMRPAXE	269	33.70	8.0	None
ELIZABETHVILLE	EZVLPAXE	7761	102.90	75.4	None
ESTELLA	ESTLPAXE	1760	151.07	11.6	None
FACTORYVILLE	FCTVPAXF	4350	34.63	125.6	None
FERNDALE	FRNDPAXF	5198	36.88	140.9	None
GAP	GAP PAXG	9799	33.04	296.6	None
GRATZ	GRTZPAXG	2030	23.50	86.4	None
HALLSTEAD	HLSTPAXH	3991	37.65	106.0	None
HARDING	HDNGPAXH	3545	21.74	163.0	None
HARVEYS LAKE	HVLKPAXH	3992	16.53	241.6	None
HENSEL	HNSLPAXH	7487	65.52	114.3	None
HUNTINGTON MILLS	HNTMPAXH	2984	50.29	59.3	None
KIRKWOOD	KRWDPAXK	8343	62.18	134.2	None
LACEYVILLE	LCYVPAXL	2754	59.06	46.6	None
LAKE WINOLA	LKWNPAXL	3025	26.53	114.0	None
LAPORTE	LAPTAXL	648	54.55	11.9	None
LAWRENCEVILLE	LRVLPAXL	2298	34.86	65.9	None

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LAWSVILLE	LVCNPAXL	2244	53.87	41.7	None
LE RAYSVILLE	LRYVPAXL	1456	44.76	32.5	None
LEESPORT	LSPTPAXL	20929	57.06	366.8	Entire
LEWISBERRY	LWBYPAXL	21777	49.16	443.0	None
LIBERTY	LBTYPAXL	1304	65.61	19.9	None
LYKENS	LYKNPAXL	2859	10.08	283.6	None
MANSFIELD	MNFDPAXM	6015	52.44	114.7	None
MEHOOPANY	MHPNPAXM	2769	91.53	30.3	None
MIDDLEBURY CENTER	MDCTPAXM	1277	48.94	26.1	None
MILLERSBURG	MLBGPAXM	6761	32.80	206.1	None
MONTROSE	MTRSPAXM	4364	41.37	105.5	None
MORRIS	MRRSPAXM	814	93.11	8.7	None
MUHENBURG	MHBGPAXM	4195	34.97	119.9	None
MUNCY VALLEY	MNVYPAXM	759	94.69	8.0	None
NEW ALBANY	NWALPAXN	2795	108.13	25.8	None
NICHOLSON	NCSNPAXN	1977	21.34	92.6	None
NOXEN	NOXNPAXN	2768	83.51	33.1	None
NUANGOLA	NNGLPAXN	9053	46.36	195.3	None
NUREMBERG	NRMBPAXN	3693	46.21	79.9	Partial
ORANGEVILLE	ORVLPAXO	2869	30.95	92.7	None
PEN ARGYL	PNARPAXP	10104	18.48	546.7	None
POCONO LAKE	PCLKPAXP	13936	91.19	152.8	None
PORTLAND	PTLDPAXP	3958	21.75	181.9	None
QUARRYVILLE	QRVLPAXQ	15941	62.09	256.7	None
RAWLINSVILLE	RWVLPAXR	7956	47.95	165.9	None
RINGTOWN	RGTWPAXR	2940	41.44	70.9	Partial
ROME	ROMEPAXR	6015	151.09	39.8	None
RUSH	RUSHPAXR	766	26.75	28.6	None
SAYLORSBURG	SYBGPAXS	17061	63.43	269.0	None
SHICKSHINNY	SHCKPAXS	2938	26.21	112.1	None
SPRINGVILLE	SVLSPAXS	5246	117.55	44.6	None
ST JOSEPH	STJSPAXS	3077	93.49	32.9	None
SUSQUEHANNA	SSQHPAXS	3952	52.19	75.7	None
SWEET VALLEY	SWVYPAXS	4567	82.54	55.3	None
TIOGA	TIOGPAXT	1669	41.04	40.7	None
TOWANDA	TWNDPAXT	10134	142.47	71.1	None
TOWER CITY	TWCYPAXT	6403	61.40	104.3	Partial
TREMONT	TRMTPAXT	3911	49.85	78.5	Entire
TROY	TROYPAXT	5794	140.82	41.1	None
TRUCKSVILLE	TKVLPAXT	9952	23.51	423.3	None
TUNKHANNOCK	TNKHPAXT	9481	93.81	101.1	None

UHLERSTOWN	ERWNPAXE	1788	14.90	120.0	None
ULSTER	ULSTPAXU	1619	34.94	46.3	None
VALLEY VIEW	VLVWPAXV	4575	45.94	99.6	Entire
WAPWALLOPEN	WPWLPAXW	2801	35.30	79.4	None
WARREN CENTER	WRCTPAXW	949	42.14	22.5	None
WELLSBORO	WLBOPAXW	10601	309.44	34.3	None
WYALUSING	WYALPAXW	5164	136.42	37.9	None

**(2) Conestoga Telephone & Telegraph Company**

Keystone seeks ETC designation in the Birdsboro, Douglassville, Green Hills, Oley, Topton, and Yellow House wire centers.

Conestoga Telephone & Telegraph Company					
Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
BALLY	BLLYPAXB	8423	42.71	197.2	Partial
BOYERTOWN	BOTWPAXB	23495	36.90	636.7	Partial
BIRDSBORO	BRDSPAXB	18303	39.25	466.3	Entire
DOUGLASSVL	DGVLPAXD	7295	13.75	530.5	Entire
GREENHILLS	GNHLPAXG	3946	17.43	226.4	Entire
MORGANTOWN	MGTWPAXM	12554	62.32	201.4	Partial
OLEY	OLEYPAXO	4862	28.17	172.6	Entire
TOPTON	TOTNPAXT	10948	39.48	277.3	Entire
YELLOW HS	YLHSPAXY	7463	27.16	274.8	Entire
SASSAMANSVILLE	SNVLPAXS	7727	23.77	325.1	Partial

**(3) United Telephone Company of Pennsylvania**

Keystone seeks ETC designation in the Beech Creek, Howard, Mill Hall, and Zion wire centers.

United Telephone Company of Pennsylvania					
Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
ALLENSVILLE	ALVLPAXA	1705	22.73	75.0	None
BEDFORD	BDFRPAXB	9953	112.98	88.1	None
BEDFORD VALLEY	BDVYPAXB	1414	53.30	26.5	None
BEECH CREEK	BCCKPAXB	3767	150.16	25.1	Entire
BELLEVILLE	BLVLPAXB	4132	89.85	46.0	None
BIGLERVILLE	BIGVPAXB	10021	87.19	114.9	None
BLACKTOWN	BLTWPAXB	5296	48.58	109.0	None
BLAIN	BLINPAXB	3046	146.46	20.8	None

BLUE RIDGE SUMMIT	BLRSPAXB	3811	11.26	338.4	None
BRUIN	BRINPAXB	780	15.58	50.1	None
BUTLER	BTLRPAXB	49261	130.25	378.2	None
CARLISLE	CRLSPAXC	57328	148.55	385.9	None
CHAMBERSBURG	CHBGPAXC	49237	95.55	515.3	None
CHARLESVILLE	CLVLPAXC	1338	40.33	33.2	None
CHICORA	CHCRPAXC	5571	49.69	112.1	None
CLAYSBURG	CYBGPAXC	4373	34.18	127.9	None
CLEARVILLE	CLRVPAXC	2176	152.61	14.3	None
COLUMBIA	CLMAPAXC	17649	20.33	868.1	None
CONNOQUENESSING	CNQNPAXC	3493	20.49	170.5	None
DRY RUN	DYRNPAXD	4343	115.51	37.6	None
DUNCANNON	DNCNPAXD	9246	52.60	175.8	None
EAST WATERFORD	EWFRPAXE	2028	104.17	19.5	None
EAU CLAIRE	EUCLPAXE	1730	40.12	43.1	None
ELIZABETHTOWN	EZTWPAXE	30099	58.35	515.8	None
EMLENTON	EMTNPAXE	1571	31.84	49.3	None
EVANS CITY	EVCYPAXE	10707	31.49	340.0	None
EVERETT	EV RTPAXE	7101	77.89	91.2	None
FAIRFIELD	FRFDPAXF	7736	61.65	125.5	None
FAYETTEVILLE	FYVLPAXF	11277	63.52	177.5	None
FISHERTOWN	FSTWPAXF	5102	70.44	72.4	None
FOXBURG	FXBGPAXF	2571	49.47	52.0	None
GETTYSBURG	GTBGPAXG	26806	131.59	203.7	None
GREENCASTLE	GNCSPAXG	19063	75.97	250.9	None
HANOVER	HNVRPAXH	56417	84.37	668.7	None
HARRISVILLE	HRVLPAXH	3388	40.35	84.0	None
HEWITT	FLNTMDFS	405	31.74	12.8	None
HOPEWELL	HPWLPAXH	2237	40.95	54.6	None
HOWARD	HWRDPAXH	2853	45.07	63.3	Entire
HYNDMAN	HYNDPAXH	2849	58.93	48.3	None
ICKESBURG	ICBGPAXI	2545	46.51	54.7	None
LITTLESTOWN	LTTWPAXL	12416	47.48	261.5	None
LIVERPOOL	LVRPPAXL	2032	21.95	92.6	None
LOYSBURG	LYBGPAXL	2640	44.75	59.0	None
LOYSVILLE	LYSVPAXL	2337	35.81	65.3	None
MARIETTA	MRTTPAXM	9183	24.84	369.7	None
MARION	MARNPAXM	3487	18.34	190.1	None
MARKLESBURG	MKBGPAXM	1617	56.37	28.7	None
MARTINSBURG	MRBGPAXM	5258	31.70	165.8	None

MARYSVILLE	MYVIPAXM	5253	31.04	169.3	None
MCALISTERVILLE	MCLVPAXM	3450	39.65	87.0	None
MCCONNELLSBURG	MCBGPAXM	7935	164.05	48.4	None
MCCONNELLSTOWN	MNTWPAXM	1202	18.57	64.7	None
MERCERSBURG	MRCBPAXM	9368	118.42	79.1	None
MERIDIAN	MRDNPAXM	4096	9.11	449.6	None
MIFFLINTOWN	MFTWPAXM	7798	94.76	82.3	None
MILL HALL	MLHLPAXE	6954	90.94	76.5	Entire
MILLERSTOWN	MLTWPAXM	1678	26.39	63.6	None
MOUNT HOLLY SPRINGS	MHSPPAXM	9813	88.35	111.1	None
MOUNT JOY	MTJYPAXM	18530	37.02	500.5	None
MOUNTVILLE	MTVLPAXM	12999	12.66	1027.0	None
NEW BLOOMFIELD	NBFDPAZN	10809	89.90	120.2	None
NEW OXFORD	NWOXPAXN	13694	50.28	272.4	None
NEWBURG	NWBGPAZN	4079	47.91	85.1	None
NEWPORT	NWPTPAXN	8926	101.96	87.5	None
NEWVILLE	NVLCPAZN	12377	103.48	119.6	None
NIXON	NIXNPAZN	4296	21.98	195.5	None
NORTH WASHINGTON	NWSHPAXN	2132	39.89	53.4	None
ORBISONIA	ORBSPAXO	3646	124.77	29.2	None
OSTERBURG	OSBGPAZO	1839	36.91	49.8	None
PARKER	PRKRPAXP	623	9.79	63.7	None
PETROLIA	PTRLPAXP	1301	11.71	111.1	None
PLAIN GROVE	PAGVPAXP	1795	28.79	62.3	None
PORT ROYAL	PTRYPAXP	4990	68.51	72.8	None
PORTERSVILLE	PTVLPAXP	5374	60.02	89.5	None
PROSPECT	PRSPPAXP	4407	36.43	121.0	None
REEDSVILLE	RDVLPAXR	8375	129.47	64.7	None
ROARING SPRING	RRSPPAXR	5994	38.77	154.6	None
RICHFIELD	RCFDPAXR	3234	45.73	70.7	Partial
SAINT THOMAS	STTMPAXS	9316	94.70	98.4	None
SHELLSBURG	SCBGPAXS	3200	100.15	32.0	None
SHADE GAP	SHGPPAXS	1391	36.75	37.8	None
SHIPPENSBURG	SHIPPAXS	29748	176.48	168.6	None
SLIPPERY ROCK	SLRKPAXS	12096	69.66	173.6	None
STATE LINE	CMLDMDCM	543	28.81	18.8	None
THOMPSONTOWN	TMTWPAXT	4173	66.35	62.9	None
THREE SPRINGS	THSPPAXT	2260	43.85	51.5	None
VOLANT	VLNTPAXV	2726	34.58	78.8	None
WAYNESBORO	WYBOPAXW	28990	89.27	324.7	None

WEST SUNBURY	WSNBPAW	3107	37.76	82.3	None
WILLIAMSBURG	WLBGPAXW	3706	64.12	57.8	None
YORK SPRINGS	YRSPPAY	5948	47.81	124.4	None
ZION	ZIONPAXZ	5057	47.43	106.6	Entire

**(4) Windstream Pennsylvania, Inc.**

Keystone seeks ETC designation in the Hughesville, Muncy, Montgomery, Port Matilda, Turbotville, and Watsonstown wire centers.

Windstream					
Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
ALBION	ALBNPAXA	7931	77.03	103.0	None
APOLLO	APLLPAXA	8278	52.21	158.5	None
BOBTOWN	BBTWPAXB	2574	35.15	73.2	None
BRAVE	BRVEPAXB	437	14.32	30.5	None
BROCKWAY	BCWYPAXB	5074	82.90	61.2	None
BROOKVILLE	BKVLPAxB	7622	84.48	90.2	None
CALLENSBURG	CALBPAXC	739	17.94	41.2	None
CARMICHAELS	CRMCPAXC	7115	65.35	108.9	None
COALPORT	CLPTPAXC	2927	37.37	78.3	None
COCHRANTON	CCHRPAXC	6369	110.27	57.8	None
COLVER	COVRPAXC	882	1.62	545.0	None
CONNEAUT LAKE	CNLKPAXC	8388	100.34	83.6	None
CONNEAUTVILLE	CNTVPAXC	5083	114.46	44.4	None
CORSICA	CRSCPAXC	1205	17.98	67.0	None
DARLINGTON	DRTNPAXD	1656	14.17	116.9	None
DAYTON	DAYTPAXD	3996	96.87	41.3	None
DELMONT	DLMTPAXD	5998	15.12	396.7	None
DRIFTWOOD	DRWDPAXD	780	240.26	3.2	None
EAST BRADY	EBRDPAXE	2354	35.36	66.6	None
ELERTON	ELDRPAXE	5027	83.04	60.5	None
EMPORIUM	EMPRPAXE	4602	202.12	22.8	None
ENON VALLEY	ENVYPAXE	4960	54.53	91.0	None
EXPORT	EXPRPAXE	31792	48.39	657.0	None
FORD CITY	FDCYPAXF	8878	44.11	201.3	None
FREDERICKTOWN	FRTWPAXF	2628	9.47	277.5	None
FREDONIA	FRDNPAXF	3909	46.67	83.8	None
GLASGOW	GLGOPAXG	2029	51.01	39.8	None
GRAYSVILLE	GYVLPAXG	2298	113.65	20.2	None

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EXHIBIT J

GREENSBORO	GNBOPAXG	1758	17.23	102.0	None
GUYS MILLS	GYMLPAXG	2386	53.87	44.3	None
HARRISON CITY	HRCYPAXH	10565	15.71	672.7	None
HAWTHORN	HWTHPAXH	2120	44.82	47.3	None
HAZEN	HAZNPAXH	1902	126.13	15.1	None
HUGHESVILLE	HGHVPAXH	7775	87.46	88.9	Entire
JAMESTOWN	JMTWPAXJ	3529	51.72	68.2	None
JOHNSONBURG	JSBGPAXJ	3100	21.74	142.6	None
KERSEY	KRSYPAXK	2703	44.62	60.6	None
KITTANNING	KTNGPAXK	16020	96.50	166.0	None
KNOX	KNOXPAXK	4952	74.47	66.5	None
LANSFORD	LNFRPAXL	10801	30.57	353.3	Partial
LEECHBURG	LCBGPAXL	12004	49.40	243.0	None
LINESVILLE	LNSVPAXL	4020	75.18	53.5	None
LUTHERSBURG	LUBGPAXL	2263	38.22	59.2	None
MEADVILLE	MDVLPAXM	27945	100.81	277.2	None
MIDWAY	MDWYPAXM	3413	26.87	127.0	None
MONTGOMERY	MTGMPAXE	5539	78.64	70.4	Entire
MOUNT MORRIS	MTMRPAXM	860	17.57	48.9	None
MUNCY	MNCYPAXM	10246	64.84	158.0	Entire
NEW ALEXANDRIA	NWAXPAXN	5999	54.03	111.0	None
NEW BETHLEHEM	NWBHPAXN	4787	82.29	58.2	None
NEW FREEPORT	NWFPPAXN	910	52.37	17.4	None
PENFIELD	PNFDPAXB	1431	63.71	22.5	None
PORT MATILDA	PTMTPAXP	8137	102.72	79.2	Entire
RICES LANDING	JFSNPAXJ	4783	25.64	186.6	None
RICHEYVILLE	RCYVPAXR	2365	14.03	168.5	None
RIDGWAY	RGWYPAXR	6547	168.12	38.9	None
RIMERSBURG	RMBGPAXR	2892	52.07	55.5	None
ROCKLAND	RKLDPAXR	1855	59.99	30.9	None
ROGERSVILLE	RRVLPAXR	1617	75.30	21.5	None
RURAL VALLEY	RRVYPAXR	3837	47.21	81.3	None
SAEGERTOWN	SAEGPAXS	5426	64.20	84.5	None
SAINT MARYS	STMYPAXS	14418	204.25	70.6	None
SANDY LAKE	SNLKPAXS	5123	76.78	66.7	None
SHEAKLEYVILLE	SHKVPAXS	3665	64.37	56.9	None
SHEFFIELD	SHFDPAXS	3710	240.92	15.4	None
SHIPPENVILLE	SPVLPAXS	1929	30.42	63.4	None
SIGEL	SIGLPAXS	1241	46.88	26.5	None
SLIGO	SLIGPAXS	1194	20.02	59.7	None

SPRAGGS	SPGGPAXS	769	25.27	30.4	None
STRATTANVILLE	SAVLPAXS	1846	46.61	39.6	None
SUMMERVILLE	SUVPAXS	1757	44.90	39.1	None
TEMPLETON	TMTNPAXT	1273	36.48	34.9	None
TIMBLIN	TMBLPAXT	1200	37.60	31.9	None
TOWNVILLE	TWVLPAXT	2561	64.34	39.8	None
TURBOTVILLE	TUVLPAXT	2856	30.16	94.7	Entire
WARRIORS MARK	WRMRPAXW	2526	37.32	67.7	None
WATSONTOWN	WTTWPAXW	13631	78.56	173.5	Entire
WAYNESBURG	WYBGPAXW	14303	115.65	123.7	None
WEEDVILLE	WEDVPAXW	1230	35.64	34.5	None
WEST SPRINGFIELD	WSPFPAXW	3175	36.21	87.7	None
WESTFORD	WSFRPAXW	2084	29.70	70.2	None
WILCOX	WLCXPAXW	909	82.12	11.1	None
WORTHINGTON	WOTNPAXW	5810	71.53	81.2	None

**(5) Mahanoy & Mahantongo Telephone Co.**

Keystone seeks ETC designation in the Mandata (LCKLPAXR) and Trevorton wire centers.

Mahanoy & Mahantongo Telephone Co.					
Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
MANDATA	LCKLPAXR	1343	33.46	40.1	Entire
MANDATA	MDTAPAXH	3453	61.01	56.6	Partial
TREVORTON	TRVRPAXR	3049	35.04	87.0	Entire

Keystone Seeks ETC designation in the entire study areas of the following rural telephone companies:

**Buffalo Valley Telephone Co.**

Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
MIFFLINBURG	HRTNPAXH	2913	81.2	35.9	ENTIRE
LEWISBURG	LWBGPAXL	21530	62.84	342.6	ENTIRE
MIFFLINBURG	MFBGPAXM	11029	110.09	100.2	ENTIRE
LEWISBURG	WMTNPAXW	3736	17.42	214.5	ENTIRE

**Frontier Communications of Lakewood, LLC**

Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
LAKWOOD	LKWDPAXL	2595	24.79	104.7	ENTIRE

**Pennsylvania Telephone Co.**

Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
OVAL	OVALPAXO	3685	68.23	54.0	ENTIRE

**Sugar Valley Telephone Co.**

Exchange	Wire Center Code	2010 Pops	Square Miles	Pop Density	Coverage
LOGANTON	LGTNPAXL	3293	86.02	38.3	ENTIRE

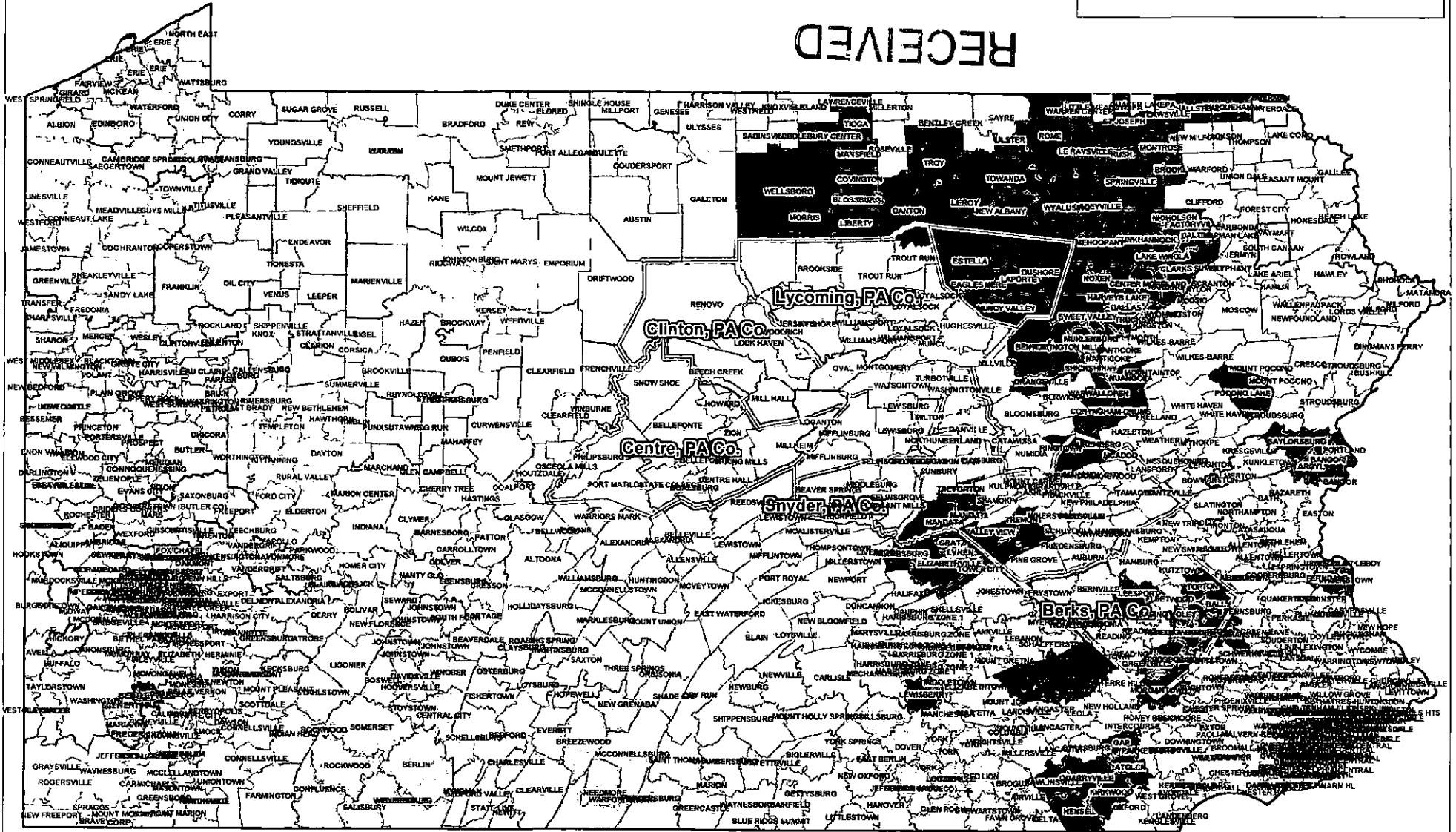
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— Wire Center / Exchange Boundary

— County Boundary



**Keystone ETC  
Exchange / Wire Center**

- ARMSTRONG TELEPHONE CO. - NORTH
- ARMSTRONG TELEPHONE CO. OF PENNSYLVANIA
- BENTLEYVILLE COMM. CORP. DBA BENTLEYVILLE TELCO
- BUFFALO VALLEY TELEPHONE CO.
- CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY
- CITIZENS TELEPHONE CO. OF KECKSBURG
- COMMONWEALTH TELEPHONE COMPANY
- CONESTOGA TELEPHONE & TELEGRAPH CO.
- DENVER & EPHRATA TELEPHONE & TELEGRAPH CO.
- DEPOSIT TELEPHONE CO., INC.
- FRONTIER COMMUNICATIONS OF BREEZEWOOD, LLC
- FRONTIER COMMUNICATIONS OF CANTON, LLC
- FRONTIER COMMUNICATIONS OF LAKEWOOD, LLC
- FRONTIER COMMUNICATIONS OF OSWAYO RIVER, LLC
- FRONTIER COMMUNICATIONS OF PENNSYLVANIA, LLC
- HANCOCK TELEPHONE CO. NY
- HICKORY TELEPHONE CO.
- IRONTON TELEPHONE CO.
- LACKAWAXEN TELECOMMUNICATIONS SERVICES, INC.
- LAUREL HIGHLAND TELEPHONE CO.
- MAHANOY & MAHANTONGO TELEPHONE CO.
- MARIANNA - SCENERY HILL TELEPHONE CO.
- NORTH EASTERN PENNSYLVANIA TELEPHONE CO.
- NORTH PENN TELEPHONE CO.
- NORTH PITTSBURGH TELEPHONE CO.
- PALMERTON TELEPHONE CO.
- PENNSYLVANIA TELEPHONE CO.
- PYMATUNING INDEPENDENT TELEPHONE CO.
- SOUTH CANAAN TELEPHONE CO.
- SUGAR VALLEY TELEPHONE CO.
- UNITED TEL CO. OF PENNSYLVANIA
- VENUS TELEPHONE CORP
- VERIZON NORTH INC.-PA
- VERIZON NORTH INC.-PA (CONTEL)
- VERIZON NORTH INC.-PA (QUAKER ST)
- VERIZON PENNSYLVANIA, INC.
- WEST SIDE TELEPHONE CO.
- WINDSTREAM PENNSYLVANIA, INC.
- YUKON - WALTZ TELEPHONE CO.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of	)	
	)	
Keystone Wireless, LLC d/b/a Immix Wireless	)	
Petition for Designation as an	)	Docket No. _____
Eligible Telecommunications Carrier	)	
In the Commonwealth of Pennsylvania	)	

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true copy of the foregoing document using first class mail upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Pennsylvania Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923

Pennsylvania Office of Small Business Advocate  
300 North Second Street  
Suite 1102  
Harrisburg, Pennsylvania 17101

Pennsylvania Office of the Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 15th Floor  
Harrisburg, Pennsylvania 17120

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**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**



Caressa D. Bennet

*Counsel for Keystone Wireless, LLC  
d/b/a Immix Wireless*

Dated this 6<sup>th</sup> day of February, 2012

From: (202) 371-1500  
Colleen von Hollen  
Bennet & Bennet, PLLC  
4350 East West Highway  
Suite 201  
Bethesda, MD 20814

Origin ID: OBTA

FedEx  
Express



J12101112190225

Ship Date: 06FEB12  
ActWgt: 6.0 LB  
CAD: 47117441NET3250

Delivery Address Bar Code



SHIP TO: (202) 551-0024

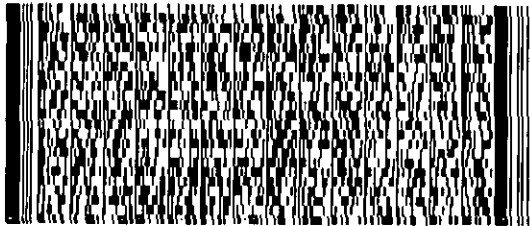
BILL SENDER

Rosemary Chiavetta  
Pennsylvania Public Utility Comm  
400 NORTH ST  
COMMONWEALTH KEYSTONE BUILDING  
HARRISBURG, PA 17120

Ref # 10434  
Invoice #  
PO #  
Dept #

TUE - 07 FEB A1  
STANDARD OVERNIGHT

TRK# 7980 2900 5845  
0201



**ZN MDTA**

17120  
PA-US  
MDT

