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June 15, 2006

Via Electronic Filing

Ms. Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, Michigan 48909

Re: In the matter, on the Commission's own motion, to examine the
Commission's role in eligible telecommunications carrier determinations
MPSC Case No. U-14900

Dear Ms. Kunkle:

Enclosed for filing is Centennial Michigan RSA 6 Cellular Corp., Centennial Michigan RSA 7 Cellular Corp., and Michiana Metronet Inc.'s (collectively, "Centennial") Response to April 13, 2006 Order. Confidential Exhibit D is being filed under seal by separate cover.

If you have any questions, please contact my office.

Very truly yours,

PLUNKETT & COONEY, P.C.

Michael J.
Brown

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Enclosure

Before the
MICHIGAN PUBLIC SERVICE COMMISSION

APPLICATION FOR CONTINUED DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF MICHIGAN

I. DESCRIPTION OF CENTENNIAL

¹ In the continental United States, Centennial Communications Corp. (through various subsidiaries) offers cellular service to more than 500,000 subscribers in thirty markets located in six

Michigan RSA 6 Cellular Corp. holds the A block cellular license for RSA 6, which covers the areas in and around Roscommon, Michigan. Centennial Michigan RSA 7 Cellular Corp. holds the A block cellular license for RSA 7, which covers the areas in and around Newaygo, Michigan. Michiana Metronet, Inc. holds the A block cellular license covering the southwestern part of Michigan. Centennial also provides Personal Communications Services (“PCS”) in the Lansing/Grand Rapids area.² Pursuant to these authorizations, Centennial serves a number of rural areas in Michigan. Attached as Exhibit A hereto is a map showing Centennial’s complete service area in the State of Michigan.

The Commission designated Centennial an ETC in 2003.³ In fact, Centennial affiliates have held ETC certifications since 1997, when Centennial received ETC designations and began receiving federal high-cost support for Puerto Rico, both as a facilities-based CLEC and as a CMRS provider. Other Centennial affiliates in the continental United States hold rural and/or non-rural ETC designations in Mississippi and Louisiana. For example, in Louisiana, Centennial is the **only** entity that provides **any** telecommunications services in certain highly rural areas.⁴

states (Texas, Mississippi, Louisiana, Ohio, Indiana, and Michigan). Centennial’s operations in the Caribbean include Puerto Rico (where it provides Personal Communications Service (PCS) to over 325,000 subscribers), the Dominican Republic and the United States Virgin Islands.

² *In the matter of the application of Michiana Metronet, Inc., Centennial RSA 6 Cellular Corp., Centennial RSA 7 Cellular Corp., for expansion of its current designated service area as an eligible telecommunications carrier in the State of Michigan*, Case No. U-13751 (April 28, 2005).

³ *In the matter of the application of Michiana Metronet, Inc., Centennial RSA 6 Cellular Corp., Centennial RSA 7 Cellular Corp. for designation as eligible telecommunications carriers pursuant to Section 214(e)(6) of the Communications Act of 1934*, Case No. U-13751 (September 11, 2003).

⁴ See ruling of the Louisiana PSC directing Centennial to extend service to the unserved areas of Shaw and Blackhawk, Louisiana. Centennial Lafayette Communications, LLC; Centennial Beauregard Cellular, LLC; Centennial Hammond Cellular, LLC; Centennial Caldwell Cellular Corp., Centennial Morehouse Cellular, LLC, Docket No. U-27174, *In re: Application for designation as an [ETC] pursuant to Section 214(e)(6) of the Communications Act of 1934 for the*

Centennial, therefore, is quite familiar with the requirements and obligations associated with rural ETC status.

In the case of Michigan, a continued designation of Centennial as an ETC will allow Centennial to receive high-cost support to upgrade and expand its current network in Michigan, thereby continuing to improve and expand its services to these rural regions; to enhance its ability to more quickly deploy advanced services; and to offer residents a viable competitive alternative to the incumbent carrier. Centennial's specific plans for Michigan include adding nine new cell sites to improve coverage; improvements to retail distribution and customer service; and improved network capability. This will provide added benefits for its Michigan customers who live in or travel to areas that receive universal service support.

II. IDENTIFICATION OF THE GEOGRAPHIC AREA FOR WHICH CONTINUING ETC DESIGNATION IS SOUGHT

Centennial requests ETC designation for the same areas where it is designated as an ETC today. These areas are highlighted in green on the attached map in Exhibit A. The Commission designated Centennial's specific ETC areas⁵ in 2003. As the Commission is aware, Centennial may only offer its CMRS services within the areas for which it holds a license from the FCC. As noted in the Commission's earlier order, Centennial has sought and received ETC designation for its entire wireless service area within Michigan. That same designation should continue.

purposes of receiving universal service support in Louisiana (on reconsideration), Order No. U-27174 (effective as of January 14, 2004; issued May 12, 2004).

⁵ See, notes 2 and 3, *supra*.

III. CENTENNIAL SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC.

As described below, Centennial satisfies each of the elements required for ETC designation set forth in MPSC's order of April 13, 2006.⁶ In addition, Exhibit F, attached hereto, summarizes Centennial's compliance with the requirements of the MPSC's order.

A. Centennial Offers All Of The Services Supported By The High-Cost Universal Service Program

Centennial provides all of the services and functionalities supported by the federal universal service program, as enumerated in Section 54.101(a) of the FCC's rules, throughout the areas of Michigan for which it is already designated an ETC. Centennial also makes Lifeline and Link-Up services available to qualifying low-income customers in Michigan, as required by Section 54.405 of the FCC's rules. Centennial will continue to publicize the availability of Lifeline and Link Up in a manner reasonably designed to reach those Michigan residents likely to qualify for the discounts. As described below (and in the Declaration attached as Exhibit B hereto), Centennial now provides the supported services throughout its Michigan service areas over its existing network infrastructure and licensed spectrum.

This FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:

1. Voice-grade access to the public switched telephone network;
2. Local usage;
3. Dual tone multi-frequency signaling or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and

⁶ *In the Matter, on the Commission's own motion, to examine the Commission's role in eligible telecommunications carrier designations*, Case U-14530 (April 13, 2006).

9. Toll limitation for qualifying low-income consumers.

47 C.F.R. §54.101(a). Centennial provides, each of these services, as described below.

1. Voice-Grade Access To The Public Switched Telephone Network. The FCC has defined voice grade access as “a functionality that enables a user of telecommunications service to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating that there is an incoming call. Bandwidth for voice grade access should be, at a minimum, 300 to 3000 Hertz.” 47 C.F.R. § 54.101(a)(1). Centennial provides voice grade access to the PSTN by means of its various interconnection agreements with local exchange carriers, as well as its provision of access services to long distance carriers.

2. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. The FCC defines local usage as “an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users.” 47 C.F.R. 54.101 (a)(2). A carrier seeking ETC designation is not required to offer unlimited local usage and the FCC has not established a minimum amount of local usage required to be included in a universal service offering. Centennial offers a variety of rate plans in Michigan that provide local usage. Attached hereto as Exhibit C is a description of Centennial’s current rate plans for Michigan, all of which include some minimum local usage.

3. Dual-Tone, Multi-Frequency (“DTMF”) Signaling, or its Functional Equivalent. DTMF is defined as “a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time.” 47 C.F.R. § 54.101(a)(4). 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. Centennial

currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Centennial also has the ability to pass DTMF signaling over its TDMA and GSM systems. Centennial therefore meets the requirement to provide DTMF signaling or its functional equivalent.

4. Single-Party Service or its Functional Equivalent. Single-party service or its functional equivalent is defined as a “telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user’s particular transmission.” 47 C.F.R. §54.101(a)(4). Centennial provides single-party service or its equivalent by providing a dedicated message path for the length of all customer calls.

5. Access to Emergency Services. Access to emergency services “includes access to 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.” 47 C.F.R. § 54.101(a)(5). Centennial currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement, and is implementing E911 services consistent with the FCC’s rules.

6. Access to Operator Services. Access to operator services is defined as “access to an automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call.” 47 C.F.R. §54.101(a)(6). Centennial provides access to operator services through itself or other entities. Centennial currently has an arrangement with Verisign, an outside contractor, which provides automated operator assistance services, pursuant to which a customer can dial “0” and receive automated assistance to place a call with a credit card, calling card or

prepaid card, or make a collect call. A customer may also dial “611” and be connected to a representative of Centennial’s call center, who can place the call for the customer.

7. Access to Interexchange Service. Access to interexchange service is defined as “the use of the loop, as well as that portion of switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier’s network.” 47 C.F.R. § 54.101(a)(7) Centennial provides all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXC’s. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

8. Access to Directory Assistance. Access to directory assistance is defined as “access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings.” 47 C.F.R. §54.101(a)(8). Centennial provides its customers with access to directory assistance by dialing “411” or “555-1212.”

9. Toll Limitation for Qualifying Low-Income Consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. 47 C.F.R. §54.101(a)(9) and §54.401(3). Centennial offers toll blocking limitation services to Lifeline customers in satisfaction of the FCC’s requirement. Currently, Centennial provides toll-blocking services for international calls and customer selected toll calls. Accordingly, Centennial has the technology to provide toll blocking and will use this technology to offer the service, at no charge, to Lifeline customers.

C. Centennial Will Offer The Supported Services Using Its Own Facilities

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 another car-

rier's services."⁷ Centennial provides the supported services using its existing network infrastructure, which includes its licensed spectrum as well as the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities currently used by the company to serve its customers in Michigan. See Exhibit B attached hereto.

D. Centennial Will Advertise The Availability of Supported Services

Centennial advertises the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the designated service area of the services and charges. Centennial currently advertises its wireless services through several different media, including newspaper, television and radio. The supported services are also advertised in all of Centennial's retail stores using brochures that explain the program and how interested customers should apply. Centennial uses media of general distribution to advertise the availability of Lifeline and Link-up service and improved service in unserved or underserved areas.

IV. CENTENNIAL MEETS THE ADDITIONAL ELIGIBILITY REQUIREMENTS FOR ETC DESIGNATION RECENTLY ADOPTED BY THE FCC AND THE MICHIGAN PUBLIC SERVICE COMMISSION.

Although the FCC adopted its new ETC requirements in March 2005, it has yet to rule on any application for ETC status filed after the effective date of the new rules. Centennial is unaware that any state commission has yet applied these rules to pending ETC applications. Consequently, there is some uncertainty surrounding the precise application of these new rules to ETC petitions. Nevertheless, Centennial believes that it meets these new requirements, either literally or in all material respects. To the extent that the Commission has any questions or concerns regarding Centennial's compliance with these new requirements, Centennial stands ready

⁷ Section 214(e)(6) Public Notice, at 22949.

to meet with the Commission (or its staff or both) to provide additional information to address those questions or concerns.

A. Centennial Is Providing a Five-Year Plan Demonstrating How High-Cost Support Will Be Used to Improve Its Coverage, Service Quality and Capacity Throughout Michigan.

As Centennial understands the Commission's purpose in calling for a five-year plan, it seeks assurance that the universal service funds will be used to provide facilities and infrastructure that would not be placed but for the support. The high expense of building and maintaining wireless network facilities in rural Michigan, combined with the relatively low density of the population, make clear that major network upgrades to serve rural Michigan are not economically feasible considered as a purely commercial matter, *i.e.*, without USF support. Centennial has estimated the amount of universal service funding it will receive as an ETC, and has developed a five-year plan that will utilize those funds to improve coverage, service quality, and capacity throughout rural Michigan. This includes upgrading the capacity and reliability of existing cell sites; adding new cell sites to improve coverage; increasing the reliability of the connectivity between cell sites, and connectivity from cell sites back to Centennial's mobile switching center; and increasing the number of retail outlets in rural Michigan at which customers may obtain supported services, including Lifeline and Link-Up plans. This plan is attached as Exhibit D hereto.⁸

⁸ In this regard, it would not be possible for Centennial to serve rural Michigan at all without acquiring licensed spectrum at considerable cost. As noted in Centennial's attached five-year plan, Centennial believes that it is appropriate to include a portion of the costs of its spectrum in assessing its use of universal service funds, just as landline carriers include the costs of their copper loops in *their* costs. In fact, however, the other costs that Centennial will incur in serving the areas of Michigan where it is designated as an ETC exceed the use of all of the universal funding that Centennial expects to receive, so there is no need to consider spectrum costs at this time.

B. Centennial is Able To Remain Functional In Emergencies.

Centennial's has extensive experience in maintaining wireless service during emergencies, including severe weather emergencies that may from time to time affect Michigan. Centennial has gained this experience by operating a highly reliable wireless system in Puerto Rico for more than eight years, as well as wireless systems in parts of Mississippi, Louisiana, and Texas that are, and have been, subject to severe weather. Indeed, following one severe storm in Louisiana, Centennial's was the only network that remained functional - including large portions of the landline network. During the Katrina and Rita hurricanes, Centennial maintained service in the face of extremely challenging environmental conditions.

Of course, one purpose of universal service funding is to ensure the availability of supported services even during emergencies. To that end, as noted above, Centennial plans to use some of the funds it will receive as an ETC to take steps to improve the reliability and survivability of its network. For example, since the Gulf catastrophes, Centennial has taken further steps to make its network more robust by installing facilities that will enable it to operate without reliance on local exchange carriers, whose restoration priorities do not often accord wireless backhaul facilities the same importance that Centennial assigns to them. In addition, emergency power system upgrades are planned for the network to ensure reliability in the event of a loss of electrical power.

C. Centennial Will Satisfy Customer Protection And Quality Standards.

As an original signatory to the CTIA Consumer Code for Wireless Service, Centennial is committed to satisfactory customer service and quality. Centennial is committed to providing quality service to customers throughout Michigan and its entire service area, and will comply

with the requirements established in the *Virginia Cellular Order*.⁹ When a potential customer requests service within its existing network, Centennial will provide service immediately. If a potential customer requests service within Centennial's licensed service area, but outside its existing network coverage, Centennial will take the following steps, as necessary, to provide service: (1) evaluate whether the requesting customer's equipment can be modified or replaced to provide service; (2) evaluate whether adjustments can be made to the nearest cell site to provide service; (3) evaluate whether adjustments that can be made to the existing network or customer facilities to provide service; and (4) evaluate whether an additional cell site, cell extender, or repeater can be deployed or constructed to provide service. If, after taking these steps, Centennial still is not able to provide service, it will notify the requesting party, and include that information in an annual report to be filed with MPSC detailing how many requests for service were unfilled for the past year.

D, Centennial Will Offer Local Usage Plans Comparable To Those Offered By The Incumbent Local Exchange Carrier In Centennial's Michigan ETC Areas.

Centennial offers a variety of calling plans designed to meet the needs of Michigan customers. Customers may select calling plans that include nationwide calling or any of several variations of wide-area calling plans in the Midwest that suit their needs. Customers can choose between five-state plans that include Michigan, Ohio, Indiana, Illinois, and Kentucky or Wisconsin. These plans feature unlimited Centennial-to-Centennial calls within the company's primary area, a variety of free long distance calling options, free incoming text messages, and free incoming Amber alert messages. In addition, the network supports picture phones as well as the call-

⁹ *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an [ETC]*, FCC 03-338 (released January 29, 2004) ("*Virginia Cellular Order*") at ¶¶ 15, 16.

ing features found on landline networks like conference calling, call waiting, Caller ID, and voicemail.

E. Centennial Acknowledges That It May Be Required To Provide Equal Access If All Other ETCs in Centennial's USF Service Areas Relinquish Their Designations.

Centennial does not view it to be likely that a landline local exchange carrier would relinquish its ETC status in portions of Michigan where Centennial is designated as an ETC. That said, Centennial understands that if that were to occur, and if there were no other ETCs in the affected area, then Centennial may be required to provide equal access to its customers. If that unlikely event were to occur, Centennial reserves the right to propose alternative approaches for handling this requirement.

V. CONTINUED DESIGNATION OF CENTENNIAL IS IN THE PUBLIC INTEREST

Before designating an ETC for an area served by a rural telephone company, the MPSC must find that the designation is in the public interest. 47 U.S.C. §214(e)(6). Because Centennial is seeking continued designation in areas served by a one or more rural local exchange carrier, the MPSC must consider public interest factors prior to continuing Centennial's designation as an ETC.

Continuing Centennial's designation as an ETC will benefit residents of Michigan in many ways. Centennial's service offerings provide many unique advantages to Michigan consumers, including but not limited to, the following:

- A. Mobility* — Centennial's customers can use their service throughout Michigan, as well as throughout the United States.

- B. *Safety* — Centennial’s service offers significant public safety benefits. Customers can make safety-related calls, including calls to 911, not only from their homes, but also from their cars and places of work.
- C. *Usage* - Centennial’s service offers local and long distance all on one bill with large buckets of minutes included in the rate plan. Centennial’s competitive rate plans offer its customers features such as free incoming calls, free night and weekends, competitive regional plans with a five-state local calling area, and bundled long distance calling throughout the United States. In addition, Centennial customers enjoy free incoming text messages and the availability of subscribing to Amber alerts at no charge. Centennial customers have access to email feedback on the company’s website and live chat with customer service advisors.
- D. *Large Calling Areas* - Because Centennial’s calling plans include large nationwide and regional buckets of minutes, Centennial offers a larger local calling area than the landline local telephone company. Most of Centennial’s calling plans offer customers the ability to make national or regional long distance calls without incurring toll charges.
- E. *Advanced Services* – Centennial’s network supports text messaging, emails, and picture phones. Planned enhancement to the network will offer higher speed access to the Internet.
- F. *Competition* - Continuing Centennial’s designation as an ETC will bring to consumers the benefits of competition, including increased choices, higher quality service and lower rates. In a competitive market, consumers will be able to choose the services that best meet their communications needs. Without a choice of service providers, the consumer is unable to select a provider based on service quality,

service availability and rates. Without competition, the incumbent provider has much more limited incentives to introduce new, innovative, or advanced service offerings.

In the context of making the requisite public interest determination, in the *Virginia Cellular Order*, the FCC indicated that it would consider the benefit of increased competitive choice, the impact of the designation on the USF, unique advantages and disadvantages of Centennial's service offerings, commitments regarding quality of service, and Centennial's ability to serve the designated areas within a reasonable time frame.¹⁰ The discussion immediately above, and in Section IV, *supra*, addresses each of these factors. As described in more detail in the 5-year plan, Centennial currently provides service in ETC-designated areas of Michigan. Centennial will continue to use the USF support it receives as an ETC to undertake a number of network improvements. For example, reconfiguration of Centennial's existing network will improve coverage and capacity and enable the company to provide quality service to customers whose location makes them difficult to serve. As one would expect in a rural area with low customer density, the economic case for providing this extended and enhanced coverage is quite difficult to make in the absence of universal service funding. The basic objective of universal service funding is to provide support to build out and maintain a robust communications infrastructure in areas where normal market forces might not reliably lead to that result. This objective will plainly be met by continuing Centennial's designation as an ETC in Michigan. Although Centennial's build-out plans will continue to evolve over time, Centennial will respond to consumer demand by taking additional steps to ensure quality coverage and service.

¹⁰ *Virginia Cellular Order* at ¶ 28.

V. REGULATORY OVERSIGHT

A. High-Cost Certification

ETCs are obliged under Section 254(e) of the Act to use federal universal service support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended” and are required under Sections 54.313 and 54.314 of the FCC’s rules to certify compliance with this requirement on an annual basis.¹¹ Centennial will use all federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which support is intended pursuant to Section 254(e) of the Act. See Exhibit E attached hereto. Centennial requests that the MPSC find that it has met the high-cost certification requirement and is entitled to continue receiving support as of its ETC designation date.¹²

B. Annual Reports

In accordance with the requirements established by the Commission,¹³ Centennial commits to comply with additional reporting requirements to allow the MPSC to ensure that Centennial is satisfying its obligation under Section 214(e) of the Act to provide supported services throughout in Michigan. As an ETC, Centennial will submit to the MPSC, the FCC and the Universal Service Administrative Company, records and documentation, on an annual basis, detailing: (1) its progress towards meeting its build-out plans in Michigan; (2) the number of com-

¹¹ 47 C.F.R. § 54.313, 54.314.

¹² As noted above, just as it is appropriate to include the costs of loops in considering whether landline ETCs are properly using their universal service funding, so too it is appropriate to consider the costs of spectrum licenses in considering whether wireless ETCs are properly using *their* universal service funding. That said, as also noted above, it is unnecessary as a factual matter to consider this factor in Centennial’s case at this time because the other costs that Centennial will incur in connection with providing the supported services within its designated areas will more than use up the available funding.

¹³ *In the matter, on the Commission’s own motion, to examine the role of the Commission in the designation of eligible telecommunications carriers*, Case U-14530 (April 13, 2006) Attachment A.

plaints it receives per 1,000 mobile handsets in Michigan; and (3) the number of requests for service from potential customers in Michigan that were unfulfilled during the past year.

V. CONCLUSION

Centennial respectfully requests that the Michigan Public Service Commission (1) continue Centennial's designation as an ETC within its FCC-established service territory in Michigan and; (2) find that Centennial has met the high-cost certification requirements of Sections 54.313 and 54.314 of the FCC's rules and is therefore entitled to continue receiving high-cost support as of the date of its ETC designation.

Respectfully submitted,

CENTENNIAL COMMUNICATIONS CORP.



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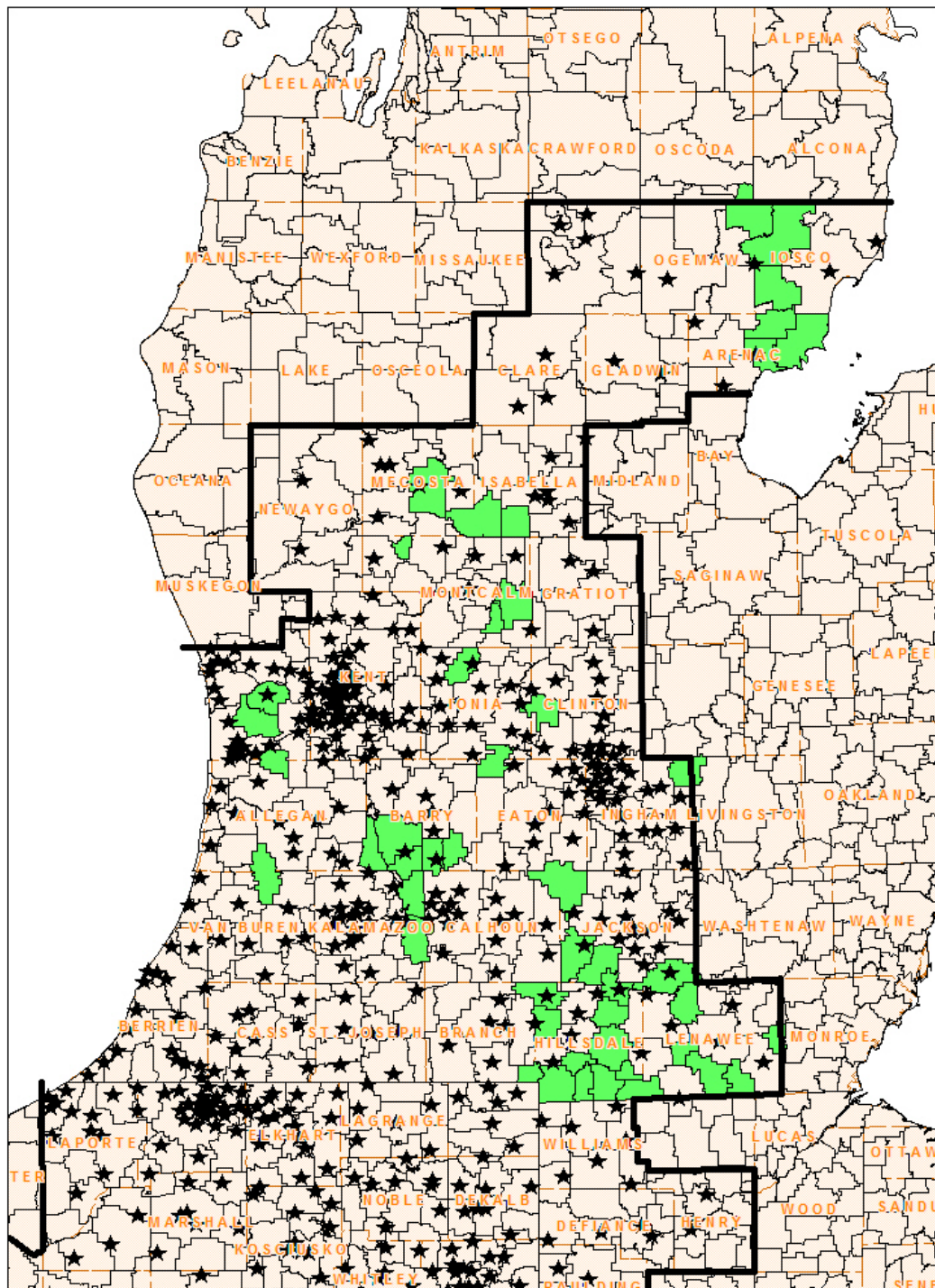
**Michael J.
Brown**

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Brown
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o=Plunkett + Cooney
Date: 2006.06.15 13:55:49 -04'00'

Dated: June 15, 2006

Exhibit A

Map of Service Area



- Green areas are USF supported portions of Centennial's Michigan service area.
- Stars represent cell sites.

Exhibit B

Declaration in Support of Application

DECLARATION UNDER PENALTY OF PERJURY

I, William Roughton, Jr., do hereby declare under penalty of perjury as follows:

1. I am the Vice President, Legal and Regulatory Affairs for Centennial Communications Corp., parent company of Michiana Metronet, Inc., Centennial RSA 6 Cellular Corp., and Centennial RSA 7 Cellular Corp. ("Centennial"), the applicants herein.

2. This Affidavit is submitted in support of Centennial's Petition for Continued Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Michigan as defined in the attached application.

3. Centennial currently provides wireless services in certain areas of Michigan.

4. The Michigan Public Service Commission designated Centennial an ETC with respect to those areas on September 11, 2003.

5. Centennial meets the MPSC's revised criteria for continued ETC designation as explained herein.

6. Centennial is a "common carrier" for purposes of obtaining continuing ETC designation pursuant to 47 U.S.C. §214(e)(1). A "common carrier" is generally defined in 47 U.S.C. §153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the FCC's Rules provide that cellular service is a common carrier service. *See* 47 C.F.R. §20.9(a)(7).

7. Centennial currently offers and is able to provide, within its FCC-licensed service area in Michigan all of the services and functionalities identified in 47 C.F.R. §54.101(a). Each of these services and functionalities is discussed more fully below.

a. Voice-Grade Access To The Public Switched Telephone Network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hertz within the 300 to 3000 Hertz frequency range. *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) ("Universal Service Order")*. Centennial meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with landline carriers serving Michigan, all customers of Centennial are able to make and receive calls on the public switched telephone network within the specified bandwidth.

b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue. *See Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rule-making, 13 FCC Rcd 21252 (1998) ("October 1998 NPRM")*. As it relates to local usage, the

NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, *if any*, local usage should be required to be provided to customers as part of a universal service offering. *October 1998 NPRM* at 21277-21281. In the *Universal Service Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide. *Universal Service Order* at 8813. Any minimum local usage requirement established by the FCC as a result of the *October 1998 NPRM* will be applicable to all designated ETCs, not simply wireless service providers. Centennial will comply with any and all minimum local usage requirements adopted by the FCC. Centennial will meet the local usage requires by including local usage as part of a universal service offering.

c. Dual-Tone, Multi-Frequency (“DTMF”) Signaling, or its Functional Equivalent. 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. 47 C.F.R. §54.101(a)(3). Centennial currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Centennial therefore meets the requirement to provide DTMF signaling or its functional equivalent.

d. Single-Party Service or its Functional Equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. 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. *Universal Service Order* at 8810. Centennial meets the requirement of a single-party service by providing a dedicated message path for the length of all customer calls.

e. Access to Emergency Services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. *See Universal Service Order* at 8815-17. Centennial currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement and works with local public emergency service providers to upgrade to Phase I or Phase II E911 service as appropriate.

f. Access to Operator Services. 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. *Universal Service Order* at 8817-18. Centennial meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (*e.g.*, LECs, IXC, etc.).

g. Access to Interexchange Service. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Universal Ser-*

vice Order at 8819. Centennial presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXCs. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

h. Access to Directory Assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service* Order at 8821. Centennial meets this requirement by providing all of its customers with access to directly assistance by dialing “411” or “555-1212.”

i. Toll Limitation for Qualifying Low-Income Consumers. 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 47 C.F.R. §54.101(a)(9). *See Universal Service Fourth Order on Reconsideration*, FCC 97-420 (Dec. 30, 1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. *See* 47 C.F.R. §§54.400-415. Centennial will participates in Lifeline as required, and provides toll blocking capability in satisfaction of the FCC’s requirement. Centennial will continue to participate in Lifeline as required, and will provide toll blocking services for international calls and customer selected toll calls. Accordingly, Centennial currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offering.

8. Centennial provides the supported services using its own facilities and its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching and interconnection facilities used by Centennial to serve its PSC customers.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2006.

Michiana Metronet, Inc.
Centennial RSA 6 Cellular Corp.
Centennial RSA 7 Cellular Corp.



By:

William L. Roughton, Jr

EXHIBIT C

Michigan Service Plans

Centennial USA 200

- 200 Nationwide Anytime Minutes
- 2000 Nationwide Nights and Weekends Minutes
- Unlimited Centennial-to-Centennial (Primary Service Area only)
- Free Nationwide Long Distance

Centennial Blue Region 600 (MI, OH, IN, IL, WI)

- 600 Anytime Minutes
- Unlimited Incoming Calls (5-state region only)
- Unlimited Night and Weekend Minutes
- Unlimited Centennial-to-Centennial Minutes (5-state region only)
- Free Long Distance (from Region to USA)

Centennial Blue Region 600 (MI, OH, IN, IL, KY)

- 600 Anytime Minutes
- Unlimited Incoming Calls (5-state region only)
- Unlimited Night and Weekend Minutes
- Unlimited Centennial-to-Centennial Minutes (5-state region only)
- Free Long Distance (from Region to USA)

Centennial USA 500

- 500 Nationwide Anytime Minutes
- 2000 Nationwide Nights and Weekends Minutes
- Unlimited Centennial-to-Centennial (Primary Service Area only)
- Free Nationwide Long Distance

Centennial Blue Region 1000 (MI, OH, IN, IL, WI)

- 1000 Anytime Minutes
- Unlimited Incoming Calls (5-state region only)
- Unlimited Night and Weekend Minutes
- Unlimited Centennial-to-Centennial Minutes (5-state region only)
- Free Long Distance (from Region to USA)

Centennial Blue Region 1000 (MI, OH, IN, IL, KY)

- 1000 Anytime Minutes
- Unlimited Incoming Calls (5-state region only)
- Unlimited Night and Weekend Minutes
- Unlimited Centennial-to-Centennial Minutes (5-state region only)
- Free Long Distance (from Region to USA)

Centennial USA 800

- 800 Nationwide Anytime Minutes
- 2000 Nationwide Nights and Weekends Minutes
- Unlimited Centennial-to-Centennial (Primary Service Area only)
- Free Nationwide Long Distance

Centennial Blue Region 1500 (MI, OH, IN, IL, WI)

- 1500 Anytime Minutes
- Unlimited Incoming Calls (5-state region only)
- Unlimited Night and Weekend Minutes
- Unlimited Centennial-to-Centennial Minutes (5-state region only)
- Free Long Distance (from Region to USA)

Centennial Blue Region 1500 (MI, OH, IN, IL, KY)

- 1500 Anytime Minutes
- Unlimited Incoming Calls (5-state region only)
- Unlimited Night and Weekend Minutes
- Unlimited Centennial-to-Centennial Minutes (5-state region only)
- Free Long Distance (from Region to USA)

For all plans:

Other Possible Charges

Directory Assistance Charge Per Call	\$1.49 per call
--------------------------------------	-----------------

Rate Plan Features

Call Waiting	\$0.49 per month
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Carrier Contract Terms and Fees

Activation Fee	\$39.00
Contract Length	2 year
Early Termination Fee	\$250.00

Carrier Customer Service

Customer Service Hours	24 Hours a Day, 7 Days a week
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Exhibit D

Five-Year Plan

Confidential

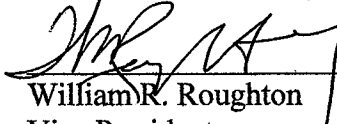
Exhibit E

High-Cost Certification

**Michiana Metronet, Inc.
Centennial RSA 6 Cellular Corp
Centennial RSA 7 Cellular Corp.**

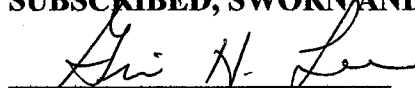
High-Cost Certification

I, William L. Roughton, Jr., on behalf of Michiana Metronet, Inc., Centennial RSA 6 Cellular Corp., and Centennial RSA 7 Cellular Corp. (collectively, "Centennial") and under penalty of perjury, hereby certify that all high-cost support provided to Centennial will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996, 47 U.S.C. §254(e).



William R. Roughton
Vice President
Legal and Regulatory Affairs

SUBSCRIBED, SWORN AND ACKNOWLEDGED before me this 15th day of June, 2006.



NOTARY PUBLIC

My Commission Expires: _____
Gina H. Lee
Notary Public, District of Columbia
My Commission Expires 06-30-2009



Exhibit F

Checklist

Checklist

1. Provide company contact person.	William L. Roughton, Jr. Vice President Legal & Regulatory Affairs 1919 Pennsylvania Avenue, NW Suite 200 Washington, DC 20006 202-828-9824 broughton@centennialcorp.com
2. List of wire centers	This information was submitted to the Commission during Centennial's ETC-designation proceeding and is a part of that record. <i>See, In the matter of the application of Michiana Metronet, Inc., Centennial RSA 6 Cellular Corp., Centennial RSA 7 Cellular Corp. for designation as eligible telecommunications carriers pursuant to Section 214(e)(6) of the Communications Act of 1934</i> , Case No. U-13751 (September 11, 2003). For convenience, the information is listed on Exhibit G.
3. Five-Year Plan	See Exhibit D. ·The amount of support Centennial has received to date and assumes that it will receive in the future (\$570,000 a year) covers only a portion of the upgrade costs and related expenses. ·To date, no projects have been uncompleted. ·Centennial has made no projections of population growth because it lacks the expertise to make demographic predictions. ·The company's use of USF support since its designation is contained in previously submitted annual reports to the Commission. ·There have been no reportable service outages. ·There have been no unfulfilled service requests. ·In 2005, there were 0.09 complaints per 1000 handsets in Centennial's Michigan service area.
4. Emergency Preparedness	Centennial's ability to meet emergencies is described in the application for continued support.

5. Consumer Protection	Centennial's privacy policy is attached as Exhibit H. Centennial adherence to CTIA's consumer code is described in the application. Examples of Centennial's Lifeline and Link-up advertisements are contained in Exhibit I.
6. Local Usage	Centennial's local calling is described in the application. Detailed information about Michigan calling plans is contained in Exhibit C.
7. Equal Access	Centennial's willingness to accept equal access obligation under the circumstances described in Case U-14530 is described in the application.

Exhibit G

Wire Centers

State	Centennial Operating Entity	Rate Center	CLLI	ILEC
MI	Centennial Michigan RSA -6 Cellular Corp.	Au Gres (Zone 2)	AUGRMIXJDS0	Century Telephone - Mid-west
MI	Centennial Michigan RSA -6 Cellular Corp.	Hale (Zone 2)	HALEMIXADS1	Century Telephone of Michigan
MI	Centennial Michigan RSA -6 Cellular Corp.	Omer (Zone 2)	OMERMIXJDS1	Century Telephone - Mid-west
MI	Centennial Michigan RSA -6 Cellular Corp.	Sand Lake Heights (Zone 2)	SLKHMIXIRS0	Century Telephone of Michigan
MI	Centennial Michigan RSA -6 Cellular Corp.	Twining	TWNGMI01DS0	Pigeon Telephone Company
MI	Centennial Michigan RSA -6 Cellular Corp.	Whittemore (Zone 2)	WHMRMIXIRS0	Century Telephone of Michigan
MI	Centennial Michigan RSA -7 Cellular Corp.	Blanchard	BLNCMIXIDS0	Blanchard Telephone Association
MI	Centennial Michigan RSA-6 Cellular Corp.	Sixty Lakes (Zone 2)	SXLSMIXIRS0	Century Telephone of Michigan
MI	Centennial Michigan RSA-7 Cellular Corp.	Crystal Zone	CRYSMIXIDS0	Century Telephone of Michigan
MI	Centennial Michigan RSA-7 Cellular Corp.	Mecosta (Zone 2)	MCSTMIXIDS0	Century Telephone - Mid-west
MI	Michiana Metronet, Inc.	Augusta Zone	AGSTMIXJDS1	Communications Corp of Michigan
MI	Michiana Metronet, Inc.	Allendale	ALDLMIXJDS2	Allendale Telephone Company
MI	Michiana Metronet, Inc.	Allen	ALLNMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Bloomingtondale	BLDLMIXIDS0	Bloomingtondale Telephone Company
MI	Michiana Metronet, Inc.	Bell Oak	BLOKMIXIRS1	Shiawassee Telephone Company
MI	Michiana Metronet, Inc.	Banfield	BNFDMIXIRS0	Barry County Telephone Company
MI	Michiana Metronet, Inc.	Bundy Hill	BNHLMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Borculo	BRCLMIXIDS1	Century Tel Midwest-Midwest, Inc.
MI	Michiana Metronet, Inc.	Brooklyn	BRKLMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Climax	CLMXMIXIDS1	Climax Telephone Company
MI	Michiana Metronet, Inc.	Cambria/Frontier	CMBAMIXJRSA	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Camden	CMDNMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Concord	CNCRMIXJDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Clayton Zone	CYTNMIXIDS0	Communications Corp of Michigan
MI	Michiana Metronet, Inc.	Delton	DELTMIXIDS0	Barry County Telephone Company
MI	Michiana Metronet, Inc.	Deerfield	DRFDMIXIRS0	Deerfield Farmers Telephone Company

MI	Michiana Metronet, Inc.	Drenthe	DRNTMIXIDS1	Drenthe Telephone Company
MI	Michiana Metronet, Inc.	Hickory Corners Zone	HKCRMIXIRS0	Communications Corp of Michigan
MI	Michiana Metronet, Inc.	Hanover	HNVRMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Litchfield (Zone 1)	LTFDMIXJDS1	Century Telephone - Midwest
MI	Michiana Metronet, Inc.	Montgomery	MTGMMIXIRS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	North Adams	NADMMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Ogden Center	OGDCMIXIDS0	Ogden Telephone Company
MI	Michiana Metronet, Inc.	Onsted	ONSTMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Orleans	ORLNMIXIDS0	Century Tel Midwest-Midwest, Inc.
MI	Michiana Metronet, Inc.	Osseo	OSSEMIXIDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Pine Lake	PNLKMIXIRS0	Barry County Telephone Company
MI	Michiana Metronet, Inc.	Osseo/Ransom	RNSMMIXJDS0	Frontier Communications of Michigan
MI	Michiana Metronet, Inc.	Sand Creek	SNCKMIXIDS0	Sand Creek Telephone Company
MI	Michiana Metronet, Inc.	Sunfield	SNFDMIXIDS0	Century Te Midwest-Midwest, Inc.
MI	Michiana Metronet, Inc.	Springport	SPPTMIXIDS0	Springport Telephone Company
MI	Michiana Metronet, Inc.	Waldron	WDRNMIXJDS1	Waldron Telephone Company
MI	Michiana Metronet, Inc.	Westphalia	WPHLMIXIDS1	Westphalia Telephone Company

Exhibit H

Privacy Policy

Public Statement on the Company's Website

Privacy Statement

Centennial Communications maintains a strict customer information privacy policy and all of our employees and agents are required to protect such information from unauthorized use and/or disclosure. Centennial welcomes visitors to our Web site and we want you to know that we apply our commitment to safeguarding privacy to our online activities.

Personally Identifiable Information

Sometimes, we may ask for information about you to provide you with requested products, services or customer care. We may use this information for our own customer contact purposes, e.g., to contact or send materials for marketing purposes, or to apprise customers of upcoming events and new products.

User Submissions

If you send us any feedback, data, answers, questions, suggestions, ideas, concepts plans or the like, such information shall be deemed non-confidential and shall become the property of Centennial. Centennial assumes no obligation to protect such information and Centennial shall have the right to reproduce, use, disclose and distribute the information without restriction.

Tracking Data

When you visit Centennial's Web site, general statistical information is gathered automatically, including domain name, time spent on the site and pages accessed. This information is not specific to any one user and is used to evaluate and improve the overall effectiveness of the site.

E-Mail

Centennial may use e-mail to respond to specific requests, questions or issues, or to inform you about events or new products.

From the Employee Code of Conduct

Privacy of Customer Information

Every associate has a legal and ethical obligation to safeguard, according to strict standards of security and confidentiality, all customer information, including any personal information our customers share with us. Customer account information, including call content, call detail records and all personal information, including, credit information may not be disclosed to anyone, including law enforcement, or other government authority, except as authorized by law, e.g., subpoena, court order, or search warrant. If you have any questions regarding the validity of a subpoena, court order or search warrant you should seek advice from the Legal Department.

Exhibit I

Lifeline & Link-Up Advertisements

APPLICATION FOR LIFELINE/ LINK-UP

Everyone deserves the ability to stay in touch. That's why we want to give you all the benefits of trusted advice from Centennial Wireless.

The Lifeline/Link-Up programs from the Universal Service Fund are subsidies for telephone service so that you can always stay in touch.

If your annual household income is at or below 150 percent of the federal poverty income standards, you qualify to receive:

- Credit of \$10.75 on your monthly bill
- A 50 percent discount on your activation fee of your primary phone.

150% of Poverty Guideline's Maximum Income		
# of Household Members	Monthly Income	Annual Income*
1	\$1,196	\$14,355
2	\$1,603	\$19,246
3	\$2,011	\$24,135
4	\$2,418	\$29,025
5	\$2,826	\$33,915
6	\$3,233	\$38,805
7	\$3,641	\$43,695
8	\$4,048	\$48,585

*Note: add \$4,890 for each additional household member. Family Independence Agency clients may qualify.

To apply, fill out and sign the Lifeline/Link-Up application on the right and attach the required documents listed on the application and send to:

Lifeline Program
Centennial Wireless
PMB #115

6435 W. Jefferson Blvd.

Fort Wayne, IN 46804

You may also call 1-800-493-3211 for more information.

Toll Blocking Service, if elected, will be provided at no charge to the Lifeline subscriber. Toll Blocking Service allows customers to elect not to allow the completion of outgoing toll calls (long distance) from their wireless phone. A Lifeline subscriber's Lifeline service will not be disconnected for non-payment of toll charges. However, in the event of nonpayment of toll charges within 90 days, Centennial may implement Toll Blocking Service.



Eligibility for Lifeline and/or Link-Up Telephone Service requires that the Applicant's household income shall not exceed 150% of the federal poverty income standards (see chart on first panel). To qualify, a household's income must be at or below 150% of the federal poverty level.

1. I hereby certify that I meet the household income requirements per the table on the left.
2. I also hereby certify that:
 - My telephone service is listed in my name;
 - I am not listed as a dependent on another person's tax return;
 - The address listed is my primary residence; not a second home or business;
 - I am not receiving a Lifeline/Link-Up credit(s) from any other landline or wireless carrier at my principal place of residence; and
3. If in the future I no longer meet the household income requirements listed above or conditions in item 2 above change, I will promptly notify Centennial Wireless that I am no longer eligible for Lifeline and/or Link-Up Service.
4. I authorize Centennial Wireless or its duly appointed representative to access any records required to verify these statements are accurate.
5. I (we) affirm, under penalty of perjury, that the foregoing representations are true.

APPLICANT'S NAME: _____

APPLICANT'S HOME ADDRESS: _____

CITY: _____ STATE: _____ ZIP CODE: _____

TELEPHONE NUMBER: _____ SOCIAL SECURITY NUMBER: _____

DRIVER'S LICENSE NUMBER: _____ STATE: _____

APPLICANT'S SIGNATURE: _____ DATE: _____

COMPLETED APPLICATION FORM AND PROOF OF HOUSEHOLD INCOME (SSI AWARD LETTER OR COPY OF LATEST TAX RETURN/ W2) MUST BE SUBMITTED TO:

Lifeline Program
Centennial Wireless
PMB #115
6435 W. Jefferson Blvd.
Fort Wayne, IN 46804

You will need to reapply every 12 months to qualify for the Lifeline/Link-Up credits.

Centennial Business Use:

Market ID #:

Account #:

Detach application at perforation and mail.



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So everyone can stay in touch.

Expression should not be limited. Through Lifeline/ Link-Up, Centennial offers the benefits of our wireless service to qualified individuals. Lifeline/ Link-Up, which is supported by the Universal Service Fund, is a program that subsidizes telephone service so that everyone can stay in touch.

If your annual household income is within Lifeline/ Link-Up federal income guidelines, you may qualify to receive a credit on your Centennial service.

Visit your local Centennial Wireless retail store for details.



To be eligible to receive Lifeline/Link-Up credit(s), subscriber must meet federal annual household income guidelines (see Centennial Wireless retail store for details), must not be listed as a dependent on another person's tax return, and certify that the subscriber is currently not receiving a Lifeline/Link-Up credit(s) from any other landline or wireless carrier at his/her principal place of residence. If approved for Lifeline/Link-Up credit(s), subscriber must reapply every 12 months to continue receiving the Lifeline credit on their Centennial Wireless service. Failure to reapply every 12 months will result in termination of the Lifeline credit and participation in the Lifeline program. Toll Blocking Service, if elected, will be provided at no charge to the Lifeline subscriber. Toll Blocking Service allows subscribers to elect not to allow the completion of outgoing long distance calls from their wireless phone. A Lifeline subscriber's service will not be disconnected for nonpayment of toll charges. However, in the event of nonpayment of toll charges within 30 days, Centennial may implement Toll Blocking Service. See a Centennial representative for more details.