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DEBORAH K. FLANNAGAN EXECUTIVE DIRECTOR

REECE McALISTER EXECUTIVE SECRETARY

Georgia Aublic Service Commission

(404) 656-4501 (800) 282-5813

244 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341 www.psc.state.ga.us

February 21, 2011

Scott Barash CEO Universal Service Administrative Company 2000 L Street, NW, Suite 200 Washington, DC 20036

Dear Mr. Barash,

Please find attached the *Order on Declaratory Ruling* of the Georgia Public Service Commission ("GPSC") in response to the Joint Petition for Declaratory Ruling filed by Allied Wireless Communications Corporation ("Allied") and Georgia RSA #8 Partnership (collectively "Petitioners"). The Joint Petition alleged that the line counts filed by Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless") with the Universal Service Administrative Company included lines for which Verizon Wireless was not entitled to high-cost support.

As detailed in the attached Order, the Joint Petition addressed the acquisition of Alltel Communications, Inc. ("Alltel") by Verizon Wireless in November 2008. Alltel operated in several areas of Georgia and was designated by the GPSC as an Eligible Telecommunications Carrier ("ETC") in October 2007. Verizon Wireless also served areas in Georgia prior to the acquisition of Alltel, but has never been designated by the GPSC as an ETC. The Petitioners alleged that, in early 2009, Verizon Wireless began counting its legacy lines and lines in areas that were divested pursuant to the Federal Communication Commission's merger order and reporting the line counts to the Universal Service Administrative Company for increased USF funding despite never being designated as an ETC in Georgia. The Petitioners requested that the GPSC (1) suspend Verizon Wireless' eligibility to draw support from the high-cost fund by informing USAC that Verizon Wireless is under investigation; (2) declare that Verizon Wireless was never designated as an ETC in Georgia and that Verizon Wireless must first be designated to report legacy lines and receive USF funding; and (3) notify USAC that Verizon Wireless has not been designated as an ETC in Georgia and that Verizon Wireless legacy lines are not eligible for high-cost USF funds. Verizon Wireless did not dispute that the lines being reported to USAC by Alltel included legacy Verizon Wireless lines within the area for which Alltel has received ETC designation.

In response to the Joint Petition, the GPSC clarified that it has not designated Verizon Wireless as an ETC in Georgia, and that its orders do not authorize Verizon Wireless to receive high cost funding from the universal service fund in relation to its legacy customers in Georgia. In addition, the GPSC stated that it would provide a certified copy of its order on the Joint Petition to USAC. Accordingly, the GPSC provides the attached Order so that USAC may be fully informed in its evaluation of the line counts that are submitted to it, and so that USAC may take whatever action it deems necessary and appropriate.

Thank you for your attention to this matter.

Sincerely,

Chuck Eaton

Vice-Chairman

Georgia Public Service Commission

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