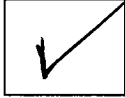


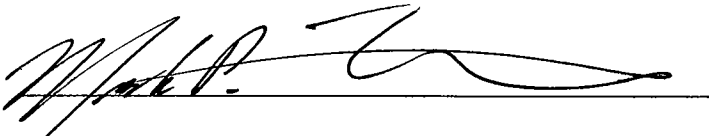
3. The applicant agrees that they will ensure the consumer will see their OTAP credit within 30 days from the date that the applicant has been notified of the consumer's eligibility status, and to remove consumers within 30 days after they no longer qualify for OTAP benefits.
4. The applicant agrees that they will submit reports for reimbursement quarterly (if they have less than 1,000 OTAP consumers) or monthly (if they have more than 1,000 OTAP consumers). Reports are expected to be submitted even if there are zero consumers (OAR 860-033-0045 (1)).
5. An OTAP recipient is required to be the named subscriber to the local telecommunication service in order for that household to qualify for OTAP benefits. PUC may waive this requirement if it determines that good cause exists. Applicant agrees to comply with reimbursing OTAP consumers who are not named subscribers at the Commission's request.
6. The applicant agrees to apply Commission assigned OTAP identification numbers to its OTAP customers' accounts.
7. Based upon accounting procedures approved by the Commission, the applicant agrees to maintain accounting records so that costs associated with OTAP can be separately identified. Records must be provided to the Commission upon request.
 - a. **Active OTAP Customer Report:** The applicant agrees to submit an Active OTAP Customer Report listing the names of all customers with the Commission assigned identification number receiving the OTAP benefits. Applicants with 1,000 or more OTAP customers must submit the report monthly to the Commission Applicants with fewer than 1,000 OTAP customers must submit the report quarterly to the Commission.
 - b. **Order Activity Report:** The applicant agrees to submit an Order Activity Report listing the names of all OTAP customers with the Commission assigned identification number whose service was disconnected. The applicant is aware that the Commission may require additional information such as a listing of all OTAP customers whose telephone numbers or addresses have changed.
 - c. **No Match Report:** The applicant agrees to notify the Commission of any discrepancy that prevents a customer from receiving the OTAP benefit after the Commission has notified the applicant of customers who meet eligibility criteria on a weekly basis.
8. The applicant agrees to ensure that confidential information (including phone number, addresses, contact information, etc.) of OTAP recipients is protected (OAR 360-033-0030 (5)). The applicant agrees to maintain a written policy to

ensure that the applicant's staff does not breach the confidentiality of OTAP consumers, and to do background checks on employees who have access to customer records.

9. The applicant agrees to have in place database encryption and firewall technologies to protect customer service information stored electronically.



APPLICANT UNDERSTANDS ALL OF THE ABOVE CONDITIONS AND AGREES TO ABIDE BY ALL APPLICABLE COMMISSION RULES, STATE LAW AND THE CONDITIONS OF CERTIFICATION. PLEASE INITIAL BOX AT LEFT.



Signature of person authorized to represent applicant

Attorney for LCW Wireless,
LLC
Title

Mark P. Trincherro

Printed Name

November 9, 2009

Date

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

APPLICATION OF LCW WIRELESS, LLC)	
FOR DESIGNATION AS AN ELIGIBLE)	
TELECOMMUNICATIONS CARRIER)	APPLICATION
IN THE STATE OF OREGON PURSUANT TO)	
THE TELECOMMUNICATIONS ACT OF 1996)	

**APPLICATION OF LCW WIRELESS, LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE STATE OF OREGON PURSUANT TO
THE TELECOMMUNICATIONS ACT OF 1996**

LCW Wireless, LLC (“LCW”), d/b/a Cricket, respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended (“Act”),¹ Section 54.201 of the Federal Communications Commission (“FCC”) rules, and consistent with this Commission’s requirements set forth in Order No. 06-292 in docket UM 1217.² LCW requests that it be designated as eligible to receive available Lifeline support from the federal Universal Service Fund (“USF”) for low-income customers only. In support of this Application, the following is respectfully shown:

¹ 47 U.S.C. § 214(e)(2).

² *In the matter of Public Utility Commission of Oregon Staff Investigation to Establish Requirements for Initial designation and Recertification of Telecommunications Carriers Eligible to Receive Federal Universal Service Support*, Order No. 06-292, entered June 13, 2006 in docket UM 1217 (“ETC Order”).

APPLICATION OF LCW WIRELESS, LLC

I. APPLICANT

The Applicant is LCW. The Applicant offers Cricket service in Oregon. Cricket owns a 73.3% non-controlling interest in LCW. Cricket is, in turn, a wholly owned subsidiary of Leap Wireless International, Inc., a Delaware corporation headquartered in San Diego, California.

LCW is authorized by the FCC to provide commercial mobile radio services (“CMRS”) throughout the requested ETC area in the state of Oregon.

II. ALLEGATION OF FACTS

A. Eligibility and Identification of the Service Area.

Under Sections 214(e) and 254 of the Act, the Public Utility Commission of Oregon (“OPUC” or “Commission”) is authorized to designate LCW as an ETC. Section 214(e)(2) of the Act requires state commissions to designate as an ETC, throughout the service area for which ETC status is sought, any common carrier that: (i) offers services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services.

Attached as Exhibit A is a list of the non-rural ILEC wire centers and the rural ILEC wire centers for which LCW seeks to be designated as an ETC. Attached as Exhibit B is a map depicting LCW’s proposed ETC service area in the state of Oregon.³ LCW’s proposed ETC area does not split any wire centers in the non-rural ILEC or rural ILEC areas. As explained in greater detail below, the Commission can grant LCW ETC status in all but one of the listed wire centers without having to further redefine any rural ILEC service areas. In order to grant LCW ETC status for the Philomath wire center, however, the Commission will need to redefine the service area of Pioneer Telephone Cooperative (“Pioneer”) from the study area level to the wire center level. Because this redefinition process requires the Commission to file a petition with the FCC for

³ See *ETC Order*, Requirement 3.1.1, Appendix A, p. 1.

concurrence in the redefinition plan, and a period of 90 days for the FCC to act on the petition, LCW requests that the Commission immediately grant ETC status for all other wire centers in LCW's proposed ETC area, and grant conditional ETC status in the Philomath wire center pending FCC concurrence in the Commission's redefinition plan. This will allow LCW to bring the benefits of Lifeline service to customers in the vast majority of its service area sooner. LCW is capable of providing Lifeline service in all remaining areas pending approval of ETC status for the Pioneer wire center.⁴

Section 214(e)(2) of the Act provides that ETC designations shall be made for a "service area" designated by the state commission. Section 214(e)(5) of the Act provides that the "service area" shall be the geographic area established by the state commission. In areas served by a non-rural company, the state commission may, without federal concurrence, redefine the study area of the incumbent local exchange carriers in designating a competitive ETC service area.⁵ In areas served by a rural telephone company, the FCC's rules generally define a competitive ETC's "service area" to mean the incumbent local exchange carrier ("ILEC") study area.⁶ If an applicant seeks to serve less than a rural telephone company's entire study area, the FCC and this Commission must "establish a different definition of service area for such company."⁷

Except for the Pioneer service area, no other rural ILEC service areas need to be redefined in order to grant LCW ETC status. With respect to CenturyTel, United Telephone/Embarq, and Cascade Utilities, the service areas of these rural ILECs have already been redefined to the wire

⁴ LCW is also capable of providing service in the Pioneer wire center prior to approval, but obviously cannot provide the Lifeline discounts while waiting for approval.

⁵ See 47 U.S.C. § 214(e)(5).

⁶ See 47 C.F.R. § 54.207(b).

⁷ 47 U.S.C. § 214(e)(5); 47 C.F.R. 54.207.

APPLICATION OF LCW WIRELESS, LLC

center level.⁸ Accordingly, no further redefinition is necessary. With respect to all other rural ILEC wire centers referenced in Exhibit A, with the exception of Pioneer, this application seeks to cover the entire rural ILEC service area. Thus, no redefinition is required for any of these areas.

For the Philomath wire center alone, LCW requests that the Commission redefine the Pioneer service area to the wire center level and petition the FCC for concurrence in this proposed redefinition. The FCC must act on such a petition within 90 days, or the petition is deemed granted.⁹ No “cream-skimming” concerns are raised by this redefinition request because LCW seeks only Lifeline support and not high-cost support. The FCC recently addressed this issue and declined to perform a cream-skimming analysis where the applicant sought ETC designation for Lifeline support only.¹⁰ This is consistent with the underlying purpose of the “cream-skimming” analysis which is designed to alleviate concerns that if a competitive ETC were to seek to serve a disproportionate share of high-density wire centers in a rural ILEC’s service area it would receive more support than the ILEC’s average cost to serve the entire service area, thus obtaining a windfall while harming the incumbent provider.¹¹ In light of this rationale, the FCC has long-since declined to employ a creamskimming analysis where “unnecessary.”¹² Because LCW

⁸ See *In the Matter of United States Cellular Corporation, Application for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996*, Order No. 04-356, entered June 24, 2004 in docket UM 1084, at pp. 14-15 (agreeing to redefine to the wire center level the service areas of Cascade, CenturyTel, Oregon Tel, and Sprint). Sprint is the former owner of the United exchanges, which were then owned by Embarq and are now owned by CenturyTel at the parent company level.

⁹ 47 C.F.R. § 54.207(c)(1), (3)(ii).

¹⁰ See *In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, CC Docket No. 96-45, Order 09-18, ¶ 39 n. 101 (March 5, 2009) (explaining that “we need not perform a creamskimming analysis because Virgin Mobile is seeking eligibility for Lifeline support only”) (hereinafter “*Virgin Mobile Order*”).

¹¹ *In the Matter of Federal-State Joint Board of Universal Service*, Report and Order, 20 FCC Rcd 6371, CC Docket No. 96-45, Order 05-46, ¶ 49 (March 17, 2005) (hereinafter “*ETC Requirements Order*”).

¹² *ETC Requirements Order*, at ¶ 52 (finding that cream-skimming is a concern in rural areas but that the analysis is “unnecessary” in non-rural service areas because of the different cost model).

APPLICATION OF LCW WIRELESS, LLC

seeks only pass-through support for low-income customers, the analysis is unnecessary here, as the FCC has properly recognized.¹³

III. LCW SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS A FEDERAL ETC

LCW satisfies each of the statutory and regulatory prerequisites set forth in the Act, the FCC's Rules¹⁴, and the *ETC Order*¹⁵. On March 17, 2005, the FCC released its *ETC Requirements Order*¹⁶ establishing additional requirements for carriers seeking ETC designation before the FCC. These additional requirements, however, are not binding on state commissions. The following year, this Commission considered whether to adopt all or some portion of the rules promulgated by the FCC, and issued a set of ETC Initial Designation Application requirements in the *ETC Order*.¹⁷ In this Application, LCW provides all of the information required by the Commission pursuant to the *ETC Order*.

A. LCW is a Common Carrier

LCW is a "common carrier" under 47 U.S.C. § 214(e)(1) and 214(e)(6) for purposes of ETC designation.

B. LCW Offers the Services and Functionalities Supported by the Federal Low-Income Universal Service Program

Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that carriers designated as ETCs shall, throughout their service area, (1) offer the services that are supported by the federal universal service support mechanisms either using their own facilities or a combination of their own facilities and resale of another carrier's services, and (2) advertise the availability of such

¹³ *Virgin Mobile Order*, at ¶ 39 n. 101; *see also id.* at ¶ 11 n. 40 (further recognizing the lack of a rural versus non-rural distinction for a Lifeline-only applicant because low-income and high-cost support are fundamentally different).

¹⁴ 47 U.S.C. § 214(e)(1)-(2), and 47 C.F.R. § 54.201.

¹⁵ *See ETC Order*, Appendix A, pp. 1-3.

¹⁶ *ETC Requirements Order*, 20 FCC Rcd 6371 (2005).

¹⁷ *ETC Order*, Appendix A, pp. 1-3.

APPLICATION OF LCW WIRELESS, LLC

services and the charges therefore using media of general distribution.¹⁸ The services which are supported by the federal USF are:

- (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
- (9) toll limitation for qualifying low-income consumers.¹⁹

LCW provides all of the nine supported services in satisfaction of the requirements of Section 214(e)(1) of the Act and the *ETC Order*.²⁰ LCW accepts the obligation to offer these supported services throughout its ETC designated area in the state upon reasonable request in full compliance with the obligation of an ETC.

Voice Grade Access. “Voice grade access” permits a telecommunications user 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 that there is an incoming call. The FCC has determined that voice grade access to the public switched telephone network means the ability to make and receive calls with a minimum bandwidth of 300 to 3000 Hertz.²¹ Through its interconnection agreements with local exchange carriers (LECs) in Oregon, LCW’s customers are currently able to make and receive calls on the public switched telephone network within the specified bandwidth.

Local Usage. “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. 47 C.F.R. §54.101(2).

¹⁸ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

¹⁹ 47 C.F.R. § 54.101(a)(1)-(9).

²⁰ *ETC Order*, Requirement 2.1, Appendix A, p. 1.

²¹ *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776 (1997) (“*First Report and Order*”), ¶¶63-64.

APPLICATION OF LCW WIRELESS, LLC

In the *ETC Requirements Order* the FCC provided further guidance on this measure, which the Commission has generally adopted in the *ETC Order*. Specifically the *ETC Order* requires an applicant to demonstrate that it “offers a local usage plan that is comparable to the basic local service offerings of the ILEC.”²² While the FCC has declined to adopt a specific local usage threshold, it instead requires that the local usage plan of an ETC applicant be reviewed on a case-by-case basis.

LCW is committed to providing all its customers with valuable calling plans and believes that its calling plans are comparable in value to those offered by the incumbent LEC. Calling plans cannot be compared solely on price, but must also consider calling scope and the additional features and functionalities offered. LCW’s current calling plans offer consumers numerous benefits including the inherent mobile nature of wireless service. For example, LCW’s “local” calling area is much broader than the incumbent LEC. All of LCW’s rate plans include unlimited local calling and caller ID. Furthermore, customers can choose from among plans that also provide unlimited long-distance calling throughout the United States, Canada and Puerto Rico; unlimited domestic text and picture messaging; unlimited text to Mexico; premium extended coverage providing unlimited service without additional roaming fees in over 4,600 domestic cities and towns; and call waiting, three-way calling, and voicemail, among other services.

Summaries of LCW’s six calling plans are attached as Exhibit C.²³ The \$30 per month plan offers unlimited talk and caller ID. The \$35 per month plan adds unlimited long distance and text to the entry-level offering, while the \$40 per month plan includes all those services and also adds pix, Mexico text, call waiting, three-way calling, and voicemail.²⁴ For these three plans costing \$40 per month or less, directory assistance may be purchased for an additional \$2 per month, or costs \$1 per

²² *ETC Order*, Requirement 2.4, Appendix A, p. 1.

²³ See also <http://www.mycricket.com/cricketplans/>

²⁴ *Id.*; Exhibit C.

APPLICATION OF LCW WIRELESS, LLC

directory assistance call if the additional service is not purchased in advance.²⁵ The three remaining plans include unlimited 411 directory assistance without any additional cost. For \$45 per month, the plan includes those services listed above, together with Mobile Web, directory assistance, and premium extended coverage.²⁶ The \$50 per month plan adds global text, automatic back-up of contacts, call forwarding, and 30 roaming minutes per month.²⁷ Finally, the \$60 per month plan gives customers 200 nationwide roaming minutes per month, in addition to the above-described services.²⁸ Any customer qualifying for the Lifeline discount could apply the discount to any of these plans.

Dual Tone Multi-frequency Signaling or its Functional Equivalent. “DTMF” is a method of signaling that facilitates the transportation of call set-up and call detail information. DTMF makes “touchtone” dialing possible by facilitating the transportation of signaling through the network. The FCC has recognized that “wireless carriers use out-of-band signaling mechanisms...[It] is appropriate to support out-of-band signaling mechanisms as an alternative to DTMF signaling.”²⁹ LCW currently uses out-of-band digital signaling and in-band multi-frequency signaling that is the functional equivalent to DTMF signaling, in accordance with the FCC’s requirements.³⁰

Single party Service. “Single-party service” permits the exclusive use of a particular subscriber loop or access line by a single subscriber. The FCC has determined that a CMRS provider meets the requirement of offering single party service when it offers a dedicated message path for the length of a user’s particular transmission.³¹ LCW meets the requirement of single-party service in all

²⁵ *Id.*; Exhibit C.

²⁶ *Id.*; Exhibit C.

²⁷ *Id.*; Exhibit C.

²⁸ *Id.*; Exhibit C.

²⁹ *Universal Service Order*, ¶71.

³⁰ *See also ETC Order*, Requirement 2.1, Appendix A, p.1.

³¹ 47 C.F.R. § 54.101(a)(4); *Universal Service Order*, ¶62.

APPLICATION OF LCW WIRELESS, LLC

of its service offerings by providing a dedicated message path for the length of a user's wireless transmission.

Access to Emergency Services. "Access to emergency service" means the ability to reach a public service answering point ("PSAP") by dialing "911". The FCC requires that a carrier must provide access to enhanced 911 or "E911", which includes the capability of providing both automatic numbering information ("ANI") and automatic location information ("ALI"), when the PSAP is capable of receiving such information and the service is requested from the carrier.³² LCW currently provides its voice customers in Oregon with the ability to access emergency services by dialing "911". LCW is also capable of delivering ANI and ALI information over its existing network and is in compliance with all applicable federal E911 requirements. LCW will continue to work with local PSAPs within its ETC services areas to make E911 service available according to the FCC's requirements.

Access to Operator Services. "Access to operator services" means any automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call.³³ LCW meets this requirement by providing access to operator services to its customers by dialing "411".

Access to Interexchange Services. An ETC must offer consumers access to interexchange service to make and receive toll or interexchange calls. LCW currently meets this requirement by providing all of its subscribers with the ability to make and receive interexchange or toll calls. This Commission in its *ETC Order* adopted the requirement that the ETC acknowledge that it may be

³² 47 C.F.R. § 20.18(j); *Universal Service Order*, ¶73.

³³ 47 C.F.R. § 54.101(a)(6); *Universal Service Order*, ¶75.

APPLICATION OF LCW WIRELESS, LLC

required to provide equal access if it is the only remaining ETC in an area.³⁴ LCW agrees to abide by this requirement consistent with the parameters of federal law.

Directory Assistance. “Access to directory assistance” means the ability to provide access to a service that makes directory listings available.³⁵ LCW currently meets this requirement by providing its customers access to directory assistance by dialing “411.”³⁶

Toll Limitation. “Toll limitation” includes the offering of either “toll control” or “toll blocking” to qualifying low-income customers, as a means of limiting or blocking the completion of outgoing toll calls.³⁷ An ETC is not required to provide both services if the carrier is incapable of providing both.³⁸ Once designated as an ETC, LCW will participate in the Lifeline and Link Up programs for qualifying low-income customers. The Lifeline calling plans that LCW intends to offer do not distinguish between local and toll calls. If for any reason LCW changes that offer, it will meet the toll limitation requirement by providing toll blocking.

C. LCW Will Provide the Supported Services Using its Own Facilities or a Combination of Its Own Facilities and Resale of Another Carrier’s Services

LCW will provide the supported services using its own facilities or a combination of its own facilities and the resale of another carrier’s service. LCW primarily will use its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching and interconnection facilities used to serve its existing customers.³⁹

³⁴ *ETC Order*, Requirement 2.5, Appendix A, p. 1.

³⁵ 47 C.F.R. § 54.101(a)(8).

³⁶ As described in the plan summaries provided in this application and in Exhibit C, directory assistance is offered at an additional charge of \$2 per month for the rate plans set at \$30, \$35, and \$40 per month; if that service is not purchased in advance, then each call to directory assistance costs \$1 under those plans. Directory assistance is included in the bundled charge for the \$45, \$50, and \$60 per month rate plans. This pricing is reflected in the calling plans attached as Exhibit C.

³⁷ 47 C.F.R. § 54.400(b)-(d); *Universal Service Order*, ¶82.

³⁸ 47 C.F.R. § 54.400(d).

³⁹ See Confidential Exhibit D, which shows the extent of current network coverage and signal strength. See *ETC Order*, Requirement 4.2, Appendix A, p. 2. Confidential Exhibit D contains highly confidential information that constitutes “trade

D. LCW Will Advertise the Availability of and Charges for its Universal Service Qualifying Offerings

Pursuant to Section 54.201 of the FCC's rules,⁴⁰ LCW will advertise the availability of the supported services detailed above and the corresponding rates and charges in a manner designed to inform the general public within its designated ETC service areas. This advertising will occur through some combination of media channels, such as television and radio, newspaper, magazine and other print advertisements, outdoor advertising, direct marketing, and the Internet. Specifically, LCW will primarily promote its Lifeline service in Oregon through print and radio advertising, collateral in its stores and direct outreach by LCW to community health, welfare and employment offices.

E. Commitment to Consumer Protection

Consistent with the FCC's *ETC Report and Order* and this Commission's requirements, LCW will abide by the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Code").⁴¹ LCW has already adopted the CTIA Code and is committed to compliance with the CTIA Code throughout its service areas, including in those areas where it is seeking designation as an ETC.

Consistent with this Commission's requirements and as it does today, LCW agrees to use its best efforts to resolve complaints received by the Commission, and designates the following contact person to work with the Commission's Consumer Services Division for complaint resolution:
Customer Operations Manager, 1750 NW Naito Pkwy, #250, Portland, OR 97209, (503) 306-2505.⁴²

secrets" exempt from disclosure pursuant to ORS 192.420(1) and 192.501(2). LCW requests the Commission accord Exhibit D confidential treatment.

⁴⁰ See also *ETC Order*, Requirement 6.1, Appendix A, p. 3.

⁴¹ See 47 C.F.R. § 54.202(a)(3).

⁴² *ETC Order*, Requirement 9.2, Appendix A, p. 3.

APPLICATION OF LCW WIRELESS, LLC

F. Commitment to Provide Service Upon Reasonable Request

Consistent with the Commission's requirements, LCW commits that if a request is made by a potential customer within its existing network coverage, LCW will provide service immediately using its standard customer equipment (handsets/wireless devices). If a potential customer requests service within LCW's designated area, but outside its existing network coverage, LCW will follow the six-step process specified in 47 C.F.R. § 54.202(a)(1)(A). Specifically, LCW will determine if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer's equipment; (b) deploying a roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling services from another carrier's facilities to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.⁴³

G. Network Improvement Plan

Because LCW seeks only low-income support, it is not required to provide a network improvement plan.⁴⁴

H. Ability to Remain Functional in an Emergency

LCW is committed to providing and maintaining essential telecommunications services in times of emergency, and certifies that it is able to function in an emergency situation. Indeed, there are numerous actions LCW has already taken for emergency preparedness. For example, all mobile switching centers and cell sites have battery backup power. Also, each switching center has a dedicated diesel generator and there are several cell site generators in the market area. In instances of power outages, priority is set based upon traffic, cell site location and time of day. In certain parts

⁴³ See *ETC Order*, Requirement 3.2, Appendix A, p. 1.

⁴⁴ See *ETC Order*, Requirement 5.3, Appendix A, p. 2.

of the service area, a cell on wheels (COW) can be deployed. In case of a total switch outage, a mobile command center may be established by each switch vendor.⁴⁵

IV. DESIGNATING LCW AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST

In addition to finding that an applicant provides the supported services and the other enumerated requirements, the Commission must also determine whether designation of LCW as an ETC in the areas requested serves the public interest. LCW strongly believes that designating LCW as an ETC is in the public interest.

A. Unique Advantages of LCW's Service Offerings

In addition to providing consumers with the benefits of increased choice and competition, there are other advantages to designating LCW as an ETC. For example, because LCW's plans offer unlimited local calling, and because most plans offer unlimited long-distance and text,⁴⁶ customers do not need to track minutes or restrict calling to specific hours of the day. LCW also offers popular features like unlimited text messaging to Mexico with some plans, giving many potential customers a valuable service targeted to their specific needs.

B. State and Federal Precedent

Designation of LCW as an ETC is consistent with ETC decisions across the country, including the decisions of this Commission. Numerous state commissions have repeatedly found that designating wireless carriers as ETCs is in the public interest. For example, in an earlier ETC designation decision, the Washington Utilities and Transportation Commission stated that designating a wireless carrier as an ETC "furthers the public interest because consumers will receive benefits from increased competition in the form of a greater variety of services and more

⁴⁵ See *ETC Order*, Requirement 8.1, Appendix A, p. 3.

⁴⁶ Only the entry-level \$30 per month plan does not include unlimited long distance and unlimited text within its bundled charges. See Exhibit C.

comparability of services, compared to more urban areas. Rural customers also benefit because they, rather than the government, will choose which services meet their telecommunications needs.”⁴⁷ By analogy here, ETC designation for low-income customers in rural areas will allow such customers to receive the Lifeline discount for wireless service in the same manner as non-rural low-income customers. This Commission has similarly concluded that designating wireless carriers as ETCs in rural ILEC territories is in the public interest,⁴⁸ specifically where it promotes quality service at affordable rates, access to advanced telecommunications and information services, and access to services in rural areas comparable to services in urban areas.⁴⁹

V. ANNUAL RECERTIFICATION PROCESS

LCW commits to comply with the annual certification requirements adopted by the Commission.⁵⁰

VII. LEGAL AUTHORITY

The Commission has the legal authority to grant the relief requested by the Applicant pursuant to 47 U.S.C. §214(e)(2); 47 C.F.R. § 54.201; *see also, In the Matter of Applications to be Designated Eligible Telecommunications Carriers in the State of Oregon*, Commission Order No. 97-481, Docket UM 873, entered December 16, 1997; *see also RCC ETC Order UM 1083*; *see also USCC ETC Order, UM 1084*; *see also Edge ETC Order, UM 1177*; *see also ETC Order, UM 1217*.

//

//

//

//

⁴⁷ AT&T Wireless, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011 (April 13, 2004), ¶40.

⁴⁸ *See RCC ETC Order* at 16; *see also USCC ETC Order* at 15; *see also Edge ETC Order* at 8.

⁴⁹ *See USCC ETC Order*, Order No. 04-356, pp. 6-7.

⁵⁰ *See ETC Order*, Appendix A, pp. 4-6.

APPLICATION OF LCW WIRELESS, LLC

VIII. RELIEF REQUESTED

For the reasons set forth above, and pursuant to Section 214(e)(2) of the Act, LCW requests that the Commission enter an Order designating LCW as an ETC for the areas described herein and that the Commission enter this Order at the earliest possible date.

Dated the 9th day of November, 2009.

Respectfully submitted,

LCW WIRELESS, LLC

By: 

Mark P. Trinchero, OSB #88322
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2300
Portland, Oregon 97201
(503) 778-5318

APPLICATION OF LCW WIRELESS, LLC






EXHIBIT A

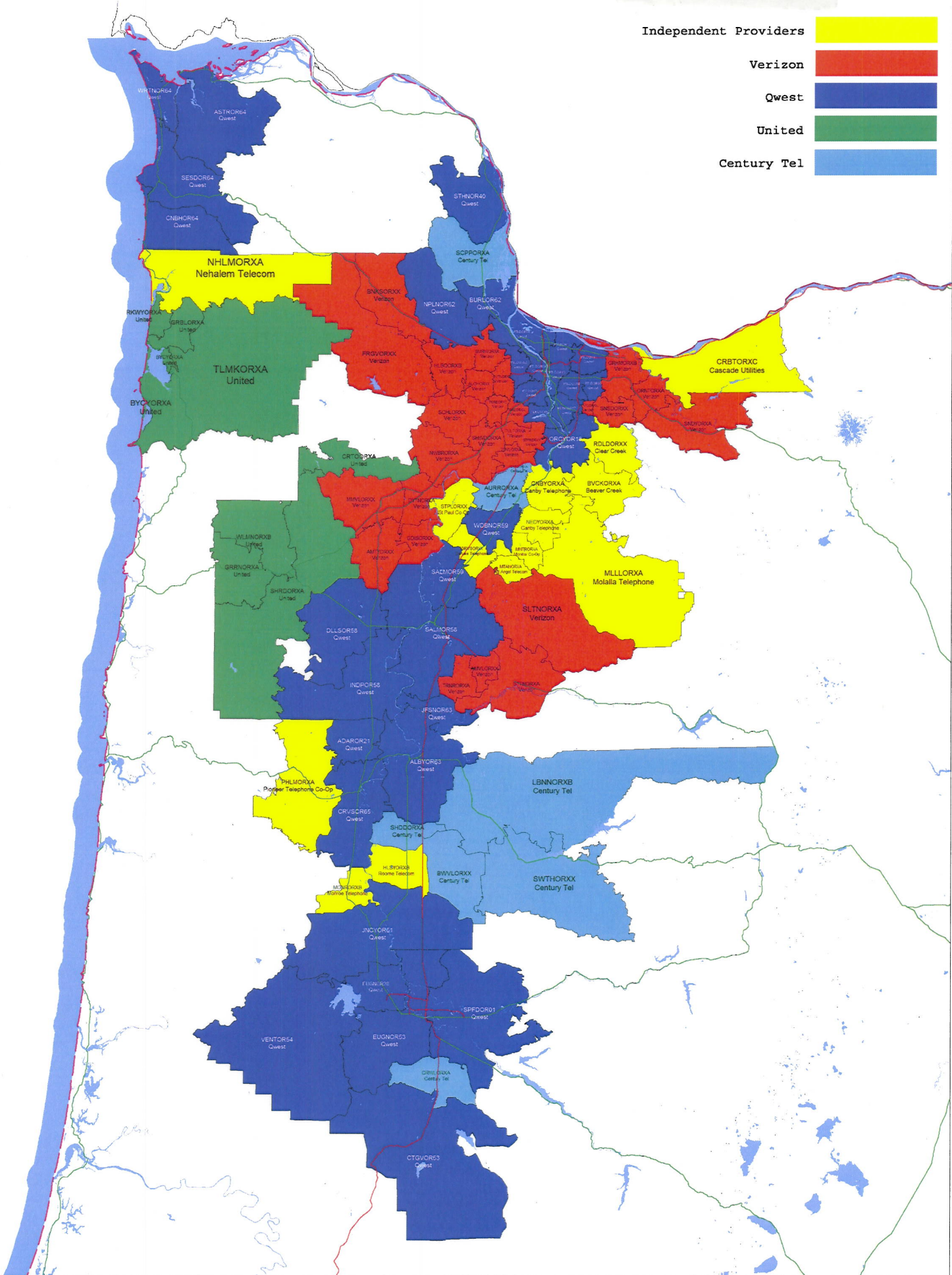
Controlling Entity	State	WC_Code	OCN Category	Locality	Exchange	Rate Center
Verizon	OR	ALOHORXX	RBOC	ALOHA	BEAVERTON	BEAVERTON
Verizon	OR	HLBOORXB	RBOC	HILLSBORO	BEAVERTON	BEAVERTON
Verizon	OR	BVTNORXB	RBOC	BEAVERTON	BEAVERTON	BEAVERTON
Verizon	OR	BNKSORXX	RBOC	BANKS	BEAVERTON	BEAVERTON
Verizon	OR	FRGVORXX	RBOC	FOREST GRV	BEAVERTON	BEAVERTON
Verizon	OR	TGRDORXA	RBOC	TIGARD	BEAVERTON	BEAVERTON
Verizon	OR	MMVLORXX	RBOC	MCMINNVL	MCMINNVILLE	MCMINNVL
Verizon	OR	SMRWORXA	RBOC	BEAVERTON	BEAVERTON	BEAVERTON
Verizon	OR	STTNORXA	CLEC	AUMSVLTRNR	AUMSVILLE-TURNER	AUMSVLTRNR
Verizon	OR	GRHMORXB	RBOC	GRESHAM	GRESHAM	GRESHAM
Verizon	OR	BVTNORXB	RBOC	BEAVERTON	BEAVERTON	BEAVERTON
Verizon	OR	TGRDORXC	RBOC	BEAVERTON	BEAVERTON	BEAVERTON
Verizon	OR	NWBRORXA	RBOC	NEWBERG	NEWBERG	NEWBERG
Verizon	OR	SNSDORXX	RBOC	SUNNYSIDE	STAFFORD	STFRD-SNDY
Verizon	OR	SCHLORXX	RBOC	SCHOLLS	BEAVERTON	BEAVERTON
Verizon	OR	SNSDORXX	RBOC	SUNNYSIDE	STAFFORD	STFRD-SNDY
Verizon	OR	SNDYORXA	RBOC	GRESHAM	GRESHAM	GRESHAM
Verizon	OR	ORNTORXA	RBOC	GRESHAM	GRESHAM	GRESHAM
Verizon	OR	SNDYORXA	RBOC	SANDY	STAFFORD	STFRD-SNDY
Verizon	OR	GRHMORXB	RBOC	GRESHAM	GRESHAM	GRESHAM
Verizon	OR	STFRORXX	RBOC	STAFFORD	STAFFORD	STFRD-SNDY
Verizon	OR	WIVLORXA	RBOC	STAFFORD	STAFFORD	STFRD-SNDY
Verizon	OR	TULTORXA	RBOC	TUALATIN	STAFFORD	STFRD-SNDY
Verizon	OR	TRNRORXA	RBOC	TURNER	AUMSVILLE-TURNER	AUMSVLTRNR
Verizon	OR	AMVLORXX	RBOC	AUMSVLTRNR	AUMSVILLE-TURNER	AUMSVLTRNR
Verizon	OR	SHWDORXA	RBOC	SHERWOOD	SHERWOOD	SHERWOOD
Verizon	OR	AMTYORXX	RBOC	AMITY	AMITY	AMITY
Verizon	OR	DYTNORXA	RBOC	DAYTON	DAYTON	DAYTON
Verizon	OR	GDISORXX	RBOC	GRAND IS	GRAND ISLAND	GRAND IS
Verizon	OR	SLTNORXA	RBOC	SILVERTON	SILVERTON	SILVERTON
Verizon	OR	VYVWORXA	RBOC	VALLEYVIEW	STAFFORD	STFRD-SNDY
Qwest	OR	PTLDOR02	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR12	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR11	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR12	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR14	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR17	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	STHNOR40	RBOC	ST HELENS	SAINT HELENS	ST HELENS
Qwest	OR	LKOSOR62	RBOC	LAKEOSWEGO	OAK GR-MILW-CLACKAMASMCM	CLACKAMAS
Qwest	OR	MLWKOR17	RBOC	OKGRVMLWKI	OAK GR-MILW-CLACKAMASMCM	CLACKAMAS
Qwest	OR	BURLOR62	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	DLLSOR58	RBOC	DALLAS	DALLAS	DALLAS
Qwest	OR	NPLNOR62	RBOC	NORTH PL	NORTH PLAINS	NORTH PL
Qwest	OR	ORCYOR18	RBOC	OREGONCITY	OAK GR-MILW-CLACKAMASMCM	CLACKAMAS
Qwest	OR	LKOSOR62	RBOC	LAKEOSWEGO	OAK GR-MILW-CLACKAMASMCM	CLACKAMAS
Qwest	OR	PTLDOR14	RBOC	PORTLAND	PORTLAND	PORTLAND

EXHIBIT A

Qwest	OR	INDPOR58	RBOC	INDEPNDNCE	DALLAS	DALLAS
Qwest	OR	PTLDOR08	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR17	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR18	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	MLWKOR17	RBOC	OKGRVMLWKI	OAK GR-MILW-CLACKAMASMCM	CLACKAMAS
Qwest	OR	PTLDOR69	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR13	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	PTLDOR69	RBOC	PORTLAND	PORTLAND	PORTLAND
Qwest	OR	SALMOR59	RBOC	SALEM	SALEM	SALEM
Qwest	OR	SALMOR58	RBOC	SALEM	SALEM	SALEM
Qwest	OR	WDBNOR59	RBOC	WOODBURN	WOODBURN-HUBBARD	WOODBURN
Qwest	OR	JFSNOR63	RBOC	JEFFERSON	JEFFERSON	JEFFERSON
Qwest	OR	CRVSOR65	CLEC	CORVALLIS	CORVALLIS	CORVALLIS
Qwest	OR	EUGNOR28	RBOC	EUGENE	EUGENE-SPRINGFIELD	EUGENE
Qwest	OR	EUGNOR53	RBOC	EUGENE	EUGENE-SPRINGFIELD	EUGENE
Qwest	OR	SHDDORXA	ILEC	SHEDD	SHEDD	SHEDD
Qwest	OR	SPFDOR01	RBOC	SPRINGFLD	EUGENE-SPRINGFIELD	EUGENE
Qwest	OR	ADAROR21	RBOC	CORVALLIS	CORVALLIS	CORVALLIS
Qwest	OR	ALBYOR63	RBOC	ALBANY	ALBANY	ALBANY
Qwest	OR	VENTOR54	RBOC	VENETA	VENETA	VENETA
Qwest	OR	CTGVOR53	RBOC	COTTAGEGRV	COTTAGE GROVE	COTTAGEGRV
Qwest	OR	JNCYOR51	RBOC	JUNCTIONCY	JUNCTION CITY	JUNCTIONCY
United	OR	BYCYORXA	ILEC	BAY CITY	BAY CITY	BAY CITY
United	OR	TLMKORXA	ILEC	TILLAMOOK	TILLAMOOK	TILLAMOOK
United	OR	GRRNORXA	ILEC	GRANDRONDE	GRANDE RONDE	GRANDRONDE
United	OR	CRTOORXA	ILEC	CARLTON	CARLTON	CARLTON
United	OR	WLMNORXB	ILEC	WILLAMINA	WILLAMINA	WILLAMINA
United	OR	SHRDORXA	WIRELESS	LINCOLN CY	LINCOLN CITY	LINCOLN CY
United	OR	GRBLORXA	ILEC	GARIBALDI	GARIBALDI	GARIBALDI
United	OR	RKWYORXA	ILEC	ROCKAWAY	ROCKAWAY	ROCKAWAY
Century	OR	SCPPORXA	ILEC	SCAPPOOSE	SCAPPOOSE	SCAPPOOSE
Century	OR	AURRORXA	ILEC	AURORA	AURORA	AURORA
Century	OR	CHBUORXA	ILEC	CHARBONNEU	CHARBONNEAU	CHARBONNEU
Century	OR	LBNNORXB	ILEC	LEBANON	LEBANON	LEBANON
Century	OR	SWTHORXX	ILEC	SWEET HOME	SWEET HOME	SWEET HOME
Century	OR	BWVLORXX	ILEC	BROWNSVL	BROWNSVILLE	BROWNSVL
Century	OR	CRWLORXA	ILEC	CRESWELL	CRESWELL	CRESWELL
St Paul COOP	OR	STPLORXX	ILEC	ST PAUL	ST PAUL	ST PAUL
Roome Telecom	OR	HLSYORXB	ILEC	HALSEY	HALSEY	HALSEY
Pioneer	OR	PHLMORXA	ILEC	PHILOMATH	PHILOMATH	PHILOMATH
Mt Angel Telephone	OR	MTANORXA	ILEC	MOUNTANGEL	MT ANGEL	MOUNTANGEL
Monroe Telephone	OR	MONRORXB	ILEC	MONROE	MONROE	MONROE
Molalla Telephone	OR	MLLLORXA	ILEC	MOLALLA	MOLALLA	MOLALLA
Gervais	OR	GRVSORXX	CLEC	WOODBURN	WOODBURN-HUBBARD	WOODBURN
Clear Creek	OR	RDLTORXX	ILEC	REDLAND	REDLAND	REDLAND
Cascade Utilities	OR	CRBTORXC	ILEC	CORBETT	CORBETT	CORBETT
Canby Telephone	OR	NEDYORXA	ILEC	CANBYNEEDY	CANBY-NEEDY	CANBYNEEDY
Canby Telephone	OR	CNBYORXA	ILEC	CANBYNEEDY	CANBY-NEEDY	CANBYNEEDY
Beaver Creek	OR	BVCKORXA	ILEC	REDLAND	REDLAND	REDLAND
Nehalem Telecom	OR	NHLMORXA	ILEC	NEHALEM	NEHALEM	NEHALEM

EXHIBIT B

- Independent Providers 
- Verizon 
- Qwest 
- United 
- Century Tel 



plans

What's up in My Community?

UNLIMITED TALK & TEXT

STARTING AT **\$25/MONTH**

New activation required

\$25/month

Hurry! This offer won't last. For less than \$1/day, there's never been a better time to join the millions of Cricket customers!

UNLIMITED:

- ▶ talk
- ▶ text
- ▶ caller ID

most popular

[Compare this to other plans ▶](#) [\\$25.00/mo Plan Details ▶](#) [add to cart ▶](#)

Plans in Your Market

Please enter your zip code to view the prices and plans available in your area:

(enter your zip code) [submit ▶](#)

Cart Summary

There are no items in your shopping cart.

ORDER BY PHONE
800-922-5159

Individual plans | family plans

\$60/month

UNLIMITED:

- ▶ talk
- ▶ long distance
- ▶ text & pix
- ▶ global text (includes Mexico)
- ▶ mobile web
- ▶ 411 directory assistance
- ▶ premium extended coverage
- ▶ myBackup
- ▶ caller ID, call waiting, call forwarding, 3-way calling & voicemail

+PLUS

- ▶ 200 nationwide roaming minutes per month

[add to cart ▶](#)

[Compare this to other plans ▶](#) [\\$60.00/mo Plan Details ▶](#)

\$50/month

UNLIMITED:

- ▶ talk
- ▶ long distance
- ▶ text & pix
- ▶ global text (including Mexico)
- ▶ mobile web
- ▶ 411 directory assistance
- ▶ premium extended coverage
- ▶ myBackup
- ▶ caller ID, call waiting, call forwarding, 3-way calling & voicemail

+PLUS

- ▶ 30 roaming minutes per month

[add to cart ▶](#)

[Compare this to other plans ▶](#) [\\$50.00/mo Plan Details ▶](#)

\$45/month

UNLIMITED:

- ▶ talk
- ▶ long distance
- ▶ text & pix
- ▶ Mexico text
- ▶ Mobile Web
- ▶ 411 directory assistance
- ▶ premium extended coverage
- ▶ caller ID, call waiting, 3-way calling & voice mail

[add to cart ▶](#)

[Compare this to other plans ▶](#) [\\$45.00/mo Plan Details ▶](#)

\$40/month

UNLIMITED:

- ▶ talk
- ▶ long distance
- ▶ text & pix
- ▶ Mexico text
- ▶ caller ID, call waiting, 3-way calling & voicemail

[add to cart ▶](#)

[Compare this to other plans ▶](#) [\\$40.00/mo Plan Details ▶](#)

\$30/month

UNLIMITED:

- ▶ talk
- ▶ caller ID

[add to cart ▶](#)

[Compare this to other plans ▶](#) [\\$30.00/mo Plan Details ▶](#)

\$40/month Cricket Broadband

UNLIMITED:

- ▶ high-speed wireless Internet access

+PLUS

- ▶ SAVE an additional \$5 per month when bundled with a Cricket unlimited voice plan

[add to cart ▶](#)

[Compare this to other plans ▶](#) [\\$40.00/mo Plan Details ▶](#)



Plans may require activation fee or migration fee.

Whether you're looking for the best **cell phone plan deals** or you want every possible feature, Cricket offers a **wireless plan** that's right for you. We invite you to **compare our cell phone plans** with cellular plans from other wireless carriers. You'll find that even our **cheapest cell phone plans** offer unlimited talking and unlimited text messaging. And that's just the beginning. For a little more, you can get additional features like unlimited long distance, voice mail, caller ID, call waiting and 3-way calling.

EXHIBIT C

Choose the UNLIMITED plan that fits your lifestyle.

There's a perfect plan for everyone. Simply rollover any plan to highlight features. Or check the compare box of any number of plans and they will be highlighted for easy comparison.

CHOOSE THE PLAN THAT'S RIGHT FOR YOU	\$60	\$50	\$45 <small>best value</small>	\$40	\$35	\$30
UNLIMITED talk	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
UNLIMITED caller ID	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
UNLIMITED long distance (includes HI, AK, Canada, and Puerto Rico)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED text messaging	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED picture messaging	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED Mexico text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED vm, call waiting, & 3-way Calling	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED call forwarding	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED mobile web	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED 411	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
premium extended coverage	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
myBackup	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UNLIMITED global text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
roaming minutes	200 minutes	30 minutes				

want more?
Customize your plan

	\$60	\$50	\$45 <small>best value</small>	\$40	\$35	\$30
UNLIMITED text to Mexico	\$3	\$3	\$3	\$3	\$3	\$3
ringback tones	\$5	\$5	\$5	\$5	\$5	\$5
premium extended coverage	\$5	\$5	\$5	\$5	\$5	\$5
ROAMING MINUTES						
120 Minutes	\$15	\$15	\$15	\$15	\$15	\$15
70 Minutes	\$10	\$10	\$10	\$10	\$10	\$10
30 Minutes	\$5	\$5	\$5	\$5	\$5	\$5
INTL LONG DISTANCE						
500 minutes (U.S. or Canada and only landlines in Mexico)	\$25	\$25	\$25	\$25	\$25	\$25
300 minutes (U.S. or Canada and only landlines in Mexico)	\$15	\$15	\$15	\$15	\$15	\$15
100 minutes (U.S. or Canada and only landlines in Mexico)	\$5	\$5	\$5	\$5	\$5	\$5
175 minutes (U.S. or Canada and only mobile phones in Mexico)	\$35	\$35	\$35	\$35	\$35	\$35
135 minutes (U.S. or Canada and only mobile phones in Mexico)	\$30	\$30	\$30	\$30	\$30	\$30
40 minutes (U.S. or Canada and only mobile phones in Mexico)	\$10	\$10	\$10	\$10	\$10	\$10
WANT EVEN MORE FUN?						
\$15 flex bucket	\$15	\$15	\$15	\$15	\$15	\$15
\$5 flex bucket	\$5	\$5	\$5	\$5	\$5	\$5
BILLING OPTIONS						
automatic bill pay	Included, free.	Included, free.	Included, free.	Included, free.	Included, free.	Included, free.
text message bill notification	A free option.	A free option.	A free option.	A free option.	A free option.	A free option.
paper bill	\$0.55	\$0.55	\$0.55	\$0.55	\$0.55	\$0.55
phone replacement program	\$4.95	\$4.95	\$4.95	\$4.95	\$4.95	\$4.95

CHOOSE THE PLAN THAT'S RIGHT FOR YOU	\$60	\$50	\$45 <small>best value</small>	\$40	\$35	\$30
	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

* requires a compatible phone.

