

McDowell & Rackner PC



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July 15, 2008

VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: **Docket UM 1375 – 2008 Annual ETC Recertification Reports**

Enclosed for filing is Comspan Communications' 2008 Annual ETC Recertification Reports. Please note that we will send the original signed Affidavits and a copy of the IAS and ICLS certification (Reports 9.1, 9.2 and 9.3) by the end of the week.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa Rackner".

Lisa F. Rackner

Enclosures

DOCKET NO. UM 1375

**Required Cover Sheet for Submission of
2008 Annual ETC Recertification Reports**

Filing Deadline: Tuesday, July 15, 2008

Name of Eligible Telecommunications Carrier: Comspan Communications

Filing date: July 15, 2008

Is this: Original submission? X

OR

Revised submission? _____ If revised, please identify which reports
are being revised _____

Person to contact for questions:

Name: Marty Patrovsky

Phone number: 541-229-2101

E-mail address: mpatrovsky@yahoo.com

Filing instructions: Please file reports under Docket No. UM 1375. File reports electronically via the PUC Filing Center; see the PUC website for instructions. Also send one original and 2 hard copies to the PUC Filing Center. If selected portions of reports, e.g., network improvement plans, are to receive confidential treatment, those portions should not be filed electronically. Hard copies of confidential material should be filed in accordance with confidential designation requirements described in OAR 860-011-0080. Regular delivery methods may be used to send all hard copy documents; overnight or express delivery is not necessary. Send documents to the Filing Center using one of the two following addresses, depending on the delivery carrier used:

For US mail: Public Utility Commission of Oregon
Attn: Filing Center
PO Box 2148
Salem, OR 97308-2148

For other carriers: Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St. NE #215
Salem, OR 97308-2148

If you have any questions on these reports, please call Kay Marinos at 503-378-6730, or Celeste Hari at 503-378-6628.

2008 Annual Recertification Reports for ETCs in Oregon

Docket No. UM 1375

Report Formats to Satisfy Requirements of Order No. 06-292 for 2008

Report #1 Supported Services Offerings

- 1.1. Basic Local Usage Service Offerings – **All ETCs**
- 1.2. Comparable Local Usage Plan – **CETCs only**
- 1.3. Supported Services Not Provided – **CETCs only**
- 1.4. Equal Access Acknowledgement – **CETCs only**

Report #2 Unfulfilled Service Requests

- 2.1. Unfulfilled Service Requests/Held Orders – **All ETCs**
- 2.2. Service Request Processing – **CETCs only**

Report #3 Evidence of Advertising for Basic Supported Services - All ETCs

Report #4 Low-income Services – All ETCs

- 4.1. Number of Lifeline Customers
- 4.2. Advertising of Low-income Program Service Offerings

Report #5 Outage Report – All ETCs

Report #6 Trouble Report – All ETCs

Report #7 Network Improvement Plan – CETCs only

Report #8 Special Commitments/Requirements – CETCs only

Report #9 Certifications – All ETCs

- 9.1. IAS or ICLS Certification Copy – **All ETCs Receiving IAS or ICLS**
- 9.2. Certification of Use of Universal Service Funds – **All ETCs Receiving Traditional High-Cost Support (HCL, LSS)**
- 9.3. Certification of Emergency Functionality and Compliance with Service Quality/Consumer Protection Measures – **All ETCs**

Report #1 – Supported Services Offerings

1.1. Basic Local Usage Service Offerings – All ETCs

Choose either A. or B. below, as applicable:

- A. Basic local usage service offerings are filed under tariff with the Oregon PUC. The specific tariff references (with *company name, tariff number, section and page numbers*) for the basic local usage offerings and corresponding rates are:
1. residence:
 2. business:
- B. Basic local usage service offerings are **not** filed under tariff with the Oregon PUC. Submit the following information for each basic service offering that includes local usage allowances (unlimited or limited): 1) plan's name, 2) advertised public description, 3) number of local minutes included, 4) calling area included, and 5) rates and charges. Include basic offerings for both residence and business services.

Comspan offers two Basic Local Usage Offering—one of which is available in Qwest ILEC territories, and one of which is available in Verizon ILEC territories. All characteristics of these services are identical with the exception of pricing, which is set to mirror that of the respective ILEC. Responses to the specific questions above are as follows:

1. Standard economy service
 2. Dial tone, Local and EAS service, E911 OS & DA , and choice of long distance providers
 3. Unlimited Local and EAS minutes
 4. Mirrors the ILEC calling area
 5. QWEST Territories:
 - Access Line Business – \$31.03
 - Access Line Residential - \$19.49
- VERIZON Territories:
- Access Line Business – \$30.49
 - Access Line Residential \$21.99

The above prices include only dial tone and Local and EAS service, exclusive of taxes, fees or special features..

1.2. Comparable Local Usage Plan – CETCs only

The carrier certifies that it offers at least one basic local usage plan that is comparable to those offered by the ILECs in its designated service area: yes no

Identify which of the plans in 1.1.B above are “comparable” to the ILEC local usage offerings, and explain the basis for the comparability. As outlined in 1.1 B above #s 1 through 5.

1.3. Supported Services Not Provided – CETCs only

Identify any supported services that were not available at designation, but were to be provided as a condition of ETC designation (e.g., toll restriction for qualifying low-income consumers, E911): None

Are these services provided currently? yes no

If no, explain why not: _____

1.4. Equal Access Acknowledgement – CETCs only

The carrier acknowledges that it may be required to provide equal access if it is the only remaining ETC in an area: yes no

Report #2 – Unfulfilled Service Requests

2.1. Unfulfilled Service Requests/Held Orders – All ETCs

Choose either A. or B. below, as applicable:

- A. Service quality reports for “primary held orders over 30 days” were filed with the Oregon PUC for calendar year 2007. No additional submission is required for recertification purposes.
- B. Service quality reports for “primary held orders over 30 days” were **not** filed with the Oregon PUC for calendar year 2007. In this case, choose **one** of the following alternatives for reporting:
1. The number of customer requests for supported services that were not fulfilled during calendar year 2007: _____.
If greater than zero, include an attachment noting for each such request, the location (address) of the request and a description of attempts to provide service.
 2. The number of “primary held orders over 30 days” (as defined in Section 860-034-0390 of the Oregon Commission rules) for calendar year 2007: _____.
If greater than zero, include attachment noting for each such held order, the reason the order was held and the original commitment date.

2.2. Service Request Processing - CETCs only

Submit a description of how the carrier ensures that every request for service that cannot be immediately fulfilled is recorded and processed under the 6-step process set forth in 47 CFR Section 54.202(a)(1)(i).

A Service Order Ticket is opened on all requests for services. When an order reaches a threshold level that indicates a delay in completing the provisioning of an order in a timely manner the ticket is updated and the update field of the order is changed to mandate an update every four hours.

Additionally the Service Order status is escalated to the provisioning manager and operations manager. At the time we reach deliverability criticality for an on-net customer and there continues a delay in providing the fixed landline solutions, we implement the process to provide a cell phone for the customers use until such time as we can satisfactorily resolve the difficulty causing the delay.

If the customer is not within our service area, which is normally determined immediately at the taking of the order, a resale order is placed with the appropriate ILEC. If the ILEC fails to complete the order in a timely manner, we open a ticket

with the ILEC and again offer the use of a cell phone to the customer to ensure they are not without service.

Report #3 – Evidence of Advertising for Basic Supported Services (excluding low-income/lifeline) – All ETCs

Describe how basic supported services were advertised during calendar year 2007 throughout the designated service area. List the types of media used, advertising frequencies and geographic coverage. Attach examples of actual advertisements, noting dates, specific distribution methods, and target geographical populations, sufficient to demonstrate that basic supported services and rates were advertised **throughout** the designated service area in 2007.

We primarily work face to face by visiting neighborhoods as we build them out. We occasionally use flyers such as those in exhibit #3A and 3B attached. We also advertise by sponsoring community service activities such as local high school sporting events, music on the half shell, the Oregon duck race, fishing derby etc. We also advertise in the local telephone directories for each service area.

Report #4 – Low-income Services – All ETCs

4.1. Number of Lifeline Customers – All ETCs

The total number of customers receiving Lifeline discounts during the month of December 2007 in the designated service area: _____.

CETCs only - also list counts by ILEC service area as follows:

<u>ILEC Svc Area</u>	<u>No. of Lifeline customers</u>
<u>Roseburg</u>	<u>115</u>
<u>Bandon</u>	<u>23</u>
<u>Coquille</u>	<u>2</u>
_____	_____
_____	_____
_____	_____
_____	_____

4.2. Advertising of Low-Income Program Service Offerings – All ETCs

Submit copies of all advertisements (for all media) for Lifeline, LinkUp, and OTAP service offerings that were run during calendar year 2007, noting media (newspaper name, radio station, bill inserts, internet postings, etc.), run/distribution dates, and geographic coverage area.

See OTAP flyers in English and Spanish exhibits 4A and 4B. These are posted in all our community offices in each wire center served as well as in Social Security offices where permitted and in senior centers within the service areas.

Report #5 – Outage Report – All ETCs

Choose either A. or B. below, as applicable:

- A. Carrier was required to report service outages (as defined in Oregon PUC Rules at Sections 860-034-0390(9) for small telecom utilities, 860-023-0055(9) for large telecom utilities, and 860-032-0012(9) for competitive telecom providers) to the Oregon PUC during year 2007. No additional submission is required for recertification purposes.
- B. Carrier was *not* required to report service outages (as defined in Oregon PUC Rules at Sections 860-034-0390(9) for small telecom utilities, 860-023-0055(9) for large telecom utilities, and 860-032-0012(9) for competitive telecom providers) to the Oregon PUC during year 2007. Select #1 (wireline carriers) or #2 (wireless carriers) below.

1. The number of service outages, as defined in Oregon PUC rules, that occurred during calendar year 2007 was _____.

If the number was greater than zero, attach a report that lists for each such outage the following: the date and time of onset, a brief description of the outage and its resolution, the particular services affected, the geographic areas affected, steps taken to prevent a similar future occurrence, and the number of customers affected.

2. The number of service outages, as defined in FCC rules at 47 CFR Section 54.209(a)(2), that occurred during calendar year 2007 was _____.

If the number was greater than zero, attach a report that lists for each such outage the following: the date and time of onset, a brief description of the outage and its resolution, the particular services affected, the geographic areas affected, steps taken to prevent a similar future occurrence, and the number of customers affected.

Report #6 – Trouble Report – All ETCs

Choose **either A. or B.** below, as appropriate:

A. X Trouble reports were filed with the Oregon PUC for calendar year 2007 per Oregon PUC service quality rules. No additional submission is required for recertification purposes.

B. _____ Trouble reports were **not** filed with the Oregon PUC during calendar year 2007. In this case, choose **one** of the following alternatives for reporting:

1. _____ The average monthly number of customer trouble reports received per 100 wireless handsets for supported services during calendar year 2007, for each company switch.

<u>Trouble Type</u>	<u>Switch A (location)</u>	<u>Switch B (location)</u>
No service	_____	_____
Network busy	_____	_____
Interruption of service	_____	_____
Poor reception	_____	_____

2. _____ The average monthly number of customer trouble reports, as defined in Section 860-034-0390 (5) of the Oregon PUC rules, per 100 access lines, received during calendar year 2007: _____ per month, per 100 working access lines.

Report #7 – Network Improvement Plan – CETCs Only

Per Docket No. UM 1217, Order No. 06-292, competitive ETCs (CETCs) must file network improvement plans annually for recertification purposes. Appendix A of the order details the information that must be included in such plans. Only CETCs must file these plans for annual recertification purposes; ILECs are not required to file such plans. CETCs that receive *only* low-income program support (no high-cost or access-related support) do not have to file network improvement plans. CETCs are strongly encouraged to use the template in the attached Excel worksheets for their network improvement plans. This template incorporates all the items of information required by the order.

Report #8 – Special Commitments/Requirements – CETCs only

Did the Oregon PUC impose any special commitments or requirements at initial designation or during the previous annual recertification process? yes ____ no **X**.

If yes, identify the commitments or requirements and explain if, and how, they have been met.

Report #9 – Certifications - All ETCs

9.1. IAS or ICLS Certification Copy – All ETCs Receiving IAS and/or ICLS

All ETCs receiving interstate access-related support (IAS or ICLS) must submit a copy of the certification for the use of IAS or ICLS support that was sent to USAC and the FCC in June 2008.

9.2. Certification of Use of Universal Service Funds – All ETCs receiving HCL and/or LSS (Rural ILECs and CETCs Designated in Rural ILEC Areas)

To continue receiving traditional high cost support (HCL, LSS), ETCs must submit a notarized affidavit signed by a responsible company official certifying that the carrier will use the high cost support funds only for the intended purposes. Use of the sample affidavit form displayed on the following page is recommended.

9.3. Certification of Emergency Functionality and Compliance with Service Quality and Consumer Protection Measures – All ETCs

Each ETC must submit a notarized affidavit signed by a responsible company official certifying that the carrier: 1) is able to remain functional in an emergency, and 2) is complying with all service quality and consumer protection measures in either the applicable Oregon Commission rules (for wireline carriers), the CTIA Consumer Code (for wireless carriers), or some other specific set of standards. All ETCs must submit this affidavit. A copy of an acceptable affidavit form follows the affidavit for high cost support.

AFFIDAVIT CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, Raymond Hazlett, being of lawful age and duly sworn, on my oath, state that I am the Chief Financial Officer [an officer] of ComSpan Communications Inc ("Company") and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

Pursuant to the rules of the Federal Communications Commission, 47 C.F.R. § 54.314, there must be annual certification that funds received under the federal Universal Service Fund programs will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended. The Company hereby certifies to the Public Utility Commission of Oregon that pursuant to 47 C.F.R. § 54.7, and for purposes of the certification required under 47 C.F.R. § 54.314, the company will use all federal high-cost support provided to it only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with the principles of universal service set forth in 47 U.S.C. 254. This includes, but is not limited to, trying to meet the goal of the provision of services that are properly supported by the high-cost funds at rates that are reasonably comparable to rates charged for similar services in urban areas.

DATED this 15th day of July, 2008.


ComSpan Communications Inc (Company)

By: Raymond Hazlett (Name)

Its: Chief Financial Officer (Title)

SUBSCRIBED AND SWORN to before me this 15th day of July, 2008.


Notary public in and for the State of Oregon

My Commission Expires: death or disbarment

Candice Alderson
Corporate Counsel

Ledcor Industries Inc.
1200, 1067 West Cordova St.
Vancouver, BC V6C 1C7

AFFIDAVIT CERTIFYING EMERGENCY FUNCTIONALITY AND COMPLIANCE
WITH SERVICE QUALITY AND CONSUMER PROTECTION MEASURES

I, Raymond Hazlett, being of lawful age and duly sworn, on my oath, state that I am the Chief Financial Officer [an officer] of ComSpan Communications Inc ("Company") and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

The Company hereby certifies to the Public Utility Commission of Oregon, pursuant to the requirements of Commission Order No. 06-292, that it:

- 1) is able to remain functional in emergencies, and,
- 2) complies with service quality and consumer protection measures in

(check one):

- applicable Oregon Commission rules, or
 the CTIA Consumer Code for Wireless Carriers, or
 other (describe and explain conformance with requirements of Order No. 06-292): _____

DATED this 15 day of July, 2008.

[Signature]
ComSpan Communications Inc (Company)

By: Raymond Hazlett (Name)

Its: Chief Financial Officer (Title)

SUBSCRIBED AND SWORN to before me this 15th day of July, 2008.

[Signature]
Notary public in and for the State of Oregon

My Commission Expires: death or disbarment

Candice Alderson
Corporate Counsel

Ledcor Industries Inc.
1200, 1067 West Cordova St.
Vancouver, BC V6C 1C7

EXHIBIT 3A

own a home, rent a house or apartment or even a
hack in ROSEBURG – DROP EVERYTHING!!!

slashing the cost to use your phone at your home!!!

BEFORE SEEN
RESIDENTIAL PHONE RATE

(see how much that is with all the taxes, sur-
charges because they are still there...)

\$10 Per
Mo.

DSL Broadband Service!!!

(DSL phone included in a package)

\$9.95 Per
Mo.

THE REVOLUTION NOW!!! Call 229-777 Today!

you own or manage a business in ROSEBURG
DROP EVERYTHING TOO!!!

We are slashing your phone costs too!!!

BEFORE SEEN
BUSINESS PHONE RATE

(see how much that is with all the taxes,
charges and fees because they are still there...)

\$16 Per
Mo.

DSL Broadband Service!!!

(DSL phone included as a package)

\$9.95 Per
Mo.

Data Service starting at

\$159.95 Per
Mo.

1 T-1 Services starting at
(for more information & details)

\$59.95 Per
Mo.

comspan
communications A Member of the LTS Group

541-229-7777



your local phone company!

Residential Lines
with unlimited local calling starting at..... **\$16.00** per line*

Business Lines
with unlimited local calling starting at..... **\$26.00** per line*

Call Us TODAY at 229-7777

Oregon Telephone Assistance Program offers low income assistance through ComSpan or call 800-848-4442 *plus applicable Taxes, Surcharges & Fees

1016 SE Oak Ave. www.comspanusa.net

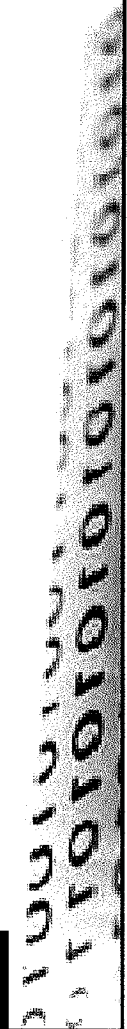


EXHIBIT 4A

***Need Help Paying
Your Phone Bill?***



comspan
communications

If you are receiving any of the following:

- ✓ Food Stamps *or*
- ✓ Temporary Aid to Needy families (TANF) *or*
- ✓ Supplemental Security Income *or*
- ✓ Medical program that determines eligibility at or below 135% of the Federal Poverty Level

*You may qualify for up to \$13.50 per month reduction of your telephone bill....

Call 1-800-848-4442

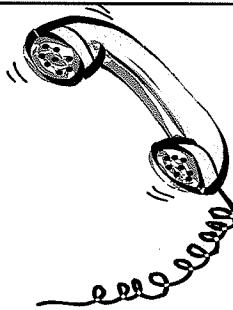
1-800-648-3458 or 7-1-1 TTY (Text Telephone only)

Applicants receiving telephone service through a prepaid telephone service such as Ameritel, Reconex, or Telnet are not eligible.

**Oregon Public Utility Commission
Oregon Telephone Assistance Program (OTAP)**



EXHIBIT 4B
***Necesita Ayuda
Económica?***



comspan
communications

Si usted recibe alguno de los siguientes servicios:

- ✓ Estampillas de Comida o
- ✓ Asistencia temporal para familias necesitadas (TANF) o
- ✓ Asistencia Económica Suplemental o
- ✓ Programa médico que determina acceso a los servicios al nivel 135% o por debajo del nivel del federal de pobreza

*Usted puede recibir ayuda económica hasta \$13.50 que serán deducidos de su cuenta de teléfono Para información llame al

1-800-848-4442

**(Residentes fuera de la ciudad
de Salem)**

503-373-7171

(Residents de la ciudad de Salem)

1-800-648-3458 or 7-1-1 (Usuarios TTY)

Personas que reciben servicio telefonico por medio de "Servicio Telefónico Pre-pagado," por ejemplo Ameritel, Reconex, or Telnet NO califican.