REPORTS AS REFERENCED IN WAC 480-123-070 AND WAC 480-123-080

Whidbey Telephone Company ("Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report for the calendar year 2010,² that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund. That report also includes certain data for the calendar year 2009. The Company further reports that the Company's gross additions to telecommunications plant during calendar year 2010 were approximately Also, of the gross additions to telecommunications plant indicated above, approximately related to Exchange Line Cable & Wire Facilities - Category 1 in the Company's designated ETC³ service area. Other major gross additions to telecommunications plant included an approximate for broadband loop carrier ("BLC") equipment and for purchases of motor vehicles, tools and other work equipment, office equipment and general purpose computer equipment.

Report 2: WAC 480-123-070(1)(b): The Company reports that the investments and expenses reported under Report 1, above, benefited customers as follows:

Through the expenditure of these funds, the Company was able to continue to provide services at a level that the Company believes meets the intent set forth in 47 U.S.C. § 254 of providing high quality telecommunications services to customers in the service area for which the Company is designated as an ETC. The Company has made substantial expenditures and investments over the past several years, which allow it to provide quality telecommunications services to its customers in its designated ETC service area. Those expenditures and investments, including those reflected in Report 1 above, generally benefit all customers receiving the federal high-cost fund supported services from the Company within its designated ETC service area.

Report 3: WAC 480-123-070(4): During the calendar year 2010, the Company did not receive from either the Federal Communications Commission or the Consumer Protection Division of the Office of the Attorney General of the State of Washington ("Consumer Protection Division") any complaints against the Company made to them by the Company's customers.

¹ It is the Company's understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3).

² National Exchange Carrier Association, Inc. Universal Service Data Collection Form 2011-1.

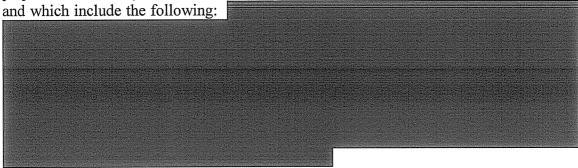
³ The term "ETC" is used herein with the same meaning as the term is used in Chapter 480-123 WAC.

⁴ References herein to the services supported by the federal high-cost fund refer to the services designated for support as set forth in 47 C.F.R. § 54.101(a).

Report 4: WAC 480-123-080(1)(b) and (2): The Company reports as follows:

As they are known to the Company at the date of this Report and except as described in the next paragraph below, the planned investment and expenses related to Washington state for the period January 1, 2011, through December 31, 2011, and January 1, 2012, through December 31, 2012, that the Company expects to use as a basis to request federal high-cost fund support for those periods, respectively, are expected to be relatively similar to those investments and expenses the Company has set forth in its information for calendar year 2010 filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. The Company expects that levels of expenses in each of those years will remain relatively the same as those it experienced in calendar year 2010, subject to the effects of inflation and other commonly experienced The Company does not anticipate major changes in cost of labor and materials. adjustments in staffing levels for either relevant period. The Company expects that, in each of the calendar years 2011 and 2012, it will have relatively the same level of expenditure and investment related to maintenance, replacement and minor upgrades of telecommunications equipment and plant as occurred in calendar year 2010.

The Company's investment and expenditures plans directly affecting federal high-cost fund supported services offered by it in its designated ETC service area include some projects in calendar years 2011 and 2012, portions of which have already been completed



The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service and the new facilities will result in a platform that will provide additional capacity for the provision of existing federal high-cost fund supported services to customers in the Company's designated ETC service area and on which additional telecommunications services, including, but not limited to, advanced telecommunications services, can be provided to customers in the Company's designated ETC service area. These projects will improve the quality of service and network capacity available to the Company's customers in the portions of the Company's designated ETC service area in which the new facilities are to be deployed, as well as increase the number of services available to customers in most, if not all, of the Company's designated ETC service area. The Company further expects that the continued receipt of federal high-cost fund support will allow the Company to continue to provide the supported services at rates that are reasonably comparable to the rates for such services in urban areas. All customers in the Company's designated ETC service area will benefit from the expected level of support

by continuing to have available to them services that are reasonably comparable to the telecommunications services offered in urban areas at rates that are reasonably comparable to the rates for such services in urban areas.

Dated: July 29, 2011

National Exchange Carrier Association, Inc.

Universal Service Fund 2011 Data Collection Form

SAC: 522	452	A Name: WHIDBEY TEI	LEPHONE CON	MPANY Regi	ion: 5 PACIFIC
I. EXCH.	ANGE CARRIER/DATA IDENTI	FICATION			
(010)	Study Area Code	(010)	522452		
(020)	Contact Name	(020)	STEPHEN JA	NTZ	
(030)	Contact Telephone Number	(030)	360/321-0088		
(040)	USF Data Collection Period	(040)	2011-1		
Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source
II. WORI	KING LOOPS				
(060)	Total Loops (Cat. 1.1, 1.2 and 1.3)		(060)		Loop Summary
(070)	Category 1.3 Loops (Excluding Cat. 1.3 TWX Loops		(070)		Loop Summary
(080)	Reserved				
III. INVE	ESTMENT, EXPENSE AND TAX	ES			
Net Plant	Investment				
(160)	Acct. 2001 - Telephone Plant in Service		(160)		Plant Summary
(170)	Acct. 1220 - Materials and Supp	lies	(170)		Plant Summary
(190)	Acct. 3100 - Accumulated Depreciation		(190)		Reserve Summary
(195)	Acct. 3400 - Accumulated Amortization Tangible		(195)		Reserve Summary
(200)	Reserved				
(205)	Reserved				
(210)	Acct. 4340 - Net Noncurrent Deferred Operating Income Tax	es e	(210)		Deferred Tax Summary
(220)	Net Plant Investment (Sum of Lines 160 + 170 Minus Lines 190 Through 210)		(220)		SUM

Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source			
Selected 1	Selected Plant Accounts							
(230)	Acct. 2210 - Central Office Switching Equipment		(230)		Plant Summary			
(235)	Acct. 2220 - Operator System Equipment		(235)		Plant Summary			
(240)	Acct. 2230 - Central Office Transmission Equipment		(240)		Plant Summary			
(245)	Total Central Office Equipment (Sum of Lines 230 Through 240)	The Apparation Production of the Control of the Con	(245)		SUM			
(250)	Circuit Equipment Category 4.13		(250)		COE Categorization			
(255)	Acct. 2410 - Cable and Wire Facilities Total	A SE SECTION OF THE S	(255)		Plant Summary			
(260)	Acct. 3100 (2210) - Accumulated Depreciation Central Office Switching Equipment	The property of the party of th	(260)		Reserve Summary			
(265)	Acct. 3100 (2220) - Accumulated Depreciation Operator System Equipment		(265)		Reserve Summary			
(270)	Acct. 3100 (2230) - Accumulated Depreciation Central Office Transmission Equipment	The state of the s	(270)		Reserve Summary			
(275)	Acct. 3100 (2210–2230) - Total Accumulated Depreciation Central Office Equipment (Sum of Lines 260 Through 270)		(275)	The second secon	SUM			
(280)	Acct. 3100 (2410) - Accumulated Depreciation Cable and Wire Facilities		(280)		Reserve Summary			

National Exchange Carrier Association, Inc.

Universal Service Fund 2011 Data Collection Form

Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source
(285)	Reserved	N O	ENTI	RY REQUI	R E D
(290)	Reserved	N O	ENTI	RY REQUI	RED
(295)	Reserved	N O	ENTI	RY REQUI	RED
(300)	Reserved	N O	ENTI	RY REQUI	RED
(305)	Reserved	N O	ENTI	RY REQUI	RED
(310)	Acct. 4340 (2210) - Net Noncurrent Deferred Operating Income Taxes - Central Office Switching Equipment		(310)		Deferred Tax Summary
(315)	Acct. 4340 (2220) - Net Noncurrent Deferred Operating Income Taxes - Operator System Equipment		(315)		Deferred Tax Summary
(320)	Acct. 4340 (2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Transmission Equipment		(320)		Deferred Tax Summary
(325)	Acct. 4340 (2210–2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Equipment (Sum of Lines 310 Through 320)		(325)		SUM
(330)	Acct. 4340 (2410) - Net Noncurrent Deferred Operating Income Taxes - Cable and Wire Facilities		(330)		Deferred Tax Summary

Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source
Plant-Spe	cific Operation Expense				
(335)	Acct. 6110 - Network Support Expense Total		(335)	The state of the s	Expense Summary
(340)	Acct. 6110 - Benefits Portion of Network Support Expense		(340)		Ben & Rents Sum
(345)	Acct. 6110 - Rents Portion of Network Support Expense		(345)		Ben & Rents Sum
(350)	Acct. 6120 - General Support Expense Total		(350)		Expense Summary
(355)	Acct. 6120 - Benefits Portion of General Support Expense		(355)		Ben & Rents Sum
(360)	Acct. 6120 - Rents Portion of General Support Expense		(360)	To the second se	Ben & Rents Sum
(365)	Acct. 6210 - Central Office Switching Expense - Total		(365)		Expense Summary
(370)	Acct. 6210 - Benefits Portion of Central Office Switching Expense		(370)		Ben & Rents Sum
(375)	Acct. 6210 - Rents Portion of Central Office Switching Expense		(375)		Ben & Rents Sum
(380)	Acct. 6220 - Operator System Expense - Total		(380)	The second section of the second seco	Expense Summary
(385)	Acct. 6220 - Benefits Portion of Operator System Expense		(385)		Ben & Rents Sum
(390)	Acct. 6220 - Rents Portion of Operator System Expense		(390)		Ben & Rents Sum
(395)	Acct. 6230 - Central Office Expense - Transmission Equipment - Total		(395)		Expense Summary

Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source
(400)	Acct. 6230 - Benefits Portion of Central Office Expense - Transmission Equipment		(400)		Ben & Rents Sum
(405)	Acct. 6230 - Rents Portion of Central Office Expense - Transmission Equipment		(405)		Ben & Rents Sum
(410)	Accts. 6210–6230 - Central Office Expense Total (Sum of Lines 365 + 380 + 395)		(410)		SUM
(415)	Reserved	N O	ЕΝТ	RY REQUI	R E D
(420)	Reserved	N O	ENT	RY REQUI	R E D
(425)	Reserved	N O	ENT	RY REQUI	RED
(430)	Acct. 6410 - Cable and Wire Facilities Expense - Total		(430)		Expense Summary
(435)	Acct. 6410 - Benefits Portion Cable and Wire Facilities Expense		(435)		Ben & Rents Sum
(440)	Acct. 6410 - Rents Portion Cable and Wire Facilities Expense		(440)		Ben & Rents Sum
(445)	Total Plant-Specific Expense (Sum of Lines 335 + 350 + 365 + 380 + 395 + 415 + 430)		(445)		SUM
Plant-Nor	specific Expense				
(450)	Acct. 6530 - Network Operations Expense - Total		(450)		Expense Summary
(455)	Acct. 6530 - Benefits Portion Network Operations Expense		(455)		Ben & Rents Sum

National Exchange Carrier Association, Inc.

Universal Service Fund 2011 Data Collection Form

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY

Region: 5 PACIFIC

Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source
(465)	Reserved	N O	ЕΝТ	RY REQUI	RED
(470)	Reserved	N O	ЕΝТ	RY REQUI	RED
(480)	Reserved	N O	ЕΝТ	RY REQUI	RED
(485)	Reserved	N O	ЕΝТ	RY REQUI	R E D
(500)	Reserved	N O	ENT	R Y R E Q U I	RED
(505)	Reserved	N O	ЕΝТ	R Y R E Q U I	RED
Depreciat	ion and Amortization Expenses				
(510)	Acct. 6560 (2210) - Depreciation and Amortization Expense - Central Office Switching Equipment		(510)		Depreciation Expense Summary
(515)	Acct. 6560 (2220) - Depreciation and Amortization Expense - Operator System Equipment		(515)	Control of the Contro	Depreciation Expense Summary
(520)	Acct. 6560 (2230) - Depreciation and Amortization Expense - Central Office Transmission Equipment		(520)		Depreciation Expense Summary
(525)	Acct. 6560 (2210–2230) Depreciation and Amortization Central Office Equipment (Sum of Lines 510 Through 520)		(525)		SUM
(530)	Acct. 6560 (2410) - Depreciation and Amortization Expense - Cable and Wire Facilities	The state of the s	(530)		Depreciation Expense Summary
Corporate Operating Expenses					
(535)	Acct. 6710 - Executive and Planning Expense - Total		(535)	10.25 Salaradora servici	Expense Summary
(540)	Acct. 6710 - Benefits Portion Executive and Planning Expense		(540)		Ben & Rents Sum

Data Line	Description	Latest View 2010-1 Amount		Data Line		ng View Amount	Data Source
(550)	Acct. 6720 - General Administrative Expense - Total			(550)	2 22 2 2 3 1 3 3 3 3 3 3 3 3 3 3 3 3 3 3		Expense Summary
(555)	Acct. 6720 - Benefits Portion - General Administrative Expense			(555)	TOP AND TO SERVICE OF THE SERVICE OF		Ben & Rents Sum
(565)	Total Corporate Operations Expense (Sum of Lines 535 + 550)			(565)	2002 316 200 2003 200 200 2003 200 200 2003 200	The state of the s	SUM
Other Exp	enses and Revenues						
(600)	Benefits Portion of All Operating Expenses - Total			(600)			Ben & Rents Sum
(610)	Rents Portion of All Operating Expenses - Total			(610)	T 19		Ben & Rents Sum
(620)	Reserved	N	О	ЕΝТ	RY	REQUI	R E D
(630)	Reserved	N	О	ENT	RY	REQUI	R E D
Taxes							
(650)	Acct. 7200 - Operating Taxes			(650)			Expense Summary
(655)	Reserved	N	О	ENT	RY	REQUI	R E D
IV. PART	T 36 - COST STUDY DATA						
(700)	Acct. 2410 - Cost Study Average Cable and Wire Facilities			(700)	12 17 17 17 17 17 17 17 17 17 17 17 17 17		C&WF Summary
(710)	Cost Study Average Cable and Wire Facilities Cat. 1 - Total Exchange Line C&WF Excluding Wide and			(710)			C&WF Summary

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY Region: 5 PACIFIC

Data Line	Description	Latest View 2010-1 Amount	Data Line	Pending View 2011-1 Amount	Data Source
	ORTIZABLE TANGIBLE ASSETS instructions prior to completing this sections	ion)			
(800)	Acct. 2680 - Amortizable Tangible Assets		(800)		Plant Summary
(805)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central Office Transmission Equipment		(805)		Plant Summary
(810)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central Office Transmission Equipment Allocated to Category 4.13		(810)		Plant Summary
(815)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities		(815)		Plant Summary
(820)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities Allocated to Category 1		(820)		Plant Summary
(830)	Acct. 6560 (2680) - Depreciation and Amortization Expense - Amortizable Tangible Assets		(830)		Depreciation Expense Summary

VI. COMMENTS/SIGNIFICANT CHANGE EXPLANATION

National Exchange Carrier Association, Inc. Universal Service Fund 2011 Data Collection Form

VII. CERTIFICATION FORM

I AM CHIEF FINANCIAL OFFICER. I HEREBY CERTIFY THAT I HAVE OVERALL
RESPONSIBILITY FOR THE PREPARATION OF ALL DATA IN THE ATTACHED

2010-1 UNIVERSAL SERVICE FUND DATA SUBMISSION FOR WHIDBEY TELEPHONE COMPANY
AND THAT I AM AUTHORIZED TO EXECUTE THIS CERTIFICATION. BASED ON INFORMATION KNOWN
TO ME OR PROVIDED TO ME BY EMPLOYEES RESPONSIBLE FOR THE PREPARATION OF THE DATA IN
THIS SUBMISSION, I HEREBY CERTIFY THAT THE DATA HAVE BEEN EXAMINED AND REVIEWED AND
ARE COMPLETE, ACCURATE, AND CONSISTENT WITH THE RULES OF THE FEDERAL COMMUNICATION

ARE COMPLETE, ACCURATE, AND CONSISTEN	IT WITH THE RULES OF THE FI	EDERAL COMMUNICATIONS
COMMISSION.		
DATE:	JULY 29, 2011	
CERTIFYING SIGNATURE:		· ·
NAME:	STEPHEN JANTZ	AND
ŢITLE:	CHIEF FINANCIAL OFFICER	······································
PERIOD COVERED:	JANUARY 1, 2010 TO DECEME	BER 31, 2010
VII.A. RURAL STATUS: The rural status of this	s company during calendar year 20	12 will be: (Check One)
X RURAL		NON-RURAL
VII.B. ACQUISITION CERTIFICATION (Chec	ok One)	
X MY COMPANY HAS NOT ACQUIRED	AN EXCHANGE DURING THE	PERIOD COVERED.
MY COMPANY HAS ACQUIRED THE	FOLLOWING EXCHANGE(S) D	URING THE PERIOD COVERED.
Exchange Name	Selling Company	No. of Loops

PURSUANT TO FCC RULES, SECTION 69.601(C), EXCHANGE CARRIERS ARE REQUIRED TO CERTIFY UNIVERSAL SERVICE FUND DATA SUBMITTED TO NECA.

(FCC RULES STATE THAT PERSONS MAKING WILLFUL FALSE STATEMENT IN THIS DATA SUBMISSION CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER THE PROVISIONS OF THE U.S. CODE, TITLE 18, SECTION 1001).