

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2018

<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHKIAKUM
<020> Program Year	2021
<030> Contact Name: Person USAC should contact with questions about this data	Carol Larson
<035> Contact Telephone Number: Number of the person identified in data line <030>	3604652211 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	clarson@west.net
Form Type	54.313 and 54.422

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code 522451

<015> Study Area Name WESTERN WAHIAKUM

<020> Program Year 2021

<030> Contact Name - Person USAC should contact regarding this data CAROL LARSON

<035> Contact Telephone Number - Number of person identified in data line
<030> 3604652211 ext

<039> Contact Email Address - Email Address of person identified in data line
<030> clarson@west.net

<400> Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.

<410> Complaints per 1000 customers for fixed voice

<420> Complaints per 1000 customers for mobile voice

(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code	522451
<015> Study Area Name	WESTERN WASHINGTON
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net
<S15> Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations
Data Collection FormFCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHIAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	522451wa610.pdf

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHIAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 522451WA1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 522451wa1030.pdf

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221>** Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222>** Details on the number of minutes provided as part of the plan,
- <1223>** Additional charges for toll calls, and rates for each such plan.

(2005) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHIAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604852211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR 54.313(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2018.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A) Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@wwest.net

(3007) Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator? Yes

(3007a) Name of Consultant	(3007b) Name of Consultant Firm/Third Party
Jenifer Wasnock	Johnson, Stone & Pagano, P.S>

CAF BLS Reporting

- (3008A) Please indicate whether new locations were deployed during the prior calendar year. (Yes/No) No
- (3008B) Please enter the number of newly deployed locations in the prior calendar year associated with each of the following speed tiers.
- (3008B1) Number of newly deployed locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.
- (3008B2) Number of newly deployed locations with access to broadband speeds of 25/3 Mbps or higher.
- (3008C) Please provide the percentage of deployment across the entire study area. 100

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHKIAKUM
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@wwest.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)} 522415wa3010B.pdf

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} No - No New Community Anchors

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or
(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued) Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/CMS Control No. 3060-0819 July 2018
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<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHIAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

Financial Data Summary

(3027) Revenue	3674839
(3028) Operating Expenses	2875857
(3029) Net Income	449320
(3030) Telephone Plant In Service(TPIS)	21915697
(3031) Total Assets	9233555
(3032) Total Debt	2454147
(3033) Total Equity	5291134
(3034) Dividends	198000

Name of Attached Document Listing Required Information

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WASHINGTON
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

**(6005) Phase II Auction Reporting
Data Collection**
**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
April 2020**

<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHIAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<6010> Total amount of Phase II auction support,
if any, the phase II Auction recipient carrier used
for capital expenditures in the previous calendar year

<6011> Phase II Auction recipient performance requirements certification (Yes/No)

**(7005) Phase-Down Support Reporting
Data Collection**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
April 2020

<010>	Study Area Code	522451
<015>	Study Area Name	WESTERN WAHIAKUM
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	Carol Larson
<035>	Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

<7010> Price Cap Carrier and Fixed Competitive Eligible Telecommunications Carrier Phase-Down support requirement certification (Yes/No)

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2018

<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHAKIYAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@wwest.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	WESTERN WAHAKIYAKUM
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	522451
Filing Due Date for this form:	07/01/2020
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010> Study Area Code	522451
<015> Study Area Name	WESTERN WAHKIAKUM
<020> Program Year	2021
<030> Contact Name - Person USAC should contact regarding this data	Carol Larson
<035> Contact Telephone Number - Number of person identified in data line <030>	3604652211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	clarson@west.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC FORM 481 (July 2020), Line 610
Descriptive Document for Functionality in Emergency Situations
Per Instructions for Completing FCC Form 481

At line 600 of FCC Form 481, Western Wahkiakum County Telephone Company (the "Company") certified that it is able to function in emergency situations as set forth in 47 C.F.R. 54.202(a)(2). This means that the Company has a reasonable amount of backup power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement describes how the Company is prepared to provide continued service in an emergency situation and applies with respect to both the Company's voice telephone service and the Company's broadband service.

The Company's network providing voice telephone and broadband service includes two (2) central offices and twenty-two (22) digital loop carrier sites ("DLCs"). The two central offices are equipped with back-up batteries having a capacity to provide reserve power in the event of a power outage for up to approximately eight (8) days, while the DLCs are equipped with batteries having a capacity to provide reserve power in the event of a power outage for up to approximately two (2) days. The Company also maintains fixed back-up power generators at its two central office locations and at the locations of two (2) of its more significant DLCs. There are automatic power transfer switches at each of these four locations, so in the event of a commercial power failure, the transfer to back-up power should occur seamlessly. The Company also maintains three (3) portable generators to be transported to the remaining locations, if needed. All locations are subject to status alarm monitoring that is connected to the Company's principal central office.

The Company also furnishes all Fiber-to-the Home customers with batteries capable of providing 8 hours of back-up power for voice service. Additionally, batteries capable of powering up to 48 hours of voice service are available for purchase.

The Company has three (3) fiber optic cable rings that provide redundancy and diversity connecting the Company's principal switching facilities with one another and connecting a number of the remote DLC locations with their respective serving switching facilities. The Company's broadband service also utilizes these fiber optic cable rings for transmission and benefits from the redundancy and diversity they provide.

Each of the Company's fiber optic-connected sites has built in redundancy for fiber optic transceivers. Most of the Company's switching and other electronic/optronic equipment utilized in providing voice telephone service and broadband service has some redundancy built in, and the Company keeps critical-spare replacement components on hand. The Company also subscribes to support service from the principal vendors of its switching and transmission equipment.

The Company has system redundancy for interexchange access service circuits (including as utilized by its affiliate to provide long distance service), E-911 trunking and SS7 signaling circuits.

Most of the Company's outside plant cable and wire is buried and thus protected from most weather events. The Company's central office switch capacity is engineered to accommodate traffic spikes, and its interexchange facilities also have the capacity to provide additional circuits for interexchange carriers should the need arise. The existing 120 interexchange trunks serving

interexchange carriers provide a substantial margin of safety for traffic spikes and may be utilized for the traffic of all interexchange carriers to whom the Company provides switched access service. The middle-mile broadband capacity presently available to the Company substantially exceeds the current busy-period through-put requirements of the Company's installed broadband service, and thus is believed by the Company to provide adequate reserve capacity for potential broadband traffic spikes.

In the case of isolated groups of customers whose service may suffer impairment due to a cable cut, the Company maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time, subject to road accessibility and environmental limitations. The Company's emergency service equipment is located within its service area and requires very little time to dispatch.

FCC FORM 481 (JULY 2020), Line 1010
Descriptive Document for Compliance Pricing of
Fixed Voice Services with Required Relationship
To Applicable National Average Urban Rate for Voice
Service Benchmark, as Required by 47 C.F.R. § 54.313(a)(2)
Per Instructions for Completing FCC Form 481

Section 54.313(a)(2) of the rules of the Federal Communications Commission (“FCC”) requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company (“Company”), annually to certify that the pricing of the Company’s voice service is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 19-1237, released December 5, 2019, in WC Docket No. 10-90 (“Public Notice”). That Public notice includes the following statements, “Based on the survey results, the 2020 urban average monthly rate (the rate floor) is \$34.81, [footnote omitted]. Therefore, the reasonable comparability benchmark for voice services, two standard deviations above the urban average is \$54.76, [footnote omitted]. Under the Commission’s rules, each ETC, including competitive ETCs providing fixed voice services, must certify in FCC Form 481 filed no later than July 1, 2020, that the pricing of its *basic residential voice* services is no more than \$54.76 [footnote omitted] [Italics added].

It is the Company’s understanding that the above-mentioned comparability benchmark includes the recurring residential service rate, any applicable State subscriber line charge rate, any applicable State universal service fund rate, any applicable minimum mandatory Extended Area Service rate, and any applicable Federal subscriber line charge rate.¹

Those components for the Company’s basic residential voice telephone service as of June 1, 2020, are as follows:

Recurring residential service rate	\$ 18.00
State subscriber line charge rate	0.00
State universal service fund rate	0.00
Minimum mandatory EAS rate	0.00
Federal subscriber line charge	<u>6.50</u>
Total	\$ 24.50

The sum of the above-identified rates (\$24.50) is not more than the voice service comparability benchmark identified in the Public Notice (\$54.76).

¹ See Note 5 on the “Data Dictionary” tab of the 2020 Results [2020 urs_voice_website_data.xlsx] located on the FCC webpage having the following URL:

<https://www.fcc.gov/general/urban-rate-survey-data-resources>

FCC FORM 481 (July 2020), Line 1030
Descriptive Document for Compliance of Pricing of
Broadband Services with Required Relationship
To Applicable National Average Urban Rate for Broadband
Service Benchmark, as Required by 47 C.F.R. § 54.313(a)(3)
Per Instructions for Completing FCC Form 481

Section 54.313(a)(3) of the rules of the Federal Communications Commission (“FCC”) requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company (“Company”), annually to certify that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark to be announced annually in a public notice issued by the Wireline Competition Bureau, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 19-1237, released December 5, 2019, in WC Docket No. 10-90 (“Public Notice”). That public notice includes the following: “Under the approach adopted by the Bureau in 2014, the reasonable comparability broadband benchmark varies, depending upon the supported service’s download and upload bandwidths and usage allowance. [footnote omitted]”

The Public Notice includes a table showing the “benchmark” rate for certain broadband service offerings and provides a URL link to an FCC webpage at which a tool to calculate “benchmarks” for other broadband service offerings may be found. The following table summarizes the broadband service plans offered to consumers by the Company’s broadband-providing affiliate and the associated “benchmark” as determined from the Public Notice or the “tool” to which it refers:

Download Speed (Mbps) (up to)	Upload Speed (Mbps) (up to)	Usage Allowance (GB)	Benchmark	Company Affiliate Pricing
10	1	Unlimited	\$83.13	\$49.95
30	10	Unlimited	\$90.57	\$71.95
75	25	Unlimited	\$107.05	\$91.95
125	40	Unlimited	\$112.09	\$111.95
300	65	Unlimited	\$143.69	\$141.95

As shown in the above table, each of the broadband service plans offered to consumers by the Company’s affiliate, is offered at a price that is below the applicable “benchmark.”

FCC FORM 481 (July 2020), Line 1210
Terms and Conditions of Voice Telephony Lifeline Plans
Per Instructions for Completing FCC Form 481

Western Wahkiakum County Telephone Company (the "Company") provides Lifeline service to qualified subscribers throughout the Company's local exchange service area, including in Grays River, Naselle and Rosburg, Washington. Customers may qualify for Lifeline service if certain low-income eligibility requirements are met.

The Company provides flat rate local exchange service to its Lifeline subscribers. It does not offer measured local exchange service or measured Extended Area Service (EAS), so the number of local exchange service and EAS minutes that are provided as part of the Lifeline plan is essentially unlimited. EAS exists between the Company's Grays River and Naselle exchanges.

The Company does not provide toll service to its Lifeline subscribers, but does provide access to toll service providers. Company Lifeline subscribers have to choose their own toll service providers. Accordingly, subscribers to the Company's Lifeline service do not incur any Company toll charges, but they may incur toll charges from the toll service providers they select.

Lifeline benefits include credits totaling \$7.25 per month on basic residential voice telephone service. Customers of Wahkiakum West receiving Lifeline credits pay \$18.20 per month for basic telephone service, not including taxes and surcharges.

No Company charges, other than those for the local exchange service and EAS that are included in the Company's Lifeline plan (including the FCC Subscriber Line Charge and E911 charges, if any) are required in order for a qualifying low-income consumer to receive Lifeline service from the Company.

**FCC FORM 481 (July 2020), Line 3010B
Certification of Compliance with Public Interest
Obligations Pertaining to the Taking of Reasonable Steps to
Provide Broadband Service with Specified Attributes
and to Requests for Such Service Having Been Met
Within a Reasonable Time, as Required by
47 C.F.R. § 54.313(f)(1)(i)
Per Instructions for Completing FCC Form 481**

Section 54.313(f)(1)(i) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company ("Company"), annually to certify that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 25 Mbps downstream/3 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

The Company hereby so certifies.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	<i>This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq and subject to federal laws and regulations regarding confidential information will be treated as confidential</i> BORROWER NAME Western Wahkiakum County Telephone Company (Prepared with Audited Data)
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<i>INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.</i>	PERIOD ENDING December 2019	BORROWER DESIGNATION WA0535
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CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII
(Check one of the following)

All of the obligations under the RUS loan documents have been fulfilled in all material respects
 There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

DATE

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents	886,804	1,822,896	25. Accounts Payable	34,718	28,641
2. Cash-RUS Construction Fund	285	285	26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments	21,105	19,232
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt	185,100	189,623
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat. -Capital Leases		
a. Telecom, Accounts Receivable	520,745	141,872	32. Income Taxes Accrued	88,521	
b. Other Accounts Receivable			33. Other Taxes Accrued	76,433	68,391
c. Notes Receivable			34. Other Current Liabilities	182,064	193,212
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)	587,941	499,099
6. Material-Regulated	223,445	299,537	LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments	23,873	35,763	37. Funded Debt-RTB Notes		
9. Other Current Assets		135,593	38. Funded Debt-FFB Notes	2,245,325	2,035,123
10. Total Current Assets (1 Thru 9)	1,655,152	2,435,946	39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		44,024
a. Rural Development			45. Other Long-Term Debt	375,000	375,000
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)	2,620,325	2,454,147
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets	338,762	131,676	47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits	1,051,939	989,175
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)	338,762	131,676	50. Total Other Liabilities and Deferred Credits (47 thru 49)	1,051,939	989,175
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom. Plant-in-Service	21,836,730	21,915,697	51. Cap. Stock Outstand. & Subscribed	54,171	54,171
19. Property Held for Future Use			52. Additional Paid-in-Capital	279,251	279,251
20. Plant Under Construction	4,356	626	53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation	14,534,981	15,250,390	55. Other Capital		
23. Net Plant (18 thru 21 less 22)	7,306,105	6,665,333	56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	4,706,392	4,957,712
	9,300,019	9,233,555	58. Total Equity (51 thru 57)	5,039,814	5,291,134
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)	9,300,019	9,233,555

Total Equity = 57.30% % of Total Assets

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

WA0535

PERIOD ENDING

December 2019

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues	254,289	246,791
2. Network Access Services Revenues	3,416,164	3,406,776
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues	21,001	21,545
5. Miscellaneous Revenues	2,359	
6. Uncollectible Revenues	(70)	273
7. Net Operating Revenues (1 thru 5 less 6)	3,693,883	3,674,839
8. Plant Specific Operations Expense	663,016	521,044
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	512,388	459,258
10. Depreciation Expense	957,684	818,144
11. Amortization Expense		
12. Customer Operations Expense	187,452	202,182
13. Corporate Operations Expense	879,315	875,229
14. Total Operating Expenses (8 thru 13)	3,199,855	2,875,857
15. Operating Income or Margins (7 less 14)	494,028	798,982
16. Other Operating Income and Expenses		
17. State and Local Taxes	119,273	94,264
18. Federal Income Taxes	56,228	165,921
19. Other Taxes		
20. Total Operating Taxes (17+18+19)	175,501	260,185
21. Net Operating Income or Margins (15+16-20)	318,527	538,797
22. Interest on Funded Debt	75,012	76,259
23. Interest Expense - Capital Leases		
24. Other Interest Expense	39,000	13,675
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)	114,012	89,934
27. Nonoperating Net Income	14,664	23,097
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income	(20,825)	(22,640)
31. Total Net Income or Margins (21+27+28+29+30-26)	198,354	449,320
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year	4,618,038	4,706,392
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)	110,000	198,000
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	4,706,392	4,957,712
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)	0	0
44. Annual Debt Service Payments	941,820	295,613
45. Cash Ratio [(14+20-10-11) / 7]	0.6545	0.6307
46. Operating Accrual Ratio [(14+20+26) / 7]	0.9446	0.8779
47. TIER [(31+26) / 26]	2.7398	5.9961
48. DSCR [(31+26+10+11) / 44]	1.3485	4.5918

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0535

PERIOD ENDED

December 2019

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Naselle 464	18.80	18.00	124	466	590	187.79	110.15
Gray's River 465	18.80	18.00	43	305	348	208.28	104.96
MobileWireless					0		
Route Mileage Outside Exchange Area						0.00	0.00
Total			167	771	938	396.07	215.11
No. Exchanges	2						

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0535

PERIOD ENDED

December 2019

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

4. BROADBAND SERVICE

Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
Naselle 464	590	525	115	6,000	1,500	29.95	Package	DSL
Gray's River 465	348	336	64	6,000	1,500	29.95	Package	DSL
Total	938	861						

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0535 PERIOD ENDING December 2019
INSTRUCTIONS- See RUS Bulletin 1744-2	

PART D. SYSTEM DATA

1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile
6	5	314	2.99	2.37

PART E. TOLL DATA

1. Study Area ID Code(s) a. 522451 b. _____ c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____	2. Types of Toll Settlements (Check one) Interstate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis Intrastate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis
---	--

PART F. FUNDS INVESTED IN PLANT DURING YEAR

1. RUS, RTB, & FFB Loan Funds Expended	
2. Other Long-Term Loan Funds Expended	
3. Funds Expended Under RUS Interim Approval	
4. Other Short-Term Loan Funds Expended	
5. General Funds Expended (Other than Interim)	177,972
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	177,972

PART G. INVESTMENTS IN AFFILIATED COMPANIES

INVESTMENTS (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development	0	0	0	0	0
2. Investment in Affiliated Companies - Nonrural Development	0	0	0	0	0

USDA-RUS
**OPERATING REPORT FOR
 TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

WA0535

PERIOD ENDING

December 2019

PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

YES

NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	16.00%
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	16.00%
5. Land and support assets - Buildings	4.00%
6. Land and support assets - Furniture and Office equipment	20.00%
7. Land and support assets - General purpose computers	20.00%
8. Central Office Switching - Digital	9.00%
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	13.00%
12. Central Office Transmission - Circuit equipment	11.19%
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	7.59%
19. Cable and wire facilities - Aerial cable - Metal	20.40%
20. Cable and wire facilities - Aerial cable - Fiber	7.11%
21. Cable and wire facilities - Underground cable - Metal	6.00%
22. Cable and wire facilities - Underground cable - Fiber	5.00%
23. Cable and wire facilities - Buried cable - Metal	6.00%
24. Cable and wire facilities - Buried cable - Fiber	5.00%
25. Cable and wire facilities - Conduit systems	4.55%
26. Cable and wire facilities - Other	

USDA-RUS		BORROWER DESIGNATION
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		WA0535
INSTRUCTIONS – See help in the online application.		PERIOD ENDED December 2019
PART I – STATEMENT OF CASH FLOWS		
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		887,089
CASH FLOWS FROM OPERATING ACTIVITIES		
2. Net Income		449,320
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>		
3. Add: Depreciation		818,144
4. Add: Amortization		0
5. Other (Explain) Other items allocated to and from financing and noncash transfer of FIT due from affiliate.		69,781
<i>Changes in Operating Assets and Liabilities</i>		
6. Decrease/(Increase) in Accounts Receivable		378,873
7. Decrease/(Increase) in Materials and Inventory		(76,092)
8. Decrease/(Increase) in Prepayments and Deferred Charges		(11,890)
9. Decrease/(Increase) in Other Current Assets		(135,593)
10. Increase/(Decrease) in Accounts Payable		(6,077)
11. Increase/(Decrease) in Advance Billings & Payments		(1,873)
12. Increase/(Decrease) in Other Current Liabilities		(85,415)
13. Net Cash Provided/(Used) by Operations		1,399,178
CASH FLOWS FROM FINANCING ACTIVITIES		
14. Decrease/(Increase) in Notes Receivable		0
15. Increase/(Decrease) in Notes Payable		0
16. Increase/(Decrease) in Customer Deposits		0
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		(161,655)
18. Increase/(Decrease) in Other Liabilities & Deferred Credits		(62,764)
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital		0
20. Less: Payment of Dividends		(198,000)
21. Less: Patronage Capital Credits Retired		0
22. Other (Explain) Other items allocated to and from operating activities.		18,740
23. Net Cash Provided/(Used) by Financing Activities		(403,679)
CASH FLOWS FROM INVESTING ACTIVITIES		
24. Net Capital Expenditures (Property, Plant & Equipment)		(75,237)
25. Other Long-Term Investments		0
26. Other Noncurrent Assets & Jurisdictional Differences		207,086
27. Other (Explain) Plant adjustment for retirements on line 24 and other items allocated from operating activities.		(191,256)
28. Net Cash Provided/(Used) by Investing Activities		(59,407)
29. Net Increase/(Decrease) in Cash		936,092
30. Ending Cash		1,823,181

Revision Date 2010

<p style="text-align: center;">USDA-RUS</p> <p style="text-align: center;">OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	<p style="text-align: center;">BORROWER DESIGNATION</p> <p style="text-align: center;">WA0535</p>
<p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>PERIOD ENDED</p> <p style="text-align: center;">December 2019</p>
<p>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	
<p>Part C 4 (d) and (e), actual least expensive broadband service is 5,000 kbps download and 1,000 kbps upload. This option was not available and chose the closest available 6,000kbps download and 1,500 kbps upload.</p>	

<p>USDA-RUS</p> <p>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	<p>BORROWER DESIGNATION</p> <p>WA0535</p>
<p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>PERIOD ENDED</p> <p>December 2019</p>
<p>CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	

sappelo@wwest.net

From: Form481@usac.org
Sent: Wednesday, June 17, 2020 1:34 PM
To: sappelo@wwest.net
Subject: Form 481 Certification Confirmation



Form 481 Certification Confirmation

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