

Attachments

Whidbey Telephone Company
FCC Form 481 (July, 2019), Line 610
Statement Describing Ability to Function in Emergency Situations
Per Instructions for Completing FCC Form 481

SUMMARY

Whidbey Telephone Company (the "Company") has a long-standing tradition of providing reliable voice telephony services. Since 1961, it has been and continues to be the Company's policy to bury all local distribution cable and wire. It is also the Company's policy and standard operating procedure to install, and use when necessary, back-up power systems at all network node installation sites. In regard to the Company's overall network design, the Company's practices are consistent with Rural Utility Service ("RUS") telecommunications industry best practices.

The Company operates and maintains transport transmission equipment of only the highest grade. Equipment specifications, which are consistent with the RUS specifications, require both redundant power and redundant circuit interfaces. All of the Company's transport and switching equipment is monitored 24x7x365(366) by trained staff located at the Company's network operations center.

NETWORK REDUNDANCY

The Company is a provider of voice telephony services to two geographically non-contiguous exchanges: the South Whidbey Exchange and the Point Roberts Exchange. The area of the Company's South Whidbey Exchange service area is more than 67 square miles, and the Company's Point Roberts Exchange service area includes approximately 6 square miles.

The Company has two Central Offices, South Whidbey and Point Roberts. The switch equipment is manufactured and supported by the manufacturer. The Point Roberts CO is connected to the Company's South Whidbey CO via multiple diversely routed redundant facilities and is configured to maintain service in the event of a facility failure to the South Whidbey CO. The primary paths consist of a diversely routed optical fiber ring utilizing Synchronous Optical Network ("SONET") technology. In addition, the Company operates a microwave transmission path between South Whidbey and Point Roberts, providing multiple DS-3s capacity which offers additional back-up capability.

The Company's voice telephony network has diversely routed paths to multiple points of interconnection with the networks of other voice telephony carriers. The Company also operates an Ethernet optical ring that connects its South Whidbey network with collocation facilities utilized by the Company outside its service area. The combination of the optical ring architecture and the DWDM capability of the Company's core transport equipment provides a highly reliable circuit network for voice telephony communications with substantial opportunity for augmentation, if demand volumes were to so require.

The Company's presence in collocation facilities allows for multiple points of interconnection with both local and regional carriers, giving the Company the flexibility to route traffic to multiple carriers. During service impairment created by physical damage or extraordinarily high traffic, the Company has the capability to reroute voice telephony traffic through any of those collocation facilities.

The network architecture within the Company's South Whidbey service area is comprised of a host CO and a number of core aggregation points, or Optical Remote Sites ("ORSs"). All of the ORS locations are connected by a physically diverse optical DWDM ring, with any of those locations being capable of maintaining service in the event of a failure of that physical fiber cable.

Connectivity to the end-user customer base is accomplished by the placement of a number of Broadband Loop Carrier remote terminals ("BLCs") that subtend the ORSs or host CO. Each of these BLCs has optical diversity between the main CO and serving ORS. Some of the BLCs also have physical route diversity connected to the CO or ORS that they subtend.

The Company's employees are trained to operate, maintain and/or repair the Company's network facilities. Qualified Company personnel are available for call-out 24x7x365(366) in the event of a service outage. The Company maintains an inventory of critical spare electronic/optronic cards, as well as cabinets, cable and other related materials necessary for restoration on site at both South Whidbey and Point Roberts.

BACK-UP POWER

The Company maintains a power plant at each CO, ORS, BLC and microwave site with batteries capable of carrying the power load for several hours with the load typically transitioning more immediately to a generator back-up power generation. For BLC sites without local generators, portable generators are deployed as needed.

In addition, the Company has installed back-up power generation at its COs, as well as at each of its ORSs and microwave installations. These generators range in size from 5kw to 750kw. Each generator has a dedicated fuel tank onsite designed to carry the power load for multiple days. All of these sites are equipped with automatic transfer switches and have monitoring equipment that provides monitoring visibility with respect to loss of external commercial power and transfer switch status. Upon recognition of loss of the commercial power source, the relevant automatic transfer switch is designed to automatically start the back-up generator and transfer the selected power source. Alarm messages are automatically reported to key personnel, as well as to the Company's 24x7x365(366) network operations center.

The Company has in-house staff trained to perform all maintenance of the power plant and has contract services available for support. Power distribution equipment within the Company's COs is inspected from time to time by vendor representatives to ensure proper maintenance. It is the Company's policy that all power plant maintenance be recorded and stored for future reference.

FCC FORM 481 (JULY 2019), LINE 1010
Descriptive Document for Compliance of 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)(10)
Per Instructions for Completing FCC Form 481

Section 54.313 (a)(10) of the rules of the Federal Communications Commission (“FCC”) requires any recipient of high-cost support, such as Whidbey Telephone Company (“Company”), annually to certify that the pricing of the Company’s voice services 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 18-1280, released December 20, 2018, in WC Docket No. 10-90 (“Public Notice”). That public notice includes the following statements, “Based on the survey results, the 2019 rate floor for voice services is \$26.98, [footnote omitted] and the reasonable comparability benchmark for voice services is \$51.61. [footnote omitted]...In addition, each ETC, including competitive ETCs providing fixed voice services, [footnote omitted] must certify in the FCC Form 481 filed no later than July 1, 2019, that the pricing for its basic residential voice services is no more than \$51.61. [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

¹ See Note 5 on the “Data Dictionary” tab of the [2016 URS Voice Data.xlsx] located from the FCC webpage having the following URL:

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

Those components for the Company's basic residential voice telephone service as of June 1, 2019, 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 (\$51.61).

FCC FORM 481 (July 2019), 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)(12)
Per Instructions for Completing FCC Form 481

Section 54.313(a)(12) of the rules of the Federal Communications Commission (“FCC”) requires any recipient of high-cost support, such as Whidbey 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 of U.S. Territories where the eligible telecommunications carrier receives support.

The most recent such notice issued by Wireline Competition Bureau is Public Notice DA-18-1280, released December 20, 2018, 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 services 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 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	Benchmark	Company Pricing
10	3	Unlimited	\$78.57	\$ 43.00
20	3	Unlimited	\$82.62	\$ 50.00
30	3	Unlimited	\$82.63	\$ 60.00
30	10	Unlimited	\$83.64	\$ 70.00
50	10	Unlimited	\$101.02	\$ 80.00
50	20	Unlimited	\$100.06	\$ 90.00
1000	1000	Unlimited	\$145.96	\$ 70.00

As shown in the above table, each of the broadband service plans offered to consumers by the Company, for which, “benchmark” rates are available, is offered at a price that is below the applicable “benchmark.”



*Local Voice Services – High Speed Internet
Long Distance – Security & Alarms – WhidbeyTV*
July 1, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
4556 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 10-90 and 14-58 –
Annual Report Due July 1, 2019, FCC Form 481 for
Rate of Return Carriers Receiving High-Cost Support
47 C.F.R. § 54.313(f)(1)(i) “Public Interest Certification”

Dear Ms. Dortch:

In compliance with the filing requirements associated with FCC Form 481 due July 1, 2019, and in compliance with Section 53.313(f)(1)(i) of the Commission’s rules, Whidbey Telephone Company (Study Area 522452) hereby certifies that it has taken 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 offerings in urban areas, and the requests for such service were met within a reasonable amount of time.

Sincerely,

WHIDBEYTELEPHONE COMPANY

By 

Gary Ricketts
Secretary /Treasurer

(3005a) Operating Report for Privately-Held Rate of Return Carriers
Balance Sheet - Data Collection Form
 Page 1 of 3

FCC Form 481
 OMB Control No. 3060-0986
 July 2013

<010> Study Area Code
 <015> Study Area Name
 <020> Program Year
 <030> Contact Name - Person USAC should contact regarding this data
 <035> Contact Telephone Number - Number of person identified in data line <030>
 <039> Contact Telephone Email Address - Email Address of person identified in data line <030>

522452
 Whidbey Telephone Company
 2020
 Gary Ricketts
 360-371-0051
 gary.ricketts@whidbeytel.com

Filed as reviewed single company
 Filed as reviewed consolidated company
 Filed as subsidiary of reviewed consolidated company

Filed as audited single company
 Filed as audited consolidated company
 Filed as subsidiary of audited consolidated company

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.

Gary Ricketts
 Signature
 6/28/19
 Date

PART A. BALANCE SHEET			
	ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			
1.	Cash and Equivalents		
2.	Cash-RUS Construction Fund		
3.	Affiliates:		
a.	Telecom, Accounts Receivable		
b.	Other Accounts Receivable		
c.	Notes Receivable		
4.	Non-Affiliates:		
a.	Telecom, Accounts Receivable		
b.	Other Accounts Receivable		
c.	Notes Receivable		
5.	Interest and Dividends Receivable		
6.	Material-Regulated		
7.	Material-Nonregulated		
8.	Prepayments		
9.	Other Current Assets		
10.	Total Current Assets (1 Thru 9)	0	0
	NONCURRENT ASSETS		
11.	Investment in Affiliated Companies		
a.	Rural Development		
b.	Nonrural Development		
12.	Other Investments		
a.	Rural Development		
b.	Nonrural Development		
13.	Nonregulated Investments		
14.	Other Noncurrent Assets		
15.	Deferred Charges		
16.	Jurisdictional Differences		
17.	Total Noncurrent Assets (11 thru 16)	0	0
	PLANT, PROPERTY, AND EQUIPMENT		
18.	Telecom, Plant-in-Service		
19.	Property Held for Future Use		
20.	Plant Under Construction		
21.	Plant Adj., Nonop. Plant & Goodwill		
22.	Less Accumulated Depreciation		
23.	Net Plant (18 thru 21, less 22)	0	0
24.	TOTAL ASSETS (10+17+23)	0	0
	LIABILITIES AND STOCKHOLDERS' EQUITY		
	CURRENT LIABILITIES		
25.	Accounts Payable		
26.	Notes Payable		
27.	Advance Billings and Payments		
28.	Customer Deposits		
29.	Current Mat. L/T Debt		
30.	Current Mat. L/T Debt-Rur. Dev.		
31.	Current Mat.-Capital Leases		
32.	Income Taxes Accrued		
33.	Other Taxes Accrued		
34.	Other Current Liabilities		
35.	Total Current Liabilities (25 thru 34)	0	0
	LONG-TERM DEBT		
36.	Funded Debt-RUS Notes		
37.	Funded Debt-RTB Notes		
38.	Funded Debt-FFB Notes		
39.	Funded Debt-Other		
40.	Funded Debt-Rural Develop. Loan		
41.	Premium (Discount) on L/T Debt		
42.	Reacquired Debt		
43.	Obligations Under Capital Lease		
44.	Adv. From Affiliated Companies		
45.	Other Long-Term Debt		
46.	Total Long-Term Debt (36 thru 45)	0	0
	OTHER LIAB. & DEF. CREDITS		
47.	Other Long-Term Liabilities		
48.	Other Deferred Credits		
49.	Other Jurisdictional Differences		
50.	Total Other Liabilities and Deferred Credits (47 thru 49)	0	0
	EQUITY		
51.	Cap. Stock Outstanding & Subscribed		
52.	Additional Paid-in-Capital		
53.	Treasury Stock		
54.	Membership and Cap. Certificates		
55.	Other Capital		
56.	Patronage Capital Credits		
57.	Retained Earnings or Margins		
58.	Total Equity (51 thru 57)	0	0
59.	TOTAL LIABILITIES AND EQUITY (35+46+50+58)	0	0

(3005b) Operating Report for Privately-Held Rate of Return Carriers
Balance Sheet - Data Collection Form

FCC Form 481
OMB Control No. 3060-0986
July 2013

<010> Study Area Code 522452
<015> Study Area Name Whidbey Telephone Company
<020> Program Year 2020
<030> Contact Name Gary Ricketts
<035> Contact Telephone Number - Number of person identified in data line <030> 360-321-0051
<039> Contact Telephone Email Address - Email Address of person identified in data line <030> gary.ricketts@whidbeytel.com

<010> Study Area Code
<015> Study Area Name
<020> Program Year
<030> Contact Name - Person USAC should contact regarding this data
<035> Contact Telephone Number - Number of person identified in data line <030>
<039> Contact Telephone Email Address - Email Address of person identified in data line <030>

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS		PRIOR YEAR	THIS YEAR
ITEM			
1.	Local Network Services Revenues		
2.	Network Access Services Revenues		
3.	Long Distance Network Services Revenues		
4.	Carrier Billing and Collection Revenues		
5.	Miscellaneous Revenues		
6.	Uncollectible Revenues	0	0
7.	Net Operating Revenues (1 thru 5 less 6)		
8.	Plant Specific Operations Expense		
9.	Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10.	Depreciation Expense		
11.	Amortization Expense		
12.	Customer Operations Expense		
13.	Corporate Operations Expense		
14.	Total Operating Expenses (8 thru 13)	0	0
15.	Operating Income or Margins (7 less 14)	0	0
16.	Other Operating Income and Expenses		
17.	State and Local Taxes		
18.	Federal Income Taxes		
19.	Other Taxes		
20.	Total Operating Taxes (17+18+19)	0	0
21.	Net Operating Income or Margins (15+16-20)	0	0
22.	Interest on Funded Debt		
23.	Interest Expense - Capital Leases		
24.	Other Interest Expense		
25.	Allowance for Funds Used During Construction		
26.	Total Fixed Charges (22+23+24-25)	0	0
27.	Nonoperating Net Income		
28.	Extraordinary Items		
29.	Jurisdictional Differences		
30.	Nonregulated Net Income		
31.	Total Net Income or Margins (21+27+28-29+30-26)	0	0
32.	Total Taxes Based on Income		
33.	Retained Earnings or Margins Beginning of Year		
34.	Miscellaneous Credits Year-to-Date		
35.	Dividends Declared (Common)		
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)]	0	0
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		
45.	Cash Ratio [(14+20-10-11)/7]	0.00	0.00
46.	Operating Accrual Ratio [(14+20+26)/7]	0.00	0.00
47.	TIER [(31+26)/26]	0.00	0.00
48.	DSCR [(31+26+10+11)/44]	0.00	0.00

<010> Study Area Code 522452
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 <039> Contact Telephone Email Address - Email Address of person identified in data line <030> gary.ricketts@whidbeytel.com

PART C. STATEMENTS OF CASH FLOWS	
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)
CASH FLOWS FROM OPERATING ACTIVITIES	
2.	Net Income
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3.	Add: Depreciation
4.	Add: Amortization
5.	Other (Explain) Noncash Operating Income, Partnership Distribution
Changes in Operating Assets and Liabilities	
6.	Decrease/(Increase) in Accounts Receivable
7.	Decrease/(Increase) in Materials and Inventory
8.	Decrease/(Increase) in Prepayments and Deferred Charges
9.	Decrease/(Increase) in Other Current Assets
10.	Increase/(Decrease) in Accounts Payable
11.	Increase/(Decrease) in Advance Billings & Payments
12.	Increase/(Decrease) in Other Current Liabilities
13.	Net Cash Provided/(Used) by Operations
CASH FLOWS FROM FINANCING ACTIVITIES	
14.	Decrease/(Increase) in Notes Receivable
15.	Increase/(Decrease) in Notes Payable
16.	Increase/(Decrease) in Customer Deposits
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital
20.	Less: Payment of Dividends
21.	Less: Patronage Capital Credits Retired
22.	Other (Explain)
23.	Net Cash Provided/(Used) by Financing Activities
CASH FLOWS FROM INVESTING ACTIVITIES	
24.	Net Capital Expenditures (Property, Plant & Equipment)
25.	Other Long-Term Investments
26.	Other Noncurrent Assets & Jurisdictional Differences
27.	Other (Explain) Loan/Advances to Affiliates
28.	Net Cash Provided/(Used) by Investing Activities
29.	Net Increase/(Decrease) in Cash
30.	Ending Cash



1501 Regents Blvd., Suite 100

Firecrest, WA 98146-6060

Independent Auditor's Report

Board of Directors
Whidbey Telephone Company
Langley, Washington

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of Whidbey Telephone Company and Subsidiaries, which comprise the consolidated balance sheets as of December 31, 2018 and 2017, and the related consolidated statements of income and comprehensive income, stockholders' equity and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of the significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Whidbey Telephone Company and Subsidiaries as of December 31, 2018 and 2017, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Our audits were conducted for the purpose of forming an opinion on the consolidated financial statements as a whole. The supplementary information is presented for purposes of additional analysis of the consolidated financial statements rather than to present the financial position, results of operations and cash flows of the individual companies, and it is not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the consolidated financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the consolidated financial statements as a whole.

Johnson, Stone & Pagano, P.S.

JOHNSON, STONE & PAGANO, P.S.

April 11, 2019

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2020
<030> Contact Name: Person USAC should contact with questions about this data	Lei McManus
<035> Contact Telephone Number: Number of the person identified in data line <030>	3603210068 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	lei.mcmanus@whidbeytel.com
Form Type	54.313 and 54.422

<010> Study Area Code 522452

<015> Study Area Name WHIDBEY TEL CO.

<020> Program Year 2020

<030> Contact Name - Person USAC should contact regarding this data Lei McManus

<035> Contact Telephone Number - Number of person identified in data line <030> 3603210063 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> lei.mcmanus@whidbeytel.com

<210> For the prior calendar year, were there any reportable voice service outages?

<220>	<a>	<b1>	<b2>	<b3>	<b4>	<c1>	<c2>	<d>	<e>	<f>	<g>	<h>
	NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures

(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	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line	3603210068 ext.
<039>	Contact Email Address - Email Address of person identified in data line	lei.mcmanus@whidbeytel.com
<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	522452
<015>	Study Area Name	WHIDBEY TEL CO
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210968 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com
<515>	Certify compliance with applicable minimum service standards	

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

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	522452wa610.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	922452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2020
<030> Contact Name - Person USAC should contact regarding this data	Le1 McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	le1.mcmanus@whidbeytel.com

<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	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lai McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210063 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lai.mcmanus@whidbeytel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 522452wa1010.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 522452wa1030.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	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Le1 McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	le1.mcmanus@whidbeytel.com

<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	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <https://www.whidbeytel.com/products-services/voice-services/local-voice-service>

"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	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

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	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

(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? No

(3007a) Name of Consultant	(3007b) Name of Consultant Firm/Third Party

CAF BLS Reporting

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

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

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.

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

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)} 522452wa3010.pdf

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

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(iii)} 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

WTC Auditors Report.pdf, 3005-Rate-of-Return-Data-Upload-Template_WTC Unredacted.xlsx

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2018

<010> Study Area Code	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2020
<030> Contact Name - Person USAC should contact regarding this data	Lei McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

Financial Data Summary

(3027) Revenue	12396211
(3028) Operating Expenses	14100879
(3029) Net Income	2483322
(3030) Telephone Plant In Service(TPIS)	100135885
(3031) Total Assets	67246734
(3032) Total Debt	11500000
(3033) Total Equity	53855239
(3034) Dividends	0

<010>	Study Area Code	52452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Lei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3603210088 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

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

Certification - Reporting 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	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2020
<030> Contact Name - Person USAC should contact regarding this data	Lei McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

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:	WHIDBEY TEL CO.
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/28/2019
Printed name of Authorized Officer:	Gary Ricketts
Title or position of Authorized Officer:	Secretary & Treasurer
Telephone number of Authorized Officer:	3603210051 ext.
Study Area Code of Reporting Carrier:	522452 Filing Due Date for this form: 07/01/2019
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	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2020
<030> Contact Name - Person USAC should contact regarding this data	Lei McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	3603210068 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

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

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2020
<030>	Contact Name - Person USAC should contact regarding this data	Le1 McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	3693210069 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	le1.mcmanus@whidbeytel.com
<810>	Reporting Carrier	Whidbey Telephone Company
<811>	Holding Company	Whidbey Telephone Company
<812>	Operating Company	Whidbey Telephone Company

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	2012 George T.F. Henny Trust	522452	Whidbey Telephone Company
	2012 George T.F. Henny Trust	522452	Whidbey Telecom
	2012 George T.F. Henny Trust	522452	WhidbeyTV
	2012 George T.F. Henny Trust	522452	Bayview Storage
	2012 George T.F. Henny Trust	522452	Whidbey Telecom Internet & Broadband
	2012 George T.F. Henny Trust	522452	WiFire
	2012 Julia Henny DeMartini Trust	522452	Whidbey Telephone Company
	2012 Julia Henny DeMartini Trust	522452	Whidbey Telecom
	2012 Julia Henny DeMartini Trust	522452	WhidbeyTV
	2012 Julia Henny DeMartini Trust	522452	Bayview Storage
	2012 Julia Henny DeMartini Trust	522452	Whidbey Telecom Internet & Broadband
	2012 Julia Henny DeMartini Trust	522452	WiFire
	2012 Mark P. Henny Trust	522452	Whidbey Telephone Company
	2012 Mark P. Henny Trust	522452	Whidbey Telecom
	2012 Mark P. Henny Trust	522452	WhidbeyTV
	2012 Mark P. Henny Trust	522452	Bayview Storage
	2012 Mark P. Henny Trust	522452	Whidbey Telecom Internet & Broadband
	2012 Mark P. Henny Trust	522452	WiFire
	Western Long Distance, Inc.	522452	Western Long Distance
	Western Long Distance, Inc.	522452	Whidbey Telecom Long Distance
	Western Long Distance, Inc.	522452	Point Roberts Long Distance
	Western Long Distance, Inc.	522452	Hat Island Long Distance
	Watercrest, Inc.	522452	Watercrest, Inc.

