

- 1 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange  
2 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 3 4. WAC 480-123-100(1)(d): The Company's rates for residential local exchange service, plus  
4 mandatory extended area service charges, are no lower than the local urban rate floor  
5 established by the Commission as the benchmark rate based on the Federal Communications  
6 Commission's national local urban rate floor pursuant to 47 C.F.R. Sec. 54.318 in effect on  
7 the date of this Petition.
- 8 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an  
9 eligible telecommunications carrier for purposes of receiving federal universal services  
10 support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for High Cost  
11 Areas with respect to the service area for which the Company is seeking Program support.  
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## 14 **II. Demonstration of Eligibility under WAC 480-123-110**

- 15 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications  
16 services and is seeking Program support is as follows: St. John Telephone, Inc.
- 17 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between  
18 the Company and all affiliates as defined in RCW 80.16.010, is attached hereto as Exhibit 1.  
19 A detailed description of any transactions between the Company and the affiliates named in  
20 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2.
- 21 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.  
22 14 of the Company's Tariff WN U-3.  
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