

August 11, 2006

To: Sprint

From: Bob Shirley, Telecommunications Policy Analyst
(360) 664-1292

Re: Request for Supplemental Filing of ETC Certifications and Reports
Docket UT-063052

- - VIA Electronic Mail - -

After review of Sprint's ETC certification and reports, commission staff has concluded that the filing is inconsistent with the requirements of WAC 480-123-020 through 080. Please file a replacement or supplement consistent with the attachment to this e-mail.

Certifications are due to the Federal Communications Commission and the Universal Service Administrative Company not later than October 1. Commission staff plans to request commission approval of certifications at the open meeting scheduled for September 13. In order to make a recommendation on September 13, commission staff will need to receive replacement or supplemental filings not later than August 22. Commission staff will work closely with Sprint and its representatives so that filings can be completed not later than August 22.

Please contact me by e-mail at bshirley@wutc.wa.gov or by calling (360) 664-1292 if you have questions. Thank you.

Attachment: ETC Certification and Report Request

cc: Records Center, UT-063052

ATTACHMENT

Sprint ETC Certification and Report Request

WAC 480-123-060(1)

Sprint needs to provide a certification that it will use federal high-cost universal service fund support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.

Sprint did not certify that future funds received from federal high-cost universal service support will only be used for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The rule requires that each ETC certify “that it will use federal high-cost universal service fund support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.”

WAC 480-123-060(1)

Sprint also needs to provide the certification *in the manner required by RCW 9A.72.085*. The certification or declaration may be in substantially the following form:

"I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct":

(Date and Place)

(Signature)

WAC 480-123-070(5) and (6)

Sprint needs to add “under penalty of perjury under the laws of the State of Washington” language to the certification request to meet the requirement of RCW 9A.72.085.

An officer of the company submitted the certification request, but did not use the required language from RCW 9A.72.085.