

**FCC FORM 481 (July 2017), 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 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 16-362, released April 5, 2016, 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 it refers:

Download Speed (Mbps) (up to)	Upload Speed (Mbps) (up to)	Usage Allowance (GB)	Benchmark	Company Affiliate Pricing
1.5	0.768	Unlimited	Not Available	\$29.95
5	1	Unlimited	\$68.87	\$49.95
10	1	Unlimited	\$77.98	\$59.95
30	10	Unlimited	\$93.49	\$77.95
70	20	Unlimited	Not Available	\$99.95
100	30	Unlimited	Not Available	\$119.95

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