

August 11, 2006

To: United States Cellular Corporation (USCC)

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 USCC'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 21. Commission staff will work closely with USCC and its representatives so that filings can be completed not later than August 21.

Please contact me by e-mail at [bshirley@wutc.wa.gov](mailto: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

### USCC ETC Certification and Report Request

#### **WAC 480-123-060(1)**

USCC needs to provide a certification consistent with WAC 480-123-060(1) by using the future tense.

USCC certified that the funds received from the federal high-cost universal service support fund *were* only used for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The rule requires a prospective statement; it requires that a certification that the ETC "...*will* use federal high-cost universal service fund support only for..." (Note that the certifications required under WAC 480-123-070(5) and (6) are for activity that *has* taken place.)

#### **WAC 480-123-070(1)(b)**

USCC needs to provide a substantive description of the benefits to consumers that resulted from expenditure and investment in 2005.

USCC provided Exhibit A that includes the amount of federal high-cost universal service support received and expended. It does not have a substantive description of the benefits to consumers. The rule requires a substantive description of the benefits to consumers that resulted from the investments and expenses reported.

#### **WAC 480-123-070(2)**

USCC needs to provide information that responds to all requirements of the subsection or seek a waiver if it did not track this information during the calendar year before the rule went into effect.

USCC provided Exhibit B with information about local service outages.

- The information contains the date but not the time of each outage.
- It contains information about the service affected, but does not state whether a public safety answering point was affected.
- It provides information about repair (called solution codes), but it is not clear if the solution code represents "steps taken to prevent a similar situation in the future."
- It does not contain an estimate of the number of customers affected.

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

USCC needs to provide a certification consistent with WAC 480-123-070(5) and (6).

The certifications provided are in the present tense. The rule requires certification that USCC *met* substantially the applicable service quality standards *had* the ability to function in an emergency in calendar year 2005.

**WAC 480-123-080(2)**

USCC needs to provide a substantive description of how investments and expenditures in 2006-07 will benefit customers.

USCC provided Exhibit M with information about planned investment and expenses for October 2006 through September 2007. It does not have a substantive description of the benefits to consumers. The rule requires a substantive description of the benefits to consumers that resulted from the investments and expenses reported.