August 11, 2006

- To: United Telephone Company of the Northwest (UTNW)
- 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 UTNW'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 UTNW and its representatives so that filings can be completed not later than August 21.

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

Attachment: ETC Certification and Report Request

cc: Records Center, UT-063052

ATTACHMENT

UTNW ETC Certification and Report Request

WAC 480-123-060(1)

UTNW did not request certification by the WUTC to the Federal Communications Commission.

UTNW is not required to request this certification. UTNW may do so if it chooses to do so. If UTNW chooses to do so, the rule requires that each "ETC must-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. The certification must be submitted by a company officer in the manner required by RCW 9A.72.085."

WAC 480-123-070(6)

UTNW needs to provide a certification that it *had* the ability to function in emergency situations in calendar year 2005.

The certification provided is in the present tense. The rule requires certification about UTNW's ability to function in calendar year 2005.