

**FCC FORM 481 (July 2017), Line 1010**  
**Descriptive Document for Compliance of Pricing of**  
**Fixed Voice Services with Required Relationship**  
**To Applicable National Average Urban Rate for Voice**  
**Service Benchmark, as required by 47 C.F.R. § 54.313(a)(10)**  
**Per Instructions for Completing FCC Form 481**

Section 54.313(a)(10) 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 the Company's voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 17-167, released February 14, 2017, in WC Docket No. 10-90 (“Public Notice”). That public notice includes the following statements, “Based on the survey results, the 2016 [sic]<sup>1</sup> rate floor for voice services is \$22.49, [footnote omitted] and the reasonable comparability benchmark for voice services is \$49.51. [footnote omitted] . . . . In addition, each ETC, including competitive ETCs providing fixed voice services, [footnote omitted] must certify in the FCC Form 481 filed no later than July 3, 2017, that the pricing for its *basic residential voice* services is no more than \$49.51. [footnote omitted]” [Italics added.]

It is the Company’s understanding that the above-mentioned comparability benchmark includes the recurring residential service rate, any applicable State subscriber line charge rate, any applicable State universal service fund rate, any applicable minimum mandatory Extended Area Service rate, and any applicable Federal subscriber line charge rate.<sup>2</sup>

Those components for the Company’s basic resident voice telephone services as of June 1, 2017, are as follows:

Recurring residential service rate	\$18.00
State subscriber line charge rate	0.00
State universal service fund rate	0.00
Minimum mandatory EAS rate	0.00
Federal subscriber line charge	<u>6.50</u>
Total \$	24.50

The sum of the above-identified rates (\$24.50) is not more than the voice service comparability benchmark identified in the Public Notice (\$49.51).

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<sup>1</sup> From its context, the Company believes that the quoted statement was intended to refer to the 2017 rate floor for voice services.

<sup>2</sup> See Note 5 on the “Data Dictionary” tab of 2017 Results [2017 URS Voice Website Data.xlsx] located from the FCC webpage having the following URL: