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6 **BEFORE THE WASHINGTON**
7 **UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

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10 PETITION OF LEWIS RIVER
11 TELEPHONE COMPANY, INC. D/B/A TDS
12 TELECOM TO RECEIVE SUPPORT FROM
13 THE STATE UNIVERSAL
COMMUNICATIONS SERVICES
PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

14 COMES NOW Lewis River Telephone Company, Inc. d/b/a TDS Telecom (the "Company")
15 and, pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC") including, but
16 not limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation
17 Commission (the "Commission") to receive support from the State Universal Communications
18 Services Program established in RCW 80.36.650 (the "Program") for the Program year 2016.
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21 **I. Demonstration of Eligibility under WAC 480-123-100**

- 22 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
23 480-120-021 that serves less than forty thousand access lines within the state.
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26 PETITION OF LEWIS RIVER TELEPHONE
COMPANY, INC. D/B/A TDS TELECOM TO
RECEIVE SUPPORT FROM THE STATE
UNIVERSAL COMMUNICATIONS SERVICES
PROGRAM - 1

- 1 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined
2 in 47 U.S.C. Sec. 251(h).
- 3 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
4 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 5 4. WAC 480-123-100(1)(d): The Company's rates for residential local exchange service, plus
6 mandatory extended area service charges, are no lower than the local urban rate floor
7 established by the Commission as the benchmark rate based on the Federal Communications
8 Commission's national local urban rate floor pursuant to 47 C.F.R. Sec. 54.318 in effect on
9 the date of this Petition.
- 10 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
11 eligible telecommunications carrier for purposes of receiving federal universal service
12 support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for High Cost
13 Areas with respect to the service area for which the Company is seeking Program support.
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16 **II. Demonstration of Eligibility under WAC 480-123-110**

- 17 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
18 services and is seeking Program support is as follows: Lewis River Telephone Company,
19 Inc. d/b/a TDS Telecom.
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- 21 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between
22 the Company and all affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1.
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1 A detailed description of any transactions between the Company and the affiliates named in
2 Exhibit 1¹ recorded in the Company's operating accounts is attached hereto as Exhibit 2.

- 3 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Section
4 Maps, Fourth Revised Sheets M-1 through M-4 of the Company's Tariff WN U-2.
- 5 4. WAC 480-123-110(1)(d): A demonstration that the Company's customers are at risk of rate
6 instability or service interruption or cessation in the absence of support from the Program is
7 attached as Exhibit 3.
- 8 5. WAC 480-123-110(1)(e)(i): On the Commission's prescribed form, attached as Exhibit 4,
9 are copies of the Company's balance sheet as of December 31, 2014, and December 31,
10 2013, and copies of the Company's statements of income and retained earnings or margin for
11 the years ended December 31, 2014 and December 31, 2013.
- 12 6. WAC 480-123-110(1)(e)(ii): A copy of the Company's consolidated annual financial
13 statements for the years ended December 31, 2014 and December 31, 2013, is attached as
14 Exhibit 5.
- 15 7. WAC 480-123-110(1)(e)(iii): Information demonstrating the Company's earned rate of
16 return on a total Washington unseparated regulated operations basis for the prior year,
17 calculated in the manner prescribed by the Commission, is provided in Exhibit 4.
- 18 8. WAC 480-123-110(1)(e)(iv): Information demonstrating the Company's earned return on
19 equity on a total company (regulated and non-regulated) Washington basis for the prior year,
20 calculated in the manner prescribed by the Commission, is provided in Exhibit 4.
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24 ¹ Pursuant to agreement with the Commission Staff, Exhibit 1 is limited to those affiliates having transactions with the
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- 1 9. WAC 480-123-110(1)(e)(v): Information detailing all of the Company's revenues from the
2 statements of income and retained earnings or margin in the same format and detail as is
3 required to complete RUS Form 479 for the prior two years is presented in Exhibit 6.
- 4 10. WAC 480-123-110(1)(e)(vi): A statement under penalty of perjury from a Company officer
5 with personal knowledge and responsibility certifying that no corporate operations
6 adjustment to existing high-cost loop and interstate common line support mechanisms
7 required by the Federal Communications Commission applied to the Company for the two
8 prior years is attached hereto as Exhibit 7.
- 9 11. WAC 480-123-110(1)(e)(vii): Exhibit 4 contains additional supporting information
10 requested by the Commission.
- 11 12. WAC 480-123-110(1)(e)(viii): A statement under penalty of perjury from a Company
12 officer with personal knowledge and responsibility certifying that the Company complies
13 with state and federal accounting, cost allocation, and cost adjustment rules pertaining to
14 incumbent local exchange companies is attached as Exhibit 8.
- 15 13. WAC 480-123-110(1)(f): A complete copy of the FCC Form 481 filed by the Company or
16 on its behalf with the Federal Communications Commission for the calendar year preceding
17 the current year has already been filed with the Commission. See the Company's filing in
18 Docket No. UT-150063 filed on or about July 1, 2015.
- 19 14. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
20 the Company as of December 31, 2014, was 3,984, all of which were within the geographic
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24 Company as identified in Exhibit 2.

1 area for which the Company is seeking support. The number of residential local exchange
2 access lines served by the Company as of December 31, 2013, was 4,051, all of which were
3 within the geographic area for which the Company is seeking support. The number of
4 business local exchange access lines served by the Company as of December 31, 2014, was
5 457, all of which were within the geographic area for which the Company is seeking
6 support. The number of business local exchange access lines served by the Company as of
7 December 31, 2013, was 492, all of which were within the geographic area for which the
8 Company is seeking support. The monthly recurring average rates charged by the Company
9 for residential local exchange access service on December 31, 2014, were \$16.27, \$20.00
10 and \$26.00 for rate options A, B and C respectively. The monthly recurring average rates
11 charged by the Company for residential local exchange access service on December 31,
12 2013, were \$15.22, \$19.47 and \$26.00 for rate options A, B and C respectively. The rates
13 charged by the Company for single line business local exchange access service on both
14 December 31, 2014 and December 31, 2013 ranged from \$23.07 to \$37.52. The Company
15 has other business local exchange service rates, but the Company understands that WAC
16 480-123-110(1)(g) is requesting the single line business local exchange access service rate.

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19 15. WAC 480-123-110(1)(h): The requested statement is attached as Exhibit 9.

20 16. All exhibits attached hereto are incorporated in this Petition as though fully set forth.


21 Respectfully submitted this 31st day of July, 2015.

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24 Lewis River Telephone Company, Inc.
d/b/a TDS Telecom

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CERTIFICATION

I, Andrew S. Petersen, an officer of the Company that is responsible for the Company's business and financial operations, hereby certify under penalty of perjury that the information and representations set forth in the Petition, above, are accurate and the Company has not knowingly withheld any information required to be provided to the Commission pursuant to the rules governing the Program.

By: 
Andrew S. Petersen
Title: VP-External Affairs & Communications