



July 30, 2007

**BY HAND**

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250

RECEIVED  
07 JUL 30 PM 3:21  
OFFICE OF THE  
CLERK OF THE  
WASHINGTON UTILITIES  
AND TRANSPORTATION  
COMMISSION

Dear Ms. Washburn:

Re: Docket No. UT-073015 -  
Request for Certification Pursuant to  
WAC 480-123-060 and 47 C.F.R. § 54.314

Pursuant to WAC 480-123-060, Western Wahkiakum County Telephone Company ("Company") hereby requests that the Washington Utilities and Transportation Commission certify to the Federal Communications Commission and the Universal Service Administrative Company that the Company has met the requirements of 47 C.F.R. § 54.314 for eligibility for continued receipt of federal high-cost funds.

The certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 are enclosed.

Sincerely,

Steven M. Appelo  
Corporate Secretary

Enclosures

**REPORTS AS REFERENCED IN WAC 480-123-070  
AND WAC 480-123-080**

Western Wahkiakum County Telephone Company (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.<sup>1</sup>

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report<sup>2</sup> for the calendar year 2006, that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund. In addition, attached is a copy of the Company's NECA-1 Report for the calendar year 2005.

Report 2: WAC 480-123-070(1)(b): The Company reports that the investments and expenses reported under Report 1, above, benefited customers as follows:

Through the expenditure of these funds, the Company was able to continue to provide services at a level that the Company believes meets the intent set forth in 47 U.S.C. § 254 of providing high quality telecommunications services to customers in the service area for which the Company is designated as an ETC.<sup>3</sup> The Company has made substantial expenditures and investments over the past several years, which allow it to provide quality telecommunications services to its customers in its designated ETC service area. Those expenditures and investments, including those reflected in Report 1 above, generally benefit all customers receiving the federal high-cost fund supported services<sup>4</sup> from the Company within its designated ETC service area. Also, during 2006, the Company was engaged in the following major construction project:

- (1) Construction of fiber optic ring facilities along Parpala Road and SR101 at a cost of approximately \$110,000. This project included the installation of fiber optic cable over a distance of approximately three miles (approximately 2.2 miles along Parpala Road and approximately .65 miles along SR 101). By creating a fiber optic ring, this project enhanced both the reach and reliability of service: the fiber ring creates redundant paths that minimize the impact of cable cuts upon customers served over these facilities. Approximately ninety customers are now served by this route.

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<sup>1</sup> It is the Company's understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3).

<sup>2</sup> The Company understands the reference to the "NECA-1 Report" to refer to the values reported by the Company in response to the National Exchange Carrier Association, Inc. Universal Service Data Collection Form or its on-line equivalent pertaining to the subject year.

<sup>3</sup> The term "ETC" is used herein with the same meaning as the term is used in Chapter 480-123 WAC.

<sup>4</sup> References herein to services supported by the federal high-cost fund refer to the services designated for support as set forth in 47 C.F.R. § 54.101(a).

- (2) Performance of the initial work on a fiber optic facility project involving the construction of a new fiber optic route from the vicinity of SR4 at Naselle to the top of Radar Ridge. This project involves the construction of approximately four miles of fiber optic facilities over a distance of approximately four miles across difficult and rocky terrain. The cost of the work performed on this project during 2006 totaled approximately \$50,000. The project is expected to be completed during 2007 (see Item 1 under Report 4 below). The project will enhance service reliability and capacity for customers situated on Radar Ridge, including a federal governmental entity (which requested additional facilities) and other customers on the State of Washington Department of Natural Resources ("DNR") Radar Ridge property.
- (3) Flood- and storm-related replacement and realignments of outside plant and portions of the Company's emergency power system, totaling approximately \$32,000. These adjustments are expected (i) to render the affected plant less susceptible to storm-related damage, and (ii) to improve the reliability of back-up power supporting the Company's Grays River central office facilities to the benefit of all of the Company's customers.
- (4) Upgrade of the Company's DMS-10 central office switch to 602 Generic at a cost of approximately \$17,000, to maintain optimal circuit switching benefiting all of the Company's customers for local exchange service and other switched services.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2006, the Company did not receive from either the Federal Communications Commission or the Consumer Protection Division of the Office of the Attorney General of the State of Washington any complaints against the Company made to them by the Company's customers.

Report 4: WAC 480-123-080(1)(b) and (2): The Company reports as follows:

The planned investment and expenses related to Washington state for calendar year 2007 that the Company expects to use as a basis to request federal high-cost support were planned to be relatively similar to those investments and expenses the Company has set forth in its information for calendar year 2006 filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. However, due to circumstances beyond the Company's control, the following project, which was previously planned to be completed in 2007, is now being deferred to 2008 or later:

Relocation of the Company's main cables (both copper and fiber optic) over a distance of approximately 1.6 miles along SR 4 at an estimated cost of approximately \$125,000. This project is due to a planned realignment of the highway by the State of Washington Department of Transportation ("DOT") from approximately the location of the Company's Grays River central office to the Deep River bridge. The DOT has surveyed the site, but has delayed, until 2008 or later, the construction, which was previously contemplated to occur in 2007. This project will enable the Company to avoid a major disruption of service that could affect all of the Company's customers.

The following projects have either been completed or are in progress during calendar year 2007:

- (1) The project described under Item (2) in Report 2 above has progressed substantially during 2007, with an additional approximately \$124,000 having been spent to date on that project during 2007. The project is expected to be completed later during 2007, at a total cost from inception of approximately \$ 178,000, and with the benefits to customers being as described under Item (2) in Report 2 above.
- (2) The Company is currently engaged in an upgrade to its DLC (digital loop carrier) to CO (central office) ATM (asynchronous transfer mode) transport platform on generally a system-wide basis. The cost of this project is expected to exceed \$ 160,000. When completed, this project is expected to result in greater capacity and reliability for voice grade access to the public switched telecommunications network for customers in most portions of the Company's designated ETC service area, while also strengthening the Company's ability to provide its customers with access to advanced telecommunications services.

The Company expects the levels of investment and expenses incurred by it during calendar years 2007 and 2008, respectively, will remain relatively the same as those it experienced in calendar year 2006, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company further expects that for calendar years 2007 and 2008, respectively, it will have relatively the same budget level of expenditures and investment related to normal maintenance, replacement and minor upgrades of plant as occurred in calendar year 2006.

In addition to the specific benefits to customers identified with respect to projects (1) and (2) above, the expected benefit to customers from the anticipated investment and expenditures is that the Company's customers will continue to receive a high level of telecommunications service. The Company further expects that the continued receipt by it of federal high-cost support will allow the Company to continue to provide the supported services at rates that are reasonably comparable to the rates for such services in urban areas. All customers in the Company's designated ETC service area will benefit

from the expected level of support by continuing to have available to them services that are reasonably comparable to telecommunications services offered in urban areas at rates that are reasonably comparable to the rates for such services in urban areas.

Dated: July 30, 2007

APPLIES TO PERIOD: YEAR END 12/2005      REG: 5      PACIFIC  
 CONTACT NAME: Carol Larson      SST: 3      SUBSET 3  
 CONTACT PHONE: (360)-465-2211 EXT:      OO: \*\*\*\*\*  
 RELEASE STATUS: RELEASED      CO: 000002451      Western Wahkiakum County  
 SOFT EDIT STATUS: PASSED EDIT      SAR: 522451      WESTERN WAHKLAKUM

DESCRIPTION	LATEST VIEW
060 TOTAL LOOPS	1,246
070 CAT. 1.3 LOOPS	1,236
160 ACCOUNT 2001	11,142,677
170 ACCOUNT 1220	52,164
190 ACCOUNT 3100	6,382,047
195 ACCOUNT 3400	0
210 ACCOUNT 4340	781,148
220 NET PLANT INVESTMENT	4,031,646
230 ACCOUNT 2210	1,620,539
235 ACCOUNT 2220	0
240 ACCOUNT 2230	1,976,376
245 TOTAL CENTRAL OFFICE	3,596,915
250 CKT EQUIP CAT 4.13	1,340,404
255 ACCOUNT 2410	6,090,012
260 ACCOUNT 3100 (2210)	920,735
265 ACCOUNT 3100 (2220)	0
270 ACCOUNT 3100 (2230)	862,922
275 ACCOUNT 3100 (2210-2230)	1,783,657
280 ACCOUNT 3100 (2410)	3,628,995
310 ACCOUNT 4340 (2210)	184,659
315 ACCOUNT 4340 (2220)	0
320 ACCOUNT 4340 (2230)	288,827
325 NET NONCURRENT	473,486
330 ACCOUNT 4340 (2410)	283,506
335 ACCOUNT 6110 TOTAL	27,198
340 ACCOUNT 6110 BENEFITS	0
345 ACCOUNT 6110 RENTS	0
350 ACCOUNT 6120 TOTAL	53,681
355 ACCOUNT 6120 BENEFITS	8,185
360 ACCOUNT 6120 RENTS	2,086
365 ACCOUNT 6210 TOTAL	216,193
370 ACCOUNT 6210 BENEFITS	55,832
375 ACCOUNT 6210 RENTS	0
380 ACCOUNT 6220 TOTAL	0
385 ACCOUNT 6220 BENEFITS	0
390 ACCOUNT 6220 RENTS	0
395 ACCOUNT 6230 TOTAL	64,912
400 ACCOUNT 6230 BENEFITS	14,112
405 ACCOUNT 6230 RENTS	0
410 ACCOUNT 6210-6230	281,105
430 ACCOUNT 6410 TOTAL	135,262
435 ACCOUNT 6410 BENEFITS	36,639
440 ACCOUNT 6410 RENTS	503
445 TOTAL PLANT SPECIFIC	497,246
450 ACCOUNT 6530 TOTAL	421,879
455 ACCOUNT 6530 BENEFITS	119,891
510 ACCOUNT 6560 (2210)	139,767
515 ACCOUNT 6560 (2220)	0
520 ACCOUNT 6560 (2230)	207,666
525 ACCOUNT 6560 (2210-2230)	347,433
530 ACCOUNT 6560 (2410)	338,766

APPLIES TO PERIOD: YEAR END 12/2005      REG: 5      PACIFIC  
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SOFT EDIT STATUS: PASSED EDIT      SAR: 522451      WESTERN WAHKIAKUM

DESCRIPTION	LATEST VIEW
535 ACCOUNT 6710 TOTAL	0
540 ACCOUNT 6710 BENEFITS	0
550 ACCOUNT 6720 TOTAL	917,250
555 ACCOUNT 6720 BENEFITS	182,743
565 SUM OF LINES 535 + 550	917,250
600 BEN. POR. OF ALL OP. EXP.	471,180
610 RENT POR. OF ALL OP. EXP	2,589
650 ACCOUNT 7200 OTHER TAXES	377,277
700 2410 (C S TOTAL CWF - AV)	5,951,636
710 2410 (C S CWF - CAT.1)	5,761,847
800 ACCOUNT 2680 TOTAL	0
805 ACCOUNT 2680 (2230)	0
810 ACCOUNT 2680 (CAT. 4.13)	0
815 ACC 2680 (2410) TOTAL CWF	0
820 ACC 2680 (2410)CWF-CAT1	0
830 ACCOUNT 6560 (2680)	0

COMMENTS:

APPLIES TO PERIOD: YEAR END 12/2006      REG: 5      PACIFIC  
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DESCRIPTION	PENDING VIEW	SOURCE
060 TOTAL LOOPS	1,241	EC
070 CAT. 1.3 LOOPS	1,233	EC
160 ACCOUNT 2001	11,174,317	EC
170 ACCOUNT 1220	83,098	EC
190 ACCOUNT 3100	6,938,785	EC
195 ACCOUNT 3400	0	EC
210 ACCOUNT 4340	718,756	EC
220 NET PLANT INVESTMENT	3,599,874	EC
230 ACCOUNT 2210	1,576,145	EC
235 ACCOUNT 2220	0	EC
240 ACCOUNT 2230	1,841,241	EC
245 TOTAL CENTRAL OFFICE	3,417,386	EC
250 CKT EQUIP CAT 4.13	1,216,095	EC
255 ACCOUNT 2410	6,283,508	EC
260 ACCOUNT 3100 (2210)	990,369	EC
265 ACCOUNT 3100 (2220)	0	EC
270 ACCOUNT 3100 (2230)	939,718	EC
275 ACCOUNT 3100 (2210-2230)	1,930,087	EC
280 ACCOUNT 3100 (2410)	3,983,300	EC
310 ACCOUNT 4340 (2210)	172,169	EC
315 ACCOUNT 4340 (2220)	0	EC
320 ACCOUNT 4340 (2230)	257,895	EC
325 NET NONCURRENT	430,064	EC
330 ACCOUNT 4340 (2410)	270,358	EC
335 ACCOUNT 6110 TOTAL	24,075	EC
340 ACCOUNT 6110 BENEFITS	0	EC
345 ACCOUNT 6110 RENTS	0	EC
350 ACCOUNT 6120 TOTAL	43,705	EC
355 ACCOUNT 6120 BENEFITS	5,205	EC
360 ACCOUNT 6120 RENTS	0	EC
365 ACCOUNT 6210 TOTAL	134,112	EC
370 ACCOUNT 6210 BENEFITS	29,635	EC
375 ACCOUNT 6210 RENTS	0	EC
380 ACCOUNT 6220 TOTAL	0	EC
385 ACCOUNT 6220 BENEFITS	0	EC
390 ACCOUNT 6220 RENTS	0	EC
395 ACCOUNT 6230 TOTAL	83,100	EC
400 ACCOUNT 6230 BENEFITS	16,911	EC
405 ACCOUNT 6230 RENTS	0	EC
410 ACCOUNT 6210-6230	217,212	EC
430 ACCOUNT 6410 TOTAL	158,162	EC
435 ACCOUNT 6410 BENEFITS	41,590	EC
440 ACCOUNT 6410 RENTS	460	EC
445 TOTAL PLANT SPECIFIC	443,154	EC
450 ACCOUNT 6530 TOTAL	512,374	EC
455 ACCOUNT 6530 BENEFITS	135,996	EC
510 ACCOUNT 6560 (2210)	148,220	EC
515 ACCOUNT 6560 (2220)	0	EC
520 ACCOUNT 6560 (2230)	214,960	EC
525 ACCOUNT 6560 (2210-2230)	363,180	EC
530 ACCOUNT 6560 (2410)	354,305	EC



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DESCRIPTION	PENDING VIEW	SOURCE
535 ACCOUNT 6710 TOTAL	0	EC
540 ACCOUNT 6710 BENEFITS	0	EC
550 ACCOUNT 6720 TOTAL	931,521	EC
555 ACCOUNT 6720 BENEFITS	185,149	EC
565 SUM OF LINES 535 + 550	931,521	EC
600 BEN. POR.OF ALL OP. EXP.	454,969	EC
610 RENT POR. OF ALL OP. EXP	460	EC
650 ACCOUNT 7200 OTHER TAXES	306,188	EC
700 2410 (C S TOTAL CWF - AV)	6,186,760	EC
710 2410 (C S CWF - CAT.1)	6,018,791	EC
800 ACCOUNT 2680 TOTAL	0	EC
805 ACCOUNT 2680 (2230)	0	EC
810 ACCOUNT 2680 (CAT. 4.13)	0	EC
815 ACC 2680 (2410) TOTAL CWF	0	EC
820 ACC 2680 (2410)CWF-CAT1	0	EC
830 ACCOUNT 6560 (2680)	0	EC

COMMENTS:

**CERTIFICATIONS PURSUANT TO  
WAC 480-123-060 AND WAC 480-123-070**

I, Steven M. Appelo, being of lawful age, state that I am Corporate Secretary of Western Wahkiakum County Telephone Company ("Company"), that I am authorized to execute these Certifications on behalf of the Company, and that the facts set forth in these Certifications are true to the best of my knowledge, information and belief. On this basis, I hereby certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and the Universal Service Administrative Company required by 47 C.F.R. § 54.314, as follows:

(1) That the Company 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;

(2) That during the 2006 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);

(3) That during the 2006 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and

(4) That during the 2006 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 30<sup>th</sup> day of July, 2007 at Olympia, Washington.

Company: Western Wahkiakum County Telephone Company

By: 

Its: Corporate Secretary