

Company filed a revised exhibit listing the actual Washington exchanges for which the company requests ETC designation.⁵

3 Boomerang states that designating the Company as an ETC is *per se* consistent with the public interest because the FCC has determined that designation of competitive ETCs increases customer choice. The Company also contends that adding Boomerang to the marketplace “will provide a valuable alternative” to consumers and significantly benefit low-income consumers in Washington by providing:

- 1) A larger local calling area and expanded coverage area (as compared to traditional wireline and single wireless carriers);
- 2) The convenience, portability, and security afforded by mobile telephone service;
- 3) The opportunity for customers to control cost by receiving a pre-set amount of flat-rate monthly airtime at no charge with the ability to purchase additional low-cost usage at flexible and affordable amounts in the event that included usage has been exhausted;
- 4) the ability of users to send and receive “SMS” or text messages as well as the option to send data and access the internet; and
- 5) 911 and, where available, enhanced 911 service in accordance with current FCC requirements.⁶

Boomerang also points out that granting its petition would serve the public interest by increasing competitive choice and by offering a range of Lifeline service plans to its customers.⁷

4 Boomerang proposes to resell wireless service from Verizon and Sprint to provide Lifeline services. Therefore, Boomerang’s petition also seeks an exemption from the following provisions of WAC 480-123-030(1):

- WAC 480-123-030(1)(d) requires high-cost program participants to file a substantive plan of the investments to be made with initial federal support for the first two years of their programs. Boomerang indicates that it does not seek ETC designation for the purpose of participating in the USF high-cost program, making the substantive investment plan inapplicable to its petition.⁸

⁵ Revised Exhibit A.

⁶ Petition or Amended Petition at 17-18, ¶¶ 37-40.

⁷ Petition at 18-27, ¶¶ 41-70; Amended Petition at 19-27, ¶¶ 41-67.

⁸ Petition at 16, ¶ 35; Amended Petition at 16, ¶ 34.

- WAC 480-123-030(1)(f) requires submission of cell site maps of geographic service areas. Boomerang states that it does not own, control, or plan to develop cell sites, but instead will rely on those owned and operated by Verizon and Sprint in Washington. Therefore, Boomerang requests a waiver of this requirement to provide coverage maps.⁹
- WAC 480-123-030(1)(g) requires ETCs to demonstrate the ability to remain functional in emergency situations. As noted above, Boomerang resells facilities owned by Verizon and Sprint and therefore relies on those carriers' facilities for backup battery power at each cell site, backup generators at each microwave hub, and backup battery and generators at each switch located in Washington. Again, Boomerang seeks a waiver of this filing requirement.¹⁰

5 Commission Staff (Staff) agrees with Boomerang that the Company meets all applicable regulatory requirements to be designated as an ETC. However, Staff presented, and the Company agreed to comply with, a list of conditions the Commission previously imposed on other similarly situated Lifeline ETCs seeking to operate in Washington. These include compliance filings, customer communications, customer eligibility audits with the Department of Social and Health Services, and quarterly reports to be filed with the Commission. A complete list of these conditions is set forth in Appendix A to this order.

6 Staff also agrees with and recommends granting Boomerang's request for exemptions from the filing requirements of WAC 480-123-030(1)(d), (f), and (g).

DISCUSSION

7 Common carriers receiving designation as ETCs under 47 U.S.C. § 214 are eligible to receive funds from the federal USF for Lifeline services. State utility commissions are responsible for designating common carriers as ETCs for the purpose of receiving such funds, and may impose conditions on a common carrier so designated.¹¹ The Commission will approve petitions from carriers requesting ETC designation if the petition meets the requirements of WAC 480-123-030, the designation will advance some

⁹ Petition at 16, ¶ 36; Amended Petition at 16, ¶ 35.

¹⁰ Amended Petition at 16-17, ¶ 35.

¹¹ *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d),(f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund*, Order 03 (June 24, 2010), UT-093012, ¶ 78.

or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.¹²

8 State commissions may designate more than one carrier as an ETC in an area if such designation is consistent with the public interest, convenience, and necessity and the carrier seeking ETC designation meets these two requirements of 47 U.S.C. § 214(e)(1):

(A) Offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) Advertise the availability of such services and the charges therefor using media of general distribution.

9 We agree with Staff that Boomerang is capable of providing services supported by federal universal service mechanisms, as defined in 47 C.F.R. § 54.101(a), by reselling wireless service from Verizon and Sprint, its underlying network carriers. If the FCC approves a carrier's compliance plan, the FCC does not apply the Act's "own facilities" requirement to carriers that seek limited ETC designation solely to participate in the Lifeline program. The compliance plan must demonstrate that the ETC applicant commits to fight waste, fraud, and abuse in the Lifeline program and will adhere to federal Lifeline rules. Here, Boomerang seeks ETC designation for the limited purpose of participating in the Lifeline program, and the FCC approved Boomerang's compliance plan on August 8, 2012.¹³ Further, Boomerang commits to advertise its Lifeline services.¹⁴

10 Staff is correct that certain additional conditions should be imposed on Boomerang as we have done when designating other similarly situated ETCs in Washington. Appendix A to this order provides the Company specific guidance on our expectations for regulatory compliance, customer service, consumer protection, and various reporting requirements that will ensure Staff can monitor Boomerang's operations for strict adherence to all ETC requirements.

¹² WAC 480-123-040.

¹³ *Wireline Competition Bureau Approved the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless and Tag Mobile*, FCC Public Notice, WC Docket Nos. 09-197 and 11-42, DA 12-1286 (rel. August 8, 2012).

¹⁴ Petition or Amended Petition at 20, ¶ 46.

11 We also agree that Boomerang has demonstrated that the requirements of WAC 480-123-030(1)(d) should not apply to the Company because the rule only applies to high-cost program participants and Boomerang is not a high-cost program participant. WAC 480-123-030(1)(f) and (g) also do not apply to Boomerang's proposed operations as an ETC because the Company will not use its own facilities to provide service; rather, Boomerang will rely on an underlying carrier's facilities and backup services. The Company's request for exemption from these portions of WAC 480-123-030 should be granted.

FINDINGS AND CONCLUSIONS

- 12 (1) The Commission has jurisdiction over the subject matter of this order and is authorized to designate Eligible Telecommunications Carriers in Washington under 47 U.S.C. § 214(e)(2), 47 C.F.R. §54.201(b)-(c), and WAC 480-123.
- 13 (2) Boomerang Wireless LLC is a telecommunications company seeking to do business in the state of Washington. Boomerang meets the requirements for designation as an ETC because the FCC has approved Boomerang's compliance plan and Boomerang has committed to advertise the availability of its services and the charges therefor using media of general distribution. Boomerang's designation as an ETC will advance the purpose of universal service because Boomerang will offer voice telephony services, which facilitate universal service. Boomerang has also demonstrated that its designation as an ETC is in the public interest.
- 14 (3) The Commission may grant an exemption from any of its rules if consistent with the public interest, the purposes underlying regulation, and applicable statutes. Boomerang has demonstrated that the requirements of WAC 480-123-030(1)(d), (f), and (g) should not apply to the Company and that granting the requested exemption is in the public interest and consistent with applicable laws and rules.
- 15 (4) This matter came before the Commission at its regularly scheduled meeting on December 12, 2013.

ORDER

THE COMMISSION ORDERS:

- 16 (1) Boomerang Wireless LLC d/b/a enTouch Wireless 's request for designation as an ETC is hereby GRANTED, subject to the conditions set out in Appendix A and limited to the list of Washington exchanges set forth in Appendix B to this order.
- 17 (2) Boomerang Wireless LLC d/b/a enTouch Wireless's request for exemption from WAC 480-123-030(1)(d), (f), and (g) is hereby GRANTED.
- 18 (3) The Commission retains jurisdiction over this matter for purposes of effectuating this order.

DATED at Olympia, Washington, and effective December 12, 2013.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

JEFFREY D. GOLTZ, Commissioner

APPENDIX A

Washington State Conditions on Designation of Boomerang Wireless LLC as an Eligible Telecommunications Carrier

1. Within 30 days of approval of its ETC designation in Washington and prior to offering Lifeline services, Boomerang must make a compliance filing for approval by the commission containing the following:
 - a. Boomerang's Lifeline rate plans, terms and conditions. The rates, terms and conditions shall include all provisions that apply to the Lifeline services offered by Boomerang in Washington State and detailed procedures explaining how customers can participate in a particular Lifeline plan.
 - b. Boomerang's proposed language to be used in all advertising of Lifeline services and on its websites. The language shall include information directing customers to the Washington State Office of the Attorney General for complaints regarding any Lifeline service issues.
 - c. Boomerang's Lifeline Customer Application Form.

Commission staff shall review Boomerang's compliance filing and recommend to the commission whether it should be approved or rejected within ten business days. Boomerang shall not offer Lifeline services until the commission has approved its compliance filing.

2. Boomerang shall file with the commission any future changes to its rates, terms, or conditions at least one day prior to the effective date of the change.
3. The information on Boomerang's rates, key terms and conditions (e.g., return policy, usage definition, refill methods, annual certification requirement, and customer service contact) shall be provided in a package sent or given to Lifeline customers after enrollment in Boomerang's Lifeline program, as well as at Boomerang's official Lifeline website.
4. Boomerang shall provide Lifeline customers with the choice of all other rate plans available to its regular customers.
5. For the rate plan free of charge to customers, Boomerang must offer at least one plan with a minimum of 250 minutes per month. The company may invoke Condition No. 2 only for the purpose of increasing the number of minutes or enhancing the features in the Lifeline plan, but not decreasing the number of minutes.

6. Boomerang shall deactivate a Lifeline account if the customer has no usage for 60 consecutive days pursuant to 47 C.F.R. § 54.407(c)(2). No fewer than eight business days before deactivation, Boomerang shall send the customer a written notice by mail about the potential deactivation and ways to avoid unwanted deactivation. The customer shall have a 30 day grace period from the deactivation date to reactivate the Lifeline account by incurring “usage.” When a customer reactivates the account, Boomerang must deposit the minutes the customer is entitled to for the grace period.
7. On a quarterly basis beginning with the quarter ending on March 31, 2014, Boomerang shall provide the number of Lifeline customers that it enrolls each month. Boomerang shall also report the number of deactivated Lifeline customers each month by service plan and the reasons for deactivation (e.g., no usage for 60 consecutive days, annual verification unsuccessful, or voluntary exit). Quarterly reports shall be filed with the commission no later than 30 days after the end of each quarter.
8. Boomerang shall respond within 30 days to commission staff’s information requests on Boomerang’s Lifeline operations, including but not limited to Lifeline customers’ usage patterns and Lifeline customer records.
9. Boomerang shall cooperate with the commission and the Department of Social and Health Services (DSHS) to work out a procedure to verify Boomerang Lifeline customers’ eligibility. Boomerang shall obtain access to DSHS’s online query database to verify the eligibility of Lifeline applicants who qualify based on their participation in Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income and Temporary Assistance for Needy Families. This condition shall be required until the national Lifeline eligibility database is fully functional.
10. Boomerang must not deduct airtime minutes for calls to customer care made from the customer’s handset by dialing 611. Boomerang shall explicitly state the policy of free 611 calls in its Lifeline service agreements. Boomerang may require the customer to call the toll-free customer care number from another phone if necessary to resolve technical issues related to the handset or its programming.
11. Boomerang shall have DSHS audit its Washington Lifeline customers’ eligibility at least once a year. Beginning in 2015, by January 31 of each year, Boomerang shall provide DSHS with its complete Washington Lifeline customer records of the prior calendar year. The records must have all the necessary information and be in an electronic format required by DSHS. After DSHS notifies Boomerang of the results of the review, Boomerang must take appropriate measures to either correct the customer records or stop providing services to ineligible customers and report the resolutions to the commission and DSHS within 60 days of the DSHS notice. This

condition shall be required until the national accountability database for duplicate Lifeline claims and the national Lifeline eligibility database are fully functional.

12. Boomerang shall provide the commission a copy of its annual Lifeline Re-certification results within 30 days it files with the Universal Service Administration Company each year.
13. Boomerang shall file with the commission, by March 31 of each year, a report on the number of complaints, categorized by the different nature of complaints that it received from Washington Lifeline customers during the prior calendar year (e.g., billing disputes and service quality complaints). This report shall include complaints filed with Boomerang, the commission's Consumer Protection and Communications Section, the Washington State Office of the Attorney General, and the Federal Communications Commission (FCC). This report shall not include calls from customers to Boomerang with regard to general inquiries such as account balance, additional purchases, service availability or technical support. The commission reserves the rights to revoke Boomerang's ETC designation if Boomerang fails to provide reasonable quality of service.
14. Boomerang shall cooperate with the Washington State Enhanced 911 Program (E911) and all Public Safety Answering Points on E911 issues and shall, upon request, designate a representative to serve as a member or alternate member of the Washington State E911 Advisory Committee or its Communications Sub-committee.
15. Boomerang shall comply with rules on cessation of business as specified in WAC 480-120-083.
 - a. Prior to cessation of business, Boomerang shall make arrangements with its underlying carriers to provide minutes already sold to customers under the same terms and conditions it has with the customers, or provide refunds to the existing customers.
 - b. Boomerang shall provide written notice to the following persons at least 30 days in advance of cessation of service:
 - i. The commission;
 - ii. The state 911 program;
 - iii. Each of its customers;
 - iv. The national number administrator.
 - c. The notice to the commission and the state 911 program must include the same information required by WAC 480-120-083(3).

- d. The notice to the customers must include the same information required by WAC 480-120-083(4).
 - e. The notice to the national number administrator must include the same information required by WAC 480-120-083(7).
 - f. Boomerang shall file with the commission at least 30 days in advance of its cessation of business and request the relinquishment of its ETC designation in Washington.
16. Boomerang shall collect and maintain necessary records and documentation to ensure its compliance with the applicable FCC and commission requirements, including existing requirements and any future modifications. The records and documentation shall be provided to commission staff upon request.
17. Boomerang shall cooperate with commission staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
18. Boomerang shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.

APPENDIX B

Boomerang Wireless LLC d/b/a enTouch Wireless Areas for Eligible Telecommunications Carrier Designation

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|---|-----------------|
| ASOTIN TELEPHONE CO. | |
| | ANATONE |
| | ASOTIN |
| CENTURYTEL OF COWICHE, INC. | |
| | COWICHE |
| | RIMROCK |
| | TIETON |
| CENTURYTEL OF INTER-ISLAND, INC. | |
| | BLAKELY ISLAND |
| | EAST SOUND |
| | FRIDAY HARBOR |
| | LOPEZ |
| CENTURYTEL OF WASHINGTON, INC. | |
| | ALMIRA |
| | AMES LAKE |
| | ARLETTA |
| | ASHFORD |
| | BASIN CITY |
| | CARNATION |
| | CATHLAMET |
| | CHENEY |
| | CHEWELAH |
| | CHINOOK |
| | CONNELL |
| | COULEE CITY |
| | CRESTON |
| | CURTIS |
| | DAVENPORT |
| | EDWALL-TYLER |
| | ELMA |
| | ELTOPIA |
| | EUREKA |
| | FALL CITY |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | FORKS |
| | FOX ISLAND |
| | GIG HARBOR |
| | HARRINGTON |
| | HUMPTULIPS |
| | HUNTERS |
| | KAHLOTUS |
| | KETTLE FALLS |
| | KINGSTON |
| | LAKEBAY |
| | LAKE QUINAULT |
| | LIND |
| | LONG BEACH |
| | MATHEWS CORNER |
| | MCCLEARY |
| | MEDICAL LAKE |
| | MESA |
| | MONTESANO |
| | MORTON |
| | NEAH BAY |
| | NESPELEM |
| | NORTH BEND |
| | OCEAN PARK |
| | OCOSTA |
| | ODESSA |
| | ORTING |
| | OTHELLO |
| | PACIFIC BEACH |
| | PACKWOOD |
| | PUGET ISLAND |
| | RANDLE |
| | REARDAN |
| | RITZVILLE-BENGE |
| | SNOQUALMIE PASS |
| | SOUTH BEND |
| | SOUTH PRAIRIE |
| | SPANGLE |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | SPRAGUE |
| | STARBUCK |
| | TWISP |
| | VADER |
| | VASHON |
| | WASHTUCNA |
| | WILBUR |
| | WILSON CREEK |
| | WINTHROP |
| | YACOLT |
| ELLENSBURG TELEPHONE CO. | |
| | ELLENSBURG |
| | KITTAS |
| | SELAH |
| | THORP |
| | VANTAGE |
| FRONTIER COMMUNICATIONS NORTHWEST INC. | |
| | ACME-DEMING-WHATCOMCTY |
| | ALGER |
| | ANACORTES |
| | ARLINGTON |
| | BENTON CITY |
| | BIG LAKE |
| | BLAINE-BIRCH BAY-GTLD |
| | BOTHELL |
| | BURLINGTON |
| | BREWSTER |
| | BRIDGEPORT |
| | CAMAS-WASHOUGAL |
| | CASHMERE |
| | CHELAN |
| | CONCRETE |
| | CONWAY |
| | CUSTER-GTLD |
| | DEMING-WHATCOMCTY |
| | EDISON |
| | ENTIAT |
| | EVERETT |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | EVERSON-GTLD |
| | FAIRFIELD |
| | FARMINGTON |
| | FERNDALE-GTLD |
| | GARFIELD |
| | GEORGE |
| | GRANITE FALLS |
| | GRAYLAND |
| | HALLS LAKE |
| | KENNEWICK |
| | KIRKLAND |
| | LA CONNER |
| | LATAH |
| | LAUREL-WHATCOMCTY |
| | LEAVENWORTH |
| | LOOMIS |
| | LYMAN-HAMILTON |
| | LYNDEN |
| | MANSFIELD |
| | MAPLE FALLS |
| | MARBLEMOUNT |
| | MARYSVILLE |
| | MONROE |
| | MOLSON |
| | MOUNT VERNON |
| | NACHES |
| | NEWPORT |
| | NILE |
| | OAK HARBOR |
| | OAKESDALE |
| | PALOUSE |
| | PULLMAN |
| | QUINCY |
| | REPUBLIC |
| | RICHLAND |
| | RICHMOND BEACH |
| | ROCKFORD |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | ROSALIA |
| | SEDRO WOOLLEY |
| | SEDRO WOOLLEY-CONTEL |
| | SILVER LAKE |
| | SKYKOMISH |
| | SNOHOMISH |
| | SOAP LAKE |
| | STEVENS PASS |
| | SULTAN |
| | SUMAS-GTLD |
| | TEKOA |
| | TONASKET |
| | WATERVILLE |
| | WENATCHEE |
| | WESTPORT |
| | WOODLAND |
| HAT ISLAND TELEPHONE CO. | |
| | HAT ISLAND |
| HOOD CANAL TELEPHONE CO. | |
| | UNION |
| INLAND TELEPHONE CO. | |
| | DEWATO |
| | PRESCOTT |
| | ROSLYN |
| | UNION TOWN |
| KALAMA TELEPHONE CO. | |
| | KALAMA |
| LEWIS RIVER TELEPHONE CO., INC. | |
| | AMBOY |
| | COUGAR |
| | LA CENTER |
| | YALE |
| MASHELL TELECOM, INC. | |
| | EATONVILLE |
| MCDANIEL TELEPHONE CO. | |
| | MOSSYROCK |
| | SALKUM |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| PEND OREILLE TELEPHONE CO. | |
| | CUSICK |
| | IONE |
| | METALINE FALLS |
| PIONEER TELEPHONE CO. | |
| | ENDICOTT |
| | LACROSSE |
| QWEST CORPORATION | |
| | ABERDEEN-HOQUIAM |
| | AUBURN |
| | BAINBRIDGE ISLAND |
| | BATTLE GROUND |
| | BELFAIR |
| | BELLEVUE |
| | BELLINGHAM-GTLD |
| | BLACK DIAMOND |
| | BREMERTON |
| | BUCKLEY |
| | CASTLE ROCK |
| | CENTRALIA |
| | CHEHALIS |
| | CLARKSTON |
| | CLE ELUM |
| | COLFAX |
| | COLVILLE |
| | COPALIS |
| | COULEE DAM |
| | CRYSTAL MT. |
| | DAYTON |
| | DEER PARK |
| | DES MOINES |
| | EASTON |
| | ELK |
| | ENUMCLAW |
| | EPHRATA |
| | GRAHAM |
| | GREEN BLUFF |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | HOODSPORT |
| | ISSAQUAH |
| | KENT |
| | LIBERTY LAKE |
| | LONGVIEW-KELSO |
| | LOON LAKE |
| | MAPLE VALLEY |
| | MOSES LAKE |
| | NEWMAN LAKE |
| | NORTHPOINT |
| | OLYMPIA |
| | OMAK |
| | OROVILLE |
| | OTHELLO |
| | PASCO |
| | PATEROS |
| | POMEROY |
| | PORT ANGELES |
| | PORT LUDLOW |
| | PORT ORCHARD |
| | PORT TOWNSEND |
| | PUYALLUP |
| | RENTON |
| | RIDGEFIELD |
| | ROCHESTER |
| | ROY |
| | SEATTLE |
| | SEQUIM |
| | SHELTON |
| | SILVERDALE |
| | SPOKANE |
| | SPRINGDALE |
| | SUMNER |
| | TACOMA |
| | TACOMA WAVERLY |
| | TOUCHET |
| | VANCOUVER |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | WAITSBURG |
| | WALLAWALLA |
| | WARDEN |
| | WINLOCK |
| | YAKIMA |
| SKYLINE TELECOM COMPANY | |
| | MT. HULL |
| ST. JOHN TELEPHONE CO. | |
| | ST JOHN |
| TENINO TELEPHONE CO. | |
| | BUCODA |
| | TENINO |
| | |
| TOLEDO TELEPHONE CO., INC. | |
| | TOLEDO |
| | |
| UNITED TELEPHONE - NORTHWEST | CHIMACUM-CENTER |
| | COLUMBIA |
| | DALLESFORT |
| | GLENWOOD |
| | GOLDENDALE |
| | GRANDVIEW |
| | GRANGER |
| | HARRAH |
| | HOOD CANAL |
| | KLICHTITAT |
| | LYLE |
| | MABTON-BICKLETON |
| | MATTAWA |
| | PATERSON |
| | PORT ANGELES-GARDINER |
| | POULSBO |
| | PROSSER |
| | ROOSEVELT |
| | STEVENSON |
| | SUNNYSIDE |
| | TOPPENISH-ZILLAH |

| <u>INCUMBENT LOCAL EXCHANGE CARRIER</u> | <u>EXCHANGE</u> |
|--|------------------------|
| | TROUT LAKE |
| | WAPATO |
| | WHITE SALMON |
| | WHITE SWAN |
| | WHITSTRAN |
| | WILLARD |
| WESTERN WAHKIAKUM COUNTY TELEPHONE CO. | |
| | GRAYS RIVER |
| | NASELLE |
| WESTGATE COMMUNICATIONS | |
| | STEHEKIN |
| WHIDBEY TELEPHONE CO. | |
| | POINT ROBERTS |
| | SOUTH WHIDBEY |
| YCOM NETWORKS, INC. | |
| | RAINER |
| | YELM |