

1  
2  
3  
4  
5  
6  
7 **BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

9  
10 PETITION OF WHIDBEY TELEPHONE  
11 COMPANY TO RECEIVE SUPPORT  
12 FROM THE UNIVERSAL SERVICE  
13 COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

14 COMES NOW Whidbey Telephone Company (the "Company") and, pursuant to Chapter  
15 480-123 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC  
16 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the  
17 "Commission") to receive support from the Universal Service Communications Program (the  
18 "Program") for the Program year 2022.

19  
20 **I. Demonstration of Eligibility under WAC 480-123-100**

- 21 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC  
22 480-120-021 that serves fewer than forty thousand access lines within the state.  
23 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined  
24 in 47 U.S.C. Sec. 251(h) or has been designated as an incumbent local exchange carrier by  
25  
26

PETITION OF WHIDBEY TELEPHONE  
COMPANY TO RECEIVE SUPPORT FROM  
THE UNIVERSAL SERVICE  
COMMUNICATIONS PROGRAM - 1

1 the Federal Communications Commission.

- 2 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange  
3 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 4 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-  
5 123-110, to provide, maintain or enhance broadband service (See II.4, below).
- 6 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an  
7 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal  
8 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for  
9 High Cost Areas with respect to the service areas for which the Company is seeking  
10 Program support.

11

12 **II. Demonstration of Eligibility under WAC 480-123-110**

- 13 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications  
14 services and is seeking Program support is as follows: Whidbey Telephone Company
- 15 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between  
16 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. <sup>1</sup>  
17 A detailed description of any transactions between the Company and the affiliates named in

18

19

20 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2. <sup>2</sup>

21

---

22

23 <sup>1</sup> Pursuant to agreement with Commission Staff, Exhibit 1 is limited to those affiliates having transactions  
with the Company that are to be identified in Exhibit 2.

24 <sup>2</sup> Exhibit 2 also includes transactions between the Company and Affiliates. Pursuant to agreement with the  
25 Commission Staff, Exhibit 2 is limited to transactions other than employment compensation and benefits  
pursuant to employ benefit plans.

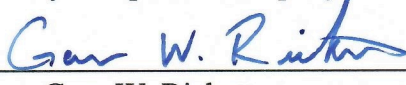
- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet Nos.  
2 300 and 301 in Schedule 42 of the Company's Tariff WN U-5.
- 3 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance  
4 broadband services in its service area is attached hereto as Exhibit 3.
- 5 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the  
6 Company complies with state and federal accounting, cost allocation, and cost adjustment  
7 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 8 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by  
9 the Company as of December 31, 2020, was 934. The number of residential local exchange  
10 access lines served by the Company as of December 31, 2019, was 961. The number of  
11 business local exchange access lines served by the Company as of December 31, 2020, was  
12 385. The number of business local exchange access lines served by the Company as of  
13 December 31, 2019, was 436. The number of broadband connections served by the  
14 Company as of December 31, 2020, was 8414. The number of broadband connections  
15 served by the Company as of December 31, 2019, was 7848. Of the approximately 15,160  
16 serviceable locations the Company has, roughly 12,580 are capable of broadband speeds of  
17 25 Mbps downstream /3 Mbps upstream, or better. The unbundled monthly recurring rate  
18 charged by the Company for residential local exchange access service on December 31,  
19 2020, was 18.00. The unbundled monthly recurring rate charged by the Company for  
20 residential local exchange access service on December 31, 2019, was 18.00. The unbundled  
21 monthly rate charged by the Company for single line business local exchange access service  
22 on December 31, 2020, was 18.00. The unbundled monthly rate charged by the Company  
23 for single line business local exchange access service on December 31, 2020, was 18.00.

1 The unbundled monthly rate charged for broadband service as of December 31, 2020, and as  
2 of December 31, 2019, is set out in the attached Exhibit 5.

- 3 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.  
4 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the  
5 Company is in compliance with the Federal Communications Commission's obligation for  
6 deployment of broadband at speeds specified by the Federal Communications Commission  
7 applicable to the Company and that the Company meets one of the eligibility criteria set out  
8 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.  
9 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.

10  
11  
12 Respectfully submitted this 15th day of September, 2021.

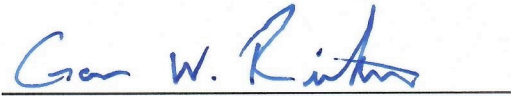
13 Whidbey Telephone Company

14 By   
15 Gary W. Ricketts  
16 Secretary & Treasurer

17  
18  
19  
20  
21 CERTIFICATION

22 I Gary W. Ricketts, an officer of the Company that is responsible for the Company's  
23 business and financial operations, hereby certify under penalty of perjury that the information and  
24 representations set forth in the Petition, above, are accurate and the Company has not knowingly  
25

1 withheld any information required to be provided to the Commission pursuant to the rules  
2 governing the Program.

3  
4  
5 

6 Gary W. Ricketts

7 Secretary & Treasurer  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**EXHIBIT 3**

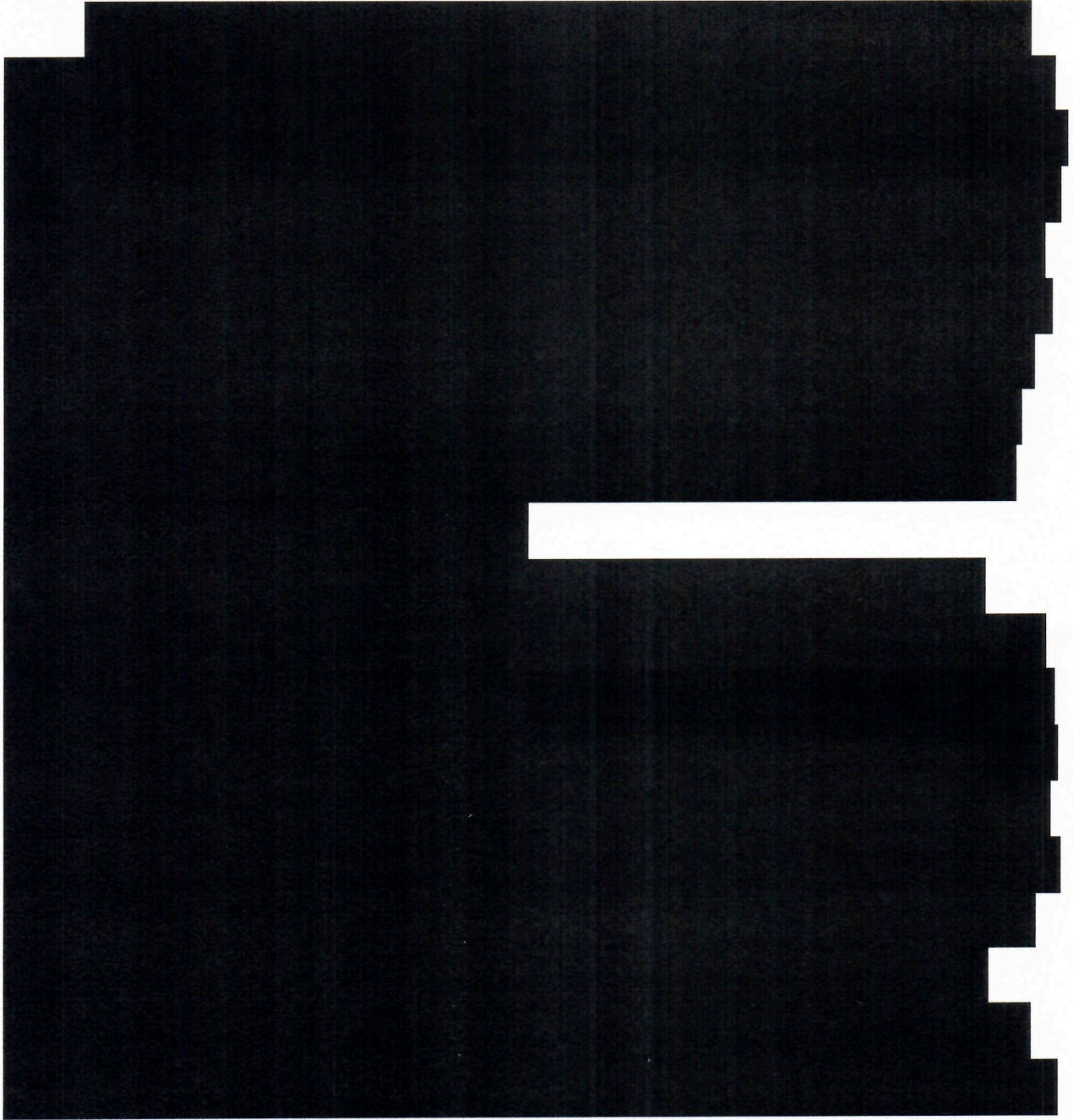
EXHIBIT 3  
BROADBAND PLAN

This Broadband Plan, as contemplated by RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d), is being adopted by **Whidbey Telephone Company** (“Company”) with the expectation that it will be submitted to the Washington Utilities and Transportation Commission (“Commission”) as one component of a petition by the Company for support from the state Universal Communications Services Program established by RCW 80.36.650 (“Program”). Pursuant to RCW 80.36.650(3), a recipient of support from the Program is to have adopted a plan to provide, enhance, or maintain broadband services in its service area. As set out in WAC 480-123-110(1)(d), the broadband plan is to include specific elements, but only to the extent applicable to that particular broadband plan. The broadband plan does not have to include all elements, but potential elements include the following: (1) a multi-year investment plan; (2) specific project(s) that are projected to provide or enhance broadband services at speeds required by the Commission or the Federal Communications Commission; (3) a plan for maintenance of broadband services in the provider’s service area; (4) a description of how the provider will enhance broadband services in its service area; and (5) any other information that the Commission may request to assist in the Commission's review and analysis of the provider's broadband plan. Where there are specific projects, the project information is to include an estimated timeline, geographic location, number of locations passed, and upload and download speeds that are projected to be produced by the project.

The Company has already constructed facilities sufficient for it to satisfy criterion three of WAC 480-123-110 and, as a result, has placed into service robust broadband infrastructure throughout all populated portions of its service area. Consequently, the Company intends to apply

for Program support to allow it to continue to provide telecommunications services and broadband services at or above the levels that it is providing today. Accordingly, the Company's broadband plan includes the following elements:

**Broadband Plan:**







In addition to the foregoing, the Company's broadband plan includes continued investment by the Company in the maintenance and enhancement of its telecommunications and broadband network.

The Company anticipates that, if its application for support from the Program during the coming Program year is granted, its expenditures during that period in providing, enhancing and maintaining broadband services in its service area, including payments in support of the above-mentioned RUS financing, will exceed the funding that it expects to receive from the Program for that period. This expectation reflects the Company's belief that it will continue to be guided by its goal of providing robust broadband capability wherever such capability is needed within the Company's service area.

The foregoing Broadband Plan was adopted by Whidbey Telephone Company on July 31, 2020.