AFFIDAVIT CONTAINING CERTIFICATIONS PURSUANT TO WAC 480-123-060 AND WAC 480-123-070

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Cellular LLC (f/k/a Washington RSA No. 8 Limited Partnership)(SAC 529003)("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit 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 Universal Service Administrative Company required by 47 C.F.R. §§ 54.307, 54.313 and/or 54.314, as follows:

- (1) That all federal high-cost support provided to the Company within the State of Washington has been used in the preceding calendar year and will be used in in a manner consistent with section 254(e) the coming calendar year; that is for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2013 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2013 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g) and in 47 C.F.R. §54.201(a)(2), as such standard relates to functionality of wireless carriers in emergency situations; and
- (4) That during the 2013 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^{th} day of July, 2014, at Roslyn, Washington.

Company: Inland Cellular LLC

James K. Brooks

Its: Treasurer/Controller

ANNUAL SECTION 64.2009(e) CERTIFICATION EB Docket No. 06-36

Annual § 64.2009(e) CPNI Certification for 2013

Dated: February 12, 2014

Company: Inland Cellular LLC (d/b/a Inland Cellular)

Form 499 Filer ID Number: 829984 Name of Signatory: James K. Brooks Title of Signatory: Treasurer/Controller

I, James K. Brooks, certify that I am a duly authorized officer of Inland Cellular LLC ("Inland Cellular" hereafter) and, acting as an agent of Inland Cellular, that I have personal knowledge that Inland Cellular has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission"), codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

Accompanying this certification is a statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules.

Inland Cellular has not taken any actions (proceedings instituted or petitions filed by Inland Cellular at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. During the calendar year ended December 31, 2013, Inland Cellular did not acquire first-hand any information that it has identified as being information with respect to the processes pretexters are using to attempt to access CPNI.

Inland Cellular has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

James K. Brooks
Treasurer/Controller
Inland Cellular LLC

STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. PART 64 SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) MARCH 1, 2014

The following statement explains how the operating procedures of Inland Cellular LLC, Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (collectively "Inland Cellular" or "Company") ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U (§§ 64.2001-64.2011) and is relevant to calendar year 2013. Except as otherwise indicated, the following applies with respect to the Commission's rules in effect both before and after the December 8, 2007 effective date of the Commission's April 2, 2007 Report and Order in CC Docket No. 96-115. See FCC 07-22 (rel. Apr. 2, 2007); Public Notice, DA 07-4915 (rel. Dec. 6, 2007). This statement covers calendar year 2013.

I. Use of customer proprietary network information without customer approval.

A. Inland Cellular may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Inland Cellular, without customer approval.

Inland Cellular presently offers CMRS to its customers.

- **B.** Inland Cellular may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the subscriber does not already subscribe from Inland Cellular, unless Inland Cellular has customer approval to do so, except as described in Section I.C.
 - (1) Inland Cellular may use, disclose or permit access to CPNI derived from their provision of wireless service, without customer approval, for the provision of CPE and information services.
 - (2) Inland Cellular may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.
- C. Inland Cellular may use, disclose, or permit access to CPNI, without customer approval, as follows:
 - (1) Inland Cellular may use, disclose, or permit access to CPNI, in its provision of installation, maintenance, and repair services.
 - (2) Inland Cellular may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of commercial mobile radio services ("CMRS").

- (3) Inland Cellular may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.
- **D.** Inland Cellular may use, disclose, or permit access to CPNI to protect Inland Cellular's rights or property; to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Inland Cellular's services; and to render, provision, bill or collect for services.

Inland Cellular's operating procedures comply with these requirements and include, but are not limited to, the provisions described below. The Company does not engage in any outbound telemarketing. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Under Company policy, none of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

Moreover, the Company does not use any CPNI for any inbound marketing of services that are not within a category of service (i.e., local, interexchange, and CMRS) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted without prior customer approval with respect to the Company's affiliates. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, and pursuant to reciprocal roaming agreements, the Company does not provide CPNI to any third-party for any purpose.

The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI without customer approval as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Section 222(c) and (d) of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission.

Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than: pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or in accordance with the authentication and other requirement described below and in the FCC's rules, as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as Social Security Number, driver's license number, mother's maiden name, user name or password, as appropriate) or documentation, or otherwise being recognized by the Company as being the subscriber or the subscriber's duly authorized agent.

II. Approval required for use of customer proprietary network information.

- A. Inland Cellular may obtain customer approval through written, oral or electronic methods.
 - (1) Inland Cellular does not seek or obtain oral approval, and therefore does not bear the burden of demonstrating that such approval has been given in compliance with the FCC's rules.
 - (2) A customer's approval or disapproval obtained by Inland Cellular to use, disclose, or permit access to the customer's CPNI, the use of CPNI outside of the customer's total service relationship with Inland Cellular must remain in effect until the customer revokes or limits such approval or disapproval.
 - (3) Inland Cellular must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes.

- (1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), Inland Cellular only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules and, by December 8, 2007, with the Commission's amended rules.
- (2) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, Inland Cellular may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should this Company policy change, however, the foregoing policies will be applicable and policies will be implemented to ensure that the FCC's rules are complied with.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

(1) Prior to any solicitation for customer approval, Inland Cellular must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

- (2) Inland Cellular must maintain records of notification, whether oral, written or electronic, for at least one year.
- **B.** Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit Inland Cellular to use, disclose, or permit access to, the customer's CPNI.

- (1) The notification must state that the customer has a right, and Inland Cellular has a duty, under federal law, to protect the confidentiality of CPNI.
- (2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.
- (3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, Inland Cellular may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.
 - (4) The notification must be comprehensible and must not be misleading.
- (5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.
- (6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.
- (7) Inland Cellular may state in the notification that the customer's approval to use CPNI may enhance Inland Cellular's ability to offer products and services tailored to the customer's needs. Inland Cellular also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.
- (8) Inland Cellular may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.
- (9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from Inland Cellular is valid until the customer affirmatively revokes or limits such approval or denial.

(10) Inland Cellular's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

Inland Cellular must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The contents of any such notification must comply with the requirements of paragraph C of this section.

- (1) Inland Cellular must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Inland Cellular may, in its discretion, provide for a longer period. Inland Cellular must notify customers as to the applicable waiting period for a response before approval is assumed.
 - (i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and
 - (ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.
- (2) Insofar as Inland Cellular is using the opt-out mechanism, it must provide a Notice to its customers every two years.
- (3) If Inland Cellular uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:
 - (i) Inland Cellular must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;
 - (ii) Inland Cellular must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;
 - (iii) Opt-out e-mail notices that are returned to Inland Cellular as undeliverable must be sent to the customer in another form before Inland Cellular may consider the customer to have received notice;
 - (iv) Inland Cellular must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and
 - (v) Inland Cellular must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Inland Cellular may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

Inland Cellular may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

F. Notice Requirements Specific to One-Time Use of CPNI.

- (1) Inland Cellular may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether Inland Cellular uses opt-out or opt-in approval based on the nature of the contact.
- (2) The contents of any such notification must comply with the requirements of paragraph C of this section, except that Inland Cellular may omit any of the following notice provisions if not relevant to the limited use for which Inland Cellular seeks CPNI:
 - (i) Inland Cellular need not advise customers that if they have optedout previously, no action is needed to maintain the opt-out election;
 - (ii) Inland Cellular need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;
 - (iii) Inland Cellular need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Inland Cellular explains to customers that the scope of the approval Inland Cellular seeks is limited to one-time use; and
 - (iv) Inland Cellular may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Inland Cellular clearly communicates that the customer can deny access to his CPNI for the call.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should this Company policy change, however, the foregoing policies will be applicable and Inland Cellular will implement policies to ensure that the FCC's rules are complied with.

IV. Safeguards required for use and disclosure of customer proprietary network information.

- A. Inland Cellular must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- B. Effective December 8, 2007, Inland Cellular may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are

complied with and (1) the customer provides Inland Cellular with a pre-established password, (2) Inland Cellular, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty (30) days, or (3) when Inland Cellular calls the telephone number of record to disclose the call detail information. Inland Cellular is permitted to create a back-up customer authentication method for lost or forgotten passwords. Inland Cellular is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from Inland Cellular personnel all of the call detail information necessary to address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then Inland Cellular personnel are permitted to proceed with its routine customer care procedures with respect to such call detail information.

- C. Not later than June 8, 2008, Inland Cellular must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account through a password.
- **D.** Effective December 8, 2007, Inland Cellular is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.
- **E.** Business customers are exempt from the password requirements which became effective December 8, 2007, if: the customer is contractually bound to Inland Cellular, is serviced by a dedicated Inland Cellular account representative as the primary contact, and within the contract Inland Cellular is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.
- F. Inland Cellular trains its personnel as to when they are and are not authorized to use CPNI, and Inland Cellular must has an express disciplinary process in place.
- G. Inland Cellular must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Inland Cellular shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Inland Cellular shall retain the record for a minimum of one year.
- H. Inland Cellular must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its

compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

- I. Effective December 8, 2007, Inland Cellular must take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. Inland Cellular must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit. Inland Cellular must take measures to protect CPNI stored in its internal databases from potential unauthorized access, and evaluate and increase its security measures should it discover an increase in attempts to gain access to unauthorized information.
- J. Inland Cellular must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
 - (1) The notice shall be in the form of a letter, and shall include Inland Cellular's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
 - (2) Such notice must be submitted even if Inland Cellular offers other methods by which consumers may opt-out.
- K. Effective December 8, 2007, Inland Cellular has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.
 - (1) Inland Cellular must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.
 - (2) Inland Cellular is prohibited from notifying customers or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) Inland Cellular identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. Inland Cellular must notify the affected customer(s) after the applicable period.
 - (3) Inland Cellular must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

Inland Cellular's operating procedures comply with all of the above requirements, including those that became effective December 8, 2007. With respect to online authentication

in particular, Inland Cellular has implemented measures to ensure compliance by the applicable June 8, 2008 deadline. Company personnel are trained as to when they are and are not authorized to use CPNI.

V. Supplemental Information

Effective December 8, 2007, the FCC's rules require that the annual certification filed pursuant to 47 C.F.R. § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. Inland Cellular is not aware of any consumer complaints regarding the unauthorized release of CPNI and has not taken action against any data brokers.

Ability to Remain Functional in Emergencies Certification §54.313(a)(6)

ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Cellular LLC (f/k/a Washington RSA No. 8 Limited Partnership)(SAC 529003) ("Company"), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies to the Idaho Public Utilities Commission, pursuant to 47 C.F.R. § 64.2009(e), that the Company's operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009 and the Cellular Communications and Internet Association's Consumer Protection Code for Wireless Service.

The Company is able to remain functional in emergencies as set forth in WAC 480-123-030(1)(g) and in 47 C.F.R. §54.201(a)(2), as such standards relate to functionality of wireless carriers in emergency situations. The Company further certifies that it maintains back-up power to ensure functionality without an external power source in the forms of auxiliary generators and batteries in its central office and auxiliary generators and/or batteries at its cellular tower locations. The Company also certifies that it constantly monitors traffic on its tower locations and that it's switching capability is more than adequate to manage the traffic of its subscribers.

The Company further certifies, depending upon the circumstances of the outage, that it is able to re-route traffic around damaged facilities. All Inland Cellular subscribers are defaulted to roam on competitors should an Inland Cellular signal cannot be obtained.

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

Dated this 30th day of June, 2014 at Roslyn, Washington.

James K. Brooks

Treasurer/Controller Inland Cellular LLC

INLAND CELLULAR LLC		
WASHINGTON RSA NO. 8 MARKET - 529003		
FIVE YEAR FORECAST - NETWORK ADDITIONS		

As they are known to the Company at the date of this Report, the planned investments and forecasted expenses related to the Washington RSA No. 8 Market (Study Area Code 529003) for the period January 1, 2014 through December 31, 2018, are listed below. Although there are plans to upgrade the data to the next generation, those upgrades are not listed at this time since CETC's whose support is being phased-down are not required to submit a new five-year build-out plan. The Company has listed what is known for the provisioning of voice services. The Company expects to use all Universal Service Fund support received in order to fund the expenses related to the provisioning, maintenance and services provided over these upgraded facilities as well as existing facilities and to service the debt created in order to make these improvements; improving service quality, coverage and capacity. The Company (SAC 529003) received \$2,041,165 in federal high-cost support for the calender year ended December 31, 2013. The Company expects that the continued receipt of Universal Service Fund support will aid the Company's efforts to continue to upgrade its network and to provide the supported services to all customers and potential customers.

SITE	DISCRIPTION	<u>2013</u>	2014	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Thorn	Microwave addition	19,858					
WW Airport	Microwave addition	11,545					
WW Smokestack	Microwave addition	17,511					
WW Sager	Microwave addition	11,617					2000
Stout	Microwave addition	30,638			j		
Uniontown	Switch Additions (ap)	7,959					
Wilma	EVDO addition	9,906					: (CC - \$0
Uniontown	Switch Additions (ap)	443,842					
Beacon Hill	EVDO addition	21,167					
Brojte	New Site		150,000				
WW South	New Site		150,000				
	TOTAL	574,043	300.000	0	0	0	(
RECASTED OPERATION							507.046
Direct Telecommun		567,988	551,228	555,362	562,294	565,798	567,212
	nd Maintenance Expense	1,071,106	1,124,662	1,615,155	1,631,306	1,647,619	1,664,096
Depreciation Exper		3,006,684	3,006,684	3,006,684	3,006,684	3,006,684	3,006,68
Subtotal Operating	g Expenses	4,645,779	4,682,574	5,177,202	5,200,285	5,220,102	5,237,99
Direct Telecom - To	oll Expense	212,680	224,490	230,722	237,128	243,712	250,478
Roaming Expense		563,515	580,529	495,809	534,398	579,909	633,22
Universal Service F	und Expense	106,599	105,700	106,492	107,822	108,493	108,76
Mobile Media Expe	nse	18,641	19,574	20,552	21,580	22,659	23,792
Engineering		13,489	13,489	13,489	13,489	13,489	13,489
Sales and Advertisi	ng Expense	1,529,157	1,527,128	1,526,114	1,525,102	1,524,090	1,523,07
Customer Service E	Expense	215,100	203,297	192,141	181,597	171,632	162,21
Billing Expense	İ	183,943	181,300	178,696	176,129	173,599	171,10
Accounting Expens	e	63,534	63,134	62,737	62,342	61,950	61,56
General & Administ		120,566	120,180	119,796	119,413	119,031	118,65
Commercial Buildin		86,900	89,507	92,192	94,958	97,807	100,74
Cost of Equipment		1,195,746	1,272,828	1,354,879	1,420,385	1,471,889	1,511,91
Tax Expense (Othe		224,493	227,870	231,299	234,779	238,312	241,89
	OPERATING EXPENSES	9,180,141	9,311,600	9,802,121	9,929,406	10.046.672	10,158,90

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

Washington	
State (An Eligible Telecommunications Carrier (ETC) must provide	de a certification form for each state in which it provides Lifeline service).
529003	Inland Cellular LLC (f/k/a Washington RSA No. 8 L.P.)
Study Area Code(s) (SAC)	ETC Name(s)
Inland Cellular Telephone Company	Inland Cellular
Holding Company Name(s)	DBA, Marketing or Other Branding Name(s)
Affiliated ETCs (include names and SACs, attach additional sheets if necessary)	See list of Affiliated ETC's

Provide a list of all ETCs that are affiliated with the reporting ETC. Affiliation shall be determined in accordance with section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification

Section 1: All ETCs MUST COMPLETE SECTION 1- Initial Certification

I certify that the company listed above has certification procedures in place either to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial

Section 2: All ETCs MUST COMPLETE SECTION 2-Annual Recertification Do not leave empty columns. If an ETC has nothing to report in a column, enter a zero.

Α	В	С
Number of Subscribers Claimed on February FCC Form(s) 497 of current Form 555 calendar year	Number of Lines Claimed on February FCC Form(s) 497 of current Form 555 calendar year provided to Wireline Resellers	Number of Subscribers claimed on the February FCC Form(s) 497 that were initially enrolled in current Form 555 calendar year
3	0	0

Initial the certifications below that apply to your ETC and complete the tables corresponding to the certification below. Depending on the state, BOTH CERTIFICATION A AND B MAY APPLY.

A) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial

Ь	Е	F=D-E	G	H = (F+G)	I
Number of Subscribers ETC Contacted Directly to Recertify Eligibility Through Attestation	Number of Subscribers Responding to ETC Contact	Number of Non- Responding Subscribers	Number of Subscribers Responding That They Are No Longer Eligible	Number of Subscribers De-enrolled or Scheduled to be De- Enrolled as a Result of Non-Response or Ineligibility	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt
3	3	0	0	0	0

AND/OR

In the space below, please list the program eligibility data sources, such as ETC access to a state database and/or notice of eligibility from the state Lifeline administrator or the Universal Service Administrative Company (USAC), and indicate for which qualifying programs (e.g., SNAP, SSI) these sources are used to verify subscriber eligibility. If any of subscribers are subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in columns D through I as appropriate and not in columns J through L.

B) I certify that the company listed above has procedures in place to re-certify consumer eligibility by relying on ______. Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial _____

J	K	L
Number of Subscribers Whose Eligibility was Reviewed By State Administrator ETC Access to Eligibility Data or by USAC	Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Finding of Ineligibility by State Administrator, ETC Access to Eligibility Data or USAC	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt

OR

C) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial

Section 3: ALL ETCS MUST COMPLETE SECTION 3 – De-enroll percentage What is the percentage of subscribers de-enrolled for this ETC?

M	N	0	P = N + O	Q = ((P + M) * 100)
Number of Subscribers Claimed on February FCC Form(s) 497	Number of Subscribers De- Enrolled or Scheduled to be De- Enrolled as a Result of Non-Response or Ineligibility	Number of Subscribers De- Enrolled or Scheduled to be De- Enrolled as a Result of a Finding of Ineligibility	Total Number of Subscribers De-Enrolled or Scheduled to be De-E nrolled	Percentage of Subscribers De-Enrolled or Scheduled t be De-Enrolled that were Claimed on the February FCC Form(s) 497
(From Column A)	(From Column H)	(From Column K)		
3	0		0	0

Section 4: ALL ETCS MUST COMPLETE APPROPRIATE CHECK BOX; PRE-PAID ETCS MUST COMPLETE ALL OF SECTION 4

Is the ETC Pre-Paid?
Yes No (A Pre-Paid ETC does not assess or collect a monthly fee from its Lifeline subscribers)
If yes, record the number of subscribers de-enrolled for non-usage by month in column S below

Non-Usage Results Applicable to Pre-Paid ETCs:

R	S
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	

Signature Block: ALL ETCS MUST COMPLETE SIGNATURE FIELDS

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above.

FCC Form 555 December 2013

Signed.

Signature of Officer

Treasurer/Controller

Title of Officer

James K. Brooks

O1/30/2014

Date

(509) 649-2500

Contact Phone Number

ETC Identification

the state of the s	
SAC	ETC Name
472423	Inland Telephone Company
522423	Inland Telephone Company
479007	Inland Cellular LLC (f/k/a Washington RSA No. 8 L.P.)
529003	Inland Cellular LLC (f/k/a Washington RSA No. 8 L.P.)
529004	Inland Cellular LLC (fikia Eastern Sub-RSA L.P.)

Holding Company Name(s)

SAC	Holding Company Name
472423	Western Elite Incorporated Services
522423	Western Elite Incorporated Services
479007	Inland Cellular Telephone Company
529003	Inland Cellular Telephone Company
529004	Inland Cellular Telephone Company

DBA, Marketing or Other Branding Name(s)

SAC	Name
472423	Inland Networks
522423	Inland Networks
479007	Inland Cellular
529003	Inland Cellular
529004	inland Cellular

Affiliated ETCs

Affiliated ETCs				
SAC	Name			
472423	Inland Telephone Company (d/b/a Inland Networks)			
522423	Inland Telephone Company (d/b/a Inland Networks)			
479007	Inland Cellular LLC (f/k/a Washington RSA No. 8 L.P.)(d/b/a Inland Cellular)			
529004	Inland Cellular LLC (f/k/a Eastern Sub-RSA L.P.)(d/b/a Inland Cellular)			
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INLAND CELLULAR

1332 G Street Lewiston, ID 83501 (208) 798-0245; (800) 248-8822 Fax (208) 746-4904

CERTIFICATION BY CUSTOMER IN ORDER TO RECEIVE FEDERAL LIFELINE SUPPORT

	E ELIGIBILITY (Subscriber signature not required) that I am qualified through the:				
	Community Action Partnership Association of Idaho (CAPAI) (See email confirmation)				
一	Washington Department of Social and Health Services (DSH	IS) - Case	#		
INCON	ME ELIGIBILITY				
			al poverty guidelines and therefore I qualify for Lifeline Support my qualifications.		
	RAL ELIGIBILITY that I qualify for Lifeline Support and am currently participa	ting in on	e or more of the programs listed that I have checked below.		
	Federal Public Housing Assistance (FPHA) or Section 8		Medicaid		
	Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)		Temporary Assistance for Needy Families (TANF)		
	Low Income Home Energy Assistance Program (LIHEAP)		Supplemental Security Income (SSI)		
	National School Lunch Program's free lunch program				
TRIBAL LIFELINE ELIGIBILITY I certify that I qualify for tribal Lifeline Support, as I reside on land that meets the Bureau of Indian Affairs definition of "reservation" (any federall recognized Indian tribe's reservation, Pueblo, or Colony including former reservations in Oklahoma, Alaska Native regions, and Indian Allotments) AND participate in one of the following programs:					
	Federal Public Housing Assistance (FPHA) or Section 8		Bureau of Indian Affairs General Assistance		
	Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)		Tribal Administered Temporary Assistance for Needy Families (TTANF)		
	Low Income Home Energy Assistance Program (LIHEAP)		Temporary Assistance for Needy Families (TANF)		
	National School Lunch Program's free lunch program		Food Distribution Program on Indian Reservations		
	Head Start (Income eligible)		Supplemental Security Income (SSI)		
	Medicaid		Income Eligibility (See Income Eligibility)		

SUBSCRIBER CERTIFICATION

It is understood that by participating in the Lifeline program, the support that I receive is not actual payment to me but a discount on my monthly billed service. Participating in Lifeline does not protect me from collection procedures if I do not pay my phone bill. I fully understand that this discount, as well as the criteria for participation in the Lifeline Program, may change and I may no longer qualify, or the amount of support may increase or decrease.

As the Certifying Subscriber, I certify that, (i) the service is for me and not a member of the household; (ii) I am not listed as a dependent on someone else's tax return; and, (iii) the service address is my primary residence. I further certify that the service that I receive from Inland Telephone Company is my main line of service and neither I nor anyone in my household receives Lifeline Support for any other telecommunications service. Further, I understand that Lifeline is a federal benefit program that provides a monthly discount on either home or mobile telephone service and ONLY ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline Support from multiple telecommunications companies. I understand that violation of the one-per-household requirement will result in deenrollment from the program and possible fines and imprisonment. As the Certifying Subscriber claiming income eligibility, I certify that the documentation I have provided accurately represents: (i) my household income and the number of persons in my household; or, (ii) proof of participation in an eligible program.

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I certify that I will notify Inland Cellular within 30 days,(i) if for any reason I should no longer participate in any of the eligible programs or qualify by income, and or (ii) if I move from the address provided on this form. If my address listed above is temporary, I certify that I will verify my address to Inland Cellular every 90 days. I understand that if I fail to respond to an attempt to verify my address within 30 days, my Lifeline support may be terminated. I understand that if I fail to give notice as required, I am subject to penalties, including de-enrollment, being barred from the program and fines and imprisonment.

I understand that Lifeline Support is not transferrable and that I may not transfer my service to any individual, including another eligible Lifeline Support recipient. I further understand that if my service goes unused for 60 days, my service will be suspended subject to a 30 day period in which I may use the service or contact Inland Cellular to confirm that I want to continue receiving the service.

Further, I fully understand that in order to continue to receive this support, I must annually, or more often, certify my eligibility and provide proof of eligibility. I understand that my failure to timely re-certify will result in de-enrollment and termination of my Lifeline benefits.

I fully understand that the Lifeline Program is administered by the Universal Service Administration Company (USAC) under the guidance and authority of the Federal Communications Commission (FCC) and that all of the information that I have supplied pertaining to my eligibility will be shared with USAC and the FCC and I give my consent to do so.

I certify that the information provided on this form is true and correct to the best of my knowledge under penalty of perjury and if I have provded any misleading statements in order to receive support, I will be liable for any support received, my service may be discontinued, it may result in deenrollment and my being barred from the program and I would be subject to state and federal fines and imprisonment.

SIGNATURE OF APPLICANT			DATE	
APPLICANT (PRINTED)				
SOCIAL SECURITY NUMBER XXX-XX-			DATE OF BIRTH	
SERVICE ADDRESS				
BILLING ADDRESS				
TELEPHONE NUMBER			NUMBER OF PERSONS IN FAMILY	OR HOUSEHOLD
a with the literature to	//////////////////////////B	ELOW - FOR OFFICIAL US	SE ONLY \\\\\\\\	
Inland Cellular - Customers serv	ing area			
EASTERN S	UB-RSA, WA		DAHO RSA 1-B2	
WASHINGT	ON RSA NO. 8, WA		DAHO RSA 2-B2	
SIGNATURE OF CUSTOMER SERV	VICE REPRESENTATIVE			
PRINTED NAME OF CUSTOMER	SERVICE REPRESENTATIVE			-
See Federal Poverty Guideline for a list	of acceptable documentation for inco	ome eliaibility.		

Inland Cellular will keep the information contained in this form confidential, except as required by federal or state law. ALL INFORMATION COMPLETED ON THIS FORM IS SUBJECT TO STATE AND FEDERAL PERJURY PENALTIES.

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LIFELINE HOUSEHOLD WORKSHEET

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. Anadult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

1)		er spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted
	phone? (check NO if you do not have a spouse or partner) YES NO
3		cked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is er household.
2	> If you che	cked NO, please answer question #2.
2)	Other tha	an a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?
	A.	A parent YES NO
	В.	An adult son or daughter YES NO
	c.	Another adult relative (such as a sibling, aunt, Cousin, grandparent, grandchild, etc)
	D.	An adult roommate YES NO
	E.	Other YES NO
	workshee	cked NO for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the t. cked YES , please answer question #3.
3)		nare living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes with at least one of the adults listed above in question #2?
3	> If you che	cked NO, then your address includes more than one household. Please initial lines A and B below, and sign and date the worksheet.
;	> If you che receives L	cked YES, then your address includes only one household. You may not sign up for Lifeline because someone in your household already ifeline.
	IFICATIO	N ertification below and sign and date this worksheet which must accompany your Lifeline application.
A.		I certify that I live at an address occupied by multiple households.
В.		I understand that violation of the one-per-household requirement is against the Federal Communications Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States Government.
SIGNAT	URE	DATE