

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

I, James K. Brooks, being of lawful age and duly sworn, on my oath state that I am Treasurer/Controller of Inland Cellular LLC (formerly Eastern Sub-RSA Limited Partnership)(d/b/a Inland Cellular)("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, with respect to the Company's operations within the State of Washington:

- (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 the coming calendar year only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2012 calendar year, the Company met substantially the applicable service quality standard for a wireless carrier found in WAC 480-123-030(1)(h);
- (3) That during the 2012 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 wireless carriers in emergency situations; and
- (4) That during the 2012 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 2013, at Roslyn, Washington.

Inland Cellular LLC  
(formerly Eastern Sub-RSA Limited Partnership)(d/b/a Inland Cellular)

By:   
James K. Brooks  
Its: Treasurer/Controller

**INLAND CELLULAR TELEPHONE COMPANY**

Corporate Offices

103 S. 2nd St.  
P.O. Box 688  
Roslyn, WA 98941  
Telephone: (509) 649-2500  
Fax: (509) 649-3300



August 13, 2013

Via electronic filing

Mr. Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250  
(360) 664-1160

Re: **Docket UT-131427** - 2013 ETC Certification – Request for  
Certification Pursuant to WAC 480-123-060 and 47 C.F.R.  
§54.307, 54.313 and/or 54.314

Dear Mr. King:

Pursuant to WAC 480-123-080(3), Inland Cellular LLC (formerly Eastern Sub-RSA Limited Partnership)(d/b/a Inland Cellular)("Company") hereby submits the required service area map in .shp format in a single zip file (WA5B2 ESRI Shape files.zip). The map should accompany the previous filing for Docket UT-131427.

If you should have any questions, please call me at (509) 649-2500

Sincerely,

  
James K. Brooks  
Treasurer/Controller

Attachment

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

Inland Cellular LLC (formerly Eastern Sub-RSA Limited Partnership)(d/b/a Inland Cellular)(the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080, with respect to its operations within the State of Washington.

Report 1 - WAC 480-123-070(1)(a): For the period January 1 through December 31, 2012, the Company made the following approximate capital additions: EVDO Rev A upgrades to 9 sites (\$66,400) and Antenna addition at Creston Butte (\$2,125). Operating expenses, excluding the cost of handsets, roaming and toll expenses, for the same time period were approximately \$3,673,875.

Report 2 - WAC 480-123-070(1)(b): These investments and expenses should enable the Company to provide increasingly better service quality, coverage, capacity and clearer signals throughout the Company's service area, thereby decreasing the potential for dropped calls or no service. Expenses directly associated with regulatory compliances for E911, plant operations, switching, maintenance, engineering and obtaining facilities from local exchange carriers and depreciation expenses comprise approximately \$2,195,840 of the expense figure set forth in Report 1 above.

Report 3 - WAC 480-123-070(2): For the period January 1 through December 31, 2012, the Company reports that it experienced the following local service outages:

2/22/12 at 11:22 am – Microwave failure at the Wilson Creek site; technician dispatched and changed frequency of microwave; approximately 164 subscribers may have been affected however, the area is also covered by overlapping signals from cellular sites at Stratford and Odessa; service restored at approximately 4:06 pm; duration of approximately 4 hours and 44 minutes; microwave failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

4/3/12 at 9:13 am – Control module failure at the Wilson Creek site; technician dispatched and reset control module; approximately 164 subscribers may have been affected however, the area is also covered by overlapping signals from cellular sites at Stratford and Odessa; service restored at approximately 4:06 pm; duration of approximately 4 hours and 44 minutes; card failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

5/31/12 at 5:53 pm – Microwave outage at the Sprague site; technician dispatched and replaced transmitter; approximately 9 subscribers were without Inland Cellular service; service restored at approximately 9:07 pm; duration of approximately 3 hours and 14 minutes; microwave failures are unexpected and back-up cannot be



provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

7/1/12 at 1:15 am – RFM failure at the Coulee City site; Technician dispatched and replaced RFM card; approximately 292 subscribers were without Inland Cellular service; service restored at approximately 8:44 am; duration of approximately 7 hours and 29 minutes; card failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

7/13/12 at 2:40 am – T1 outage to our Coulee City site; approximately 292 subscribers were without Inland Cellular service; called CenturyLink as the outage was on the CenturyLink side which they repaired; service restored at approximately 9:07 am; duration of approximately 6 hours and 10 minutes; facilities failures from another provider are unexpected; no affordable steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

7/13/12 at 2:40 am – Microwave failure at the Dunes site; technician dispatched and re-tuned microwave; approximately 2,085 subscribers may have been affected however, the area is also covered by overlapping signals from a cellular site at Moses Lake West which covers the majority of Moses Lake proper; service restored at approximately 8:50 am; duration of approximately 6 hours and 10 minutes; microwave failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

9/7/12 at 11:25 am – Microwave interference detected at the Dunes site; technician dispatched and re-tuned microwave; approximately 2,085 subscribers may have been affected however, the area is also covered by overlapping signals from a cellular site at Moses Lake West which covers the majority of Moses Lake proper; service restored at approximately 5:53 pm; duration of approximately 6 hours and 28 minutes; microwave failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

9/30/12 at 10:15 am – RFM failure at the Creston Butte site; Technician dispatched and replaced RFM card; approximately 100 subscribers may have been without Inland Cellular service; overlapping signals in the area from Davenport and Wilbur; service restored at approximately 2:11 pm; duration of approximately 3 hours and 56 minutes; card failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

10/2/12 at 12:06 pm – RFM failure at the Dunes site; technician dispatched and replaced RFM card; approximately 2,085 subscribers may have been affected however, the area is also covered by overlapping signals from a cellular site at Moses

Lake West which covers the majority of Moses Lake proper; service restored at approximately 10:17 am; duration of approximately 22 hours and 11 minutes; microwave failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

10/3/12 at 5:50 am – RFM failure at the Woodward site; technician dispatched and replaced RFM card; it is unknown as to how many subscribers may have been affected because this site is a primary roaming site on highway 26 between Othello and Washtucna however, the area is covered by overlapping signals from cellular sites at Cunningham, Lind, Lind East and Washtucna; service restored at approximately 8:13 am; duration of approximately 2 hours and 23 minutes; card failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

10/5/12 at 1:23 pm – RFM failure at the Creston Butte site; Technician dispatched and replaced RFM card; approximately 100 subscribers may have been without Inland Cellular service; overlapping signals in the area from Davenport and Wilbur; service restored at approximately 5:36 pm; duration of approximately 3 hours and 59 minutes; card failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

10/7/12 at 1:11 pm – RFM failure at the Coulee City site; Technician dispatched and replaced RFM card; approximately 292 subscribers were without Inland Cellular service; service restored at approximately 12:56 pm (10/8/12); duration of approximately 23 hours and 45 minutes; card failures are unexpected and back-up cannot be provided; no economical steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

Report 4 - WAC 480-123-070(3): For the period January 1 through December 31, 2012, the Company reports zero (0) instances where it failed to provide service within its designated service area.

Report 5 - WAC 480-123-070(4): For the period January 1 through December 31, 2012, the Company did not receive from the Federal Communications Commission or the Consumer Protection Division of the Attorney General of the State of Washington any complaints against the Company made by the Company's customers concerning the services provided to its customers.

Report 6 – WAC 480-123-080(1)(a): As it is known to the Company at the date of this Report, the following is the planned use of federal support related to Washington state that is anticipated to be received from any category in the federal high-cost fund by the Company during the period January 1, 2014 through December 31, 2014:

The Company is budgeted for cellular sites that include microwave back-bone facilities (\$100,000) and upgrade sites to EVDO Rev A (\$100,000); total estimated additions of \$200,000. Since the Company makes additions from operating revenue generation, some of these additions are carry-overs from the previous year. The Company estimates that operating expenses, excluding cost of handsets, roaming and toll expenses, will be approximately \$3,786,400.

Report 7 – WAC 480-123-080(2): The budgeted investments and expenses should enable the Company to provide increasingly better service quality, coverage, capacity and clearer signals throughout the Company's service area, thereby decreasing the potential for dropped calls. Expenses directly associated with regulatory compliances for E911, plant operations, switching, maintenance, engineering and obtaining facilities from local exchange carriers and depreciation expenses comprise approximately \$2,279,700 of the expense figure set forth in Report 6 above.

Dated: July 30, 2013

**INLAND CELLULAR TELEPHONE COMPANY**  
Corporate Offices



103 S. 2nd St.  
P.O. Box 688  
Roslyn, WA 98941  
Telephone: (509) 649-2500  
Fax: (509) 649-3300

February 25, 2013

Via Federal Express overnight delivery

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Suite TW-A325  
Washington, DC 20554

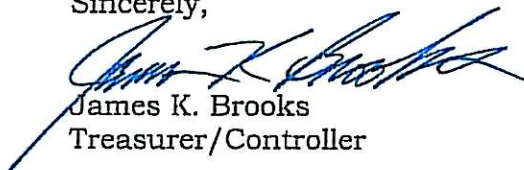
With a delivery address of:  
9300 East Hampton Drive  
Capital Heights, MD 20743  
(202) 418-0300

Re: **EB Docket No. 06-36**  
Annual Section 64.2009(e) Certification

As required by section 64.2009(e) of the Commission's rules, enclosed are an original and four copies of the Customer Proprietary Network Information Compliance Certification executed by Inland Cellular Telephone Company/Inland Cellular LLC on behalf of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership (collectively "Inland Cellular"), Form 499 Filer ID Numbers 801744 and 801741, respectively. Also enclosed is the Statement Regarding Operating Procedures for Inland Cellular.

If you should have any questions, I can be contacted at (509) 649-2500.

Sincerely,

  
James K. Brooks  
Treasurer/Controller

Enclosures

Cc: Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
FCC Enforcement Bureau



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

**Annual § 64.2009(e) CPNI Certification for 2012**

**Dated: February 22, 2013**

**Company: Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular)**

**Form 499 Filer ID Number: 801744**

**Name of Signatory: James K. Brooks**

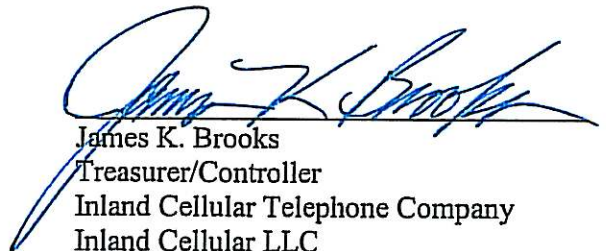
**Title of Signatory: Treasurer/Controller**

I, James K. Brooks, certify that I am a duly authorized officer of Inland Cellular Telephone Company/Inland Cellular LLC/Washington RSA No. 8 Limited Partnership (hereafter "WA-8 LP") and, acting as an agent of WA-8 LP and in accordance with the underlying partnership agreement, that I have personal knowledge that WA-8 LP 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.

Attached to this certification is an accompanying 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.

WA-8 LP has not taken any actions (proceedings instituted or petitions filed by WA-8 LP 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, 2012, WA-8 LP 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.

WA-8 LP has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

  
James K. Brooks  
Treasurer/Controller  
Inland Cellular Telephone Company  
Inland Cellular LLC  
Washington RSA No. 8 Limited Partnership



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

**Annual § 64.2009(e) CPNI Certification for 2012**

**Dated: February 25, 2013**

**Company: Eastern Sub-RSA Limited Partnership (d/b/a Inland Cellular)**

**Form 499 Filer ID Number: 801741**

**Name of Signatory: James K. Brooks**

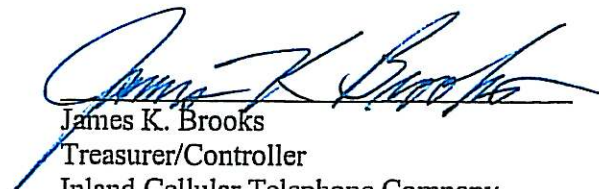
**Title of Signatory: Treasurer/Controller**

I, James K. Brooks, certify that I am a duly authorized officer of Inland Cellular Telephone Company/Inland Cellular LLC/Eastern Sub-RSA Limited Partnership (hereafter "ESRLP") and, acting as an agent of ESRLP and in accordance with the underlying partnership agreement, that I have personal knowledge that ESRLP 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.

Attached to this certification is an accompanying 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.

ESRLP has not taken any actions (proceedings instituted or petitions filed by ESRLP 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, 2012, ESRLP 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.

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

  
James K. Brooks  
Treasurer/Controller  
Inland Cellular Telephone Company  
Inland Cellular LLC  
Eastern Sub-RSA Limited Partnership

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)  
MARCH 1, 2013**

The following statement explains how the operating procedures of 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 2011. 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 2012.

**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 opted-out 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.

Approved by OMB  
3060-0819

FCC Form 555  
November 2012

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**  
All carriers must complete Sections 1, 2, and 3. Carriers must complete Section 4, if applicable.

*Deadline: January 31<sup>st</sup> (Annually)*

Washington

State  
*(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each state in which it provides Lifeline service).*  
529004 Eastern Sub-RSA Limited Partnership  
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)	Additional Sheet Attached
---	---------------------------

**Section 1:** All ETCs (Initial the certification that applies to your ETC. Depending on the state, both certifications may apply).

I certify that the company listed above has certification procedures in place to review income and program-based eligibility documentation prior to enrolling a customer 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. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial *JP*

529004

*(List the specific SAC(s) for which you are making this certification if it is not applicable to all of your study areas within the state. Attach additional sheets if necessary).*

AND/OR

I certify that the company listed above confirms consumer eligibility by relying on \_\_\_\_\_ prior to enrolling a customer in the Lifeline program. (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 and indicate for which qualifying programs (e.g., SNAP, SSI) these sources are used to verify consumer eligibility). I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial \_\_\_\_\_

*(List the specific SAC(s) for which you are making this certification if it is not applicable to all of your study areas within the state. Attach additional sheets if necessary).*

FCC Form 555  
November 2012

**Section 2:** All ETCs (Initial the certification that applies to your ETC, and if applicable, complete columns A through L the tables below. Attach additional sheets if necessary).

I certify that the company listed above has procedures in place to re-certify the continued eligibility of all of its Lifeline customers, and that, to the best of my knowledge, the company obtained signed certifications from all consumers attesting to their continuing eligibility for Lifeline, except those subscribers whose eligibility was verified by the company through the use of other sources of eligibility information as well as those subscribers who were re-certified by the state Lifeline administrator. 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 AB

A	B
Number of Subscribers Claimed on May FCC Form(s) 497	Number of Lines Claimed on May FCC Form(s) 497 Provided to Wireline Resellers
2	0

C	D	E = C-D	F	G = (E+F)	H
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
1	1	0	0	0	1

I	J	K	L
Number of Subscribers Whose Eligibility was Reviewed By State Administrator or By ETC Access to Eligibility Data	Number of Subscribers Whose Eligibility Was Examined by State Administrator or By ETC Access to Eligibility Data and Found to be Ineligible	Number of Customers De-enrolled or Scheduled to be De-Enrolled as a Result of a Finding of Ineligibility	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt



Approved by OMB  
3060-0819

FCC Form 555  
November 2012

OR

I certify that my company did not claim federal Low Income support for any Lifeline customers prior to June \_\_\_\_ (insert current 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 \_\_\_\_\_

(List the specific SAC(s) for which you are making this certification if it is not applicable to all of your study areas within the state. Attach additional sheets if necessary).

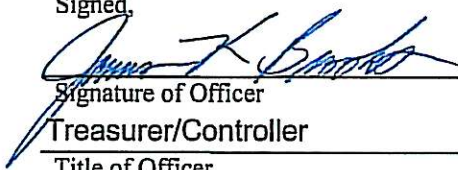
Section 3: All ETCs (Initial the certification below).

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. Initial JB

Section 4: Non-Usage Applicable to Certain Pre-Paid ETCs (the ETC does not assess or collect a monthly fee from its Lifeline subscribers)(Record the number of subscribers de-enrolled for non-usage by month in column N below).

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

Signed,

  
 \_\_\_\_\_  
 Signature of Officer  
 Treasurer/Controller  
 \_\_\_\_\_  
 Title of Officer  
 James K. Brooks  
 \_\_\_\_\_  
 Person Completing this Certification Form

James K. Brooks  
 \_\_\_\_\_  
 Printed Name of Officer  
 January 31, 2013  
 \_\_\_\_\_  
 Date  
 (509) 649-2500  
 \_\_\_\_\_  
 Contact Phone Number



Approved by OMB  
3060-0819

FCC Form 555  
November 2012

### ETC Identification

SAC	ETC Name
472423	Inland Telephone Company
522423	Inland Telephone Company
479007	Washington RSA No. 8 Limited Partnership
529003	Washington RSA No. 8 Limited Partnership
529004	Eastern Sub-RSA Limited Partnership

### 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