

June 29, 2016

#### **VIA E-FILING**

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

Re:

2016 ETC Certification - Request for Certification Pursuant to WAC 480-123-060 and

47C.F.R. §54.314

Dear Mr. King:

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

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

If there are any questions concerning the foregoing, please contact the undersigned at 360-832-4130.

Sincerely,

Michael J. Martell

Vice President

# ETC ANNUAL REPORT PER WAC 480-123-070 AND WAC 480-123-080 Contains Certifications Required by WAC 480-123-060 and 070 July 1, 2016

Pend Oreille Telephone Company (the "Company") herby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

1. Report 1: Report on use of funds: WAC 480-123-070(1)(a):

The Company used support from the federal high-cost fund in 2015 as follows:

The funds from the universal service communication program are contributing to the Company's ongoing provision of high-quality basic telecommunications service to customers residing in the area the Company serves.

In addition, the Company undertook several construction and maintenance projects. The Company expanded its local area network by upgrading its field electronics and central office electronics to enable faster DSL services and also added additional fiber capacity to handle additional bandwidth.

The funds received from the universal service communications program can be viewed as contributing to the Company's ability to perform this project, including, without limitation, the repayment of loan funds.

For 2015 the Company's gross capital expenditures were referenced in Form 481.

Per the direction of Commission Staff, the NECA-1 report will be provided as soon as it is available and no later than August 1, 2016.

2. <u>Report 2</u>: WAC 480-123-070(1)(b): The Company reports that the investments and expenses report under Report 1, above, benefited the customers as follows:

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

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<sup>&</sup>lt;sup>1</sup> The term "ETC" is used in the same sense as the term is used in Chapter 480-123 WAC.

Company within its designated ETC service area. Company offers services that are comparable to services offered in urban areas at rates that are comparable to rates for such services in urban areas.

#### 3. Report 3: Local Services Outage Report: WAC 480-123-070(2):

Outages are listed on the report labeled (200) Service Outage Reporting (Voice) of FCC Form 481

#### 4. Report 4: Report on Failure to Provide Service: WAC 480-123-070(3):

The Company had no unfulfilled service request and no unfulfilled broadband requests as identified on lines 300 and 320 of the FCC Form 481

### 5. Report 5: Report on Complaints per 1000 Connections: WAC 480-123-070(4):

The company had 1 voice complaint and no broadband complaints as identified on line(s) 410 and 440 of the FCC Form 481. A complaint was filed with the WUTC regarding the inability to have standalone DSL.

## 6. Report 6: Annual Plan: WAC 480-123-080(1):

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the period January 1, 2017, through December 31, 2017, are projected to be for gross capital expenditures and for operating expenses. Major projects are disclosed on the five year plan included with FCC Form 481 filed with the Commission last year.

The Company expects that levels of expenses will remain relatively the same as those it experience in calendar year 2015, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and increased depreciation on new investment placed in service. The Company does not anticipate major adjustments in staffing levels for the relevant period.

### 7. Report 7: Plan of Investments and Expenditures: WAC 480-123-080(2):

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the period January 1, 2017, through December 31, 2017, will remain relatively the same as those it experienced in calendar year 2016, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and increased depreciation on new investment placed in service. All customers in the Company's designated ETC service area will benefit from the enhanced broadband service expected from the level of support and other factors, such as support from the state fund, continuing to aide efforts to have available to the customer services that are comparable to the telecommunications services offered in urban areas.

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

- I, Michael J. Martell, being of lawful age, state that I am Vice President of Pend Oreille Telephone Company ("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. §54.314, as follows:
- (1) That the Company in 2015 used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2015 calendar year, the Company met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h);
- (3) That during the 2015 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and
- (4) That during the 2015 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 29 day of June 2016, at Glenns Ferry, Idaho.

Company: Pend Oreille Telephone Company

By:

Type Name: Michael J. Martell

Its: <u>Vice President</u>