

05 AUS 11 PH 3: 32



August 11, 2006

BY HAND

Ms. Carole J. Washburn, Executive Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Dear Ms. Washburn:

Re: Docket No. UT-063052 -

Request for Certification Pursuant to

WAC 480-123-060 and 47 C.F.R. §54.314

Pursuant to WAC 480-123-060, Western Wahkiakum County Telephone Company ("Company") hereby requests that the Washington Utilities and Transportation Commission certify to the Federal Communications Commission and the Universal Service Administrative Company that the Company has met the requirements of 47 C.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.

Sincerely,

Steven M. Appelo

Corporate Secretary

Enclosures

REPORTS AS REFERENCED IN WAC 480-123-070 AND WAC 480-123-080

Western Wahkiakum County Telephone Company (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report² for the calendar year 2005, that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund. In addition, attached is a copy of the Company's NECA-1 Report for the calendar year 2004.

Report 2: WAC 480-123-070(1)(b): The Company reports that the investments and expenses reported under Report 1, above, benefited 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 high quality telecommunications services to customers in the service area for which the Company is designated as an ETC.³ The Company has made substantial expenditures and 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 Company within its designated ETC service area. Also, during 2005, the Company was engaged in three major investment projects within its designated ETC service area as described below:

- (1) The addition of fiber optic facilities from Fairview to KM Hill, a distance of approximately 4.1 miles. This project, which had a cost of approximately \$149,000, enhances service reliability and extends broadband capabilities to customers in the eastern portion of the Company's designated ETC service area, as well as improving prospects of future diversity routing.
- (2) The addition of GR-303 interface compatibility to the Company's Nortel DMS10 host central office switch at a cost of approximately \$77,000. This project enhances the reliability and efficiency of the Company's local distribution network used to provision federal

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¹ It is the Company's understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3).

² The Company understands the reference to the "NECA-1 Report" to refer to the values reported by the Company in response to the National Exchange Carrier Association, Inc. Universal Service Data Collection Form or its on-line equivalent relating to the subject year.

³ The term "ETC" is used herein with the same meaning as the term is used in Chapter 480-123 WAC.

⁴ References herein to services supported by the federal high-cost fund refer to the services designated for support as set forth in 47 C.F.R. § 54.101(a).

high-cost fund supported services. The project benefits most of the Company's customers by improving service reliability and transmission characteristics.

(3) The replacement of the roofs on the Company's headquarters buildings at a cost of approximately \$53,000, thereby increasing protection for the Company's switching equipment and other facilities, equipment and resources located within the headquarters buildings, which in turn is of benefit to all of the Company's customers.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2005, the Company did not receive from either the Federal Communications Commission or the Consumer Protection Division of the Office of the Attorney General of the State of Washington any complaints against the Company made to them by the Company's customers.

Report 4: WAC 480-123-080(1)(b) and (2): The Company reports as follows:

The planned investment and expenses related to Washington state for calendar year 2006 that the Company expects to use as a basis to request federal high-cost support were planned to be relatively similar to those investments and expenses the Company has set forth in its information for calendar year 2005 filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. However, due to circumstances beyond the Company's control, the following two projects, which were originally planned to be completed in 2006, are now being deferred in large part to 2007:

- (1) Relocation of the Company's main cables (both copper and fiber optic) over a distance of approximately 1.6 miles along State Highway 4 at an estimated cost of approximately \$125,000. This project is due to a planned realignment of the highway by the State of Washington Department of Transportation ("DOT") from approximately the location of the Company's Grays River central office to the Deep River bridge. The DOT has delayed construction, previously contemplated to occur in 2006, apparently due to an eminent domain complication relating to a portion of the land involved. This project will enable the Company to avoid a major disruption of service that could affect all of the Company's customers.
- (2) Construction of a new fiber optic route from the vicinity of State Highway 4 at Naselle to the top of Radar Ridge, a distance of approximately four miles, at an estimated cost of approximately \$153,000, (including approximately \$32,000 spent in 2006). This project, in part in response to service requests by a federal governmental entity, is expected to provide additional and more

reliable capacity to serve governmental and other customers on State of Washington Department of Natural Resources ("DNR") property. The timing of this project is dependent, in part, upon DNR, across whose lands most of the project would be constructed.

The Company is still planning on the following additional major construction project for 2006:

(3) Construction of fiber ring facilities principally along Parpala Road at an estimated cost of approximately \$80,000. This project is expected to include the installation of fiber optic cable over a distance of approximately 2.2 miles. Approximately ninety customers are expected be served by this route. The ring configuration will enhance the reliability of service to customers served over these facilities.

Because of the deferral of projects (1) and (2) above, it is expected that the Company's level of new telecommunications plant investment in calendar year 2006 will be somewhat lower than was accomplished in calendar year 2005. The Company expects that levels of expenses incurred by it during calendar years 2006 and 2007, respectively, will remain relatively the same as those it experienced in calendar year 2005, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company further expects that for calendar years 2006 and 2007, respectively, it will have relatively the same annual level of expenditure and investment related to normal maintenance, replacement and minor upgrades of plant as occurred in calendar year 2005.

In addition to the specific benefits to customers identified with respect to projects (1), (2) and (3) above, the expected benefit to customers from the anticipated investment and expenditures is that the Company's customers will continue to receive a high level of telecommunications service. The Company further expects that the continued receipt by it of federal high-cost support will allow the Company to continue to provide the supported services at rates that are reasonably comparable to the rates for such service in urban areas. All customers in the Company's designated ETC service area will benefit from the expected level of support by continuing to have available to them services that are reasonably comparable to telecommunications services offered in urban areas at rates that are reasonably comparable to the rates for such services in urban areas.

Dated: August 11, 2006

08/09/2006

19:24:25 1/ 2

CONTACT NAME:

APPLIES TO PERIOD: YEAR END 12/2005 Carol Larson

REG: 5 SST: 3

PACIFIC SUBSET 3

CONTACT PHONE:

(360)-465-2211 EXT:

00: *******

RELEASE STATUS: RELEASED

CO: 000002451 Western Wahkiakum County

SOFT BDIT STATUS: PASSED EDIT WESTERN WAHRIAKUM SAR: 522451

| DESCRIPTION | PENDING VIEW SOURCE |
|---|---------------------------|
| 060 TOTAL LOOPS | 1 246 pg |
| 070 CAT. 1.3 LOOPS | 1,246 EC |
| 160 ACCOUNT 2001 | 1,236 EC |
| 170 ACCOUNT 1220 | 11,142,677 EC |
| 190 ACCOUNT 3100 | 52,164 EC 6,382,047 EC |
| 195 ACCOUNT 3400 | |
| 210 ACCOUNT 4340 | 0 EC 781,148 EC |
| 220 NET PLANT INVESTMENT | 4,031,646 EC |
| 230 ACCOUNT 2210 | 1,620,539 BC |
| 235 ACCOUNT 2220 | 0 EC |
| 240 ACCOUNT 2230 | 1,976,376 EC |
| 245 TOTAL CENTRAL OFFICE | 3,596,915 EC |
| 250 CKT EQUIP CAT 4.13 | 1,340,404 EC |
| 255 ACCOUNT 2410 | 6,090,012 EC |
| 260 ACCOUNT 3100 (2210) | 920,735 EC |
| 265 ACCOUNT 3100 (2220) | 0 EC |
| 270 ACCOUNT 3100 (2230) | 862,922 EC |
| 275 ACCOUNT 3100 (2210-2230) | 1,783,657 EC |
| 280 ACCOUNT 3100 (2410) | 3,628,995 EC |
| 310 ACCOUNT 4340 (2210) | 184,659 EC |
| 315 ACCOUNT 4340 (2220) | 0 EC |
| 320 ACCOUNT 4340 (2230) | 288,827 EC |
| 325 NET NONOCURRENT | 473,486 EC |
| 330 ACCOUNT 4340 (2410) | 283,506 EC |
| 335 ACCOUNT 6110 TOTAL | 27,198 EC |
| 340 ACCOUNT 6110 BENEFITS | · 0 EC |
| 345 ACCOUNT 6110 RENTS | 0 EC |
| 350 ACCOUNT 6120 TOTAL | 53,681 EC |
| 355 ACCOUNT 6120 BENEFITS | 10,537 EC |
| 360 ACCOUNT 6120 RENTS | 2,086 EC |
| 365 ACCOUNT 6210 TOTAL | 216,193 EC |
| 370 ACCOUNT 6210 BENEFITS | 71,341 EC |
| 375 ACCOUNT 6210 RENTS | 0 ZC |
| 380 ACCOUNT 6220 TOTAL | 0 EC |
| 385 ACCOUNT 6220 BENEFITS 390 ACCOUNT 6220 RENTS | O EC |
| | 0 EC |
| 1011 | 64,912 EC |
| | 18,239 EC |
| | 0 EC |
| | 281,105 EC |
| | 135,262 EC |
| AAA BARRING ALLA | 47,131 EC |
| 440 ACCOUNT 6410 RENTS 445 TOTAL PLANT SPECIFIC | 503 EC |
| 450 ACCOUNT 6530 TOTAL | 497,246 EC |
| 455 ACCOUNT 6530 BENEFITS | 421,879 EC |
| 510 ACCOUNT 6560 (2210) | 154,933 EC |
| 515 ACCOUNT 6560 (2220) | 139,767 EC |
| 520 ACCOUNT 6560 (2230) | 0 EC |
| 525 ACCOUNT 6560 (2210-2230) | 207,666 EC |
| 530 ACCOUNT 6560 (2410) | 347,433 EC |
| 0000 (EIIU) | 338,766 EC |

N... E... C... A... INC. USF1010 PENDING VIEW REPORT 08/09/2006 19:24:25

Page 2/ 2

CONTACT NAME: Carol Larson

APPLIES TO PERIOD: YEAR END 12/2005

REG: 5 SST: 3 PACIFIC SUBSET 3

CONTACT PHONE: RELEASE STATUS: RELEASED

(360)-465-2211 EXT:

OO: ***********
CO: 000002451 Western Wahkiakum County

SOFT EDIT STATUS: PASSED EDIT

SAR: 522451 WESTERN WAHKIARUM

| | DESCRIPTION | PENDING VIEW | SOURCE |
|-----|---------------------------|--------------|--------|
| 535 | ACCOUNT 6710 TOTAL | 0 | EC |
| 540 | ACCOUNT 6710 BENEFITS | 0 | EC |
| 550 | ACCOUNT 6720 TOTAL | 917,250 | EC |
| 555 | ACCOUNT 6720 BENEFITS | 248, 190 | EC |
| 565 | SUM OF LINES 535 + 550 | 917,250 | EC |
| 600 | BEN. POR.OF ALL OP. EXP. | 606,542 | EC |
| 610 | RENT FOR. OF ALL OP. EXP | 2,589 | EC |
| 650 | ACCOUNT 7200 OTHER TAXES | 419,777 | EC |
| 700 | 2410 (C S TOTAL CWF - AV) | 5,951,636 | EC |
| 710 | 2410 (C S CWF - CAT.1) | 5,761,847 | EC |
| 800 | ACCOUNT 2680 TOTAL | 0 | EC |
| 805 | ACCOUNT 2680 (2230) | 0 | EC |
| 810 | ACCOUNT 2680 (CAT. 4.13) | Ö | EC |
| 815 | ACC 2680 (2410) TOTAL CWF | O | EC |
| 820 | ACC 2680 (2410)CMF-CAT1 | . 0 | EC |
| 830 | ACCOUNT 6560 (2680) | O | EC |

COMMENTS:

08/09/2006 19:23:49

Page 1/ 2

APPLIES TO PERIOD: YEAR END 12/2004 REG: 5 PACIFIC CONTACT NAME: Carol Larson SST: 3 SUBSET 3

CONTACT PHONE: (360)-465-2211 EXT: 00: *******

RELEASE STATUS: RELEASED CO: 000002451 Western Wahkiakum County

SOFT EDIT STATUS: PASSED EDIT SAR: 522451 WESTERN WAHKIAKUM

| DESCRIPTION | LATEST VIEW |
|--------------------------------------|-------------|
| 060 TOTAL LOOPS | |
| 070 CAT. 1.3 LOOPS | 1,243 |
| 160 ACCOUNT 2001 | 1,233 |
| 170 ACCOUNT 1220 | 10,510,166 |
| | 82,624 |
| | 5,708,848 |
| | 0 |
| | 821,110 |
| | 4,062,832 |
| 230 ACCOUNT 2210 235 ACCOUNT 2220 | 1,540,804 |
| | 0 |
| | 1,774,953 |
| | 3,315,757 |
| | 1,162,908 |
| | 5,813,261 |
| | 854,996 |
| | 0 |
| 270 ACCOUNT 3100 (2230) | 655,256 |
| 275 ACCOUNT 3100 (2210-2230) | 1,510,252 |
| 280 ACCOUNT 3100 (2410) | 3,294,563 |
| 310 ACCOUNT 4340 (2210) | 204,055 |
| 315 ACCOUNT 4340 (2220) | 0 |
| 320 ACCOUNT 4340 (2230) | 295,218 |
| 325 NET NONOCURRENT | 499,273 |
| 330 ACCOUNT 4340 (2410) | 293,266 |
| 335 ACCOUNT 6110 TOTAL | 23,387 |
| 340 ACCOUNT 6110 BENEFITS | 0 |
| 345 ACCOUNT 6110 RENTS | 0 |
| 350 ACCOUNT 6120 TOTAL | 54,875 |
| 355 ACCOUNT 6120 BENEFITS | 5,877 |
| 360 ACCOUNT 6120 RENTS | 2,086 |
| 365 ACCOUNT 6210 TOTAL | 248,493 |
| 370 ACCOUNT 6210 BENEFITS | 48,744 |
| 375 ACCOUNT 6210 RENTS | 0 |
| 380 ACCOUNT 6220 TOTAL | 0 |
| 385 ACCOUNT 6220 BENEFITS | 0 |
| 390 ACCOUNT 6220 RENTS | 0 |
| 395 ACCOUNT 6230 TOTAL | 57,878 |
| 400 ACCOUNT 6230 BENEFITS | 8,926 |
| 405 ACCOUNT 6230 RENTS | 0 |
| 410 ACCOUNT 6210-6230 | 306,371 |
| 430 ACCOUNT 6410 TOTAL | 118,730 |
| 435 ACCOUNT 6410 BENEFITS | 21,522 |
| 440 ACCOUNT 6410 RENTS | 460 |
| 445 TOTAL PLANT SPECIFIC | 503,363 |
| 450 ACCOUNT 6530 TOTAL | 427,000 |
| 455 ACCOUNT 6530 BENEFITS | 102,419 |
| 510 ACCOUNT 6560 (2210) | 140,712 |
| 515 ACCOUNT 6560 (2220) | .0 |
| 520 ACCOUNT 6560 (2230) | 179,5İ0 |
| 525 ACCOUNT 6560 (2210-2230) | 320,222 |
| 530 ACCOUNT 6560 (2410) | 333, 189 |
| | |

N... E... C... A... INC. USF1010 LATEST VIEW REPORT 08/09/2006 19:23:49

2/ 2

CONTACT NAME:

APPLIES TO PERIOD: YEAR END 12/2004 Carol Larson

REG: 5 SST: 3 PACIFIC SUBSET 3

CONTACT PHONE:

(360)-465-2211 EXT:

00: *******

RELEASE STATUS: RELEASED

SOFT EDIT STATUS: PASSED EDIT SAR: 522451

CO: 000002451 Western Wahkiakum County

WESTERN WARKIAKUM

| | DESCRIPTION | LATEST VIEW |
|-----|---------------------------|-------------|
| 535 | ACCOUNT 6710 TOTAL | 0 |
| 540 | ACCOUNT 6710 BENEFITS | 0 |
| 550 | ACCOUNT 6720 TOTAL | 822,680 |
| 555 | ACCOUNT 6720 BENEFITS | 146,033 |
| 565 | SUM OF LINES 535 + 550 | 822,680 |
| 600 | BEN. POR.OF ALL OP. EXP. | 372,243 |
| 610 | RENT POR. OF ALL OP. EXP | 2,546 |
| 650 | ACCOUNT 7200 OTHER TAXES | 444,720 |
| 700 | 2410 (C S TOTAL CWF - AV) | 5,754,070 |
| 710 | 2410 (C S CNF - CAT.1) | 5,541,294 |
| 800 | ACCOUNT 2680 TOTAL | 0 |
| 805 | ACCOUNT 2680 (2230) | 0 |
| 810 | ACCOUNT 2680 (CAT. 4.13) | Ō |
| 815 | ACC 2680 (2410) TOTAL CWF | 0 |
| 820 | ACC 2680 (2410) CWF-CAT1 | 0 |
| 830 | ACCOUNT 6560 (2680) | . 0 |
| | | |

COMMENTS:

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

- I, Steven M. Appelo, being of lawful age, state that I am Corporate Secretary of Western Wahkiakum County Telephone Company ("Company"), that I am authorized to execute these Certifications on behalf of the Company, and that the facts set forth in these Certifications 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 will use federal high-cost universal service fund support only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2005 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2005 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 2005 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 11th day of August, 2006 at Olympia, Washington.

Company: Western Wahkiakum County Telephone Company

By: Stor By Spalo

Its: Corporate Secretary