

August 14, 2006

To: Inland Cellular, Eastern Sub-RSA LP (Inland Cellular)

From: Bob Shirley, Telecommunications Policy Analyst  
(360) 664-1292

Re: Request for Supplemental Filing of ETC Certifications and Reports  
Docket UT-063052

**- - VIA Electronic Mail - -**

After review of Inland Cellular's ETC certification and reports, commission staff has concluded that the filing is inconsistent with the requirements of WAC 480-123-020 through 080. Please file a replacement or supplement consistent with the attachment to this e-mail.

Certifications are due to the Federal Communications Commission and the Universal Service Administrative Company not later than October 1. Commission staff plans to request commission approval of certifications at the open meeting scheduled for September 13. In order to make a recommendation on September 13, commission staff will need to receive replacement or supplemental filings not later than August 22. Commission staff will work closely with Inland Cellular and its representatives so that filings can be completed not later than August 22.

Please contact me by e-mail at [bshirley@wutc.wa.gov](mailto:bshirley@wutc.wa.gov) or by calling (360) 664-1292 if you have questions. Thank you.

Attachment: ETC Certification and Report Request

cc: Records Center, UT-063052

ATTACHMENT

**Inland Cellular Eastern Sub-RSA LP ETC Certification and Report Request**

**WAC 480-123-060(1)**

Inland Cellular needs to change the certification to refer to “federal high-cost universal service fund.”

The submitted certification limits the source of support to 47 C.F.R. § 54.314. Because that meaning of the phrase “federal high-cost universal service fund” is broader than “funds from sources described in 47 C.F.R. § 54.314,” the rule requires a certification broader than one tied to 47 C.F.R. § 54.314. The rule requires an ETC seeking certification to state “that it 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.”

**WAC 480-123-060(1)**

Inland Cellular also needs to provide the certification *in the manner required by RCW 9A.72.085*. The certification or declaration may be in substantially the following form:

"I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct":

(Date and Place)

(Signature)

An officer of the company submitted the certification request, but did not use the required language from RCW 9A.72.085.

**WAC 480-123-070(2)**

Inland Cellular needs to state a number, e.g., zero.

The company states, “. . . it is not aware of any outages. . .”

**WAC 480-123-070(3)**

Inland Cellular needs to specify a number, e.g., zero.

The company identified the process for providing service to an applicant, but the rule requires “the report must include...number of requests for service from applicants within its designated service areas that were unfulfilled for the reporting period.”

**WAC 480-123-070(4)**

Inland Cellular needs to specify a number, e.g., zero, for the number of complaints.

The company stated, “. . . not aware of any complaints” to the FCC or the Attorney General. The rule requires companies to state “the number of complaints that the ETC’s customers made to the federal communications commission, or the consumer protection division of the office of the attorney general of Washington.”

**WAC 480-123-070(5) and (6)**

Inland Cellular also needs to provide the certification *in the manner required by RCW 9A.72.085*. The certification or declaration may be in substantially the following form:

"I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct":

(Date and Place)

(Signature)

An officer of the company submitted the certification request, but did not use the required language from RCW 9A.72.085.