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**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

IN RE

PETITION OF THE TOLEDO TELEPHONE
CO., INC. TO RECEIVE SUPPORT FROM
THE UNIVERSAL SERVICE
COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

COMES NOW The Toledo Telephone Co., Inc. (the "Company") and, pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to receive support from the Universal Service Communications Program (the "Program") for the Program year 2021.

I. Demonstration of Eligibility under WAC 480-123-100

1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC 480-120-021 that serves fewer than forty thousand access lines within the state.
2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined in 47 U.S.C. Sec. 251(h) or has been designated as an incumbent local exchange carrier by

1 the Federal Communications Commission.

2 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
3 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.

4 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-
5 123-110, to provide, maintain or enhance broadband service (See II.4, below).

6 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
7 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal
8 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for
9 High Cost Areas with respect to the service areas for which the Company is seeking
10 Program support.

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12 **II. Demonstration of Eligibility under WAC 480-123-110**

13 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
14 services and is seeking Program support is as follows: The Toledo Telephone Co., Inc.

15 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between
16 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. ¹

17 A detailed description of any transactions between the Company and the affiliates named in
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20 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.
21 20 of the Company's Tariff WN U-1.

22 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance
23 broadband services in its service area is attached hereto as Exhibit 3.

- 1 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the
2 Company complies with state and federal accounting, cost allocation, and cost adjustment
3 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 4 6. The company has two affilliates, Toldeo Telentet that is the affliliate that conducts internet
5 access (middle mile) and internet service. And Toledo Telenet Long Distance that conducts
6 billing for long distance customers.
- 7 7. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
8 the Company as of December 31, 2019, was 126. The number of residential local exchange
9 access lines served by the Company as of December 31, 2018, was 161. The number of
10 business local exchange access lines served by the Company as of December 31, 2019, was
11 42. The number of business local exchange access lines served by the Company as of
12 December 31, 2018, was 55. The number of broadband connections served by the Company
13 as of December 31, 2019, was 1497. 100% of broadband connections within the exchange
14 are fiber optic and are capable of 1 gigabit speed. The number of broadband connections
15 served by the Company as of December 31, 2018, was 1490. 100% of broadband
16 connections within the exchange are fiber optic and are capable of 1 gigabit speed. The
17 unbundled monthly recurring rate charged by the Company for residential local exchange
18 access service on December 31, 2019, was \$18. The unbundled monthly recurring rate
19 charged by the Company for residential local exchange access service on December 31,
20
21 2018, was \$18. The unbundled monthly rate charged by the Company for single line
22 business local exchange access service on December 31, 2019, was \$18 The
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1 unbundled monthly rate charged by the Company for single line business local exchange
2 access service on December 31, 2018, was \$18The unbundled monthly rate charged for
3 broadband service as of December 31, 2019, and as of December 31, 2018, is set out in the
4 attached Exhibit 5.

- 5 8. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.
- 6 9. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the
7 Company is in compliance with the Federal Communications Commission's obligation for
8 deployment of broadband at speeds specified by the Federal Communications Commission
9 applicable to the Company and that the Company meets one of the eligibility criteria set out
10 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.
- 11 10. All exhibits attached hereto are incorporated into this Petition as though fully set forth.

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14 Respectfully submitted this 28th day of August, 2020.

15 The Toledo Telephone Co., Inc.

16 By 
17 VP/COO

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21 CERTIFICATION

22 I Dale Merten, an officer of the Company that is responsible for the Company's business and
23 financial operations, hereby certify under penalty of perjury that the information and representations
24 set forth in the Petition, above, are accurate and the Company has not knowingly withheld any
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1 information required to be provided to the Commission pursuant to the rules governing the
2 Program.

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5 Dale Merten VP/COO
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