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September 2, 2021

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Supplemental Information for Petition to Receive Support from the State Universal
Communications Services Program Pursuant to WAC 480-123-100 and 480-123-110
Docket UT-210591

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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CLAIM OF CONFIDENTIALITY

Dear Mr. Johnson:

St. John Telephone, Inc. ("Company") hereby submits to the Washington Utilities and Transportation Commission ("WUTC") pursuant to WAC 480-123-100 and WAC 480-123-110 supplemental information to the petition based on discussion with commission staff to receive support from the State Universal Communications Services Program for the Program year 2022.

The Company has revised the petition at paragraph II. 6. and exhibit 3 Broadband Plan. The petition for support and exhibits in its entirety that are specified in WAC 480-123-100 and WAC 480-123-110 accompany this letter and, together with this letter, are being filed electronically.

Please note that portions of the information in the accompanying exhibits are being filed on a confidential basis pursuant to WAC 480-07-160, in that certain of the information contained therein constitutes valuable and confidential commercial information, including financial information. Both confidential (unredacted) and redacted versions accompany this letter.

Sincerely,

Eric Trump
General Manager, Assistant Secretary

Enclosures

OFFICERS

Gary Bailey • *President*
Mac W. Mills • *Vice President*
Jerry Schauble • *Secretary*

DIRECTORS

Paul Heglar
Jessiann Loomis

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7 **BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

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10 PETITION OF ST. JOHN TELEPHONE,
11 INC. TO RECEIVE SUPPORT FROM THE
12 UNIVERSAL SERVICE
13 COMMUNICATIONS PROGRAM

DOCKET NO. UT-210591

PETITION FOR SUPPORT

14 COMES NOW St. John Telephone, Inc. (the "Company") and, pursuant to Chapter 480-123
15 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC 480-123-
16 110, hereby petitions the Washington Utilities and Transportation Commission (the "Commission")
17 to receive support from the Universal Service Communications Program (the "Program") for the
18 Program year 2022.

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

- 21 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
22 480-120-021 that serves fewer than forty thousand access lines within the state.
- 23 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined
24 in 47 U.S.C. Sec. 251(h).

- 1 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
2 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 3 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-
4 123-110, to provide, maintain or enhance broadband service (See II.4, below).
- 5 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
6 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal
7 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for
8 High Cost Areas with respect to the service areas for which the Company is seeking
9 Program support.

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

- 12 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
13 services and is seeking Program support is as follows: St. John Telephone, Inc.
- 14 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between
15 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. A
16 detailed description of any transactions between the Company and the affiliates named in
17 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2.
- 18 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.
19 14 of the Company's Tariff WN U-3.
- 20 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance
21 broadband services in its service area is attached hereto as Exhibit 3.
- 22 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the
23 Company complies with state and federal accounting, cost allocation, and cost adjustment
24 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.

- 1 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
2 the Company as of December 31, 2020, was 308. The number of residential local exchange
3 access lines served by the Company as of December 31, 2019, was 326. The number of
4 business local exchange access lines served by the Company as of December 31, 2020, was
5 123. The number of business local exchange access lines served by the Company as of
6 December 31, 2019, was 132. The Company as of December 31, 2020 is capable of serving
7 615 locations with broadband speeds at or above 25/3 Mbps. The number of broadband
8 connections served by the Company as of December 31, 2020, was 457. The number of
9 broadband connections served by the Company as of December 31, 2019, was 438. The
10 unbundled monthly recurring rate charged by the Company for residential local exchange
11 access service on December 31, 2020 and 2019, was \$18.00. The unbundled monthly rate
12 charged by the Company for single line business local exchange access service on December
13 31, 2020 and 2019, was \$18.00. (The Company has other business local exchange service
14 rates, but the Company understands that WAC 480-123-110(1)(g) is requesting the single
15 line business local exchange access service rate.) The unbundled monthly rate charged for
16 broadband service as of December 31, 2020, and as of December 31, 2019, is set out in the
17 attached Exhibit 5.
- 18 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.
- 19 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the
20 Company is in compliance with the Federal Communications Commission's obligation for
21 deployment of broadband at speeds specified by the Federal Communications Commission
22 applicable to the Company and that the Company meets one of the eligibility criteria set out
23 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.
- 24 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.
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Respectfully submitted this 2 day of September, 2021.

ST. JOHN TELEPHONE, INC.

By 
Eric Trump, General Manager, Assistant Secretary

CERTIFICATION

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



Eric Trump, General Manager, Assistant Secretary

EXHIBIT 1

CORPORATE ORGANIZATION CHART

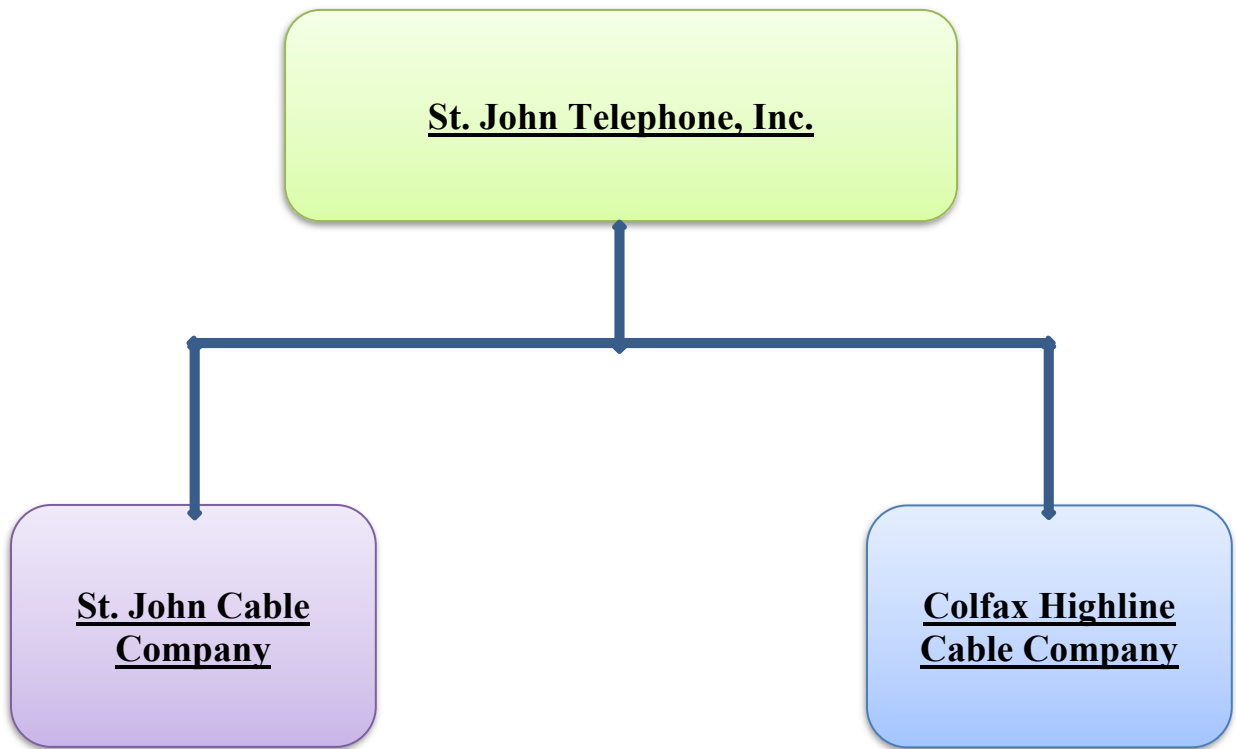


EXHIBIT 2

AFFILIATED TRANSACTIONS

The Company has affiliated transactions with its subsidiary companies St. John Cable Company and Colfax Highline Cable Company. The nature of these transactions for 2020 among these entities consists of loan advances and telecommunication services. The Company advances funds to the affiliates and provides wholesale interstate special access DSL services to St. John Cable Company, bills the Company's subscribers on behalf of St. John Cable Company for retail DSL services. All affiliates pay their share of federal income taxes to the Company. The Company records these transactions to the proper affiliated payable or receivable account.

EXHIBIT 3

BROADBAND PLAN

This Broadband Plan is being submitted by St. John Telephone, Inc. in compliance with RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d). Under the terms of the legislation incorporated into RCW 80.36.650(3), a recipient of support from the state Universal Communications Program is to submit a broadband plan showing how the provider will provide, maintain, or enhance broadband services in its service area. As set out in WAC 480-123-110(1)(d), the broadband plan is to include specific elements, but only to the extent applicable to that particular broadband plan. The broadband plan does not have to include all elements but it can include any of the following elements: (1) a multi-year investment plan; (2) specific projects that are projected to provide or enhance broadband service at speeds required by the Commission or the Federal Communications Commission; (3) a plan for maintenance of broadband services in the provider's service area; (4) a description of how the provider will enhance broadband services in its service area; and (5) any other information that the Commission may request to assist in the Commission's review and analysis of the provider's broadband plan. Where there are specific projects, the project information is to include an estimated timeline, geographic location, number of locations passed, and upload and download speeds that are projected to be produced by the project.

St. John Telephone, Inc. has constructed sufficient facilities for it to fall into either criterion three or criterion four of WAC 480-123-110 and as a result has constructed substantial broadband infrastructure throughout much or all of its service territory. This means that the company is looking for program support to allow it to continue to provide telecommunications services and broadband services at the levels that are provided today, with enhancements becoming available where appropriate. St. John Telephone, Inc. plan anticipates for 2022 planned investment and expenses to be projected at [REDACTED] for gross capital expenditures, [REDACTED] for repair and maintenance expenses and [REDACTED] for repayment of loan funds that were used in previous years to complete the fiber-to-the-home project.

Capital expenditures projected for 2022 will be used to purchase other work equipment and central office equipment and installing new fiber drops. Typically, the Company installs one to two fiber drops per year from customer requests and costs our significant due to the terrain and length of the drops. Repair and maintenance estimated expenditures include plant specific related repair and maintenance support for existing outside plant and central office equipment plus land, building and vehicle expenses. As well as non-specific related expenses for plant administration and operations.

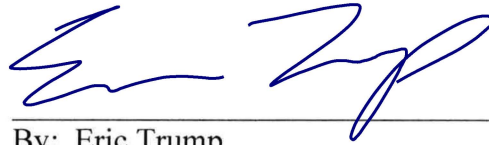
The foregoing Broadband Plan was adopted by St. John Telephone, Inc. on July 30, 2020.

EXHIBIT 4

CERTIFICATION RELATING TO ACCOUNTING STANDARDS

I, Eric Trump, am an officer of St. John Telephone, Inc., (the Company as set out in the Petition to which this is an Exhibit). Thereby, I certify that the Company complies with state and federal accounting, cost allocation, and cost adjustment rules pertaining an incumbent local exchange carrier for the period of time that the Company will receive support under the Petition to which this is an Exhibit.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 29th day of July, 2021.



By: Eric Trump
Title: General Manager, Assistant Secretary

EXHIBIT 5
UNBUNDLED MONTHLY RATE CHARGE FOR BROADBAND SERVICES

ST. JOHN TELEPHONE, INC.

Download Speed*	Upload Speed*	End of Year Rate 2019	End of Year Rate 2020	Res/ Bus/ Both
5	1.5	\$ 38.00		Both
25	25		\$ 38.00	Both
50	25	\$ 45.00		Both
50	50		\$ 45.00	Both
100	50	\$ 85.00		Both
100	100		\$ 85.00	Both

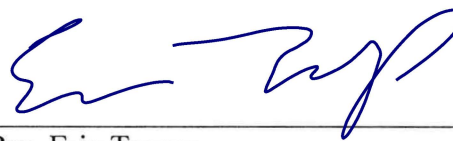
*mbps

EXHIBIT 6

CONTINUED OPERATIONS CERTIFICATE

I, Eric Trump, an officer of St. John Telephone, Inc. (the Company as set out in the Petition to which this is an Exhibit), under penalty of perjury, hereby certify that if the Company receives Program support, the Company will continue to provide communications services pursuant to its tariffs on file with the Commission and will continue through its affiliate to provide broadband services throughout its service territory in Washington for which the Company is seeking and receives Program support during the entirety of 2022.

Dated at St. John, Washington this 29th day of July, 2021.



By: Eric Trump
Title: General Manager, Assistant Secretary

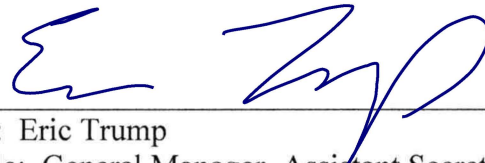
EXHIBIT 7

CERTIFICATION OF ELIGIBILITY

I, Eric Trump, am an officer of St. John Telephone, Inc. (the Company as set out in the Petition to which this is an Exhibit) and thereby certify that the Company is in compliance with the Federal Communications Commission's obligation for deployment of broadband at speeds specified by the Federal Communications Commission that apply to the Company.

For WAC 480-123-110 (1)(j)(iv): Further, I certify that the Company has broadband service available to one hundred percent of locations within the Company's service area and the Company commits to making broadband service available to any new locations within the Company's service area if such arise.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 29th day of July, 2021.

A handwritten signature in blue ink, appearing to read 'E Trump', is written over a horizontal line.

By: Eric Trump
Title: General Manager, Assistant Secretary