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

Whidbey Telephone Company ("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 Report 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. That report also includes certain data for the calendar year 2004. The Company further reports that the Company's gross additions to telecommunications plant during calendar year 2005 were approximately Redacted. Also, of the gross additions to telecommunications plant indicated above, approximately Redacted related to Exchange Line Cable & Wire Facilities - Category 1 in the Company's designated ETC³ service area. Other major gross additions related primarily to the installation of new fiber optic cable routes and circuit equipment.

<u>Report 2</u>: 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. 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.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2005, the Company received from the Federal Communications Commission ("FCC") one notice of informal complaint made by a customer of the Company. The informal complaint, insofar as it allegedly involved the Company, related to a delay in the submission to the Company by an interexchange carrier of a request for change of presubscribed interexchange carrier assigned to a line served by the Company, and charges billed by the Company in the performance by the Company of billing and collection services for the interexchange carrier from which the customer desired to make a change. The Company submitted a response to the FCC setting forth the Company's

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 National Exchange Carrier Association, Inc. Universal Service Data Collection Form 2006-1.

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 the 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).

view that the Company had fulfilled its obligations with respect to the matters complained of, and that the informal complaint related to the conduct of other carriers. A copy of the Company's response was also mailed to the customer. The Company does not know if, or how, the informal complaint was resolved, but the Company believes that it was resolved in some manner, since the customer's account with the Company was thereafter paid in full.

The Company further reports that during the calendar year 2005, the Company did not receive from the Consumer Protection Division of the Office of the Attorney General of the State of Washington any complaint against the Company made by any of the Company's customers.

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

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, 2006, through December 31, 2006, that the Company expects to use as a basis to request federal high-cost support are expected 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. The Company expects that levels of expenses 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 does not anticipate major adjustments in staffing levels for the relevant period. The Company expects that during calendar year 2006 it will have relatively the same level of expenditure and investment related to maintenance, replacement and minor upgrades of telecommunications equipment and plant as occurred in calendar year 2005. The Company's investment plans affecting federal high-cost supported services offered by it in its designated ETC service area also include the following major construction project for calendar year 2006:

The Company is in the process of completing a major upgrade of its central office space,

Redacted

This project has an estimated cost of approximately Re dacted, and benefits all of the Company's customers by strengthening the reliability of the Company's services.

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, 2007, through December 31, 2007, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments (with the exception of the major projects noted below) 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. The Company expects that levels of expenses 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 does not anticipate major adjustments in staffing levels for the relevant period. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of telecommunications equipment and plant as occurred in calendar year 2005.

In addition to the foregoing, the Company is planning some major projects in 2007.

Redacted

The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service and the new facilities will result in a platform on which additional telecommunications services, including, but not limited to, advanced services, can be provided to customers. These projects will improve the quality of service and network capacity available to the Company's customers in the portions of the Company's designated ETC service area in which the new facilities are to be deployed, as well as increase the number of services available to customers in most, if not all, of the Company's designated ETC service area. The Company further expects that the continued receipt 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 the 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

Universal Service Fund 2006 Data Collection Form

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY Region: 5 PACIFIC

I. EXCH	ANGE CARRIER/DATA IDENTIFICATION	ON				
(010)	Study Area Code	(010)	5224	452	***************************************	
(020)	Contact Name	(020)	BRU	JCE RUSS	ELL	
(030)	Contact Telephone Number	(030)	360/	/321-0086		
(040)	USF Data Collection Period	(040)	2000	5-1		
Data Line	Description	Latest View 2005-1 Amount	<u>t</u>	Data Line	Pending View 2006-1 Amount	Data Source
II. WOR	KING LOOPS					
(060)	Total Loops (Cat. 1.1, 1.2 and 1.3)	Redacted		(060)	Redacted	Loop Summary
(070)	Category 1.3 Loops (Excluding Cat. 1.3 TWX Loops)	Redacted	_	(070)	Redacted	Loop Summary
(080)	Reserved	N	1 O	ЕΝТ	RY REQUI	RED
III. INVI	ESTMENT, EXPENSE AND TAXES					
Net Plant	Investment					
(160)	Acct. 2001 - Telephone Plant in Service	Redacted		(160)	Redacted	Plant Summary
(170)	Acct. 1220 - Materials and Supplies	Redacted	_	(170)	Redacted	Plant Summary
(190)	Acct. 3100 - Accumulated Depreciation	Redacted		(190)	Redacted	Reserve Summary
(195)	Acct. 3400 - Accumulated Amortization Tangible	Redacted	_	(195)	Redacted	Reserve Summary
(200)	Reserved	N	1 O	ENT	RY REQUI	RED
(205)	Reserved	N	1 O	ЕΝТ	RY REQUI	RED
(210)	Acct. 4340 - Net Noncurrent Deferred Operating Income Taxes	Redacted		(210)	Redacted	Deferred Tax Summary
(220)	Net Plant Investment (Sum of Lines 160 + 170 Minus Lines 190 Through 210)	Redacted		(220)	Redacted	SUM

CONFIDENTIAL PER WAC 480-07-160

REDACTED

Universal Service Fund 2006 Data Collection Form

SAC: 522452

SA Name: WHIDBEY TELEPHONE COMPANY

Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source		
Selected Plant Accounts							
(230)	Acct. 2210 - Central Office Switching Equipment	Redacted	(230)	Redacted	Plant Summary		
(235)	Acct. 2220 - Operator System Equipment	Redacted	(235)	Redacted	Plant Summary		
(240)	Acct. 2230 - Central Office Transmission Equipment	Redacted	(240)	Redacted	Plant Summary		
(245)	Total Central Office Equipment (Sum of Lines 230 Through 240)	Redacted	(245)	Redacted	SUM		
(250)	Circuit Equipment Category 4.13	Redacted	(250)	Redacted	COE Categorization		
(255)	Acct. 2410 - Cable and Wire Facilities Total	Redacted	(255)	Redacted	Plant Summary		
(260)	Acct. 3100 (2210) - Accumulated Depreciation Central Office Switching Equipment	Redacted	(260)	Redacted	Reserve Summary		
(265)	Acct. 3100 (2220) - Accumulated Depreciation Operator System Equipment	Redacted	(265)	Redacted	Reserve Summary		
(270)	Acct. 3100 (2230) - Accumulated Depreciation Central Office Transmission Equipment	Redacted	(270)	Redacted	Reserve Summary		
(275)	Acct. 3100 (2210–2230) - Total Accumulated Depreciation Central Office Equipment (Sum of Lines 260 Through 270)	Redacted	(275)	Redacted	SUM		
(280)	Acct. 3100 (2410) - Accumulated Depreciation Cable and Wire Facilities	Redacted	(280)	Redacted	Reserve Summary		

Universal Service Fund 2006 Data Collection Form

SAC: 522452

SA Name: WHIDBEY TELEPHONE COMPANY

Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source
(285)	Reserved	N O	ENT	RY REQUI	R E D
(290)	Reserved	N O	ENT	RY REQUI	RED
(295)	Reserved	N O	ENT	RY REQUI	R E D
(300)	Reserved	N O	ENT	RY REQUI	R E D
(305)	Reserved	N O	ENT	RY REQUI	RED
(310)	Acct. 4340 (2210) - Net Noncurrent Deferred Operating Income Taxes - Central Office Switching Equipment	Redacted	(310)	Redacted	Deferred Tax Summary
(315)	Acct. 4340 (2220) - Net Noncurrent Deferred Operating Income Taxes - Operator System Equipment	Redacted	(315)	Redacted	Deferred Tax Summary
(320)	Acct. 4340 (2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Transmission Equipment	Redacted	(320)	Redacted	Deferred Tax Summary
(325)	Acct. 4340 (2210–2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Equipment (Sum of Lines 310 Through 320)	Redacted	(325)	Redacted	SUM
(330)	Acct. 4340 (2410) - Net Noncurrent Deferred Operating Income Taxes - Cable and Wire Facilities	Redacted	(330)	Redacted	Deferred Tax Summary

Universal Service Fund 2006 Data Collection Form

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source		
Plant-Specific Operation Expense							
(335)	Acct. 6110 - Network Support Expense Total	Redacted	(335)	Redacted	Expense Summary		
(340)	Acct. 6110 - Benefits Portion of Network Support Expense	Redacted	(340)	Redacted	Ben & Rents Sum		
(345)	Acct. 6110 - Rents Portion of Network Support Expense	Redacted	(345)	Redacted	Ben & Rents Sum		
(350)	Acct. 6120 - General Support Expense Total	Redacted	(350)	Redacted	Expense Summary		
(355)	Acct. 6120 - Benefits Portion of General Support Expense	Redacted	(355)	Redacted	Ben & Rents Sum		
(360)	Acct. 6120 - Rents Portion of General Support Expense	Redacted	(360)	Redacted	Ben & Rents Sum		
(365)	Acct. 6210 - Central Office Switching Expense - Total	Redacted	(365)	Redacted	Expense Summary		
(370)	Acct. 6210 - Benefits Portion of Central Office Switching Expense	Redacted	(370)	Redacted	Ben & Rents Sum		
(375)	Acct. 6210 - Rents Portion of Central Office Switching Expense	Redacted	(375)	Redacted	Ben & Rents Sum		
(380)	Acct. 6220 - Operator System Expense - Total	Redacted	(380)	Redacted	Expense Summary		
(385)	Acct. 6220 - Benefits Portion of Operator System Expense	Redacted	(385)	Redacted	Ben & Rents Sum		
(390)	Acct. 6220 - Rents Portion of Operator System Expense	Redacted	(390)	Redacted	Ben & Rents Sum		
(395)	Acct. 6230 - Central Office Expense - Transmission Equipment - Total	Redacted	(395)	Redacted	Expense Summary		

Universal Service Fund 2006 Data Collection Form

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source
(400)	Acct. 6230 - Benefits Portion of Central Office Expense - Transmission Equipment	Redacted	(400)	Redacted	Ben & Rents Sum
(405)	Acct. 6230 - Rents Portion of Central Office Expense - Transmission Equipment	Redacted	(405)	Redacted	Ben & Rents Sum
(410)	Accts. 6210–6230 - Central Office Expense Total (Sum of Lines 365 + 380 + 395)	Redacted	(410)	Redacted	SUM
(415)	Reserved	N O	ENT	RY REQUI	R E D
(420)	Reserved	N O	ЕΝТ	RY REQUI	R E D
(425)	Reserved	N O	ЕΝТ	RY REQUI	RED
(430)	Acct. 6410 - Cable and Wire Facilities Expense - Total	Redacted	(430)	Redacted	Expense Summary
(435)	Acct. 6410 - Benefits Portion Cable and Wire Facilities Expense	Redacted	(435)	Redacted	Ben & Rents Sum
(440)	Acct. 6410 - Rents Portion Cable and Wire Facilities Expense	Redacted	(440)	Redacted	Ben & Rents Sum
(445)	Total Plant-Specific Expense (Sum of Lines 335 + 350 + 365 + 380 + 395 + 415 + 430)	Redacted	(445)	Redacted	SUM
Plant-Nor	aspecific Expense				
(450)	Acct. 6530 - Network Operations Expense - Total	Redacted	(450)	Redacted	Expense Summary
(455)	Acct. 6530 - Benefits Portion Network Operations Expense	Redacted	(455)	Redacted	Ben & Rents Sum

Universal Service Fund 2006 Data Collection Form

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source
(465)	Reserved	N O	ENTE	RY REQUI	RED
(470)	Reserved	N O	ENTF	RY REQUI	RED
(480)	Reserved	N O	ENTF	RY REQUI	RED
(485)	Reserved	N O	ENTF	RY REQUI	RED
(500)	Reserved	N O	ENTF	RY REQUI	RED
(505)	Reserved	N O	ENTF	RY REQUI	RED
Depreciat	ion and Amortization Expenses				
(510)	Acct. 6560 (2210) - Depreciation and Amortization Expense - Central Office Switching Equipment	Redacted	(510)	Redacted	Depreciation Expense Summary
(515)	Acct. 6560 (2220) - Depreciation and Amortization Expense - Operator System Equipment	Redacted	(515)	Redacted	Depreciation Expense Summary
(520)	Acct. 6560 (2230) - Depreciation and Amortization Expense - Central Office Transmission Equipment	Redacted	(520)	Redacted	Depreciation Expense Summary
(525)	Acct. 6560 (2210–2230) Depreciation and Amortization Central Office Equipment (Sum of Lines 510 Through 520)	Redacted	(525)	Redacted	SUM
(530)	Acct. 6560 (2410) - Depreciation and Amortization Expense - Cable and Wire Facilities	Redacted	(530)	Redacted	Depreciation Expense Summary
Corporate	Operating Expenses				
(535)	Acct. 6710 - Executive and Planning Expense - Total	Redacted	(535)	Redacted	Expense Summary
(540)	Acct. 6710 - Benefits Portion Executive and Planning Expense	Redacted	(540)	Redacted	Ben & Rents Sum
CONF	IDENTIAL PER WAC 480-07-160				REDACTED

Universal Service Fund 2006 Data Collection Form

SAC: 522452

SA Name: WHIDBEY TELEPHONE COMPANY

Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source
(550)	Acct. 6720 - General Administrative Expense - Total	Redacted	(550)	Redacted	Expense Summary
(555)	Acct. 6720 - Benefits Portion - General Administrative Expense	Redacted	(555)	Redacted	Ben & Rents Sum
(565)	Total Corporate Operations Expense (Sum of Lines 535 + 550)	Redacted	(565)	Redacted	SUM
Other Exp	penses and Revenues				
(600)	Benefits Portion of All Operating Expenses - Total	Redacted	(600)	Redacted	Ben & Rents Sum
(610)	Rents Portion of All Operating Expenses - Total	Redacted	(610)	Redacted	Ben & Rents Sum
(620)	Reserved	N O	ENT	RY REQUI	R E D
(630)	Reserved	N O	ENT	RY REQUI	R E D
Taxes					
(650)	Acct. 7200 - Operating Taxes	Redacted	(650)	Redacted	Expense Summary
(655)	Reserved	N O	ЕΝТ	RY REQUI	R E D
IV. PAR	T 36 - COST STUDY DATA				
(700)	Acct. 2410 - Cost Study Average Cable and Wire Facilities	Redacted	(700)	Redacted	C&WF Summary
(710)	Cost Study Average Cable and Wire Facilities Cat. 1 - Total Exchange Line C&WF Excluding Wide Band	Redacted	(710) ⁻	Redacted	C&WF Summary

Universal Service Fund 2006 Data Collection Form

SAC: 522452 SA Name: WHIDBEY TELEPHONE COMPANY Region: 5 PACIFIC

Data Line	Description	Latest View 2005-1 Amount	Data Line	Pending View 2006-1 Amount	Data Source
	ORTIZABLE TANGIBLE ASSETS instructions prior to completing this section	1)			
(800)	Acct. 2680 - Amortizable Tangible Assets	Redacted	(800)	Redacted	Plant Summary
(805)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central Office Transmission Equipment	Redacted	(805)	Redacted	Plant Summary
(810)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central Office Transmission Equipment Allocated to Category 4.13	Redacted	(810)	Redacted	Plant Summary
(815)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities	Redacted	(815)	Redacted	Plant Summary
(820)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities Allocated to Category 1	Redacted	(820)	Redacted	Plant Summary
(830)	Acct. 6560 (2680) - Depreciation and Amortization Expense - Amortizable Tangible Assets	Redacted	(830)	Redacted	Depreciation Expense Summary

VI. COMMENTS/SIGNIFICANT CHANGE EXPLANATION

National Exchange Carrier Association, Inc. Universal Service Fund 2006 Data Collection Form

I AM CHIEF FINANCIAL OFFICER. I HEREBY CERTIFY THAT I HAVE OVERALL

VII. CERTIFICATION FORM

RESPONSIBILITY FOR THE PREPARATION OF ALL DATA IN THE ATTACHED 2006-1 UNIVERSAL SERVICE FUND DATA SUBMISSION FOR WHIDBEY TELEPHONE COMPANY AND THAT I AM AUTHORIZED TO EXECUTE THIS CERTIFICATION. BASED ON INFORMATION KNOWN TO ME OR PROVIDED TO ME BY EMPLOYEES RESPONSIBLE FOR THE PREPARATION OF THE DATA IN THIS SUBMISSION, I HEREBY CERTIFY THAT THE DATA HAVE BEEN EXAMINED AND REVIEWED AND ARE COMPLETE, ACCURATE, AND CONSISTENT WITH THE RULES OF THE FEDERAL COMMUNICATIONS COMMISSION. DATE: CERTIFYING SIGNATURE: NAME: BRUCE RUSSELL TITLE: CHIEF FINANCIAL OFFICER JANUARY 1, 2005 TO DECEMBER 31, 2005 PERIOD COVERED: RURAL STATUS: The rural status of this company during calendar year 2007 will be: (Check One) VII.A. <u>X</u> RURAL NON-RURAL ACQUISITION CERTIFICATION (Check One) VII.B. MY COMPANY HAS NOT ACQUIRED AN EXCHANGE DURING THE PERIOD COVERED. MY COMPANY HAS ACQUIRED THE FOLLOWING EXCHANGE(S) DURING THE PERIOD COVERED. Exchange Name Selling Company No. of Loops

PURSUANT TO FCC RULES, SECTION 69.601(C), EXCHANGE CARRIERS ARE REQUIRED TO CERTIFY UNIVERSAL SERVICE FUND DATA SUBMITTED TO NECA.

(FCC RULES STATE THAT PERSONS MAKING WILLFUL FALSE STATEMENT IN THIS DATA SUBMISSION CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER THE PROVISIONS OF THE U.S. CODE, TITLE 18, SECTION 1001).

CONFIDENTIAL PER WAC 480-07-160

REDACTED