



Service Since 1913

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July 6, 2021

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

Re: Eligible Telecommunications Carriers' Annual Certification on High Cost Fund Pursuant  
to WAC 480-123-060, 070, 080 and 47 C.F.R. §54.314

**RESUBMISSION – DOCKET UT-210521**

Dear Mr. Johnson:

Pursuant to WAC 480-123-060, St John Telephone, Inc. (“Company”) hereby requests that the Washington Utilities and Transportation Commission certify 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 attached and will be filed electronically. Report 1 and 6 are filed on a confidential basis pursuant to WAC 480-07-160 because it contains company-specific proprietary financial data. Please note both confidential and redacted versions of the report are attached. In Report 1, NECA-1 data noted is provided by the National Exchange Carrier Association.

For the Commission’s information, in addition to the Lifeline advertisement covered in the enclosed certification, St. John Telephone, Inc. posts the Lifeline information in its St. John business office, lists the Lifeline services available in the Company’s phone book and provides the Lifeline information to all new customers at the time the customer subscribes for telephone service.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Trump", is written over a faint, larger signature.

Eric Trump  
General Manager, Assistant Secretary

Enclosures

**OFFICERS**

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

**DIRECTORS**

Paul Heglar  
Jessiann Loomis

**AFFIDAVIT CONTAINING CERTIFICATIONS  
PURSUANT TO WAC 480-123-060 AND WAC 480-123-070**

I, Eric Trump, being of lawful age, state that I am the General Manager, Assistant Secretary of St. John Telephone, Inc. ("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit 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 in 2020 used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;

(2) That during the 2020 calendar year, the Company met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h);

(3) That during the 2020 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 2020 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 6<sup>th</sup> day of July 2021, at St. John, Washington.

Company: St. John Telephone, Inc.

By: 

Eric Trump

Its: General Manager, Assistant Secretary