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August 25, 2005

VIA FEDERAL EXPRESS

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
Post Office Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

Subject: High Cost Certification of RCC Minnesota, Inc.
Docket No. UT-053030

Dear Ms. Washburn:

Enclosed, pursuant to WAC 480-120-399(c)(2) is the annual state certification filing for RCC Minnesota, Inc. ("RCC"). Additionally, materials are enclosed pursuant to the Staff memo in this docket dated May 13, 2005, requesting additional information regarding examples of advertising and descriptions of how advertising was designed to publicize the availability of services in a manner reasonably designed to reach those likely to qualify for Lifeline or Link Up service. The following information is enclosed:

1. Certification letter of David Del Zoppo pursuant to WAC 480-120-399(2)(a).
2. Lifeline advertising memo describing RCC's outreach efforts to those eligible for Lifeline and Link Up programs.
3. Lifeline advertising summary spreadsheet.
4. Lifeline and Link Up internet website advertising.
5. Lifeline/Link Up poster.

MILLER | NASH_{LLP}
ATTORNEYS AT LAW

Carole J. Washburn
August 25, 2005
Page 2

6. Examples of RCC advertising copy for print media, including Lifeline/Link Up advertising and Spanish language advertising.¹

7. Copy of a bill statement message included on Washington bills regarding Lifeline and Link Up services in Washington.

Please contact me if you have any questions.

Sincerely,


David L. Rice

cc w/encs: Mr. Bob Shirley
Ms. Beth Kohler
Mr. Steve Otto

¹ Note that the ads were run using the trademarks "Unicel" and "Cellular One." Unicel is the current d/b/a of RCC. Cellular One was a d/b/a of RCC at the time the advertisements using that trademark were run.

ATTACHMENT 1



August 26, 2005

VIA FEDERAL EXPRESS

Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

**Re: High Cost Certification of RCC Minnesota, Inc.
Docket No. UT-053030**

Dear Ms. Washburn:

The certifications below are provided pursuant to the WUTC's Order Requiring Filing By Eligible Telecommunications Carriers Receiving Federal High Cost Support, dated and effective as of July 25, 2001.

On behalf of RCC Minnesota, Inc. ("RCC"), I hereby certify under penalty of perjury under the laws of the State of Washington that all high-cost support provided to RCC Minnesota, Inc. will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

RCC was granted Eligible Telecommunications Carrier ("ETC") status by the WUTC on June 14, 2002. RCC expects to continue to receive support in 2005 and 2006 under USAC's current system for distributing support.

Since the date of its ETC grant, including calendar year 2004, RCC has provided all of the supported services required by 47 U.S.C. 214(e) and the Commission's Order granting ETC status. RCC is capable of providing, and will continue to provide all of the supported services for the remainder of calendar year 2005 and throughout 2006. During calendar year 2004, RCC advertised the availability of supported services and the charges for them as required by 47 U.S.C. 214(e) and the Commission's Order, and will continue to do so during calendar year 2005 and throughout 2006.

RCC submitted loop counts to USAC for lines as of the end of the all four quarters of 2004. The number of loops submitted for and upon which RCC's support for 2004 was based are as follows:

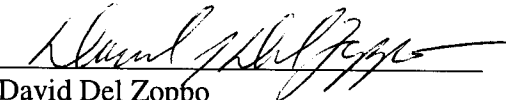


First Quarter 2004 - 42,531
Second Quarter 2004 - 42,395
Third Quarter 2004 - 42,198
Fourth Quarter 2004 - 40,266

RCC received \$3,484,811 in federal universal service high-cost support for the 2004 calendar year. The amount includes all High Cost Loop Support, Local Switching Support, Long Term Support, Interstate Access Support, and Interstate Common Line Support.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed this 8th day of August, 2005, at Alexandria [city],
Minnesota [state].



David Del Zoppo
Vice President, Finance and Accounting

cc: R. Shirley



ATTACHMENT 2

Lifeline Advertising Memo

RCC utilizes a variety of resources to publicize the availability of Lifeline services to those most likely to qualify for the services. Following is a summary of those resources:

Newspaper Advertising: RCC utilizes newspaper advertising to promote the Lifeline program. In its selection of newspapers, RCC makes special consideration for:

- Selecting newspapers with distribution points that cover RCC's service area.
- Utilizing newspapers that are free to the public
 - One of the free newspapers that RCC promotes Lifeline in is the Colville Sun which has multiple walking routes within the Colville Tribal Reservation.
- Utilizing newspapers with alternative languages
 - RCC has advertised in the Wenatchee El Mundo and the La Voz which are Hispanic newspapers with distribution points of Hispanic populations.

Bill Messages: On a periodic basis, RCC includes a bill message on our customer's monthly statement outlining the Lifeline program. This is to assure that all of RCC's existing customers are aware of the Lifeline services available to them.

Posters: RCC has posters in all retail locations which promote Lifeline. These posters are displayed so they are visible to any consumer entering a retail location to inquire about phone service.

Websites: RCC has information regarding the Lifeline program available on our website. RCC has also requested the information be placed on USAC's Low Income website.

Additional Efforts regarding Colville Tribal Reservation:

- RCC's Business Account Executives have met with the Tribal Social Services Department regarding the Lifeline program.
- RCC has contacted the Colville Tribal newspaper regarding advertising the Lifeline program in their newspaper.
- RCC has contacted the Colville Tribe regarding promoting the Lifeline program on the Tribe's website.
- RCC is preparing a mailing to the Colville Tribe that explains the Lifeline program and encourages them to make information available to qualified tribal members. The mailing will include posters to be displayed at TANf offices, the health center, and other tribal offices.

ATTACHMENT 3

Lifeline Advertising Summary

ETC Name: RCC Minnesota, Inc.
 ETC Contact and Phone Number: Steve Otto (320) 808-2479

Lifeline Newspaper Advertising

Newspaper 2004 - Full Ad	Ad Size	Distribution Area	Run Date	Comments
Wenatchee World	15" SC	Wenatchee, East Wenatchee, Cashmere, Chelan	12/6/2004	
Omak Chronicle	15" SC	Omak and Okanogan County	12/6/2004	
Colville Statesman Examiner	15" SC	Colville and Stevens County	12/6/2004	
Wenatchee El Mundo (Hispanic)	15" SC	Wenatchee, East Wenatchee	12/6/2004	
Walla Walla Union-Bulletin	15" SC	Walla Walla, Dayton, College Place	12/6/2004	
Moscow - Pullman Daily News	15" SC	Moscow, Pullman	12/6/2004	
The East Washingtonian	4.25 X 5	Pullman, Colfax	12/15/2004	
The Chewelah Independent	4.25 X 5	Chewelah	12/16/2004	
The Newport Miner	4.25 X 5	Metalline Falls, Metalline, Ione, Newport, Diamond Lake	12/15/2004	
Lake Chelan Mirror	4.25 X 5	Lake Chelan	12/15/2004	
Leavenworth Echo	4.25 X 5	Leavenworth	12/15/2004	
Cashmere Valley Record	4.25 X 5	Cashmere	12/15/2004	
Okanogan Gazette Tribune	4.25 X 5	Omak and Okanogan County	12/15/2004	
Whitman County Gazette	2 col X 6	Pullman, Moscow, Colfax, Uniontown, Colton	12/16/2004	
The Wenatchee Nickel	4.25 X 5	Wenatchee, East Wenatchee	12/16/2004	
Newspaper 2004 - Lifeline Tag Line	Ad Size	Distribution Area	Run Date	
Wenatchee World	Tag line	Wenatchee, East Wenatchee, Cashmere, Chelan	2/2/04 to 2/14/04	
Omak Okanogan Co. Chronicle	Tag line	Omak and Okanogan County	2/2/04 to 2/14/04	
Colville Statesman Examiner	Tag line	Colville and Stevens County	2/2/04 to 2/14/04	
Wenatchee El Mundo (Hispanic)	Tag line	Wenatchee, East Wenatchee	2/2/04 to 2/14/04	
Walla Walla Union-Bulletin	Tag line	Walla Walla, Dayton, College Place	2/2/04 to 2/14/04	
Moscow - Pullman Daily News	Tag line	Moscow, Pullman	2/2/04 to 2/14/04	
La Voz (Hispanic)	Tag line	Walla Walla, Pasco	2/2/04 to 2/14/04	
Newspaper 2005 - Full Ad	Ad Size	Distribution Area	Run Date	
Wenatchee World	18" BW	Wenatchee, East Wenatchee, Cashmere, Chelan	7/4/2005	
Omak Chronicle	18" BW	Omak and Okanogan County	7/4/2005	
Colville Statesman Examiner	18" BW	Colville and Stevens County	7/4/2005	
Wenatchee El Mundo (Hispanic)	18" BW	Wenatchee, East Wenatchee	7/11/2005	
Walla Walla Union-Bulletin	18" BW	Walla Walla, Dayton, College Place	7/4/2005	
Moscow - Pullman Daily News	18" BW	Moscow, Pullman	7/4/2005	
The East Washingtonian	4.25 X 5	Pullman, Colfax	7/6/2005	
The Chewelah Independent	4.25 X 5	Chewelah	7/7/2005	
The Newport Miner	4.25 X 5	Metalline Falls, Metalline, Ione, Newport, Diamond Lake	7/6/2005	
Lake Chelan Mirror	4.25 X 5	Lake Chelan	7/6/2005	
Leavenworth Echo	4.25 X 5	Leavenworth	7/6/2005	
Cashmere Valley Record	4.25 X 5	Cashmere	7/6/2005	
Whitman County Gazette	3 col X 7	Pullman, Moscow, Colfax, Uniontown, Colton	7/7/2005	
The Wenatchee Nickel	3 col X 7	Wenatchee, East Wenatchee	7/7/2005	
La Voz (Hispanic)	5.75 X 6	Walla Walla, Pasco	7/14/2005	
Omak Bottom Line	18" BW	Omak Chronicle	7/13/2005 Free newspaper	
Colville Sun	18" BW	Colville and Stevens County	7/12/2005 Free newspaper	
Walla Walla Bulletin Extra	18" BW	Walla Walla, Dayton, College Place	7/12/2005 Free newspaper	
Moscow - Pullman Palouse Living	18" BW	Whitman County	7/12/2005 Free newspaper	

Bill Messages

Lifeline/Link Up bill message appears on customer's monthly statement.

January 2004 Statements
 Scheduled for August 2005
 Statements

Posters

Lifeline/Link Up: "Wireless Service to Fit Your Budget"
 * see attached exhibit for sample

All retail locations

Unicel Website

www.Unicel.com

USAC Website

Unicel has submitted a request and is awaiting USAC to update their website.

www.universal service.org

ATTACHMENT 4

<input type="checkbox"/> Unicel - A part of life here		<input type="checkbox"/> Sh		<input type="checkbox"/> Products and		<input type="checkbox"/> Special		<input type="checkbox"/> Supp		<input type="checkbox"/> About		<input type="checkbox"/> Up	
Service for: Bend, Oregon		<input type="checkbox"/> Service Plans		<input type="checkbox"/> Phones		<input type="checkbox"/> Info2Go							

Lifeline and Link Up Programs for Unicel

Unicel has been designated as an Eligible Telecommunication Carrier in the State of Washington and the State of Oregon and is authorized to provide Lifeline and Link Up services to qualifying individuals.

What is Lifeline and Link Up?

Lifeline is a government program that provides a discount to qualified individuals on their monthly telephone bill. Link Up helps households pay the initial installation or activation charge for the setup of your telephone service.

How much can I save on my phone bill?

By participating in Lifeline, Washington customers will save \$8.25 a month and Oregon customers will save \$13.50 a month. These benefits apply to your local telephone service charges that you purchase as a flat rate service, measured service, or local service purchased as part of a bundled service. Link Up will provide a one-time credit of \$17.50 to reduce your service activation fee. Additional credits may be available for qualified consumers living on federally recognized reservations.

How do I know if I'm eligible?

Washington residents are eligible for Lifeline and Link Up if you participate in any of the following programs:

- Food Stamps

<input type="checkbox"/> SPECIAL OFFERS	Motorola V220 Camera Phone for \$29.99!
<input type="checkbox"/> No Strings - No Contract!	
<input type="checkbox"/> Free Shipping & Handling For Online Orders!	
<input type="checkbox"/> LOCAL PLANS	
<input type="checkbox"/> GSM Local Plans	
<input type="checkbox"/> Unlimited Round The Clock Calling	
<input type="checkbox"/> NATIONAL PLANS	
<input type="checkbox"/> GSM True Nationwide Plans	
<input type="checkbox"/> PREPAID PLANS	
<input type="checkbox"/> SmartPay Prepay	
<input type="checkbox"/> LIFELINE SERVICE	
<input type="checkbox"/> Lifeline and Link Up	

Download service plan brochure in PDF format

- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- State Family Assistance (SFA)
- General Assistance - Unemployable (GALU)
- Refugee Assistance
- Medical Assistance, including Medicare cost sharing programs.
- Community Options Program Entry System (COPES)
- DSHS Chore Services

Oregon residents are eligible for Lifeline and Link Up if you participate in any of the following programs:

- Food Stamps
- Supplemental Security Income (SSI)
- Oregon Health Plan
- Welfare Medical ID Card

Also, qualified consumers in Washington and Oregon living on federally recognized reservations may establish eligibility through these additional programs:

- Bureau of Indian Affairs (BIA) General Assistance
- Temporary Assistance for Needy Families (TANF)
- Head Start (if income eligible)
- Free meals under the National School Lunch Program

Are there any restrictions?

Lifeline and Link Up can only be used for the main telephone line in your household. The name on your phone bill must match the name of the participant who is eligible in the program. Only one occupant per household may receive benefits. You may not be a dependent for federal tax purposes, or you must be 60 years of age or older.

How do I apply?

To apply for Lifeline and Link Up, call 1-800-Go Cellular (1-800-462-3558) or pick up an application at various retail locations throughout Washington or Oregon. Oregon customers can also call the Oregon

Telephone Assistance Program at 1-800-848-4442 for an application. You will be asked to provide proof of your eligibility by signing a self-certification form and providing a copy of a document that verifies you participate in any of the above-mentioned programs.

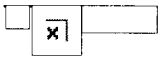
How do I continue to receive Lifeline benefits?

Eligibility is reviewed periodically. Your benefits will be discontinued when you no longer meet eligibility requirements.

Other Useful Information:

There are other options that can help you save money, including free toll blocking and waived deposit with toll blocking.

Being a Lifeline and Link Up customers does not protect you from being disconnected if you fail to pay your telephone bill.



Shop

- Service Plans
 - Service Packages
 - Link Plan (existing customers)
 - Accessories
 - Gift Cards
- Store Locator
- Zip:

Text Messaging

The power of the unspoken word! Send a text message today!

What's New

- Wireless AMBER Alerts
- StandUp!

Sign up now to begin receiving alerts on the geographic areas you choose. Unicel is proud to present StandUp!, a campaign against cyber bullying via the Internet and cell phones.

Info2Go

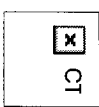
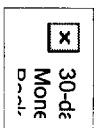
Discover any number of the million and one ways to make your phone uniquely your own with Unicel's Info2Go.

Info2Go features may not be available in all areas

Support

Need some help? Our online support center provides you with helpful information without having to call customer service. Check out

the FAQ's, How Do It's, and Product Guides.



Copyright © 2004 Rural Cellular Corporation. All Right Reserved. [Privacy Policy](#) | [Terms of Use](#) | [Change Location](#) | [Home](#)



ATTACHMENT 5



UNICEL®



:: LIFELINE / LINK UP



Wireless Service

To fit your budget

How Do I Determine If I'm Eligible?

If you are currently enrolled in: Food Stamps, Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), State Family Assistance (SFA), General Assistance - Unemployable (GAU), Refugee Assistance, Medical Assistance, including Medicare cost sharing programs, Community Options Program Entry System (COPES), DSHS Chore Service



FEATURED CALLING PLAN

550 Anytime
Minutes*

\$29⁹⁹
/ month

*Calls made within RCC Northwest Licensed Properties.

What is The Lifeline Credit Value?

The Lifeline Credit Value is up to \$8.25 per month for eligible customers that reside in the Unicel calling area.

Additional credits may be available for qualified customers living on federally recognized reservations.



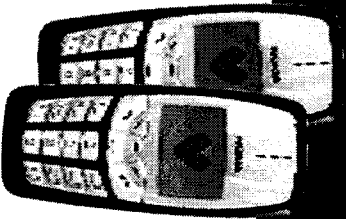
ATTACHMENT 6

CELLULARONE®
part of life here.

Share a plan. Share the love.

Add a line to any new calling plan and share your plan minutes for just \$9.99 a month for the first three months. That's half the regular price!

Plus share unlimited mobile to mobile calling between Cellular One customers.



Valentine's Day Sale, February 1 - 14
Hurry in for great deals on phones!

New 24-month service agreement required on all promotions.

1-800-GO CELLULAR (462-3558)

www.cellularone-nw.com

CELLULAR ONE RETAIL STORES: **Coville:** 103 North Main Street **Omak:** 201 North Main, Suite 313
Wenatchee: 1304-B North Miller Street

Cellular One is an authorized provider of Ltltime and Link Up services in the state of Washington.

ATTENTION BUSINESSES: Whether big or small, we have plans to meet your needs. Call our Business to Business team at 1-800-663-7907

Cellular One is a service of RCC Holdings, Inc. Offer subject to terms of wireless service agreement and calling plan details. Service activation requires \$35 one-time activation fee (unless waived as part of promotion) and credit check and may require security deposit. \$200 early termination fee applies to each line. Customer must remain on chosen rate plan for a minimum of three months after activation and after rate plan changes; a \$10 rate plan change fee will be charged thereafter. Customer will automatically be billed \$20/month for additional line after third month. Unlimited Mobile to Mobile calling applies to calls made between Cellular One customers in the Northwest Licensed Properties. Federal, state and local taxes and other surcharges apply. Must be at least 18 years old with positive ID. Customer must verify physical address within the Northwest Licensed Properties to obtain service. Limited time offer, good while supplies last. Requires the use of approved in-mode digital equipment. Other restrictions apply. See store for details and guarantee terms and conditions.



CELLULAR**ONE** IS NOW

UNICEL

part of life here.

Unicel lets you stay connected for less!

Unicel participates in the Lifeline/Link-Up Telecommunications Assistance program offering discounted wireless service plans to qualified low-income individuals.

550 Anytime Minutes

\$29⁹⁹ monthly access

Calls made or received within RCC NW Licensed Properties.

New 12-month service agreement required.

You may be eligible if you're enrolled in:

Food stamps or Supplemental Security Income (SSI),
Temporary Assistance for Needy Families (TANF),
State Family Assistance (SFA), General Assistance—Unemployable (GAU),
Refugee Assistance, Medical Assistance, including Medicare cost-sharing programs,
Community Options Program Entry System (COPES) and DSHS Chore Service.

Visit your local Unicel retail store for more information.

Unicel is a service of RCC Holdings, Inc. Additional charges will be included for each line of service to help Unicel defray its costs of complying with federal and state regulatory obligations, as follows: 2.62% USF charge, \$0.19 WNP charge and, if roaming charges are incurred, roaming taxes as passed on by our roaming partners and a \$2.00 roaming administration charge. These charges are not taxes or government-required charges. Federal, state and local taxes and surcharges apply. Service activation requires \$35 one-time activation fee per line and credit check and may require security deposit. \$200 early termination fee applies to each line. Calls cannot be made or received outside the NW Licensed Properties. Customer may not migrate from selected plan for 90 days after activation. Digital features and service are not available in all areas and may vary due to atmospheric, topographical and other conditions. Approved tri-mode digital phone required. Must be at least 18 years old with positive ID. Customer must verify physical address within the NW Licensed Properties to obtain service. Limited time offer. Additional restrictions apply. See store for details.



UNICEL®

:: LÍNEA DE VIDA / CONÉCTATE



Servicio de telefonía celular al alcance de su bolsillo.

Como Determine Si Soy Elegible?

Si usted esta actualmente inscrito en: Estampas de Comida, Ingresos Suplementarios de Seguridad (SSI), Asistencia de Ayuda Temporal para Familias Necesitadas (TANF), Asistencia Estatal para Familias (SFA), Asistencia General-Discapitados (GAU), Asistencia a Refugiados, Asistencia Medica, incluyendo programas que comparte costos de Medicare, Sistema Primario del Programa Comunitario de Opciones (COPEs), Servicio de Trabajos DSHS.

PROMOCIÓN DE PLAN DE LLAMADAS

550 minutos
cualquier
hora*

\$29⁹⁹ / mes

*Llamadas hechas dentro de RCC Northwest Licensed Properties

Cual es el Valor de Crédito de la Línea de Vida?

El valor de crédito de la línea de vida vale hasta \$8.25 por mes para clientes elegibles que residan en el área de llamadas de Unicel.

Créditos adicionales pueden estar disponibles para clientes calificados que viven en reservaciones federalmente reconocidas.



ATTACHMENT 7

WASHINGTON:

Unicel is an authorized provider of Lifeline and Link Up services in Washington. Lifeline provides credits of \$8.25 a month to income-qualified individuals on their local telephone bill. You may be eligible if you participate in any of the following programs: Food Stamps, Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), State Family Assistance (SFA), General Assistance – Unemployable (GAU), Refugee Assistance, Medical Assistance, including Medicare cost sharing programs, Community Options Program Entry System (COPES), or DSHS Chore Services. Additional credits are available for qualified individuals living on federally recognized tribal reservations. To see if you qualify for Lifeline and Link Up, call 1-800-GO-CELLULAR or pick up an application at our retail locations.