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June 29, 2018

**FILED VIA WEB PORTAL**

Mr. Steven V. King  
Executive Director & Secretary  
Washington Utilities and Transportation Commission  
Post Office Box 47250  
1300 S. Evergreen Park Dr. SW  
Olympia, Washington 98504-7250

**Subject: United States Cellular Corporation – 2016 Annual ETC Recertification  
Docket UT-18\_\_\_\_\_**

Dear Mr. King:

Pursuant to WAC 480-123-070, *et seq.*, U. S. Cellular Corporation ("USCC") hereby files its annual certifications and reports in Docket No. UT-18\_\_\_\_\_, as follows:

ANNUAL ETC CERTIFICATION AND REPORT, with listed Exhibits -

- Exhibit A Declaration Certifying Use of Universal Service Funds
- Exhibit B Report on use of federal funds and benefits to customers  
*Confidential*
- Exhibit C Local service outage report - *Confidential*
- Exhibit D Report on failure to provide service - *Confidential*
- Exhibit E Report on complaints per one thousand handsets or lines  
*Confidential*
- Exhibit F Declaration Certifying Compliance With Applicable Service  
Quality Standards and Consumer Protection Rules
- Exhibit G Declaration Certifying Ability To Function In Emergency  
Situations

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- Exhibit H Declaration Certifying Lifeline Advertising
- Exhibit I Samples of advertising and outreach materials
- Exhibit J Annual plan for Universal Service support – *Confidential*

Pursuant to WAC 480-07-140, we are making this filing electronically. In the confidential portion of the filing, each electronic file will contain, as part of the file name, the word "CONFIDENTIAL." Additionally, each page in the confidential electronic and paper files will be labeled "Confidential Per WAC 480-07-160." A redacted copy of each confidential exhibit will also be filed electronically.

Pursuant to RCW §80.04.095 enclosures designated as "confidential" contain valuable commercial information, including trade secrets and confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information. Accordingly, pursuant to RCW §80.04.095 such information should not be subject to inspection or copying under RCW Chapter 42.56. Moreover, the records designated as "confidential" contain valuable formulae, designs, and research data, the disclosure of which would produce private gain and public loss and should be exempt from public disclosure pursuant to RCW 42.56.270(1).

In addition to the undersigned, the following might be directly affected by disclosure of the confidential information:

U. S. Cellular Corporation  
8410 West Bryn Mawr Avenue  
Chicago, IL 60631  
Phone: (773) 864-3167  
E-mail: [John.Gockley@uscellular.com](mailto:John.Gockley@uscellular.com)  
Attention: John C. Gockley

Mr. Steven V. King

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If you have any questions please contact the undersigned.

Very truly yours,

/s/

Brooks E. Harlow, WSBA # 11843  
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cc: Mr. Tim Zawislak  
Ms. Stephanie Cassioppi

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

	)	
	)	DOCKET NO. UT-18 _____
In the Matter of State	)	
Certification of Support as	)	ANNUAL ETC CERTIFICATION AND
Required by 47 C.F.R. § 54.314	)	REPORT OF UNITED STATES
	)	CELLULAR CORPORATION
.....	)	

Pursuant to WAC 480-123-060, *et seq.*, United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 (“USCC”), seeks recertification as an ETC in the State of Washington based on the following:

1. USCC was designated as an eligible telecommunications carrier (“ETC”) by the Washington Utilities and Transportation Commission in Docket No. UT-970345 on December 23, 1997, as supplemented December 30, 1999 and January 27, 2000, May 14, 2008, and September 26, 2013.

2. During the calendar year 2017, USCC provided the services required by 47 U.S.C. § 214(e) consistent with the Commission Orders in Docket No. UT-970345. As certified in **Exhibit A**, funds USCC receives from the federal high-cost universal service support fund were and will be used only for the provision, maintenance and upgrading of the facilities and services for which the support was intended.

3. **Exhibit B** attached is intended to satisfy the requirements of WAC 480-123-070 (1) “Report on use of federal funds and benefits to customers”. The 4G LTE investments and expenses provide substantial benefits to consumers in the form of advanced wireless technology to significantly increase both the speed and capacity of mobile networks in USCC’s Washington ETC area. 4G LTE – the next generation of cellular technology –

allows customers to surf the web, send and receive pictures, download music and watch videos at speeds up to 10 times faster than 3G. – *Confidential*

4. **Exhibit C** details reportable service outages in 2017.
5. **Exhibit D** attached is intended to satisfy the requirements of WAC 480-123-070 (3) “Report on failure to provide service”. - *Confidential*
6. **Exhibit E** attached is intended to satisfy the requirements of WAC 480-123-070 (4) “Report on complaints per one thousand handsets or lines”. - *Confidential*
7. **Exhibit F** certifies USCC is in compliance with the CTIA Consumer Code for Wireless Carriers. This statement is made in response to WAC 480-123-070 (5) “Certification of compliance with applicable service quality standards”.
8. In 2014 USCC had a reasonable amount of backup power (fixed, portable or other backup power source) for its cell sites, and backup power for its switches is as prescribed in WAC 480-120-411(3). The certification of compliance in **Exhibit G** is made in response to WAC 480-123-070 (6) “Certification of ability to function in emergency situations”.
9. During the calendar year 2017, USCC advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e), and the Commission Orders in Docket No. UT-970345. **Exhibit H** certifies that USCC publicized the availability of supported services, including Lifeline Services and tribal outreach. Samples of advertising are attached as **Exhibit I**. This paragraph is in response to WAC 480-123-070 (7) “Advertising certification, including advertisement on Indian reservations”.
10. **Exhibit J**, attached, details USCC’s intended investment and expenditures within its ETC boundaries in the State of Washington for the time period October 1, 2018

through September 30, 2019. The planned expenditures will benefit customers by ensuring continued and ongoing mobile voice and data services in high cost areas that otherwise might not be served or served as well without the federal support. This information is provided as a response to WAC 480-123-080. - *Confidential*

Respectfully submitted this 29th day of June, 2018.

LUKAS, LAFURIA, GUTIERREZ & SACHS, LLP

/s/

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Attorneys for United States Cellular Corporation

**Exhibit A – U.S. Cellular - WAC 480-123-070**

DECLARATION CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, John C. Gockley, am Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 (“U.S. Cellular”). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission that pursuant to 47 C.F. R. Sec. 54.7, and for purposes of the certification required under 47 C.F.R. Sec. 54.314, that all federal high-cost support provided to U.S. Cellular within Washington state was used in the preceding calendar year [2017] and will be used in the coming calendar year [2019] only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with the principles of universal service set forth in 47 U.S.C. 254.

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

Executed at Chicago, Illinois this 21<sup>st</sup> day of June, 2018.

UNITED STATES CELLULAR CORPORATION

By:  (Name)

Its: Vice President – Legal and Regulatory Affairs (Title)

Exhibit B Report on use of federal funds and benefits to customers – *Confidential*

Attached in native format separately as  
“WA USCC ETC 2018 CERT Exhibit B CONFIDENTIAL.xlsx”













**CONFIDENTIAL PER WAC 80-07-160**

**Exhibit E  
U.S. Cellular  
State of Washington  
WAC 480-123-070 (4)**

**Report on Complaints per One Thousand Handsets or Lines  
Calendar Year 2017**

During calendar year 2017 U.S. Cellular was the named company in [REDACTED] consumer complaints filed with the Federal Communications Commission. Of these complaints, one (1) was related to [REDACTED]  
[REDACTED]

During calendar year 2017 U.S. Cellular was the named company in four (4) consumer complaints filed with the Washington Attorney General. All of these complaints were related to billing issues.

The 2017 year end customer count in Washington State was [REDACTED].

FCC Complaints per 1,000 customers in calendar year 2017 equaled 0.035.

Complaints to the Washington Attorney General per 1,000 customers in calendar year 2017 equaled 0.028.

**Exhibit F – U.S. CELLULAR - WAC 480-123-070 (5)**

**DECLARATION CERTIFYING COMPLIANCE WITH APPLICABLE SERVICE  
QUALITY STANDARDS AND CONSUMER PROTECTION RULES**

I, John C. Gockley, am Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 (“U.S. Cellular”). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission, pursuant to the requirements of WAC 480-123-070(5), that it has substantially met the applicable service quality standards and consumer protection rules pursuant to WAC 480-123-030(1)(h) by its commitment to comply with the CTIA Consumer Code for Wireless Service in effect as of January 1, 2015.

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

Executed at Chicago, Illinois this 21<sup>st</sup> day of June, 2018.

UNITED STATES CELLULAR CORPORATION

By:  (Name)

Its: Vice President, Legal and Regulatory Affairs (Title)

**Exhibit G – U.S. CELLULAR - WAC 480-123-070 (6)**

**DECLARATION CERTIFYING ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

I, John C. Gockley, am Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 (“U.S. Cellular”). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission, pursuant to the requirements of WAC 480-123-070(6), that it had, and has, the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030(1)(g).

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

Executed at Chicago, Illinois this 21<sup>st</sup> day of June, 2018.

UNITED STATES CELLULAR CORPORATION

By:  (Name)

Its: Vice President – Legal and Regulatory Affairs (Title)



**Exhibit H – U.S. CELLULAR - WAC 480-123-070 (7)**

**DECLARATION CERTIFYING LIFELINE ADVERTISING**

I, John C. Gockley, am Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 (“U.S. Cellular”). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

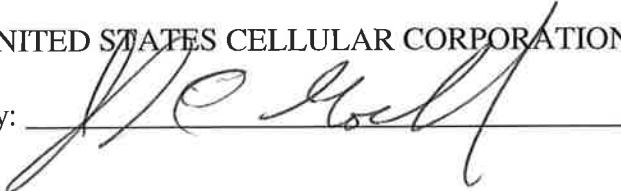
U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission, pursuant to the requirements of WAC 480-123-070(7), that it has “publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations” within U.S. Cellular’s designated service area. U.S. Cellular’s efforts include:

During the calendar year 2017, U.S. Cellular advertised the availability of supported services and the charges for them as required by 47 U.S.C. Sec. 214(e), and the Commission Orders in Docket No. UT-970345. Outreach activities included newspaper advertising, informational postings at [www.uscellular.com](http://www.uscellular.com), and advertising materials located in retail locations throughout Washington. Select retail locations in the Yakima, Washington area are equipped to allow potential Native American Lifeline customers sign up for service. All potential Lifeline customers in Washington can have their questions answered and sign up for service via a dedicated Lifeline telephone number.

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

Executed at Chicago, Illinois this 21<sup>st</sup> day of June, 2018.

UNITED STATES CELLULAR CORPORATION

By:  (Name)

Its: Vice President – Legal and Regulatory Affairs (Title)



# GET THE NETWORK — THAT WORKS — AS HARD AS YOU DO

Our Lifeline Calling Plans bring discounted wireless service to participants in certain government-assisted programs—all on the network that works in the Middle of Anywhere.

Visit [uscellular.com/lifeline](http://uscellular.com/lifeline) or call **1-800-447-1339** for more information.

Plans starting at

**\$34<sup>25</sup>**

before Lifeline discount for Lifeline 1,000 Voice, Unlimited Messaging Plan.



**Things we want you to know:** Lifeline is a federal government benefit program and only qualified persons may participate. Lifeline service may not be transferred to any other individual. Applicants must present documentation of household income or participation in qualifying programs. Lifeline is only available for one phone line per household, whether landline or wireless. The Lifeline Calling Plan/Lifeline discounts are available only to residents in states where U.S. Cellular is an Eligible Telecommunications Carrier (ETC). To purchase this Lifeline Calling Plan or to receive Lifeline discounts, you must participate in one of the eligible programs and reside within U.S. Cellular's ETC coverage area based on your home address. Lifeline subsidies may only be applied once per household on either your landline or your wireless service. Eligibility to receive Lifeline discounts will be verified annually. Lifeline Calling Plans support all of the federal universal services provided for in 47CFR Sec. 54.101. Additional terms and conditions apply. See store or [uscellular.com](http://uscellular.com) for details. ©2017 U.S. Cellular

U.S. Cellular®  
October 1, 2018 to September 30, 2019  
Annual Plan for Universal Service Support  
WAC 480-123-080

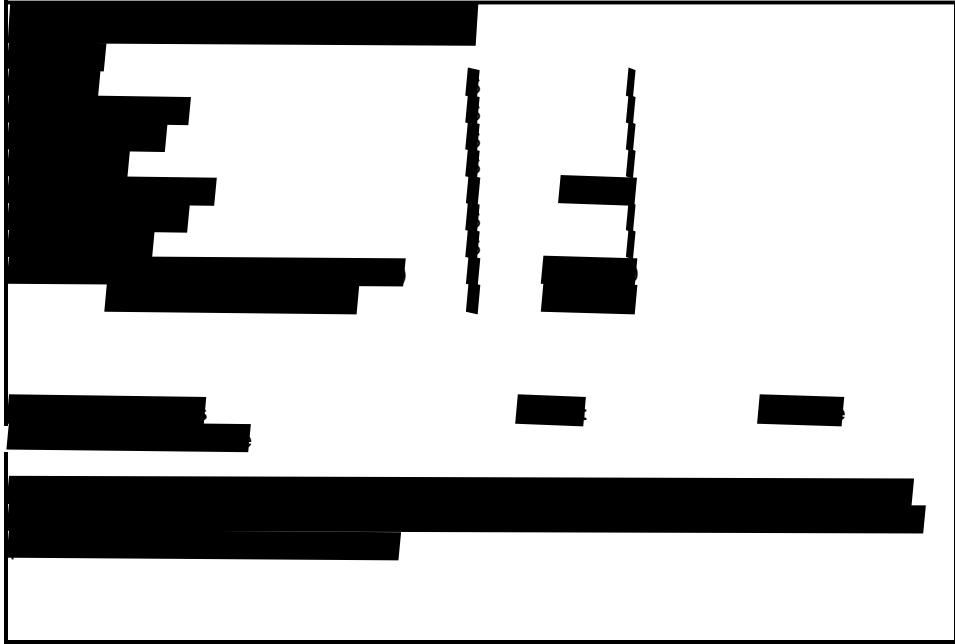
**EXHIBIT J**

**CONFIDENTIAL PER WAC 480-07-160**

[REDACTED]

[REDACTED]

[REDACTED]



A table with a black border containing redacted content. The table has a header row with several columns. The first column contains a large block of redacted text. The second and third columns contain vertical lines. The fourth and fifth columns contain small redacted boxes. Below the table, there are three small redacted boxes and a long redacted bar at the bottom.



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