

Attachments

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

**JULY 1, 2016
REDACTED**

(710) Broadband Price Offerings
Data Collection Form

<010> Study Area Code 522452
 <015> Study Area Name WHIDBEY TEL CO.
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Trish Mason
 <035> Contact Telephone Number - Number of person identified in data line <030> 3603210013 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> trish.mason@whidbeytel.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service Download Speed (Mbps)	Broadband Service Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance When Limit Reached (select)
	WA	South Whidbey	29.95	0.0	29.95	6.0	1.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	34.95	0.0	34.95	6.0	3.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	39.95	0.0	39.95	10.0	3.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	39.95	0.0	39.95	12.0	1.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	44.95	0.0	44.95	12.0	3.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	44.95	0.0	44.95	18.0	1.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	49.95	0.0	49.95	18.0	3.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	49.95	0.0	49.95	20.0	3.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	59.95	0.0	59.95	30.0	3.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	69.95	0.0	69.95	30.0	10.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	79.95	0.0	79.95	50.0	10.0	0.0	Other, No limit on usage allowance
	WA	South Whidbey	89.95	0.0	89.95	50.0	20.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	29.95	0.0	29.95	6.0	1.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	34.95	0.0	34.95	6.0	3.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	39.95	0.0	39.95	10.0	3.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	39.95	0.0	39.95	12.0	1.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	44.95	0.0	44.95	12.0	3.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	44.95	0.0	44.95	18.0	1.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	49.95	0.0	49.95	18.0	3.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	49.95	0.0	49.95	20.0	3.0	0.0	Other, No limit on usage allowance
	WA	Point Roberts	59.95	0.0	59.95	30.0	3.0	0.0	Other, No limit on usage allowance

REDACTED - FOR PUBLIC INSPECTION

(800) Operating Companies
 Data Collection Form

<010> Study Area Code 522452
 <015> Study Area Name WHIDBEY TEL CO.
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Trish Mason
 <035> Contact Telephone Number - Number of person identified in data line <030> 3603210013 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> trish.mason@whidbeytel.com

<810> Reporting Carrier Whidbey Telephone Company
 <811> Holding Company Whidbey Telephone Company
 <812> Operating Company Whidbey Telephone Company

<a1>	Affiliates	<a2>	SAC	<a3>
<813>				Doing Business As Company or Brand Designation
2012	George T.F. Henny Trust	522452	Whidbey Telephone Company	Whidbey Telephone Company
2012	George T.F. Henny Trust	522452	Whidbey Telecom	Whidbey Telecom
2012	George T.F. Henny Trust	522452	WhidbeyTV	WhidbeyTV
2012	George T.F. Henny Trust	522452	Bayview Storage	Bayview Storage
2012	George T.F. Henny Trust	522452	Whidbey Telecom Internet & Broadband	Whidbey Telecom Internet & Broadband
2012	George T.F. Henny Trust	522452	WiFire	WiFire
2012	Julia Henny DeMartini Trust	522452	Whidbey Telephone Company	Whidbey Telephone Company
2012	Julia Henny DeMartini Trust	522452	Whidbey Telecom	Whidbey Telecom
2012	Julia Henny DeMartini Trust	522452	WhidbeyTV	WhidbeyTV
2012	Julia Henny DeMartini Trust	522452	Bayview Storage	Bayview Storage
2012	Julia Henny DeMartini Trust	522452	Whidbey Telecom Internet & Broadband	Whidbey Telecom Internet & Broadband
2012	Julia Henny DeMartini Trust	522452	WiFire	WiFire
2012	Mark P. Henny Trust	522452	Whidbey Telephone Company	Whidbey Telephone Company
2012	Mark P. Henny Trust	522452	Whidbey Telecom	Whidbey Telecom
2012	Mark P. Henny Trust	522452	WhidbeyTV	WhidbeyTV
2012	Mark P. Henny Trust	522452	Bayview Storage	Bayview Storage
2012	Mark P. Henny Trust	522452	Whidbey Telecom Internet & Broadband	Whidbey Telecom Internet & Broadband
2012	Mark P. Henny Trust	522452	WiFire	WiFire
2012	Western Long Distance, Inc.	522452	Western Long Distance	Western Long Distance
2012	Western Long Distance, Inc.	522452	WhidbeyTelecom Long Distance	WhidbeyTelecom Long Distance
2012	Western Long Distance, Inc.	522452	Point Roberts Long Distance	Point Roberts Long Distance
2012	Western Long Distance, Inc.	522452	Hat Island Long Distance	Hat Island Long Distance
2012	Watercrest, Inc.	522452	Watercrest, Inc.	Watercrest, Inc.

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WHIDBEY TELEPHONE COMPANY – 5-YEAR QUALITY IMPROVEMENT PLAN

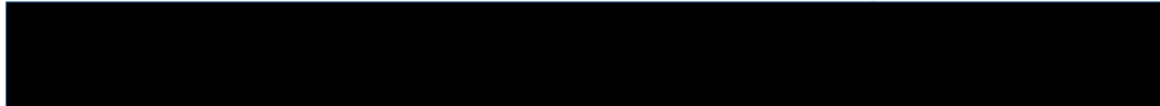
2015 PROGRESS REPORT

PURSUANT TO 47 C.F.R. 54.202(a)

Whidbey Telephone Company (“WTC”) (“Company”) hereby submits this 2015 Progress Report relating to the 5-Year Service Quality Improvement Plan filed previously pursuant to 47 C.F.R. 54.202(a). This report documents proposed improvements or upgrades to the WTC network throughout its service area that have been implemented since January 1, 2015 through December 31, 2015.

Total Support Received

In 2015, WTC received support in the amount of \$2,519,682 (ICLS and ICC). This support was used to support expenditures relating to both Capital purchases as well the on-going maintenance and support requirements that allow WTC to expand and improve service offerings throughout its service area.



Accordingly, WTC apportions the support received as follows:

Capital Expenses	
Operating Expenses	
Total	

The support breakdown by description is as follows:

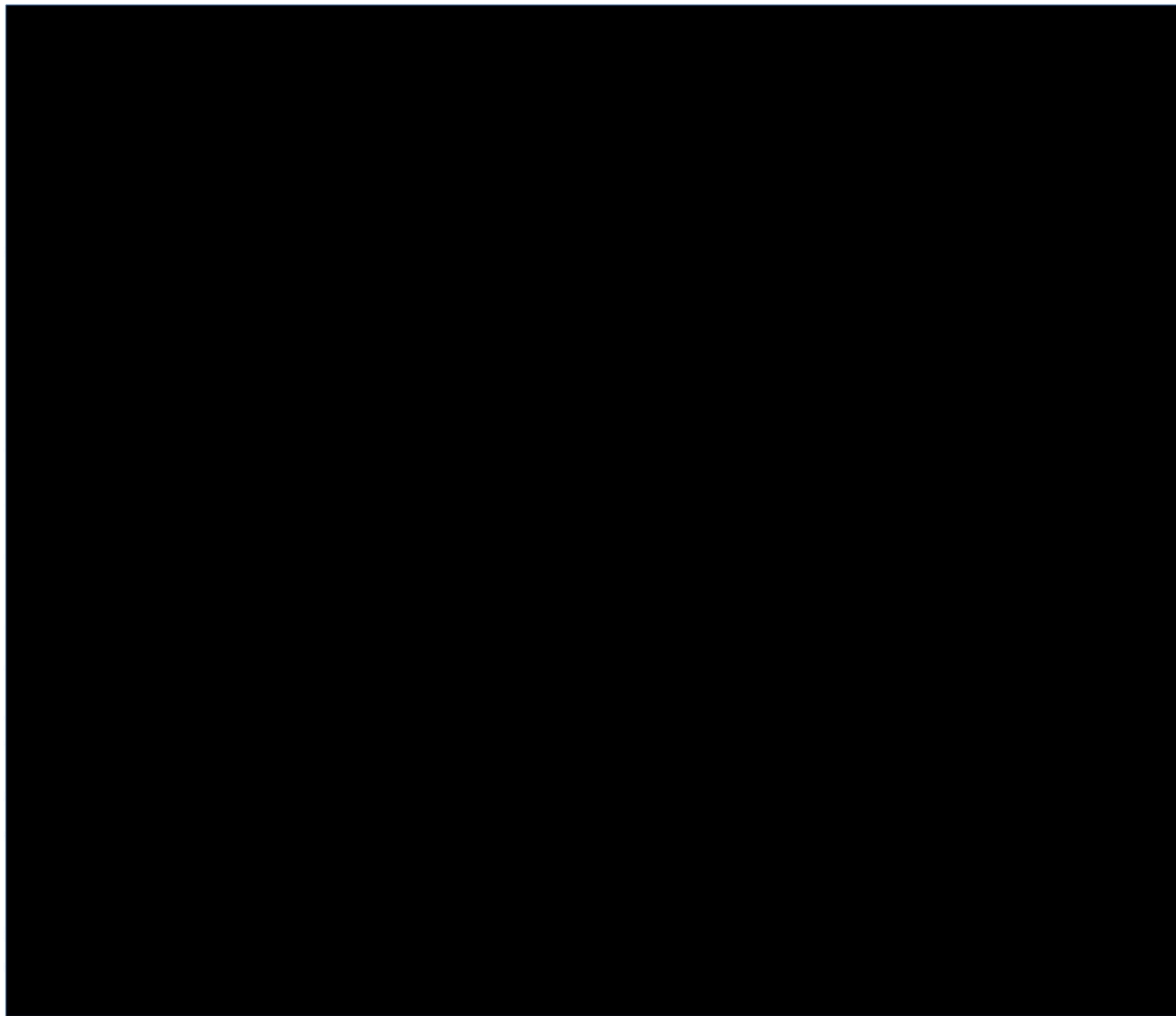
Improve Service Quality	
Improve Service Coverage	
Improve Service Capacity	
Total	

Voice Services

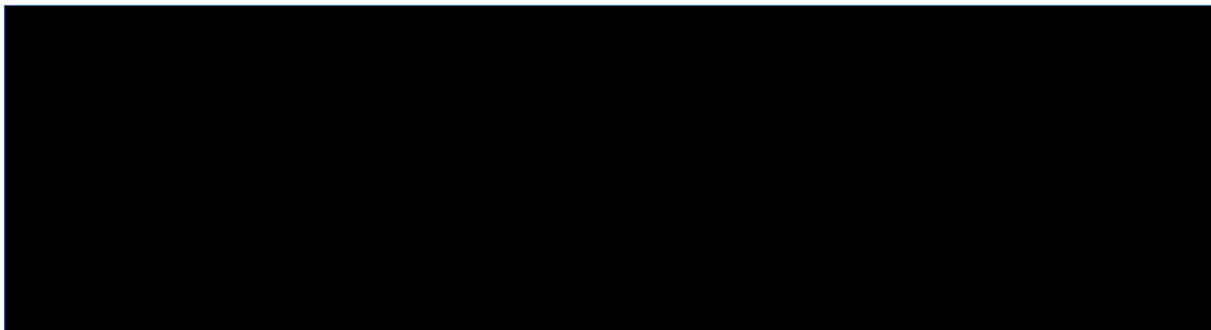
The following is the 2015 excerpt from the 5-Year Service Quality Improvement Plan filed for Voice Services and for Broadband Services:

Network Improvements/Upgrades – Voice Services – For Calendar Year 2015				
Project Description (Specific proposed improvements and/or upgrades)	Estimated Start Date	Estimated Completion Date	Service Area Name	Estimated Population
[REDACTED]	01/01/2015	Partially Completed 12/31/2015	[REDACTED]	1,578
	01/01/2015	12/31/2015		17,252
	01/01/2015	12/31/2015		17,252
	01/01/2015	12/31/2015		17,252
	01/01/2015	12/31/2015		15,938
	01/01/2015	06/30/2015		15,938
	01/01/2015	Not Completed		17,252
	01/01/2015	12/31/2015		17,252

Network Improvements/Upgrades – Broadband Services – For Calendar Year 2015				
Project Description (Specific proposed improvements and/or upgrades)	Estimated Start Date	Estimated Completion Date	Service Area Name	Estimated Population





Operating Expenses

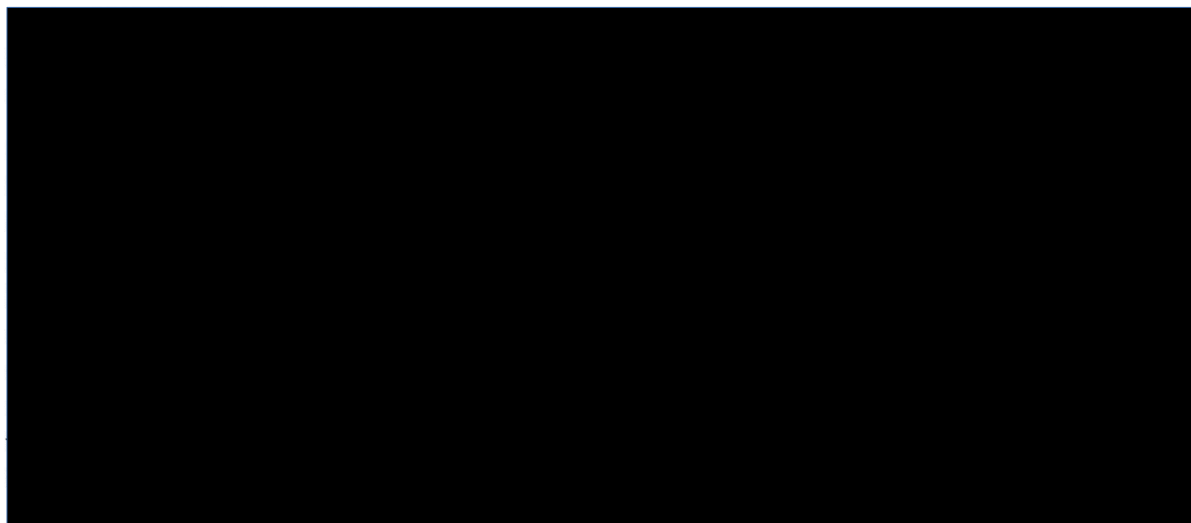


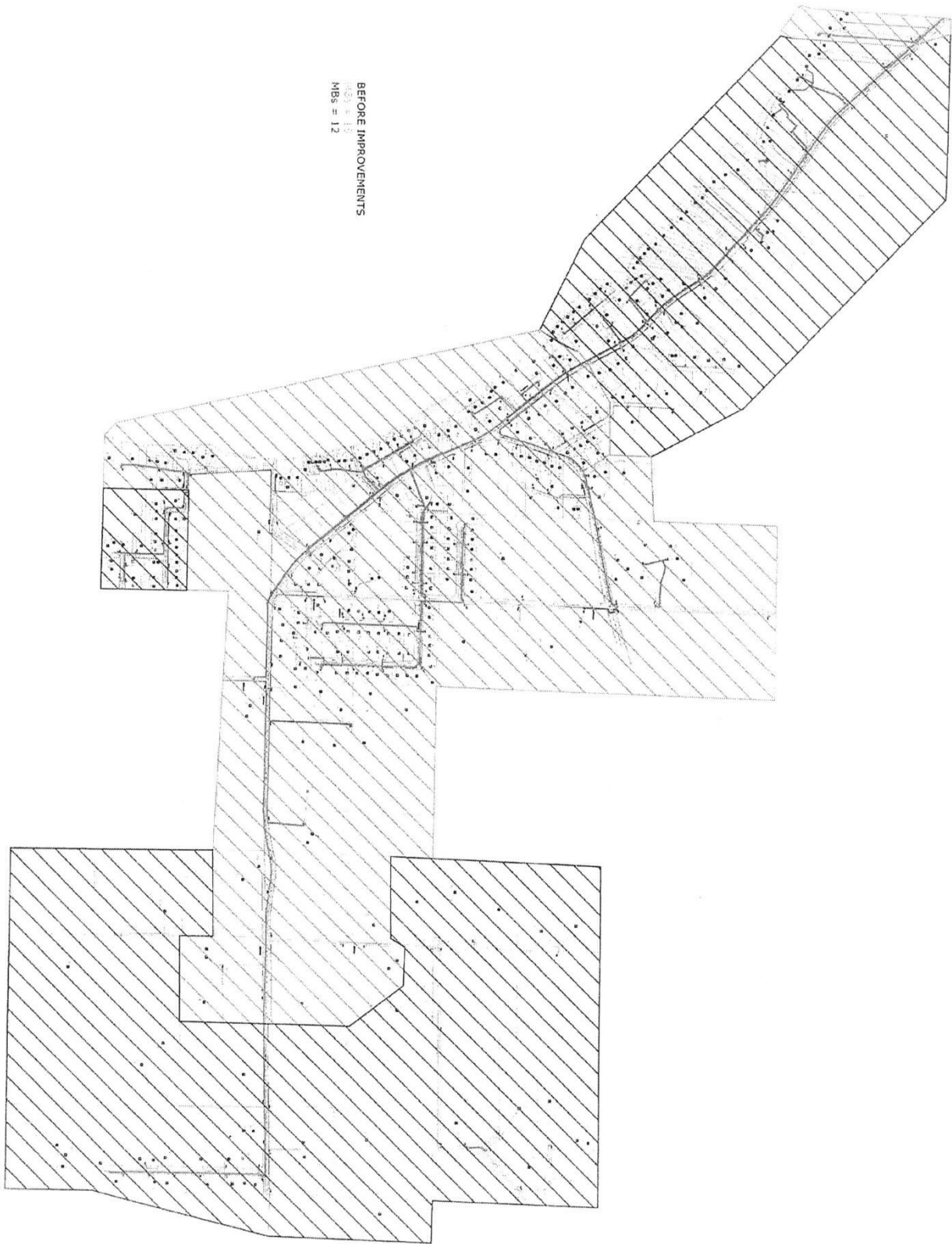
Projects Not Completed

Due to restrictions on available capital in 2015, certain projects have either been delayed or eliminated. Projects that were delayed or not completed have been noted on the above charts.

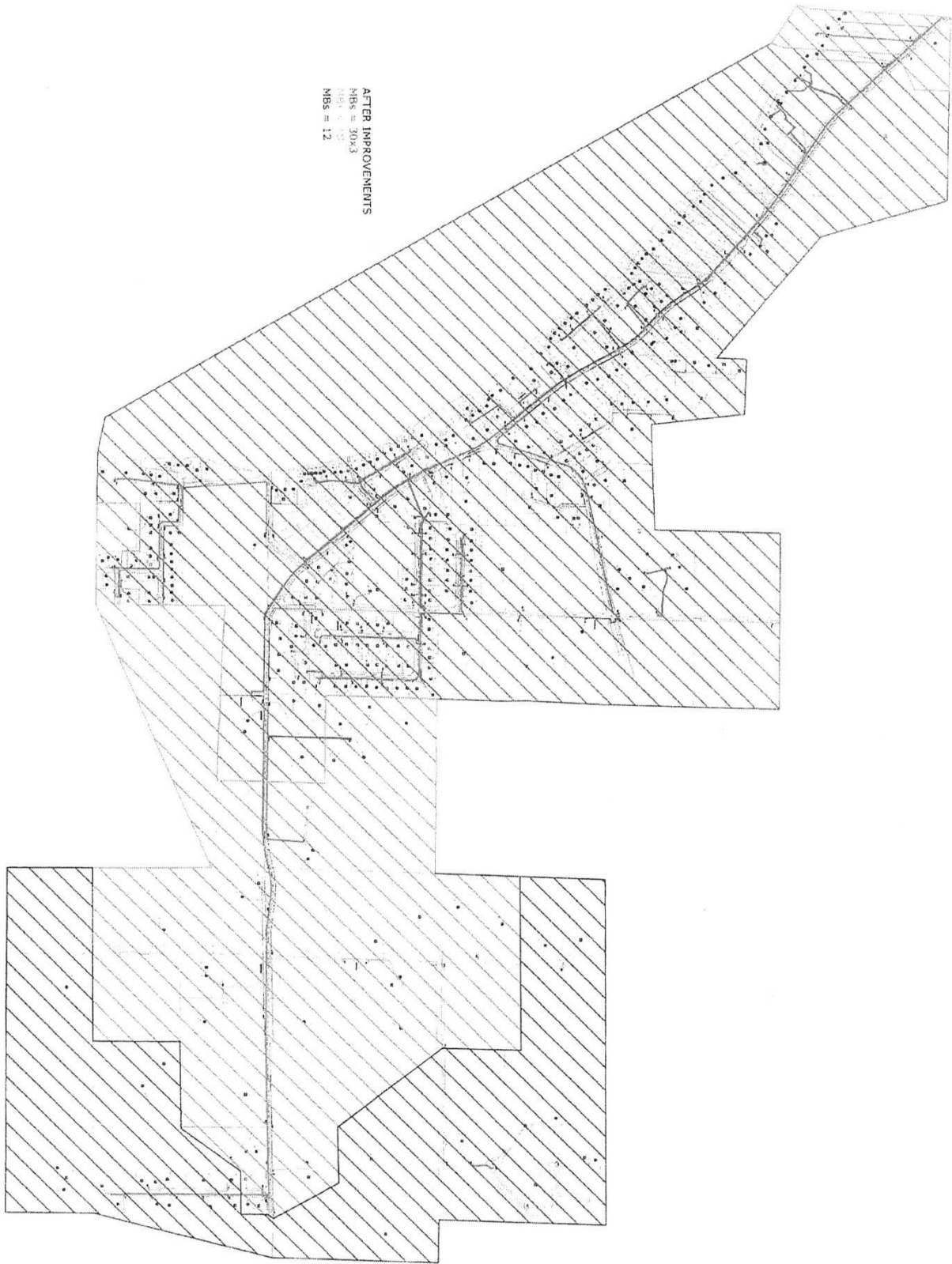
	01/01/2015	Partially Completed 12/31/2015		1,578
	01/01/2015	12/31/2015		17,252
	01/01/2015	12/31/2015		17,252
	01/01/2015	12/31/2015		15,938
	01/01/2015	06/30/2015		15,938
	01/01/2015	Not Completed		17,252
	01/01/2015	12/31/2015		17,252

Capital Expenditures





BEFORE IMPROVEMENTS
MSB = 13
MSB = 12



AFTER IMPROVEMENTS
RIBS = 30X3
MBS = 12

**Whidbey Telephone Company
FCC Form 481 (July, 2016), Line 510
Description of Processes and Procedures to Ensure
Compliance with Service Quality Standards and
Consumer Protection Rules Per Instructions
For Completing FCC Form 481**

This document details the processes and procedures that Whidbey Telephone Company (the "Company") follows to ensure compliance with service quality standards and consumer protections rules as set forth in the Instructions for Completing FCC Form 481.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as needed.

In addition, Company employees are periodically briefed on issues involving service quality standards and consumer protection rules. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. An example of such an issue is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed.

Whidbey Telephone Company
FCC Form 481 (July, 2016), Line 610
Statement Describing Ability to Function in Emergency Situations
Per Instructions for Completing FCC Form 481

SUMMARY

Whidbey Telephone Company (the “Company”) has a long-standing tradition of providing reliable voice telephony services. Since 1961, it has been and continues to be the Company’s policy to bury all local distribution cable and wire. It is also the Company’s policy and standard operating procedure to install, and use when necessary, back-up power systems at all network node installation sites. In regard to the Company’s overall network design, the Company’s practices are consistent with Rural Utility Service (“RUS”) telecommunications industry best practices.

The Company operates and maintains transport transmission equipment of only the highest grade. Equipment specifications, which are consistent with the RUS specifications, require both redundant power and redundant circuit interfaces. All of the Company’s transport and switching equipment is monitored 7x24x365(366) by trained staff located at the Company’s network operations center.

NETWORK REDUNDANCY

The Company is a provider of voice telephony services to two geographically non-contiguous exchanges: the South Whidbey Exchange and the Point Roberts Exchange. The area of the Company’s South Whidbey Exchange service area is more than 67 square miles, and the Company’s Point Roberts Exchange service area includes approximately 6 square miles.

The Company operates two central office switches (each a “CO”): an access tandem and host switch at South Whidbey and a remote switch at Point Roberts. These switches are manufactured and supported by their manufacturer. The Point Roberts CO is connected to the Company’s South Whidbey CO via multiple diversely routed redundant facilities and is configured to maintain service in the event of a facility failure to the South Whidbey CO. The primary paths consist of a diversely routed optical fiber ring utilizing Synchronous Optical Network (“SONET”) technology. In addition, the Company operates a microwave transmission path between South Whidbey and Point Roberts, providing multiple DS-3s capacity which offers additional back-up capability.

The Company’s voice telephony network has diversely routed paths to multiple points of interconnection with the networks of other voice telephony carriers. The Company also operates an Ethernet optical ring that connects its South Whidbey network with collocation facilities utilized by the Company outside its service area. The combination of the optical ring architecture and the DWDM capability of the Company’s core transport equipment provides a highly reliable circuit network for voice telephony communications with substantial opportunity for augmentation, if demand volumes were to so require.

The Company's presence in collocation facilities allows for multiple points of interconnection with both local and regional carriers, giving the Company the flexibility to route traffic to multiple carriers. During service impairment created by physical damage or extraordinarily high traffic, the Company has the capability to reroute voice telephony traffic through any of those collocation facilities.

The network architecture within the Company's South Whidbey service area is comprised of a host CO and a number of core aggregation points, or Optical Remote Sites ("ORSs"). All of the ORS locations are connected by a physically diverse optical DWDM ring, with any of those locations being capable of maintaining service in the event of a failure of that physical fiber cable.

Connectivity to the end-user customer base is accomplished by the placement of a number of Broadband Loop Carrier remote terminals ("BLCs") that subtend the ORSs or host CO. Each of these BLCs has optical diversity between the main CO and serving ORS. Some of the BLCs also have physical route diversity connected to the CO or ORS that they subtend.

The Company's employees are trained to operate, maintain and/or repair the Company's network facilities. Qualified Company personnel are available for call-out 24x7x365(366) in the event of a service outage. The Company maintains an inventory of critical spare electronic/optronic cards, as well as cabinets, cable and other related materials necessary for restoration on site at both South Whidbey and Point Roberts.

BACK-UP POWER

The Company maintains a power plant at each CO, ORS, BLC and microwave site with batteries capable of carrying the power load for several hours with the load typically transitioning more immediately to a generator back-up power generation. For BLC sites without local generators, portable generators are deployed as needed.

In addition, the Company has installed back-up power generation at its COs, as well as at each of its ORSs and microwave installations. These generators range in size from 750kw to 5kw. Each generator has a dedicated fuel tank onsite designed to carry the power load for multiple days. All of these sites are equipped with automatic transfer switches and have monitoring equipment that provides monitoring visibility with respect to loss of external commercial power and transfer switch status. Upon recognition of loss of the commercial power source, the relevant automatic transfer switch is designed to automatically start the back-up generator and transfer the selected power source. Alarm messages are automatically reported to key personnel, as well as to the Company's 7x24x365(366) network operations center.

The Company has in-house staff trained to perform all maintenance of the power plant and has contract services available for support. Power distribution equipment within the Company's COs is inspected from time to time by vendor representatives to ensure proper maintenance. It is the Company's policy that all power plant maintenance be recorded and stored for future reference.