

August 17, 2006

To: Bob Shirley, Telecommunications Policy Analyst

From: Steve Otto, USF Program Manager  
Rural Cellular Corp. (RCC)

Re: Response to Request for Supplemental Filing of ETC Certifications and Reports  
Docket UT-063052

Attached is RCC's supplemental filing as requested by commission staff in order to meet the requirements of WAC 480-123-020 through 080.

Please contact me by e-mail at [stevebo@unicel.com](mailto:stevebo@unicel.com) or by calling (320) 808-2479 if you have questions. Thank you.

Attachment: ETC Certification and Report Request with RCC responses  
Declaration Certifying Use on Universal Service Funds  
Declaration Certifying Ability to Function in Emergency Situations  
Complaints per 1,000 Handsets report

ATTACHMENT

**Rural Cellular Corp. (RCC) ETC Certification and Report Request**

**WAC 480-123-060(1)**

RCC needs to provide the certification in the manner required by RCW 9A.72.085.

An officer of the company submitted the certification request, but did not use the required language from RCW 9A.72.085. The certification or declaration may be in substantially the following form:

"I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct":

(Date and Place)

(Signature)

[RCC is providing a revised certification containing the required language.](#)

**WAC 480-123-070(2)**

RCC needs to provide information that responds to all requirements of the subsection or seek a waiver if it did not track this information during the calendar year before the rule went into effect.

RCC provided information about service affected by the outages, but does not state whether a public safety answering point was affected. The rule requires that the report include "particular services affected, including whether a public safety answering point (PSAP) was affected."

[PSAPs were not affected by any outages reported in RCC's Local Service Outage Report.](#)

**WAC 480-123-070(4)**

RCC needs to provide the number of complaints to the FCC and, separately, to the Washington Attorney General (AG). The number may be zero.

RCC provided a number of complaints per 1,000 handsets, but did not say whether it is for the FCC or AG. The rule requires companies to state "the number of complaints that the ETC's customers made to the federal communications commission, or the consumer protection division of the office of the attorney general of Washington."

[RCC is providing a revised Complaints per 1,000 handsets report providing the information for the FCC or AG specifically.](#)

**WAC 480-123-070(6)**

RCC needs to provide a certification consistent with WAC 480-123-070(6).

The certification provided is in the present tense. The rule requires certification that RCC “*had* the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030(1)(g).”

RCC is providing a revised certification containing the required language.

DECLARATION CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, David Del Zoppo, being of lawful age, make this declaration under penalty of perjury. I am the Senior Vice President, Finance and Accounting [an officer] of Rural Cellular Corporation and each of its affiliates, including RCC Minnesota, Inc. ("Company") and that I am authorized to execute this declaration on behalf of the Company, and the facts set forth in this declaration are true to the best of my knowledge, information and belief.

Pursuant to the rules of the Federal Communications Commission, 47 C.F.R. § 54.314, there must be annual certification that funds received under the federal Universal Service Fund programs will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended. The Company hereby certifies to Washington Utilities and Transportation Commission that pursuant to 47 C.F.R. § 54.7, and for purposes of the certification required under 47 C.F.R. § 54.314, the company will use all federal high-cost support provided to it 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. This includes, but is not limited to, trying to meet the goal of the provision of services that are properly supported by the high-cost funds at rates that are reasonably comparable to rates charged for similar services in urban areas.

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

Executed at Alexandria, Minnesota.

DATED this 16<sup>th</sup> day of August, 2006.

RCC Minnesota, Inc. (Company)

By: David Del Zoppo (Name)

Its: Sr VP (Title)





RURAL CELLULAR CORPORATION

DECLARATION CERTIFYING ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

I, David Del Zoppo, being of lawful age, make this declaration under penalty of perjury. I am the Senior Vice President, Finance and Accounting [an officer] of Rural Cellular Corporation and each of its affiliates, including RCC Minnesota, Inc. ("Company") and that I am authorized to execute this declaration on behalf of the Company, and the facts set forth in this declaration are true to the best of my knowledge, information and belief.

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

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

Executed at Alexandria, Minnesota.

DATED this 16<sup>th</sup> day of August, 2006.

RCC Minnesota, Inc. (Company)

By: David Del Zoppo (Name)

Its: Sr VP (Title)



### Complaints Per One Thousand Handsets

#### Washington Attorney General (AG) Complaints

# Complaints per 1,000	Complaint Type	Carrier Resolution
0.0536	Contractual - 30 Day Cancellation Policy	Provided credits to customers for remaining balance.
0.0536	Service/Equipment issues	Allowed to terminate service without an early termination fee; Provided new handsets at discounted prices.

#### FCC Complaints

# Complaints per 1,000	Complaint Type	Carrier Resolution
0	No complaints to report	N/A