

July 31, 2007

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250

Re: Request for Certification Pursuant to WAC 480-123-060 and  
47 C.F.R. §54.314, and

Claim of confidentiality.

Dear Ms. Washburn:

Pursuant to WAC 480-123-060, CenturyTel of Washington, Inc. ("Company") and CenturyTel of Inter-Island, 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 enclosed.

The Company also requests that the attachment entitled "CenturyTel 2007 Planned Investments" be treated as confidential. The schedule contains information that is quite detailed as to type of equipment, location and cost. Therefore, the Company claims that the information on the schedule is confidential under RCW 80.04.095 in that it constitutes valuable commercial information in the form of network configuration and design information.

Sincerely,



Terrance Hinkston  
Compliance Analyst  
CenturyTel

Enclosures

**REPORT AS REQUIRED BY WAC 480-123-070  
AND WAC 480-123-080  
CENTURYTEL OF WASHINGTON, INC.  
CENTURYTEL OF INTER-ISLAND, INC.**

CenturyTel of Washington, Inc. (the "Company") and CenturyTel of Inter-Island, Inc. (the "Company") hereby submits the following report in accordance with WAC 480-123-070 and WAC 480-123-080.

WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report for the calendar year 2005, that, as of the date of this report, the Company has submitted to NECA. The plant investment and expense amounts listed on NECA-1 represent the basis for federal high cost funding support associated with the Company's operations in 2006.

WAC 480-123-070(1)(b): The Company reports that the investment in plant and the expenses reported on the 2006 NECA-1 report submitted herewith provide very direct and substantial benefits to consumers. Over the years the Company has invested hundreds of millions of dollars in building and then maintaining and operating a telecommunications network in the state of Washington. It is the growth, enhancement and continued viability of this network that gives consumers in the Company's service territory access to services that are vital in meeting their telecommunications needs. The expenditures reflected in the Company's NECA-1 report have allowed the Company to provide services that meet the expectations addressed in 47 U.S.C. 254 for consumers in the service area for which the Company is designated as an ETC.

The expenditures reflected in the Company's NECA-1 were directed to assuring that the network is positioned to meet the ever increasing needs and expectations of consumers. The company's expenditures included projects to increase network capacity.<sup>1</sup> For example, projects that added fiber to the network increased the network's capacity. Consumers benefit from increased capacity in that it allows additional consumers to join or access the network, allows additional services to be offered over the network, and reduces the likelihood that calls will be blocked.

Company expenditures have also gone to maintaining and increasing network reliability. For example, expenditures are included for projects that address backup power via batteries and generators. Ability to access the network during periods of power outages clearly benefits the health and safety of consumers. Network reliability also benefits consumers by generally increasing the overall quality of service.

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<sup>1</sup> The NECA-1 report does not identify expenditures at the project level. The projects underlying the expenditures on NECA-1 would tend to be very similar to those identified in response to WAC 480-123-080 (1) (b) which does identify certain planned expenditures at the project level.

WAC 480-123-070(4): The Company reports that there were two complaints during calendar year 2006 to the Federal Communications Commission and three complaints to the Consumer Protection Division of the Office of the Attorney General of Washington in 2006 concerning the services provided to its customers. This translates to a number of complaints per 1,000 lines of approximately .01. The Company submits herewith a schedule entitled "CenturyTel 2006 Washington Attorney General and FCC Complaints." The schedule generally describes each complaint and the Company's efforts to resolve each complaint.

WAC 480-123-080(1)(b): The Company submits herewith a schedule entitled "2007 Planned Investment."<sup>2</sup> The schedule is not all-inclusive of the Company's planned capital expenditures but does list some of the more significant projects the Company is undertaking in 2007. The schedule is quite detailed with regard to equipment, location and cost and therefore constitutes valuable commercial information in the form of network configuration and design information as recognized under RCW 80.04.095. Therefore the schedule is being submitted as a CONFIDENTIAL document under WAC 480-07-160. The Company also expects to incur expenses associated with maintaining and operating its network in the state of Washington at a level that will be similar to the expenses indicated on the 2006 NECA-1 form submitted in response to WAC 480-123-070(1)(a).

WAC 480-123-080(2): The Company states that federal support will be used only for the provision, maintenance and upgrading of the facilities and services for which the support is intended under 47 U.S.C. 254. The federal support will be used to fund operation of and improvements to the network including various projects included on the 2007 Planned Investment schedule as well as expenses at a level similar to that indicated on the 2006 NECA-1 form submitted in response to WAC 480-123-070(1)(a). The Company's use of federal support in this manner will benefit consumers. As discussed previously in this report, these types of expenditures will serve to sustain and improve network capacity and reliability. This network capacity and reliability is essential to providing the level of service anticipated in 47 U.S.C. 254 and therefore benefits consumers.

For more specific consumer benefits associated with planned expenditures, the Company incorporates by reference the column of the 2007 Planned Investment schedule that is entitled "Narrative." The narrative for each project on the schedule identifies specific improvements that will benefit consumers in specific areas.

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<sup>2</sup> The schedule includes projects for CenturyTel of Washington, Inc., CenturyTel of Inter-Island, Inc and CenturyTel of Cowiche, Inc.

**AFFIDAVIT CONTAINING CERTIFICATIONS  
AS REQUIRED BY WAC 480-123-060 AND WAC 480-123-070**

I, Jeffrey Glover, being of lawful age and duly sworn, on my oath state that I am Vice President External Relations of CenturyTel of Washington, Inc. ("Company") and CenturyTel of Inter-Island, 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 federal high-cost universal service fund support received by the Company will be used only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;

(2) That during the 2006 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);

(3) That during the 2006 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 2006 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, including residents of federally recognized Indian Reservations 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 31st day of July, 2007

Company: CenturyTel of Washington, Inc and CenturyTel of Inter-Island, Inc.

By: Jeffrey S. Slaves

Its: Vice President External Relations

SUBSCRIBED AND SWORN to before me this 31st day of July, 2007 at  
Monroe, Louisiana.

Wanita W. Jones 6/5/07



APPLIES TO PERIOD: YEAR END 12/2006	REG: 2	SOUTHERN
CONTACT NAME: Donnie Aultman	SST: 2	SUBSET 2
CONTACT PHONE: (318)-388-9497 EXT:	OO: 200000016	CenturyTel, Inc.
RELEASE STATUS: RELEASED	CO: 300000440	CenturyTel, Inc.
SOFT EDIT STATUS: PASSED EDIT	SAR: 522408	CENTURYTEL-WASHINGTO

DESCRIPTION	PENDING VIEW	MESSAGE
060 TOTAL LOOPS	166,185	
070 CAT. 1.3 LOOPS	160,369	
160 ACCOUNT 2001	612,066,645	
170 ACCOUNT 1220	6,606	
190 ACCOUNT 3100	338,215,879	
195 ACCOUNT 3400	0	
210 ACCOUNT 4340	49,161,571	
220 NET PLANT INVESTMENT	224,695,801	
230 ACCOUNT 2210	91,374,103	
235 ACCOUNT 2220	0	
240 ACCOUNT 2230	137,693,233	
245 TOTAL CENTRAL OFFICE	229,067,336	
250 CKT EQUIP CAT 4.13	84,829,414	
255 ACCOUNT 2410	353,893,777	
260 ACCOUNT 3100 (2210)	49,426,634	
265 ACCOUNT 3100 (2220)	0	
270 ACCOUNT 3100 (2230)	86,807,651	
275 ACCOUNT 3100 (2210-2230)	136,234,285	
280 ACCOUNT 3100 (2410)	188,981,670	
310 ACCOUNT 4340 (2210)	7,339,224	
315 ACCOUNT 4340 (2220)	0	
320 ACCOUNT 4340 (2230)	11,059,606	
325 NET NONOCURRENT	18,398,830	
330 ACCOUNT 4340 (2410)	28,424,967	
335 ACCOUNT 6110 TOTAL	230,136	
340 ACCOUNT 6110 BENEFITS	30,127	
345 ACCOUNT 6110 RENTS	959	
350 ACCOUNT 6120 TOTAL	2,723,555	
355 ACCOUNT 6120 BENEFITS	203,271	
360 ACCOUNT 6120 RENTS	269,462	
365 ACCOUNT 6210 TOTAL	5,062,705	
370 ACCOUNT 6210 BENEFITS	1,142,613	
375 ACCOUNT 6210 RENTS	31,777	
380 ACCOUNT 6220 TOTAL	0	
385 ACCOUNT 6220 BENEFITS	0	
390 ACCOUNT 6220 RENTS	0	
395 ACCOUNT 6230 TOTAL	2,899,579	
400 ACCOUNT 6230 BENEFITS	553,448	
405 ACCOUNT 6230 RENTS	219,401	
410 ACCOUNT 6210-6230	7,962,284	
430 ACCOUNT 6410 TOTAL	15,118,163	
435 ACCOUNT 6410 BENEFITS	3,379,627	
440 ACCOUNT 6410 RENTS	1,753,039	
445 TOTAL PLANT SPECIFIC	26,034,138	
450 ACCOUNT 6530 TOTAL	5,220,556	
455 ACCOUNT 6530 BENEFITS	1,028,104	
510 ACCOUNT 6560 (2210)	5,281,147	
515 ACCOUNT 6560 (2220)	0	
520 ACCOUNT 6560 (2230)	10,715,189	
525 ACCOUNT 6560 (2210-2230)	15,996,336	
530 ACCOUNT 6560 (2410)	14,779,904	

N... E... C... A... INC.  
USF1010 ERROR REPORT

07/31/2007

11:05:35

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APPLIES TO PERIOD: YEAR END 12/2006            REG: 2            SOUTHERN  
CONTACT NAME:        Donnie Aultman            SST: 2            SUBSET 2  
CONTACT PHONE:        (318)-388-9497 EXT:        OC: 200000016    CenturyTel, Inc.  
RELEASE STATUS:        RELEASED                    CO: 300000440    CenturyTel, Inc.  
SOFT EDIT STATUS:     PASSED EDIT                 SAR: 522408       CENTURYTEL-WASHINGTO

DESCRIPTION	PENDING VIEW	MESSAGE
535 ACCOUNT 6710 TOTAL	1,741,040	
540 ACCOUNT 6710 BENEFITS	778,663	
550 ACCOUNT 6720 TOTAL	9,403,845	
555 ACCOUNT 6720 BENEFITS	1,481,489	
565 SUM OF LINES 535 + 550	11,144,885	
600 BEN. POR.OF ALL OP. EXP.	10,874,841	
610 RENT POR. OF ALL OP. EXP	2,275,168	
650 ACCOUNT 7200 OTHER TAXES	19,937,445	
700 2410 (C S TOTAL CWF - AV)	349,999,565	
710 2410 (C S CWF - CAT.1)	341,361,303	
800 ACCOUNT 2680 TOTAL	0	
805 ACCOUNT 2680 (2230)	0	
810 ACCOUNT 2680 (CAT. 4.13)	0	
815 ACC 2680 (2410) TOTAL CWF	0	
820 ACC 2680 (2410)CWF-CAT1	0	
830 ACCOUNT 6560 (2680)	0	
Control Total:	3,517,637,550	

COMMENTS:



Customer Name

[REDACTED]

Account Number

[REDACTED]

Source

FCC

Date Received

2/23/06

Problem

Customer disputing charges on her bill related to long distance calls which should have been billed under her Simple Choice Unlimited plan.

Resolution

We have investigated the customer's complaint to confirm our records indicate credits in the amount of \$27.12 were applied to her account for calls, which should have been covered under the unlimited long distance calling plan programmed on her account. We have also issued credits in the amount of \$269.05 to correct the charges reflected on her billing statement. After these adjustments were applied to the customer's account, there was a credit balance of \$88.77 associated with her account.

Customer Name

[REDACTED]

Account Number

[REDACTED]

Source

WA Attorney General

Date Received

2/23/06

Problem

Customer states: In mid November I called the customer 1-800 number to inquire about my billing statement and to request cancellation of all services by the end of the month (November). On Dec. 1 I returned from work and picked up my telephone, which was dead. As I had requested cancellation of service for 11-30 that was my confirmation they had disconnected the service as requested. In December I got a bill for the full month of December, although I had had service d/c (they bill in advance). I called Customer Service again and talked to a representative and then to her supervisor, who said she would authorize crediting my account for the disconnected service. I just received a bill for December service for both phone and internet (which I had not had) and it appears the last person I talked to gave me a credit for one week of the December bill. I have, in good faith, called customer service and relayed my wishes. I feel the company should honor what they say they will do and erase this charge from my old account.

Resolution

In order to correct this situation, we have issued a credit in the amount of the remaining balance, \$96.40, to the account. The account currently reflects a zero balance and is, in fact, cancelled.

Customer Name

██████████

Account Number

██████████

Source

WA Attorney General

Date Received

4/18/06

Problem

Customer states fraudulent account for telephone service established in her name-reported to three major credit reporting agencies as "IN collection" and has reduced her credit score. Customer requesting account be dismissed under her name and blocked from all three credit reporting agencies.

Resolution

Total balance associated with the account will be written off, \$562.78, due to fraudulent activity.

Customer Name

██████████

Account Number

██████████

Source

FCC

Date Received

8/25/06

Problem

CenturyTel would not transfer customer's phone number to Comcast so customer had to use AOL to connect to the Internet. While using AOL, customer accumulated \$75.96 in long distance charges because there is no local connection in town. Customer has paid his CenturyTel bill and would like to be reimbursed for a least the long distance phone calls to 360-538-2418, which is a connection line for AOL.

Resolution

As a courtesy, we have issued a credit of \$75.96 to customer's account. She will be receiving a refund check in this amount within the next 7 to 10 business days. This credit will reimburse her for the long distance charges she incurred for using AOL to access the website

Customer Name

██████████

Account Number

██████████

CenturyTel 2006 Washington Attorney General and FCC Complaints --- WAC 480-123-070 (4)

Source

WA Attorney General

Date Received

8/21/06

Problem

Customer states approximately 5 years ago CenturyTel added an extra \$20.00 to my bill for something I knew nothing about. I immediately tried to contact them and was unable to do so. The following month the same thing happened, another \$20.00 was added to my bill and again I did not pay it. But the 2nd time I was able to contact them and they stopped charging me the \$20.00 per month but told me I had to pay the \$40.00. I then refused and for the last 5 years have been getting \$1.00 or more added to my bill every month for late fees which I have also refused to pay.

Resolution

Review of the customer's account reveals he was charged ILD Teleservices charges on 04/15/02 in the amount of \$30.85, on 05/15/02 in the amount of \$30.85 and again on 06/15/02 in the amount of \$30.85. Our records indicate on 07/15/06 ILD Services credited the customer \$18.84 for the above charges, but no further credits were given to clear the charges out. This left a remaining amount owed of \$73.71. Unfortunately, CenturyTel is not able to remove other company's charges from a customer's account. This problem is associated with an issue directly brought about by ILD Teleservices billing. We have removed all late fees that CenturyTel billed the customer over the past three years. The total credit of \$42.82 will be reflected on the customer's next month's billing statement.