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July 30, 2007

**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: Docket No. UT-073015

Dear Ms. Washburn:

Pursuant to WAC 480-123-060, Rural Cellular Corporation hereby submits one copy of its annual recertifications and reports in the above-referenced docket as follows:

- Tab A Declaration Certifying Use of Universal Service Funds
- Tab B 2006 Service Improvement Plan re Use of Funds – **Confidential**
- Tab C Local Service Outage Report - **Confidential**
- Tab D Unfulfilled Request for Service – **Confidential**
- Tab E Complaints per 1,000 handsets
- Tab F Declaration Certifying Compliance With Applicable Service Quality Standards And Consumer Protection Rules
- Tab G Declaration Certifying Ability To Function In Emergency Situations
- Tab H Declaration Certifying Lifeline Advertising

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July 30, 2007

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Tab I Service Improvement Plan, October 2007 through  
September 2008 – **Confidential**

Tab J .jpg version of coverage map - **Confidential**

Please note that paper copies of all confidential portions of the report are copied on yellow paper,<sup>1</sup> designated on each page as "confidential Per WAC 480-07-160," and contained in a sealed envelope marked "Confidential Per WAC 480-07-160." For the electronic version of this filing, each electronic file contains, as part of the file name, the word "CONFIDENTIAL." Additionally, each page in the electronic file is labeled "Confidential Per WAC 480-07-160."

Finally, as required by WAC 480-123-080, a CD is filed with the paper copies of this filing containing .shp format map files of coverage. The CD is labeled "Confidential Per WAC 480-07-160. However, the .shp format is not readily amenable to marking each page "confidential." Accordingly, RCC respectfully requests that the requirement of WAC 480-07-160(1)(b)(ii) to mark each page in the file as "confidential" be waived.

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:

Rural Cellular Corporation  
302 Mountain View Drive, Suite 200  
Colchester, Vermont 05446  
Phone: (802) 654-5093  
Fax: (802) 654-5050  
E-mail: [bethlk@unicel.com](mailto:bethlk@unicel.com)  
Attention: Elizabeth Kohler

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<sup>1</sup> An exception is the .pdf version of the coverage map, which is printed on white paper. The map is a color map and would not render well on yellow paper.



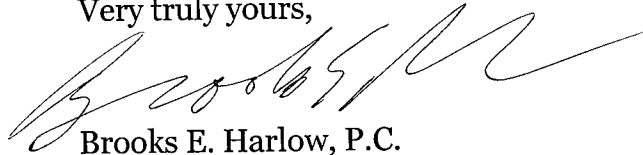
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If you have any questions please contact the undersigned.

Very truly yours,



Brooks E. Harlow, P.C.

cc: Mr. Bob Shirley  
Mr. Tim Zawislak  
Ms. Deborah Reynolds

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 10<sup>th</sup> day of July, 2007.

RCC Minnesota, Inc. (Company)

By: David Del Zoppo (Name)

Its: Sr VP (Title)

Service Improvement Plan -- Calendar Year 2006

Support Received - 2006 (thous. \$)      \$      2,733

Uses of Support Funds (thous. \$) - 2006  
Project

New Cell Sites Constructed:

Population Benefitted

Investment Benefit

Status

Expense \$

Investment \$

**REDACTED**

OUTAGE January 1, 2006 to December 31, 2006

Geographic Area	Date	Outage Time	Date	Restored Time	Outage Description	Resolution of Outage	Services Affected	PSAP Affected	# Customers Affected	Steps taken to prevent similar situations.
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REDACTED

**Unfulfilled Service Requests  
For 2006**

**Address**

**City**

**Description of Attempts to Provide Service**

**REDACTED**

Complaints Per One Thousand Handsets

Washington Attorney General (AG) Complaints

# Complaints per 1,000	Complaint Type	Carrier Resolution

FCC Complaints

# Complaints per 1,000	Complaint Type	Carrier Resolution
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REDACTED



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

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(5), that it has substantially met the service quality standard pursuant to WAC 480-123-030(1)(h) by its commitment to comply with the CTIA Consumer Code for Wireless Service.

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 10<sup>th</sup> day of July, 2007.

RCC Minnesota, Inc. (Company)

By: David Del Zoppo (Name)

Its: SV (Title)

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 10<sup>th</sup> day of July, 2007.

RCC Minnesota, Inc. (Company)

By: David Del Zoppo (Name)

Its: Sr VP (Title)

DECLARATION CERTIFYING LIFELINE ADVERTISING

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(7), that it has publicized the availability of Lifeline services. RCC's efforts include:

- Newspaper advertising, including newspapers of alternative languages and free to the public
- Bill messages to existing customers
- Posters at all retail locations
- Information posted on Unicel's and USAC's website
- Outreach mailings, including posters for display, to social service agencies and reservations

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 10<sup>th</sup> day of July, 2007.

RCC Minnesota, Inc. (Company)

By: David Del Zoppo (Name)

Its: Sr VP (Title)

Estimated Support (thous. \$) No Cap

\$

Projected Uses of Support Funds (thous. \$)

New Cell Sites Constructed: Project

Investment \$ Expense \$ Status Investment Benefit

Population Benefitted

REDACTED

# ***UNICEL WASHINGTON ETC MAP***

**REDACTED**