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Calvin K. Simshaw
Vice President
Associate General Counsel - Regulatory



March 7, 2006

Ms. Carole J. Washburn
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia, WA 98504-7250

RECEIVED
RECORDS MANAGEMENT
05 MAR - 8 AM 11:51
STATE OF WASHINGTON
UTIL. AND TRANSP.
COMMISSION

Re: In the Matter of the Petition of CenturyTel of Washington, Inc., For Waiver of
WAC 480-120-071(2)(a)

Dear Ms. Washburn:

Enclosed for filing is the original and 12 copies of the *Petition for Waiver of WAC 480-120-071 (2) (a)* in the above-referenced matter.

Please contact me if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Calvin K. Simshaw".

Calvin K. Simshaw
Assoc. General Counsel-Regulatory

Enclosures

05 MAR -8 AM 11:51

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	Docket No. UT- _____
)	
CENTURYTEL OF WASHINGTON, INC.)	PETITION
)	
For Waiver of WAC 480-120-071(2)(a))	
_____)	

I. **RELIEF REQUESTED**

Pursuant to WAC 480-120-071(7), CenturyTel of Washington, Inc. ("CenturyTel") petitions the Commission for a waiver of, or an exemption from, the requirements of WAC 480-120-071 with regard to extending service to a location (hereafter the "Johnson location") in CenturyTel's Nespalem exchange in Okanogan County. The cost to extend service to this location is estimated at \$301,039.62. CenturyTel submits that it is not reasonable for CenturyTel and other telecommunications customers in the state of Washington to pay over \$300,000 to extend service to a single customer. In addition to the prohibitive expense of initial construction, maintaining service to this location would impose substantial ongoing operational difficulties and financial burdens on CenturyTel and its other customers. Granting of the requested exemption and a waiver are in the public interest.

II. **STATEMENT OF FACTS**

1. CenturyTel has received a request for service from Loretta Johnson who resides at 2914 Columbia River Road, a location within the boundaries of CenturyTel's Nespalem

1 exchange (the "Johnson location"). There has never been landline telephone service to the
2 Johnson location.

3 2. The Johnson location is located on Columbia River Road approximately 27,582
4 feet (or 5.2 miles) from the end of CenturyTel's existing facilities. The end of CenturyTel's
5 existing facilities is itself 12596 feet from the serving CXR (loop concentrator) . The serving
6 CXR is 23,242 feet from the Nespelem Central Office. Included with this Petition as Attachment
7 A is a map showing the location of the Johnson location, the end of CenturyTel's existing
8 facilities, the serving CXR and the community of Nespelem.

9 3. The Johnson location and the route leading to the Johnson location are situated in
10 the Columbia River canyon which is dominated by very rocky terrain. Extension of facilities to
11 the Johnson location would require a substantial amount of costly rock cutting.

12 4. CenturyTel estimates that the cost to extend facilities to the Johnson location
13 would be \$301,039.62. Attachment A also shows a breakout of the costs associated with such an
14 extension.

15 5. CenturyTel is aware of one other potential customer along the route to the
16 Johnson location. That customer requested service at a location approximately 4.7 miles from
17 the end of CenturyTel's existing facilities. However, since being informed of the customer fees
18 applicable pursuant to WAC 480-120-071 (3), that customer has expressed no further interest in
19 receiving CenturyTel service.

20 6. CenturyTel discussions with Qwest have indicated that Qwest is not in a position
21 to provide service the Johnson location.

22 7. Cellular service is not currently available at the Johnson location.

1 **III. GRANTING THE REQUESTED WAIVER WOULD BE**
2 **CONSISTENT WITH THE PUBLIC INTEREST**
3
4

5 8. In adopting WAC 480-120-071, the Commission recognized that some requested
6 line extensions would pose unreasonable costs and burdens and should not be made. Therefore
7 the Commission provided for a waiver process set forth at WAC 480-120-071 (7). The
8 Commission has since reiterated that “The provisions of the rule clearly contemplate that, in
9 conjunction with other factors, some cost level might prove too high.” *Third Supplemental*
10 *Order*, Docket No. UT-011439, service date April 23, 2003.

11 9. CenturyTel submits that factors associated with extension of facilities to the
12 Johnson location clearly rise to the level of costs that “prove too high.” This Petition presents a
13 clear case for waiver of the obligation in WAC 480-120-071 to extend facilities to the Johnson
14 location. It would not be in the public interest to force CenturyTel and/the other telephone
15 customers in the state of Washington to pay approximately \$301,039.62 (plus ongoing high
16 maintenance costs) to provide service to a single customer.

17 10. An analysis of the seven criteria identified at WAC 480-120-071 (7) (b) support
18 this conclusion.

19 (A) **The total direct cost of the extension;** The expected cost of \$301,039.62 to
20 extend facilities to the Johnson location is several orders of magnitude higher than typical line
21 extension costs. For example the average cost of line extension in CenturyTel’s most recent line
22 extension cost recovery filing was \$18,675.

23 (B) **The number of customers to be served;** Based upon occupied premises in the
24 area, at most only two customers would be served by this extension. This number of customers
25 does not begin to justify the total cost of the extension.

1 (C) The comparative price and capabilities of radio communication service or
2 other alternatives available to customers; It does not appear that cellular or any other form of
3 radio service is available at the Johnson location.

4 (D) Technological difficulties and physical barriers presented by the requested
5 extension; The shear distance involved with the Johnson location presents difficulties. The
6 location is three times farther from the serving CXR than even the most distant existing
7 customer. The rocky terrain at, and en route to the Johnson location presents a physical barrier
8 that could only be overcome with inordinately costly rock cutting in the construction and
9 placement process.

10 (E) The effect on the individuals and communities involved; There is no landline
11 service within five miles of the Johnson location. Neither Ms. Johnson, or the community likely
12 had, or should have had an expectation that there ever would landline service at that location. As
13 noted by the Commission in *Third Supplemental Order*, Docket No. UT-011439, "There is no
14 provision of federal or state law that prescribes that every location and every potential customer,
15 no matter how remote or expensive to reach by wireline, is entitled to wireline service. (order
16 at page 18).

17 (F) The effect on the public switched network; CenturyTel has limited personnel
18 and funds to maintain and repair its facilities and network in the Nespelem exchange. The
19 addition of several miles of facility in challenging terrain in an area distant from dispatch
20 locations in order to serve only one customer would dilute responsiveness and the ability to
21 effectively maintain the network.

1 (G) **The effect on the company;** Extension of facilities through 5.2 miles of rocky
2 terrain to serve only one customer would be an inefficient use of CenturyTel's limited resources
3 and work to the detriment of the company's existing customers.


4 (H) **Other factors;** Forcing CenturyTel to extend facilities costing over \$300,000 to
5 serve a single customer would create a dangerous and unrealistic expectation on the part of
6 others who may be considering taking up residence in remote and costly locations.

7
8 **IV. Summary**

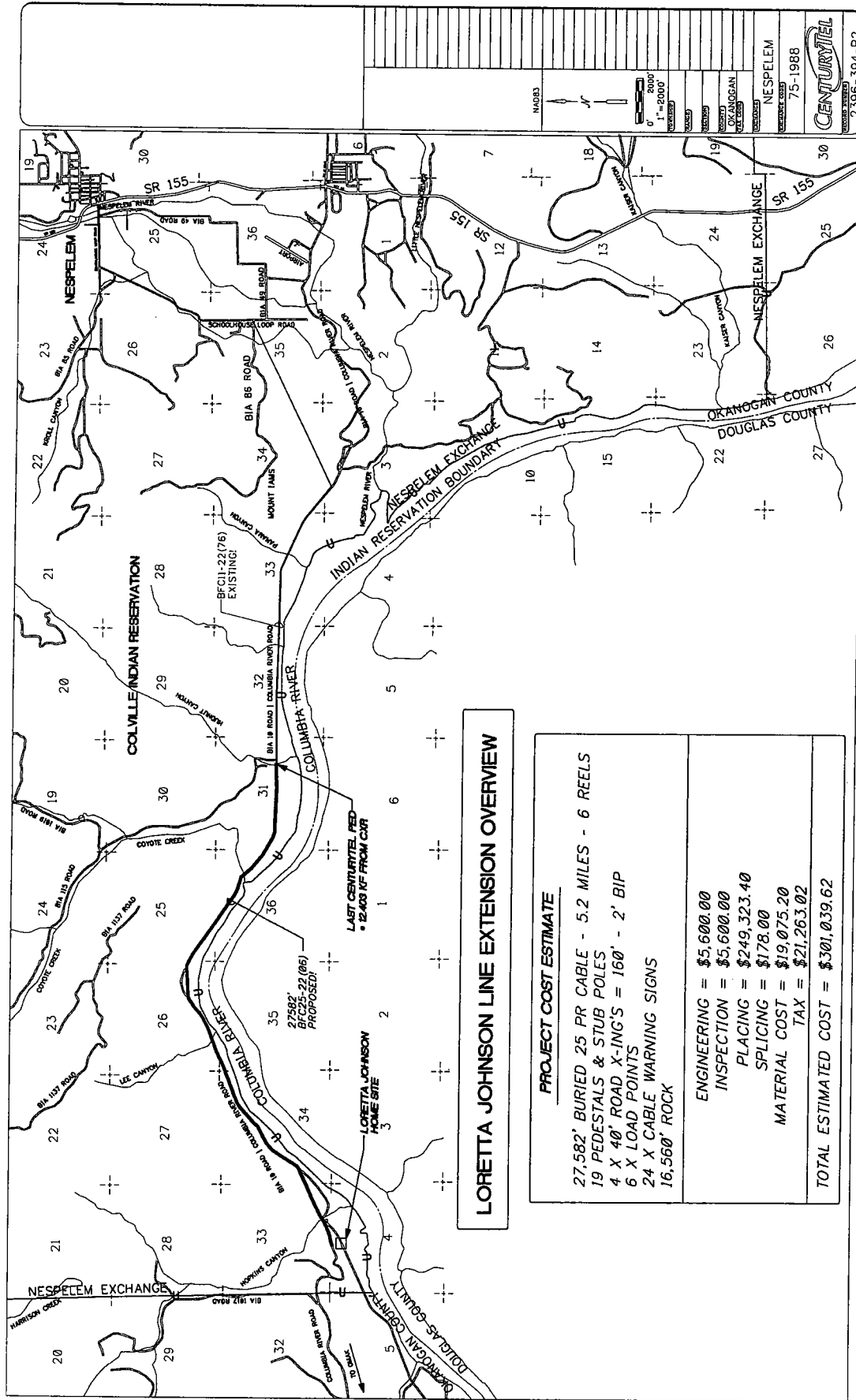
9
10 The factors underlying an extension of land line facilities to the Johnson location present
11 the classic case anticipated by the Commission in adopting a waiver provision in WAC 480-120-
12 071 (7). This case presents a clear situation where the Commission must once again conclude
13 that the cost "prove too high." The requested waiver should be granted.
14

15
16 Respectfully submitted this 7th day of March 2006.

17
18 CENTURYTEL OF WASHINGTON, INC.

19
20
21 By 
22 Calvin K. Simshaw
23 Associate General Counsel
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25
26
27

Attachment "A"



LORETTA JOHNSON LINE EXTENSION OVERVIEW

PROJECT COST ESTIMATE	
27,582' BURIED 25 PR CABLE - 5.2 MILES - 6 REELS	
19 PEDESTALS & STUB POLES	
4 X 40' ROAD X-ING'S = 160' - 2' BIP	
6 X LOAD POINTS	
24 X CABLE WARNING SIGNS	
16,560' ROCK	
ENGINEERING = \$5,600.00	
INSPECTION = \$5,600.00	
PLACING = \$249,323.40	
SPLICING = \$178.00	
MATERIAL COST = \$19,075.20	
TAX = \$21,263.02	
TOTAL ESTIMATED COST = \$301,039.62	

NORTH
 0' 2000'
 1" = 2000'
 1988
 NESPPELEM
 75-1988
CENTURTEL
 2396-394-P2
 11/8/88

CERTIFICATE OF SERVICE

I hereby certify that an original and 12 copies of the *Petition for Waiver of WAC 480-120-071 (2)(a)* was filed this 7th day of March, 2006, via overnight mail and a true and correct copy thereof has been served on each of the parties listed below, postage prepaid.



Rhonda Parisio

Ms. Loretta Johnson
2914 Columbia River Road
Nespelem, Washington 99155