



525 Junction Road  
Madison, WI 53717  
www.tds telecom.com

UT-091192-CT

July 27, 2009

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

Re: 2009 ETC Certification  
Request for Certification Pursuant to WAC 480-123-060, 070 and 080

Dear Ms. Washburn:

Pursuant to WAC 480-123-060, 070 and 080 Asotin Telephone Company, Lewis River Telephone Company and McDaniel Telephone Company, Inc. all d/b/a TDS Telecom ("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.

Sincerely,

Kristine M. Haskin  
Manager – Federal Affairs

Enclosures

Cc: Gail Long

RECEIVED  
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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

**REPORTS AS REQUIRED BY WAC 480-123-070  
AND WAC 480-123-080**

**Asotin Telephone Company d/b/a TDS Telecom** (the “Company”) hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.<sup>1</sup>

**Report 1: WAC 480-123-070(1)(a): Report On Use Of Federal Funds And Benefits To Customers**

Attached is a copy of the Company’s NECA-1 Report for the calendar year 2008, that as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund. The amounts on the NECA-1 report include any cost study adjustments that have been made to the financial data.

Also attached is a report titled “Attachment to Affidavit” which includes the financial data before any cost study adjustments and is used to show the use of federal funds. For the year 2008, refer to “Report #1 Column Actual”.

**Report 2: WAC 480-123-070(1)(b): Substantive Description of Benefits to Consumers Resulting from Report Number 1**

Through the expenditure of these funds, the Company was able to continue to provide services at a level that the Company believes meets the intent set forth in 47 U.S.C. §254 of providing high quality telecommunications services to customers in the service area for which the Company is designated as an ETC.<sup>2</sup>

The Company has made substantial investments over the past several years which allow it to provide quality telecommunications services to its customers in its designated ETC service area. Those expenditures and investments, including those reflected in Report 1, above, generally benefit all customers receiving the federal high-cost fund supported services from the Company within its designated service area.<sup>3</sup>

In addition, during 2008, the Company was engaged in a major investment projects within its designated ETC service area as described below:

1. Completed the Asotin Creek 1218 DLC Replacement - \$35,800.
2. Completed the upgrade power equipment (rectifiers & batteries) at Grouse Flats & Puffer Butte - \$33,500.

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<sup>1</sup> It is the Company’s understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3).

<sup>2</sup> The term “ETC” is used in the same sense as the term is used in Chapter 480-123 WAC.

<sup>3</sup> The references to the services supported by the federal high-cost fund is to the services designated for support as set forth in 47 C.F.R. §54.101(a).

3. Completed the Anatone East Mountain Road cable and pedestal install - \$20,500.
4. Completed the Grand Ronde DLC Replacement - \$23,900.
5. Completed the replacement of Microwave transport - \$458,000.

**Report 3: WAC 480-123-070(4): Report on Complaints per One Thousand Lines.**

The Company reports that it is aware of zero complaints made during calendar year 2008 to the Federal Communications Commission and no complaints to the Consumer Protection Division of the Office of the Attorney General of the State of Washington concerning the services provided to its customers by the Company that are either subject to the regulatory jurisdiction of the Washington Utilities and Transportation Commission or among the services supported by the federal high-cost fund.

**Report 4: WAC 480-123-080(1)(b): Annual Plan for Universal Service Support Expenditures.**

As part of its participation in the pooling processes of the National Exchange Carrier Association, Inc. ("NECA"), the Company does prepare annual forecasts of anticipated investment and expense levels on a calendar year basis.

Attachment to Affidavit, Report #4 Column includes estimates of expenditures for the years 2009 and 2010 for the provision, maintenance and upgrading of facilities and services supported by federal universal service.

**Report 5: WAC480-123-080 (2): Substantive Plan and Description of Investments & Expenditures and Benefits to Customers.**

The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service, rates for its local exchange services will be maintained so that they are affordable and reasonably comparable to rates being charged for the same services in urban areas and Asotin will continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service. The use of federal universal service support for these purposes is clearly consistent with the federal universal service principals

The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2008, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2008.

In addition to the foregoing, the Company is planning on several large projects for 2009. The large projects are as follows:

- Asotin backhaul upgrade to provide network stability – estimated \$2245

- Other capitol projects are under consideration, but at this time, the company is focused on Semi-annual preventative maintenance performed at all DLC sites, CO's and remotes. Semi-annual checks are completed to ensure batteries, cabinets, grounding, cross connects and generators are all in good working order to ensure we maintain reliable local exchange service.
- Continue to maintain existing facilities by inspecting, testing, repairing and performing preventative maintenance on outside plant. This includes, but is not limited to: materials, pedestal repair, repair drop wire, protectors, grounding, storm damage cleanup, repair and restoration.

All of the aforementioned projects will allow the company to continue to maintain and improve the level of service provided as well as increase bandwidth for future growth and advance services.

Customers will benefit from these investment and expenditures through their continued ability to maintain their high quality level of telecommunications service. As to the specific investment project identified above, it is expected that customers will benefit by increased reliability of service and the increased availability of a broader range of telecommunications services, including, but not limited to, advanced services.

**AFFIDAVIT CONTAINING CERTIFICATIONS  
PURSUANT TO WAC 480-123-060 AND WAC 480-123-070**

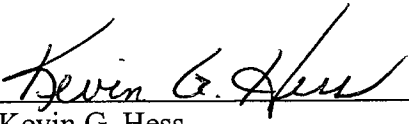
I, Kevin G. Hess, being of lawful age, state that I am Senior Vice President, Government & Regulatory Affairs of TDS Telecommunications Corporation, parent company of Asotin Telephone Company d/b/a TDS Telecom ("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that 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 Company will use federal high-cost universal service fund support only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2008 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2008 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 2008 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 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 23<sup>rd</sup> day of July, 2009 at Madison, WI.

Company: Asotin Telephone Company, d/b/a TDS Telecom

By:   
Kevin G. Hess

Its: Senior Vice President, Government & Regulatory Affairs

NATIONAL EXCHANGE CARRIER ASSOCIATION  
 UNIVERSAL SERVICE FUND  
 2009 DATA COLLECTION FORM (09-1)

RUN DATE: 22-Jul-09  
 Based on Financials Ending: 12/31/08  
 Submitted to NECA: 7/31/2009  
 Compensation Commences: 01/01/10

SAC NAME ASOTIN (WA) TELEPHONE COMPANY

SAC: 522404

Comp # 64

I. EXCHANGE CARRIER/DATA IDENTIFICATION

(010) Study Area Code Name  
 (020) Contact Name  
 (030) Contact Telephone Number  
 (040) USF Data Collection Period

ASOTIN (WA) TELEPHONE COMPANY  
 Jeffrey M. Johnson  
 (608) 664-4197  
 2009-1

Data LN	Description	Data Source	Data Line	2009-1	Amount
<b>II. WORKING LOOPS</b>					
(060)	Total Loops - (Cat 1.1, 1.2 and 1.3)	OSP Records	(060)		1,234
(070)	Category 1.3 Loops - (Excluding Cat 1.3 TWX Loops)	OSP Records	(070)		1,228
(080)	Reserved - NO ENTRY REQUIRED		(080)		
<b>III. INVESTMENT, EXPENSES, AND TAXES</b>					
Net Plant Investment					
(160)	Acct 2001 - Telephone Plant in Service	General Ledger W. Adj	(160)		8,131,259
(170)	Acct 1220 - Material and Supplies	General Ledger W. Adj	(170)		6,086
(190)	Acct 3100 - Accumulated Depreciation	General Ledger W. Adj	(190)		4,763,581
(195)	Acct 3400 - Accumulated Amortization Tangible	General Ledger W. Adj	(195)		4,116
(200)	Reserved - NO ENTRY REQUIRED		(200)		
(205)	Reserved - NO ENTRY REQUIRED		(205)		
(210)	Acct 4340 - Net Noncurrent Deferred Operating Income Taxes	General Ledger W. Adj	(210)		261,569
(220)	<b>Net Plant Investment (Sum of Lines 160+170 minus Lines 190 through 210)</b>	General Ledger W. Adj	(220)		<b>3,108,079</b>
Selected Plant Accounts					
(230)	Acct 2210 - Central Office Switching Equipment	General Ledger W. Adj	(230)		827,415
(235)	Acct 2220 - Operator System Equipment	General Ledger W. Adj	(235)		0
(240)	Acct 2230 - Central Office Transmission Equipment	General Ledger W. Adj	(240)		1,935,267
(245)	<b>Total Central Office Equipment (Sum of Lines 230 through 240)</b>	General Ledger W. Adj	(245)		<b>2,762,682</b>
(250)	Circuit Equipment Category 4.13	Prorate per CS	(250)		926,658
(255)	Acct 2410 - Cable & Wire Facilities Total	General Ledger W. Adj	(255)		4,634,048
(260)	Acct 3100 (2210) - Accumulated Depreciation Central Office Switching	General Ledger W. Adj	(260)		291,174
(265)	Acct 3100 (2220) - Accumulated Depreciation Operators System	General Ledger W. Adj	(265)		0
(270)	Acct 3100 (2230) - Accumulated Depreciation Central Office Transmission	General Ledger W. Adj	(270)		764,314
(275)	<b>Acct 3100 (2210-2230) - Total Accumulated Depreciation Central Office Equipment (Sum of Lines 260 thru 270)</b>	General Ledger W. Adj	(275)		<b>1,055,488</b>
(280)	Acct 3100 (2410) - Accumulated Depreciation C&WF	General Ledger W. Adj	(280)		3,141,090
(285)	Reserved - NO ENTRY REQUIRED		(285)		
(290)	Reserved - NO ENTRY REQUIRED		(290)		
(295)	Reserved - NO ENTRY REQUIRED		(295)		
(300)	Reserved - NO ENTRY REQUIRED		(300)		
(305)	Reserved - NO ENTRY REQUIRED		(305)		
(310)	Acct 4340 (2210) - Net Noncurrent Deferred Operating Income Taxes - Central Office Switching	General Ledger W. Adj	(310)		25,736
(315)	Acct 4340 (2220) - Net Noncurrent Deferred Operating Income Taxes - Operator System	General Ledger W. Adj	(315)		0
(320)	Acct 4340 (2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Transmission	General Ledger W. Adj	(320)		60,195
(325)	<b>Acct 4340 (2210-2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Equipment (Sum of Lines 310 through 320)</b>	General Ledger W. Adj	(325)		<b>85,931</b>
(330)	Acct 4340 (2410) - Net Noncurrent Deferred Operating Income Taxes - C&WF	General Ledger W. Adj	(330)		144,334
Plant Specific Operation Expense					
(335)	Acct 6110 - Network Support Expense Total	General Ledger W. Adj	(335)		935
(340)	Acct 6110 - Benefits Portion of Network Support Expense	General Ledger W. Adj	(340)		14
(345)	Acct 6110 - Rents Portion of Network Support Expense	General Ledger W. Adj	(345)		0
(350)	Acct 6120 - General Support Expense Total	General Ledger W. Adj	(350)		18,126
(355)	Acct 6120 - Benefits Portion of General Support Expense	General Ledger W. Adj	(355)		2,331
(360)	Acct 6120 - Rents Portion of General Support Expense	General Ledger W. Adj	(360)		5,414
(365)	Acct 6210 - Central Office Switching Expense - Total Switching Expense - Total	General Ledger W. Adj	(365)		32,923
(370)	Acct 6210 - Benefits Portion of COE Switching Expense	General Ledger W. Adj	(370)		1,732
(375)	Acct 6210 - Rents Portion of Central Office Switching Expense	General Ledger W. Adj	(375)		0
(380)	Acct 6220 - Operator System Expense - Total	General Ledger W. Adj	(380)		0
(385)	Acct 6220 - Benefits Portion of Operator System Expense	General Ledger W. Adj	(385)		0
(390)	Acct 6220 - Rents Portion of Operator System Expense	General Ledger W. Adj	(390)		0
(395)	Acct 6230 - Central Office Expense - Transmission Equipment - Total	General Ledger W. Adj	(395)		29,994
(400)	Acct 6230 - Benefits Portion of Central Office Expense - Transmission	General Ledger W. Adj	(400)		10,402

NATIONAL EXCHANGE CARRIER ASSOCIATION  
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- (020) Contact Name
- (030) Contact Telephone Number
- (040) USF Data Collection Period

ASOTIN (WA) TELEPHONE COMPANY  
 Jeffrey M. Johnson  
 (608) 664-4197  
 2009-1

Data LN	Description	Data Source	Data Line	2009-1	Amount
(405)	Acct 6230 - Rents Portion of Central Office Expense - Transmission	General Ledger W. Adj	(405)		0
<b>(410) 365+380+395)</b>		General Ledger W. Adj	<b>(410)</b>		<b>62,917</b>
(415)	Reserved - NO ENTRY REQUIRED		(415)		
(420)	Reserved - NO ENTRY REQUIRED		(420)		
(425)	Reserved - NO ENTRY REQUIRED		(425)		
(430)	Acct 6410 - Cable and Wire Facilities Expense - Total	General Ledger W. Adj	(430)		85,511
(435)	Acct 6410 - Benefits Portion Cable and Wire Facilities Expense	General Ledger W. Adj	(435)		26,731
(440)	Acct 6410 - Rents Portion Cable and Wire Facilities Expense	General Ledger W. Adj	(440)		5,165
<b>(445) Total Plant Specific Expense (Sum of Lines 335+350+365+380+395+430)</b>		General Ledger W. Adj	<b>(445)</b>		<b>167,489</b>
Plant Non Specific Expense					
(450)	Acct 6530 - Network Operations Expense - Total	General Ledger W. Adj	(450)		101,080
(455)	Acct 6530 - Benefits Portion Network Operations Expense	General Ledger W. Adj	(455)		5,233
(465)	Reserved - NO ENTRY REQUIRED		(465)		
(470)	Reserved - NO ENTRY REQUIRED		(470)		
(480)	Reserved - NO ENTRY REQUIRED		(480)		
(485)	Reserved - NO ENTRY REQUIRED		(485)		
(500)	Reserved - NO ENTRY REQUIRED		(500)		
(505)	Reserved - NO ENTRY REQUIRED		(505)		
Depreciation and Amortization Expenses					
(510)	Acct 6560 (2210) - Depreciation And Amortization Expense - CO Switching	General Ledger W. Adj	(510)		75,588
(515)	Acct 6560 (2220) - Depreciation And Amortization Expense - Operator System	General Ledger W. Adj	(515)		0
(520)	Acct 6560 (2230) - Depreciation and Amortization Expense - CO Transmission	General Ledger W. Adj	(520)		155,373
<b>(525) Acct 6560 (2210-2230) - Depreciation and Amortization Central Office Equipment (Sum of Lines 510 thru 520)</b>		General Ledger W. Adj	<b>(525)</b>		<b>230,961</b>
(530)	Acct 6560 (2410) - Depreciation and Amortization Expense - C&W Facilities	General Ledger W. Adj	(530)		228,225
Corporate Operating Expenses					
(535)	Acct 6710 Executive and Planning Expense - Total	General Ledger W. Adj	(535)		0
(540)	Acct 6710 Benefits Portion Executive and Planning Expense	General Ledger W. Adj	(540)		0
(550)	Acct 6720 - General Administrative Expense - Total	General Ledger W. Adj	(550)		153,803
(555)	Acct 6720 - Benefits Portion - General Administrative Expense	General Ledger W. Adj	(555)		988
<b>(565) Total Corporate Operations Expense (Sum of Lines 535 + 550)</b>		General Ledger W. Adj	<b>(565)</b>		<b>153,803</b>
Other Expenses and Revenues					
(600)	Benefits Portion of All Operating Expenses - Total Operating Expenses - Total	General Ledger W. Adj	(600)		54,064
(610)	Rents Portion of All Operating Expenses - Total	General Ledger W. Adj	(610)		10,579
(620)	Reserved - NO ENTRY REQUIRED		(620)		
(630)	Reserved - NO ENTRY REQUIRED		(630)		
Taxes					
(650)	Acct 7200 - Operating Taxes	General Ledger W. Adj	(650)		183,136
(655)	Reserved - NO ENTRY REQUIRED		(655)		
IV. PART 36 - COST STUDY DATA					
(700)	Cost Study Average Cable and Wire Facilities Acct 2410	Cost Study	(700)		4,606,866
	Cost Study Average Cable and Wire Facilities Cat. 1 - Total Exchange Line				
(710)	C&WF Excluding Wide Band	Cost Study	(710)		4,282,739
V. AMORTIZABLE TANGIBLE ASSETS (Refer to instructions prior to completing this section)					
(800)	Acct 2680 - Amortizable Tangible Assets	General Ledger W. Adj	(800)		5,919
(805)	Acct 2680 (2230) - Amortizable Tangible Assets - CO Transmission	General Ledger W. Adj	(805)		5,919
(810)	Acct 2680 (2230) - Amortizable Tangible Assets - CO Transmission Allocated to Category 4.13	General Ledger W. Adj	(810)		0
(815)	Acct 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities	General Ledger W. Adj	(815)		0
(820)	Acct 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities Allocated to Category 1	General Ledger W. Adj	(820)		0
(830)	Acct 6560 (2680) - Depreciation & Amortization Expense - Amortizable Tangible	General Ledger W. Adj	(830)		13,072
VI. COMMENTS / SIGNIFICANT CHANGE EXPLANATION				Hash Total	43,648,516
Reconciled with 2008 study.					

**USF Certification for 2009  
Attachment to Affidavit**

ASOTIN TELEPHONE CO.					
	d/b/a/ TDS Telecom				
<b>Access Lines</b>	<b>Exchange</b>	<b>CLLI Code</b>	<b>OCN</b>	<b>SAC</b>	
1,025	ASOTIN	ASOTWAXADS1	2404	522404	
203	ANATONE	ANATWAXXRS1			
-					
-					
-					
-					
-					
-					
1,228					

**Year 2008 Federal Universal Service Receipts Subject To Certification.**

High Cost Loop Support	\$ 158,386	
ICLS Support	\$ -	Not Applicable See FCC Part 54.904
Safety Net Additive	\$ -	
Safety Value Additive	\$ 150,624	
Local Switching Support	\$ 309,010	
<b>TOTAL</b>		

**Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding**

	Report #1 2008	Report #4 2009	Report #4 2010
<b>Plant Specific Operations Expenses</b>			
Network support (Accts. 6100s)	\$ 935	\$ 1,000	\$ 1,000
General support (Accts. 6120s)	\$ 17,834	\$ 18,000	\$ 18,000
Central office switching (Accts. 6210s)	\$ 34,203	\$ 34,000	\$ 35,000
Central office transmission (Accts. 6230s)	\$ 29,994	\$ 30,000	\$ 31,000
Cable and wire facilities (Accts. 6410s)	\$ 85,511	\$ 86,000	\$ 88,000
Network operations (Accts. 6530s)	\$ 101,241	\$ 102,000	\$ 105,000
Depreciation and amortization (Accts. 6560s)	\$ 506,756	\$ 514,000	\$ 527,000
<b>Customer operations expenses</b>			
Customer services (Accts. 6610-20s)	\$ 108,082	\$ 109,000	\$ 112,000
<b>Corporate operations expenses</b>			
Executive, general and corporate (Accts. 6710-20s)	\$ 153,222	\$ 154,000	\$ 158,000
<b>Total Year Supported Expenses, Before Return On Investment</b>	<b>\$ 1,037,778</b>	<b>\$ 1,048,000</b>	<b>\$ 1,075,000</b>
<b>Additions</b>			
Central Office Equipment (Acct. 2200s)	\$ 625,871	\$ 2,200	\$ -
Cable and wire (Acct. 2400s)	\$ 47,469	\$ 9,400	\$ 96,000
<b>TOTAL</b>	<b>\$ 673,340</b>	<b>\$ 11,600</b>	<b>\$ 96,000</b>
<b>Total Year Supported Expenditures, Before Return On Investment</b>	<b>\$ 1,711,118</b>	<b>\$ 1,059,600</b>	<b>\$ 1,171,000</b>