

July 29, 2009

## **BY HAND**

Mr. David A. Danner, Secretary Washington Utilities and Transportation Commission P. O. Box 47250 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Dear Mr. Danner:

Re: 20

2009 ETC Certification

Request for Certification Pursuant to

WAC 480-123-060 and 47 C.F.R. § 54.314

Pursuant to WAC 480-123-060, Tenino Telephone Company ("Company") hereby requests that the Washington Utilities and Transportation Commission certify to the Federal Communications Commission and the Universal Service Administrative Company 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,

Steven D. Hanson

Vice President

**Enclosures** 

## CERTIFICATIONS PURSUANT TO WAC 480-123-060 AND WAC 480-123-070

- I, Steven D. Hanson, being of lawful age, state that I am Vice President of Tenino Telephone Company ("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 29<sup>th</sup> day of July, 2009 at Tenino, Washington.

Company: Tenino Telephone Company

Its: Vice President

## REPORTS AS REFERENCED IN WAC 480-123-070 AND WAC 480-123-080

Tenino Telephone Company (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report for the calendar year 2008,<sup>2</sup> that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund. That report also includes certain data for the calendar year 2007.

<u>Report 2</u>: WAC 480-123-070(1)(b): The Company reports that the investments and expenses reported under Report 1, above, benefited customers as follows:

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>3</sup> The Company has made substantial expenditures and 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. In addition, during 2008, the Company was engaged in a number of major investment projects within its designated ETC service area, including the following:

- (1) The Company installed a digital soft switch at a cost of approximately \$281,000. This installation provided for growth capacity and improved service for virtually all customers receiving federal high-cost fund supported services.
- (2) The Company installed Digital Subscriber Line (DSL) equipment at a cost of approximately \$20,000. This provided growth capacity and improved service for approximately 860 subscribers.
- (3) The Company installed exchange line circuit equipment at a cost of approximately \$140,000. This project improved service for approximately 260 customers, plus allowing for future growth in the area served.

<sup>&</sup>lt;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>&</sup>lt;sup>2</sup> The attached report replicates National Exchange Carrier Association, Inc. Universal Service Data Collection Form 2008-1.

<sup>&</sup>lt;sup>3</sup> The term "ETC" is used herein with the same meaning as the term is used in Chapter 480-123 WAC.

<sup>&</sup>lt;sup>4</sup> References herein to the services supported by the federal high-cost fund refer to the services designated for support as set forth in 47 C.F.R. § 54.101(a).

(4) The company purchased fiber optical test equipment at a cost of approximately \$23,000. This equipment supports routine maintenance and testing and improves service for virtually all customers.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2008, the Company did not receive from either the Federal Communications Commission or the Consumer Protection Division of the Office of the Attorney General of the State of Washington any complaints against the Company made to them by the Company's customers.

Report 4: WAC 480-123-080(1)(b) and (2): The Company reports as follows:

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the period January 1, 2009, through December 31, 2009, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information for calendar year 2008 filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. 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 during calendar year 2009 it will have relatively the same level of expenditure and investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in The Company's investment plans directly affecting federal highcalendar vear 2008. cost supported services offered by it in its designated ETC service area also include the following major construction project for 2009:

The Company plans to install exchange line circuit equipment at a cost of approximately \$224,000. This project will improve service for approximately 430 customers, plus allowing for future growth in the area served.

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the period January 1, 2010, through December 31, 2010, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information for calendar year 2008 filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. 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's investment plans for calendar year 2010 directly affecting federal high-cost supported services offered by it in its designated ETC service area do not include a major construction project at the present time. 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. The Company has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2010.

In addition to the specific benefits noted for the above-identified project, the expected benefit to customers from the anticipated investment and expenditures in 2010 is that customers will continue to receive a high level of telecommunications service. The Company further expects that the continued receipt of federal high-cost support will allow the Company to continue to provide the supported services at rates that are reasonably comparable to the rates for such service in urban areas. All customers in the Company's designated ETC service area will benefit from the expected level of support by continuing to have available to them services that are reasonably comparable to the telecommunications services offered in urban areas at rates that are reasonably comparable to the rates for such services in urban areas.

Dated: July 28, 2009

**NAME: Tenino Telephone Company** 

Description	Pending View 2008-1 Amount	Prior Year 2007-1
II. WORKING LOOPS		
60 Total Loops (Cat 1.1, 1.2 and 1.3)	3,721	3,712
70 Category 1.3 loops (excluding Cat 1.3 TWX Loops)	3,629	3,628
II. INVESTMENT, EXPENSE AND TAXES		
NET PLANT INVESTMENT		
160 Acct 2001 – Telephone Plant in Service	20,435,737	19,332,992
170 Acct 1220 – Material and Supplies	0	0
190 Acct 3100 – Accumulated Depreciation	15,732,097	14,721,419
195 Acct 3400 – Accumulated Amortization - Tangible	0	0
210 Acct 4340 – Net Noncurrent Deferred Operating Income Taxes	(19,172)	(29,850)
220 Net Plant Investment	4,722,812	4,641,423
SELECTED PLANT ACCOUNTS		
230 Acct 2210 – Central Office Switching Equipment	2,343,239	2,260,131
235 Acct 2220 – Operator System Equipment	0	0
240 Acct 2230 - Central Office Transmission Equipment	3,696,554	3,340,230
245 Total Central Office Equipment	6,039,793	5,600,361
250 Circuit Equipment - Category 4.13	3,003,985	2,447,057
255 Acct 2410 – Cable and Wire Facilities - Total	9,315,108	8,787,286
260 Acct 3100 (2210) – Accumulated Depreciation - Central Office Switching Equipment	2,344,744	2,262,492
265 Acct 3100 (2220) Accumulated Depreciation - Operator System Equipment	0	0

NAME: Tenino Telephone Company

Descr	iption	Pending View 2008-1 Amount	Prior Year 2007-1
270 Acct 3100 (2230) – Accur Central Office Transmission	•	2,499,377	2,240,521
275 Acct 3100 (2210 thru 223 Depreciation - Central Off		4,844,121	4,503,013
280 Acct 3100 (2410) – Accur Cable and Wire Facilities	mulated Depreciation -	6,313,567	5,819,402
310 Acct 4340 (2210) – Net N Income Taxes – Central (	loncurrent Deferred Operating Office Switching Equipment	(2,201)	(3,494)
315 Acct 4340 (2220) – Net N Income taxes – Operator S	•	0	0
320 Acct 4340 (2230) – Net N Income Taxes – Central C	Ioncurrent Deferred Operating Office Transmission Equipment	(3,471)	(5,164)
325 Acct 4340 (2210 thru 223 Operating Income Taxes - (Sum of 4340 (2210) throu	- Central Office Equipment	(5,672)	(8,658)
330 Acct 4340 (2410) – Net Ne Income Taxes – Cable an		(8,749)	(13,599)

**NAME: Tenino Telephone Company** 

Description		Pending View 2008-1 Amount	Prior Year 2007-1
PLANT :	SPECIFIC OPERATION EXPENSE		
335	Acct 6110 – Network Support Expense Total	229,436	211,103
340	Acct 6110 – Benefits Portion of Network Support Expense	13,756	7,415
345	Acct 6110 – Rents Portion of Network Support Expense	22,500	13,860
350	Acct 6120 – General Support Expense Total	400,400	444,549
355	Acct 6120 - Benefits Portion of General support Expense	36,389	35,499
360	Acct 6120 – Rents Portion of General support Expense	0	0
365	Acct 6210 – Central Office Switching Expense –Total	424,771	405,739
370	Acct 6210 – Benefits Portion of Central Office Switching Expense	37,547	32,308
375	Acct 6210 – Rents Portion of Central Office Switching Expense	0	0
380	Acct 6220 - Operator System Expense - Total	0	0
385	Acct 6220 – Benefits Portion of Operator System Expense	0	0
390	Acct 6220 - Rents Portion of Operator System Expense	0	0
395	Acct 6230 - Central Office Transmission Expense - Total	190,316	169,108
400	Acct 6230 – Benefits Portion of Central Office Transmission Expense	21,065	16,291
405	Acct 6230 – Rents Portion of Central Office Transmission Expense	0	0

**NAME: Tenino Telephone Company** 

Description	Pending View 2008-1 Amount	Prior Year 2007-1
410 Acct 6210 – 6230 – Central Office Expense - Total	615,087	574,847
430 Acct 6410 – Cable and Wire Facilities Expense – Total	259,525	286,152
435 Acct 6410 – Benefits Portion of Cable and Wire Facities Expense	36,721	37,206
440 Acct 6410 – Rents Portion of Cable and Wire Facilities Expense	3,712	3,405
445 Total Plant Specific Expense	1,504,448	1,516,651
PLANT NON-SPECIFIC EXPENSE		
450 Acct 6530 - Network Operations Expense - Total	581,264	489,478
455 Acct 6530 – Benefits Portion of Network Operations Exp	57,605	49,513
DEPRECIATION & AMORTIZATION EXPENSE		
510 Acct 6560 (2210) – Depreciation and Amortization Expense – Central Office Switching Equipment	30,256	47,378
515 Acct 6560 (2220) – Depreciation and Amortization Expense – Operator System Equipment	0	0
520 Acct 6560 (2230) – Depreciation and Amortization Expense – Central Office Transmission Equipment	310,851	258,313
525 Acct 6560 (2210 thru 2230) – Depreciation and Amortization Central Office Equipment	341,107	305,691
530 Acct 6560 (2410) – Depreciation and Amortization Expense – Cable and Wire Facilities	494,165	470,416

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	Description	Pending View 2008-1 Amount	Prior Year 2007-1
CORF	PORATE OPERATIONS EXPENSE		
535	Acct 6710 – Executive and Planning Expense – Total	150,706	168,099
540	Acct 6710 – Benefits Portion of Executive &Planning Exp	14,985	15,119
550	Acct 6720 – General Administrative Expense – Total	639,601	637,581
555	Acct 6720 – Benefits Portion of General Administrative Exp	69,809	67,977
565	Total Corporate Operations Expense	790,307	805,680
ОТНЕ	ER EXPENSE		
600	Benefits Portion of All Operating Expenses – Total	324,637	298,593
610	Rents Portion of Plant Specific Operating Expenses - Total	26,212	17,265
<b>TAXE</b> 650	S Acct 7200 – Operating taxes	266,638	188,972
IV.	PART 36 – COST STUDY DATA		
700	Cost Study Average Cable And Wire Facilities - Acct 2410	9,056,148	8,567,388
710	Cost Study Average Cable and Wire Facilities Cat 1 – Total Exchange Line C&WF Excluding Wideband	8,696,928	8,043,419
V.	AMORTIZABLE TANGIBLE ASSETS (REFER TO INSTRUCTIONS PRIOR TO COMPLETING THI	S SECTION)	
800	Acct 2680 Amortizable Tangible Assets	0	0

**NAME: Tenino Telephone Company** 

Description	Pending View 2008-1 Amount	Prior Year 2007-1
805 2680 (2230) – Amortizable Tangible Assets - Office Transmission Equipment	- Central0	0
810 Acct 2680 (2230) – Amortizable Tangible As Central Office Transmission Equipment Assi To Category 4.13		0
815 Acct 2680 (2410) – Amortizable Tangible As Cable and Wire Facilities	sets –0	0
820 Acct 2680 (2410) – Amortizable Tangible As Cable and Wire Facilities Assigned to Categ	_	0
830 Acct 6560 (2680) – Depreciation and Amortic Expense – Amortizable Tangible Assets	zation0	0
	Check Total 106,906,111	100,087,917

Subn	nitted By
RAV	
July 2	29, 2008