



UT-091214-CT

TELEPHONE
TELEVISION

July 30, 2009

BY HAND

Mr. David W. Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

RECEIVED
GENERAL MANAGEMENT
2009 JUL 30 PM 12:33
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. Danner:

Re: 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, Western Wahkiakum County 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 M. Appelo
Corporate Secretary

Enclosures

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

Western Wahkiakum County Telephone Company (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.¹

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report² 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. In addition, attached is a copy of the Company's NECA-1 Report for the calendar year 2007.

Report 2: 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.³ 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 services⁴ from the Company within its designated ETC service area. Also, during 2008, the Company was engaged in the following major construction projects:

- (1) Construction of new fiber optic routes along from the vicinity of SR4 at the Company's East Naselle Remote, along South Valley Road for a distance of approximately 3.4 miles and then along Knappton Road to Highway 401 for a distance of approximately 4.1 miles. The cost incurred by the Company in 2008 to complete this project was approximately \$442,000. The project has enhanced service reliability and capacity for approximately 134 customers and is expected to enable further such enhancements in

¹ It is the Company's understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3). Nevertheless, the Company reports that during 2008, the Company had no major service outages, within the meaning of that term as defined in WAC 480-120-021, and that as of December 31, 2008, the Company had no unfulfilled requests for service from applicants within the Company's designated ETC service areas.

² The Company understands the reference to the "NECA-1 Report" to refer to the values reported by the Company in response to the National Exchange Carrier Association, Inc. Universal Service Data Collection Form or its on-line equivalent pertaining to the subject year.

³ The term "ETC" is used herein with the same meaning as the term is used in Chapter 480-123 WAC.

⁴ References herein to 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).

the future by providing the backbone infrastructure for such enhancements.

- (2) Continued work on upgrading the Company's DLC (digital loop carrier) to CO (central office) ATM (asynchronous transfer mode) transport platform on generally a system-wide basis. The amount spent in 2008 to complete this project was approximately \$14,500. As completed, this project resulted in greater capacity and reliability for voice grade access to the public switched telecommunications network for customers in most portions of the Company's designated ETC service area, while also strengthening the Company's ability to provide its customers with access to advanced telecommunications services.
- (3) Completion of installation and wiring of a new back-up generator power system. The cost in 2008 for this project was approximately \$13,200. This project will facilitate and extend the capability of the Company to continue to provide telecommunications services during a failure of the commercial power system.
- (4) Acquisition and installation of a fiber optic network router that will enhance the Company's network management capabilities, which in turn contributes to enhanced network reliability. The cost for this addition during 2008 was approximately \$38,000.
- (5) Installation of new equipment to enhance the ability of the Company staff to implement changes to DMS-10 switch functions for adding or deleting features and services for customers. The cost of this project in 2008 was approximately \$34,000. The new equipment will enable the Company to make customer requested feature and/or service changes more efficiently for the benefit of potentially all subscribers served by the Company.

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:

The planned investment and expenses related to Washington state for calendar year 2009 that the Company expects to use as a basis to request federal high-cost support were planned 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. However, investment

levels benefiting federal high-cost fund supported services are now expected to be higher during 2009 (and 2010) than in 2008.

In addition, the following projects have either been completed during 2009 or are in progress and are expected to be completed during 2009 or during the first nine months of 2010:

- (1) Construction of new fiber optic routes along the length of North Valley Road, Upper Naselle Road and Bighill Road. These routes have involved, or will involve, the laying of approximately 9.5 miles of buried fiber optic facilities. The costs incurred or expected to be incurred in 2009 as the Company completes this project are estimated to be approximately \$530,000. This project will enhance service reliability and capacity for approximately 165 customers, as well as provide backbone capacity to serve other portions of the Company's designated ETC service area.
- (2) Construction of a new fiber optic route along Miller Point Road in the Company's Grays River Exchange. This project involves the laying of approximately 3 miles of buried fiber optic facilities. The costs incurred or expected to be incurred in 2009 as the Company completes this project are estimated to be approximately \$75,000. This project will enhance service reliability and capacity for approximately 31 customers along its route.
- (3) Accomplishment of a central office upgrade with the addition of Telabs MSAP (multiservice access platform) to facilitate traffic management. This project is expected to benefit all customers in the Company's designated ETC service area. The cost of this upgrade expected to be incurred in 2009 is approximately \$51,700.

Except as described above in this Report 4, the Company expects the levels of investment and expenses incurred by it during calendar years 2009 and 2010, respectively, 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 further expects that, except as described above in this Report 4, for calendar years 2009 and 2010, respectively, it will have relatively the same budget level of expenditures and investment related to normal maintenance, replacement and minor upgrades of plant as occurred in calendar year 2008.

In addition to the specific benefits to customers identified with respect to projects (1), (2) and (3) above, the expected benefit to customers from the anticipated investment and expenditures is that the Company's customers will continue to receive a high level of telecommunications service. The Company further expects that the continued receipt by it 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 services 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 telecommunications services offered in urban areas at rates that are reasonably comparable to the rates for such services in urban areas.

Dated: July 30, 2009



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2008	Reg: 6	WESTERN	Subset 3
Contact Name:	Carol Larson	MSM: 020007494	Melody Crane	
Contact Phone:	(360)-465-2211 Ext:	OO: *****		
Release Status:	Released	Co: 000002451	Western Wahkiakum County Tel. Co.	
Soft Edit Status:	Passed Edit	SAR: 522451	WESTERN WAHAKIACUM	

Description	Pending View	Source
060 Total Loops	1,179	EC
070 Cat. 1.3 Loops	1,169	EC
160 Account 2001	12,451,842	EC
170 Account 1220	52,187	EC
190 Account 3100	8,417,543	EC
195 Account 3400	0	EC
210 Account 4340	519,958	EC
220 Net Plant Investment	3,566,528	EC
230 Account 2210	1,627,385	EC
235 Account 2220	0	EC
240 Account 2230	2,289,183	EC
245 Total Central Office	3,916,568	EC
250 Ckt Equip Cat 4.13	1,821,548	EC
255 Account 2410	6,999,072	EC
260 Account 3100 (2210)	1,251,025	EC
265 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	1,356,206	EC
275 Account 3100 (2210-2230)	2,607,231	EC
280 Account 3100 (2410)	4,701,058	EC
310 Account 4340 (2210)	131,603	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	158,610	EC
325 Account 4340 (2210-2230)	290,213	EC
330 Account 4340 (2410)	215,885	EC
335 Account 6110 Total	23,374	EC
340 Account 6110 Benefits	0	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	66,633	EC
355 Account 6120 Benefits	8,194	EC
360 Account 6120 Rents	0	EC
365 Account 6210 Total	111,539	EC
370 Account 6210 Benefits	23,700	EC
375 Account 6210 Rents	0	EC
380 Account 6220 Total	0	EC
385 Account 6220 Benefits	0	EC
390 Account 6220 Rents	0	EC
395 Account 6230 Total	66,900	EC
400 Account 6230 Benefits	11,054	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	178,439	EC
430 Account 6410 Total	226,140	EC
435 Account 6410 Benefits	37,595	EC
440 Account 6410 Rents	739	EC
445 Total Plant Specific	494,586	EC
450 Account 6530 Total	494,097	EC
455 Account 6530 Benefits	128,395	EC
510 Account 6560 (2210)	152,717	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	214,353	EC



USF1010 PENDING VIEW REPORT

Applies to Period: Year End 12/2008
Contact Name: Carol Larson
Contact Phone: (360)-465-2211 Ext:
Release Status: Released
Soft Edit Status: Passed Edit

Reg: 6 WESTERN Subset 3
MSM: 020007494 Melody Crane
OO: *****
Co: 000002451 Western Wahkiakum County Tel. Co.
SAR: 522451 WESTERN WAHAKIACUM

Description	Pending View	Source
525 Account 6560 (2210-2230)	367,070	EC
530 Account 6560 (2410)	383,693	EC
535 Account 6710 Total	0	EC
540 Account 6710 Benefits	0	EC
550 Account 6720 Total	953,976	EC
555 Account 6720 Benefits	190,977	EC
565 Sum of Lines 535 + 550	953,976	EC
600 Ben. Por. of all Op. Exp.	442,892	EC
610 Rent Por. of all Op. Exp.	739	EC
650 Account 7200 Other Taxes	152,619	EC
700 2410 (C S Total CWF - AV)	6,772,107	EC
710 2410 (C S CWF - Cat.1)	6,398,900	EC
800 Account 2680 Total	0	EC
805 Account 2680 (2230)	0	EC
810 Account 2680 (Cat. 4.13)	0	EC
815 Acc 2680 (2410) Total CWF	0	EC
820 Acc 2680 (2410)CWF-Cat1	0	EC
830 Account 6560 (2680)	0	EC

Comments:



USF1010 OFFICIAL VIEW REPORT

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Applies to Period:	Year End 12/2007	Reg: 6	WESTERN	Subset 3
Contact Name:	Carol Larson	MSM: 020007494	Melody Crane	
Contact Phone:	(360)-465-2211 Ext:	OO: *****		
Release Status:	Released	Co: 000002451	Western Wahkiakum County Tel. Co.	
Soft Edit Status:	Passed Edit	SAR: 522451	WESTERN WAHKIAKUM	

Description	Official View
060 Total Loops	1,172
070 Cat. 1.3 Loops	1,162
160 Account 2001	11,759,445
170 Account 1220	54,309
190 Account 3100	7,714,096
195 Account 3400	0
210 Account 4340	584,070
220 Net Plant Investment	3,515,588
230 Account 2210	1,624,165
235 Account 2220	0
240 Account 2230	2,047,672
245 Total Central Office	3,671,837
250 Ckt Equip Cat 4.13	1,586,876
255 Account 2410	6,545,143
260 Account 3100 (2210)	1,138,052
265 Account 3100 (2220)	0
270 Account 3100 (2230)	1,141,853
275 Account 3100 (2210-2230)	2,279,905
280 Account 3100 (2410)	4,345,484
310 Account 4340 (2210)	147,753
315 Account 4340 (2220)	0
320 Account 4340 (2230)	199,180
325 Account 4340 (2210-2230)	346,933
330 Account 4340 (2410)	225,470
335 Account 6110 Total	27,998
340 Account 6110 Benefits	0
345 Account 6110 Rents	0
350 Account 6120 Total	39,672
355 Account 6120 Benefits	4,516
360 Account 6120 Rents	0
365 Account 6210 Total	123,251
370 Account 6210 Benefits	23,905
375 Account 6210 Rents	0
380 Account 6220 Total	0
385 Account 6220 Benefits	0
390 Account 6220 Rents	0
395 Account 6230 Total	71,298
400 Account 6230 Benefits	12,575
405 Account 6230 Rents	0
410 Account 6210-6230	194,549
430 Account 6410 Total	126,612
435 Account 6410 Benefits	32,041
440 Account 6410 Rents	654
445 Total Plant Specific	388,831
450 Account 6530 Total	490,983
455 Account 6530 Benefits	124,148
510 Account 6560 (2210)	147,683
515 Account 6560 (2220)	0
520 Account 6560 (2230)	201,735



USF1010 OFFICIAL VIEW REPORT

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Applies to Period:	Year End 12/2007	Reg: 6	WESTERN	Subset 3
Contact Name:	Carol Larson	MSM: 020007494	Melody Crane	
Contact Phone:	(360)-465-2211 Ext:	OO: *****		
Release Status:	Released	Co: 000002451	Western Wahkiakum County Tel. Co.	
Soft Edit Status:	Passed Edit	SAR: 522451	WESTERN WAHKIAKUM	

Description	Official View
525 Account 6560 (2210-2230)	349,418
530 Account 6560 (2410)	362,183
535 Account 6710 Total	0
540 Account 6710 Benefits	0
550 Account 6720 Total	918,683
555 Account 6720 Benefits	185,968
565 Sum of Lines 535 + 550	918,683
600 Ben. Por. of all Op. Exp.	425,097
610 Rent Por. of all Op. Exp.	654
650 Account 7200 Other Taxes	284,381
700 2410 (C S Total CWF - AV)	6,414,326
710 2410 (C S CWF - Cat. 1)	6,231,318
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

Comments:

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

I, Steven M. Appelo, being of lawful age, state that I am Corporate Secretary of Western Wahkiakum County Telephone Company ("Company"), that I am authorized to execute these Certifications on behalf of the Company, and that the facts set forth in these Certifications 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 the 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 30th day of July, 2009 at Olympia, Washington.

Company: Western Wahkiakum County Telephone Company

By: 

Its: Corporate Secretary