St. John Telephone Company

LET-101284-CT Om 9-30-10 Regular Agenda

July 27, 2010

P. O. Box 268 St. John, Washington 99171 (509) 648-3322 FAX 648-9900

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

Re: Request for Certification Pursuant to WAC 480-123-060 and 47 C.F.R. §54.314

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Dear Ms. Washburn:

Pursuant to WAC 480-123-060, St John Co-operative Telephone and Telegraph Company ("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.

For the Commission's information, in addition to the Lifeline advertisement covered in the enclosed certification, St. John Co-operative Telephone and Telegraph Company posts the Lifeline/WTAP information in its St. John business office, lists the Lifeline/WTAP services available in the Company's phone book and provides the Lifeline/WTAP information to all new customers at the time the customer subscribes for telephone service. Also, the Company experienced no major outages for 2009 and had no requests for service from applicants within the Company's designated service area that was unfilled for the calendar year 2009.

Sincerely,

Greg Morasch General Manager

OFFICERSEnclosures
Patrick Gordon • President
Mac W. Mills • Vice President
Paul Heglar • Secretary

DIRECTORSJerry Schauble
Gary Bailey

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

I, Greg Morasch, being of lawful age, state that I am General Manager of St. John Co-operative Telephone and Telegraph 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 2009 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2009 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 2009 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 27 day of July, 2010, at St. John, Washington.

Company: St. John Co-operative Telephone and Telegraph Company

Greg Morasch

Its: General Manager

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

St. John Co-operative Telephone and Telegraph 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 Reports for the calendar years 2008 and 2009, that, as of the date of the reports, the Company has reported as the basis for support from the federal high-cost fund.

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 quality telecommunications services to customers in the service area for which the Company is designated as an ETC. 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 ETC service area. The Company has expanded its network over the past several years so that it is capable of providing access to broadband services throughout all of the Company's designated ETC service area. The Company offers services that are comparable to services in urban areas. In addition, during 2009, the Company was engaged in a major investment project within its designated ETC service area as described below:

The Company major construction project was the third and final phase of a fiber-to-the-home project costing approximately \$1.3 million which covers approximately 400 of the Company's customer in its designated ETC service area. This major addition benefits the Company's customers by providing the Company with state-of-the-art facilities to replace old facilities and to provide even better customer service and broadband capabilities.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2009, the Company did not receive 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 by the Company's customers.

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).

² The term "ETC" is used in the same sense as the term is used in Chapter 480-123 WAC.

Report 4: WAC 480-123-080(1)(b): 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, 2010, through December 31, 2010, that the Company expects to use as a basis to request federal high-cost support are expected to be approximately the same due to those investments and expenses the Company has set forth in its information filed under Report 1, above. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2009, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and depreciation on investment placed in service. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company's investment plans directly affecting federal high-cost supported services offered by it in its designated ETC service area do not include a major The Company expects that it will have a lower construction project at the present time. level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2009 (2010 approximate investment of \$143,000 versus 2009 of \$1.3 million).

Report 5: WAC 480-123-080(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, 2011, through December 31, 2011, that the Company expects to use as a basis to request federal high-cost support are expected to be lower to those investments and expenses the Company has set forth in its information filed under Report 1, above. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2009, 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 has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2011. The Company 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 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 comparable to the telecommunications services offered in urban areas at rates that are comparable to the rates for such services in urban areas.



Applies to Period:

Year End

12/2008

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Rea:

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Gregory W. Morasch MSM: 020007494 Contact Name: Contact Phone: (509)-648-3322 Ext: 00: Special Released Co: 000002442 Release Status: Passed Edit SAR: Soft Edit Status: 522442 Official View Description 633 060 **Total Loops** 614 070 Cat. 1.3 Loops 12,545,528 160 Account 2001 Account 1220 31,043 170 2,953,653 Account 3100 190 0 195 Account 3400 236,162 210 Account 4340 9,386,756 220 Net Plant Investment 892,285 230 Account 2210 235 Account 2220 1,476,801 240 Account 2230 2,369,086 245 **Total Central Office** Ckt Equip Cat 4.13 1,099,251 250 9.122.876 255 Account 2410 525,748 260 Account 3100 (2210) 265 Account 3100 (2220) O 1,265,509 270 Account 3100 (2230) 275 Account 3100 (2210-2230) 1,791,257 280 Account 3100 (2410) 629,532 310 Account 4340 (2210) 16,896 315 Account 4340 (2220) 0 27,595 320 Account 4340 (2230) 44,491 325 Account 4340 (2210-2230) 173,037 330 Account 4340 (2410) 3,827 335 Account 6110 Total 12 340 Account 6110 Benefits 0 345 Account 6110 Rents 25,693 350 Account 6120 Total 162 355 Account 6120 Benefits 1,500 360 Account 6120 Rents 365 Account 6210 Total 43,934 7,799 370 Account 6210 Benefits 375 0 Account 6210 Rents 0 380 Account 6220 Total 0 385 Account 6220 Benefits 0 390 Account 6220 Rents 65.579 395 Account 6230 Total 12,909 400 Account 6230 Benefits 405 Account 6230 Rents 0 109,513 410 Account 6210-6230 142,029 430 Account 6410 Total 33,935 435 Account 6410 Benefits 11,694 440 Account 6410 Rents 445 **Total Plant Specific** 281,062 17,132 450 Account 6530 Total 6 455 Account 6530 Benefits 66,272 510 Account 6560 (2210) Account 6560 (2220) 0 515 63,562 520 Account 6560 (2230)

Subset 3

WESTERN

Melody Crane

St. John Tel. Co.

ST JOHN TEL CO



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Subset 3

Applies to Period: Contact Name: Contact Phone:		Year End Gregory W. I (509)-648-33		Reg: MSM: OO:	6 020007494	WESTERN Melody Crane
Release Status:		Special Rele		Co:	000002442	St. John Tel. Co.
Soft Edit Status:		Passed Edit		SAR:	522442	ST JOHN TEL CO
Soft Edit Status. 1 assed Edit				OAIX.	J22772	01 001111 122 00
Description				Official View		
525	Account 6560 (2210-2230)			129,834		
530	Account 6560 (2410)			253,103		
535	Account 6710 Total			74,846		
540	Account 6710 Benefits			13,689		
550	Account 6720 Total			150,818		
555	55 Account 6720 Benefits			5,173		
565	55 Sum of Lines 535 + 550			225,664		
600	600 Ben. Por. of all Op. Exp.			93,131		
610	Rent Por. of all Op. Exp.			13,194		
650	Account 7200 Other Taxes			3,299		
700	2410 (C S Total CWF - AV)			7,438,437		
710	2410 (C S CWF - Cat.1)			7,364,742		
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		
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Comments:

Date: 7/7/2009

Increases in plant investment accounts is due to St John Telephone implementing
Phase II of their Fiber to the Home project in current year. Increases in depreciation,
accumulated depreciation and deferred federal income taxes is due to the completion of Phase I
in prior year and Phase II in current year of their Fiber to the Home project.

Date: 10/2/2009

2. 10-02-09/Per Jenifer W., decrease in loops due to a combination of customers moving to cell phones, VOIP services such as Vonage, and some house vacancies in the study area.

Consumer Information Guide (Cont'd)

DEPOSIT REFUNDS

Accounts that have a deposit will be reviewed for six months. The deposit, with interest, will be returned if payments have been made when due. Interest will be paid from the date of receipt to the date of refund.

ORDERING SERVICE

To help speed the ordering of your service, you should have the following information available when you call our Business Office.

- 1. Complete address.
- 2. How you would like your name to appear in the directory.
- 3. Employment status.
- 4. Information about your previous telephone service.
- 5. An estimate of your monthly long distance charges.

Payment in advance for installation and one month's service charges may be required. For information about any telephone service, call our Business Office. Your service representative will be glad to help you.

CONSUMER COMPLAINTS AND DISPUTES

When you have a problem with your telephone service or billing, call our Business Office. When your problem cannot be solved by the representative, higher levels of management are available to help you.

A customer may make a formal or informal complaint to the Washington Utilities and Transportation Commission for further review of the complaint or dispute when satisfaction is not received.

DIRECTORY ASSISTANCE INTERSTATE

There will be a charge for each Directory Assistance call. However, there may be credits given for certain Directory Assistance requests. These credits may vary from company to company and carrier to carrier. Contact your local company for further

- 1. When making a request for directory assistance, you are allowed a maximum of two telephone numbers per call.
- 2. The charge applies whether or not the Directory Assistance Bureau furnished the requested number - such as in the case of non-published numbers.
- Subscribers who are unable to use a directory because of a visual or physical handicap may apply to the local telephone company to obtain a special waiver from these directory charges.

WRITE DOWN NUMBERS-DIRECTORY ASSISTANCE CALLS COST YOU MONEY

TELEPHONE DIRECTORIES

One directory for each access line leased through this business office is furnished

WASHINGTON TELEPHONE ASSISTANCE PROGRAM

The Washington Telephone Assistance Program (WTAP) is available to adult recipients of any of the following Department of Social and Health Service Programs:

- Temporary Aid for Needy Families
- General Assistance
- Medical Assistance
- Supplemental Security Income with State Medical
- Food Assistance

- Community Options Program
- DSHS Chore Services

The WTAP program provides:

- A discount on connection fees
- A Waiver of deposit for local service
- A Discount on local monthly service

For more information, please call the toll-free number 1-888-700-8880.



WASHINGTON TELEPHONE ASSISTANCE PROGRAM

The Washington Telephone Assistance Program (WTAP) is available to adult recipients of any of the the following Department of Social and Health Service Programs:

Temporary Aid for Needy Families
General Assistance
Medical Assistance
Supplemental Security Income with State Medical
Food Assistance
Community Options Program
DSHS Chore Services
State Family Assistance
Refugee Assistance

The WTAP Program provides:

A discount on connection fees A waiver of deposit for local service A discount on local monthly service

For more information, please call the toll-free number 1-888-700-8880.

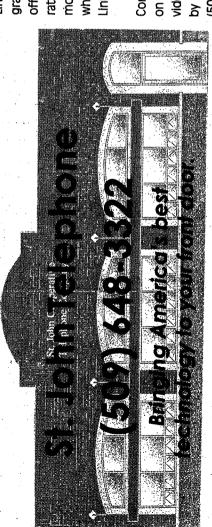
This is posted in the business office and a copy is given to new customers.

YEARLY NOTICES

Non-Discrimination Statement

St. John Cooperative Telephone and Telegraph Company is the recipient of Federal financial assistance from the US Department of Agriculture (USDA). The USDA prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal or because all of a part of an individuals' income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDAs TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). "USDA is an equal opportunity provider, employer, and lender."



Service Charges

The St. John Telephone Company has been serving the St. John area since 1913. We serve both residential and commercial customers in our rural community with quality services at competitive rates. In addition to our basic telephone services, we offer internet access, both dial up and high speed, special calling features and voice mail. Our basic services are comprised of several components, which at a minimum include:

Service Provided

Residence \$9.50

Business \$13.00

Single party voice grade access to the public network

Access to emergency 911 services State/County mandated surcharges

Residence \$.20/\$.5

3.20/\$.50

St. John Telephone Company participates in the Federal Lifeline and Link-Up Programs as well as the Washington Telephone Assistance Program (WTAP). Under these programs, St. John Telephone Company offers to qualifying low-income customers a discount off the monthly rate for basic residential exchange service. The current discounted monthly rate for lifeline residential service is up to \$7.50 per month, while the installation charge for service may be discounted under the Link-Up Program and WTAP by \$10.00.

These services are available to all customers of St. John Telephone Company. The costs associated with each are reflected each month on a regular telephone bill along with other charges for services provided by us. Information about these and other services are available by contacting the St. John Telephone Company business office at (509) 648-3322.