

# ST. JOHN TELEPHONE COMPANY Regul

July 15, 2011

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

> Request for Certification Pursuant to WAC 480-123-060 aine 47 C.F.R. §54.314

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 2010 and had no requests for service from applicants within the Company's designated service area that was unfilled for the calendar year 2010.

Sincerely,

Greg Morasch General Manager

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**OFFICERS** 

Patrick Contolos Presisent Mac W. Mills • Vice President Paul Heglar • Secretary

**DIRECTORS** Jerry 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 & 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 2010 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2010 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 2010 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 15 day of July, 2011, at St. John, Washington.

Company: ST. JOHN CO-OPERATIVE TELEPHONE & 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 2009 and 2010, 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.<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 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 offered in urban areas at rates that are comparable to rates for such services in urban areas.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2010, 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.

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, 2011, through December 31, 2011, 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, taking in account

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

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 2010, 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 construction project at the present time. The Company expects that it have a similar level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2010.

Report 5: WAC 480-123-080(1)(a) and 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, 2012, through December 31, 2012, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively the same as those investments and expenses the Company has set forth in its information 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 2010, 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 directly affecting fedral 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 has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2012. 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.





520

Account 6560 (2230)

Subset 3 Applies to Period: Year End 12/2010 Reg: 6 WESTERN Contact Name: Gregory W. Morasch MSM 020007494 Melody Crane Contact Phone: (509)-648-3322 Ext: 00: Release Status: Released Co: 000002442 St. John Tel. Co. Soft Edit Status: Failed Edit SAR: 522442 ST JOHN TEL CO Description Pending View Source 060 Total Loops 605 EC 070 Cat. 1.3 Loops 587 EC Account 2001 13.484.522 EC 160 64,007 EC 170 Account 1220 190 Account 3100 3,764.874 EC Account 3400 EC 195 0 210 Account 4340 721.284 EC 220 9,062,371 Net Plant Investment FC 230 Account 2210 910,430 EC 235 Account 2220 EC 0 240 Account 2230 1,679,172 EC 245 Total Central Office 2,589,602 FC 250 Ckt Equip Cat 4.13 1,249,055 EC Account 2410 9,790,674 255 EC 260 Account 3100 (2210) 597,979 EC 265 Account 3100 (2220) 0 EC 270 Account 3100 (2230) 1,457,984 EC 275 Account 3100 (2210-2230) 2,055,963 EC 280 Account 3100 (2410) 1,105,858 EC 310 Account 4340 (2210) 47.575 EC EC 315 Account 4340 (2220) 0 320 Account 4340 (2230) 88,693 EC 325 Account 4340 (2210-2230) 136.268 EC 530,078 EC 330 Account 4340 (2410) 335 5.009 EC Account 6110 Total 340 Account 6110 Benefits 0 EC 345 Account 6110 Rents 0 EC 350 Account 6120 Total 21,944 EC 355 Account 6120 Benefits 37 EC 0 EC 360 Account 6120 Rents 90,082 EC 365 Account 6210 Total 370 Account 6210 Benefits 8,912 EC 36,765 375 Account 6210 Rents EC Account 6220 Total 0 EC 380 0 385 Account 6220 Benefits EC 390 Account 6220 Rents 0 EC 152.855 395 Account 6230 Total EC 16,438 EC 400 Account 6230 Benefits 405 Account 6230 Rents EC 410 Account 6210-6230 242,937 EC 430 Account 6410 Total 160,974 EC 38,504 435 Account 6410 Benefits EC 440 Account 6410 Rents 22,003 EC 430,864 EC 445 Total Plant Specific 12,485 EC 450 Account 6530 Total 455 Account 6530 Benefits 93 EC 510 Account 6560 (2210) 81,063 EC 515 Account 6560 (2220) 0 EC 53.366 EC



7/14/2011 12:44:36 pm Page 2 of 2

Applies to Period: Contact Name: Contact Phone: Release Status: Soft Edit Status:	Year End 12/2010 Gregory W. Morasch (509)-648-3322 Ext: Released Failed Edit	Reg: MSM: OO: Co: SAR:	6 020007494 000002442 522442	WESTERN Melody Crane St. John Tel. Co. ST. JOHN TEL CO	Subse: 3
Description		Pending View		Source	
525 Account 6560 530 Account 6560 535 Account 6710 540 Account 6720 555 Account 6720 565 Sum of Lines 600 Ben. Por. of al 610 Rent Por. of al 650 Account 7200 700 2410 (C S CM 800 Account 2680 805 Account 2680 810 Account 2680 815 Acc 2680 (241)	(2410) Total Benefits Total Benefits 535 + 550 II Op. Exp. II Op. Exp. Other Taxes al CWF - AV) /F - Cat.1) Total (2230) (Cat. 4.13)		134,429 387,354 81,632 13,586 168,042 8,165 249,674 104,311 58,768 188,751 9,843,612 9,697,175 0 0	EC E	
820 Acc 2680 (24° 830 Account 6560			0	EC EC	

Date: 7/14/2011

<sup>1.</sup> Line 700 (\$9,843,612)is higher than Line 255 (\$9,790,674) due to removing additional Part 64 costs from current year CWF.



7/2: /2010 11:40 /9 am | Pago 1 of 2

Succet 3

Release Status   Released Edit   Ratio   Rat	Applies to Period: Contact Name: Contact Phone:		Year End 12/2009 Gregory W. Morasch (509)-648-3322 Ext:	Reg: MSM; OO:	6 020007494	WESTERN Malody Crane
Total Loops		Release Status: Special Released		Co:		
070         Calt 1 3 Loops         601         EC           160         Account 2001         13,575,248         EC           170         Account 3100         3,251,277         EC           195         Account 3100         0         EC           196         Account 3400         0         EC           220         Net Plant Investment         9,753,360         EC           230         Account 2210         907,008         EC           235         Account 2220         0         EC           240         Account 2220         0         EC           241         Total Central Offoe         2,579,869         EC           250         Ckt Equip Carl 4.13         1,244,361         EC           250         Ckt Equip Carl 4.13         1,244,361         EC           250         Account 3100 (2210)         9,856,549         EC           265         Account 3100 (2220)         1         EC           270         Account 3100 (2220)         1         EC           271         Account 3100 (2210)         7,343,138         CC           280         Account 3100 (2210)         7,345,138         CC           281         Ac	Descri	Description		р	ending View	Source
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Account 3400	170	Account 1220			59,993	EC
Not Plant Investment	190	Account 3100			3,251,277	EC
220         Net Plant Investment         9,783,360         EC           230         Account 2210         907,008         EC           236         Account 2230         0         EC           240         Account 2230         1,672,861         EC           240         Total Central Office         2,579,869         EC           250         Ckt Equip Cat 4.13         1,244,361         EC           250         Account 2410         9,896,645         EC           260         Account 3100 (2210)         520,538         EC           261         Account 3100 (2230)         1,400,936         EC           270         Account 3100 (2210-2230)         1,921,534         EC           280         Account 3100 (2210)         743,138         EC           310         Account 4340 (2210)         743,138         EC           311         Account 4340 (2210)         71,945         EC           312         Account 4340 (2210)         71,945         EC           320         Account 4340 (2210)         71,945         EC           331         Account 6110 Rents         6         EC           340         Account 6110 Rents         0         EC	195	Account 3400			0	EC
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370         Account 6210 Benefits         6160         EC           375         Account 6210 Rents         12 216         EC           380         Account 6220 Total         0         EC           385         Account 6220 Benefits         0         EC           390         Account 6220 Rents         0         EC           395         Account 6230 Total         84,481         EC           400         Account 6230 Benefits         13,778         EC           405         Account 6230 Rents         0         EC           410         Account 6210-6230         185,787         EC           430         Account 6410 Total         123,877         EC           435         Account 6410 Benefits         28,136         EC           440         Account 6410 Rents         17,769         EC           445         Total Plant Specific         290,838         EC           450         Account 6530 Total         13,460         EC           455         Account 6530 Benefits         79         EC           510         Account 6560 (2210)         72,604         EC           515         Account 6560 (2220)         0         EC	360	Account 6120 Ren	ots		0	All a grange man a man b c
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445         Total Plant Specific         290,838         EC           450         Account 6530 Total         13,460         EC           456         Account 6530 Benefits         79         EC           510         Account 6560 (2210)         72,604         EC           515         Account 6560 (2220)         0         EC	435	Account 6410 Ber	nefits		28,136	EC
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520 Account 6560 (2230) 57,674 EC	515	Account 6560 (22	20)			
	520	Account 6560 (22	30)		57,674	EC



7/28/2010 11:49:59 am Page 2 of 2

Contact Name:		Year End 12 Gregory W. Mor (509)-648-3322		Reg: MSM: OO:	6 020007494	WESTERN Melody Crane	Subset	3
Releas	Release Status: Special Released		ed	Co:	000002442	St. John Tel. Co.		
Soft Edit Status: Passed Edit			SAR:	522442	ST JOHN TEL CO			
Description			Pending View		Source			
525 Account 6560 (2210-2230)				130,278	EC			
530 Account 6560 (2410)				364,020	EC			
535	Account 6710 Total				69,095	EC		
540 Account 6710 Benefits				13,805	EC			
550 Account 6720 Total				156,547	EC			
555 Account 6720 Benefits				5,843	EC			
565 Sum of Lines 535 + 550				225,642	EC			
600 Ben. Por. of all Op. Exp.				90,891	EC			
610	Rent Por. of all Op.	Exp.			29,987	EC		
650	650 Account 7200 Other Taxes				162,399	EC		
700	700 2410 (C S Total CWF - AV)				9,509,712	EC		
710	710 2410 (C S CWF - Cat.1)				9,420,841	EC		
800	800 Account 2680 Total				0	EC		
805	805 Account 2680 (2230)				0	EC		
810	10 Account 2680 (Cat. 4.13)				0	EC		
815	815 Acc 2680 (2410) Total CWF				0	EC		
820	20 Acc 2680 (2410)CWF-Cat1				0	EC		
830	30 Account 6560 (2680)				0	EC		

#### Comments:

Date: 7/27/2010

Increases in plant investment accounts is due to St John Telephone implementing the
final Phase III 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 all
phases of the Fiber to Home project over the past three years (2007-2009).

# NOTICE

# **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,



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# NOTICE

# **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. Single party voice grade access to the public network

Access to emergency 911 services State/County mandated surcharges Residence \$.25/\$.70 Business \$.25/\$.70

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.

St. John Telephone Co. (509) 648-3322

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Service Provided	<u>Residence</u>	<u>Business</u>
Single party voice grade access to	\$9.50	\$13.00
The public network		
r r		
Access to emergency 911 services		
State/county mandated surcharges	\$.25/\$.70	\$.25/\$.70

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# **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.

# 4 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 vary from company to company and carrier to carrier. Contact your local company for further information.

- 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.
- 3. 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 without charge.

### 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 Program:

- . 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.