



TELEPHONE
TELEVISION

WT-111392-CT
09-15-11 Om
Regular Agenda

July 29, 2011

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

Dear Mr. Danner:

Re: 2011 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

RECEIVED
RECORDS MANAGEMENT
2011 JUL 29 PM 12:46
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**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 2010 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);

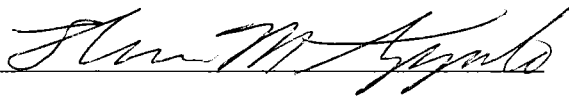
(3) That during the 2010 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and

(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 29th day of July, 2011 at Olympia, Washington.

Company: Western Wahkiakum County Telephone Company

By: 

Its: Corporate Secretary

**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 2010, 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 2009.

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 2010, the Company was engaged in a number of major construction projects, including the following:

- (1) Construction of new, predominantly buried fiber optic routes along Parpala Road in the Company’s Naselle Exchange, for a distance of approximately 7.4 miles. The cost incurred by the Company in 2010 to complete this project was approximately \$441,500. This project will enhance service reliability and capacity for approximately 64 customers along its route.

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 2010, 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, 2010, the Company had no unfulfilled requests for service from applicants within the Company’s designated ETC service area.

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).

- (2) Construction of new, buried fiber optic routes along the upper end of Salmon Creek Road in the Company's Naselle Exchange, for a distance of approximately 6.7 miles. The cost incurred by the Company in 2010 to complete this project was approximately \$273,000. This project will enhance service reliability and capacity for approximately 36 customers along its route.
- (3) Construction of new, buried fiber optic routes along State Route 4 from Salmon Creek Road to Crusher Lane in the Company's Naselle Exchange, for a distance of approximately 9.6 miles. The cost incurred by the Company in 2010 to complete this project was approximately \$370,000. This project will enhance service reliability and capacity for approximately 73 customers along its route.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2010, 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 2011 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 2010 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 2011 than in 2010.

In addition, the following projects have either been completed during 2011 or are in progress and are expected to be completed during 2011:

- (1) Construction of new, buried fiber optic routes along Crusher Lane to Naselle Youth Camp along State Route 4 in the Company's Naselle Exchange, for a distance of approximately 4.2 miles. The cost incurred or expected to be incurred in 2011 as the Company completes this project is estimated to be approximately \$250,000. This project will enhance service reliability and capacity for approximately 86 customers along its route, as well as provide backbone capacity to serve other portions of the Company's designated ETC service area.
- (2) Construction of new, buried fiber optic routes along Naselle Road, Torppa Road and County Shed Road, and along State Route 401 to

Knappton, all in the Company's Naselle Exchange, for a distance of approximately 8.9 miles. The cost incurred or expected to be incurred in 2011 as the Company completes this project is estimated to be approximately \$250,000. This project will enhance service reliability and capacity for approximately 48 customers along its route, as well as provide backbone capacity to serve other portions of the Company's designated ETC service area.

- (3) Construction of new, buried fiber optic routes along State Route 4 from approximately Salme Road to approximately Fossil Creek Road in the Company's Grays River Exchange, for a distance of approximately 10.2 miles. The cost incurred or expected to be incurred in 2011 as the Company completes this project is estimated to be approximately \$962,000. This project will provide backbone capacity to serve the bulk of the Company's designated ETC service area.
- (4) Engineering and staking work for new, buried fiber optic routes to be constructed within the Company's Grays River Exchange, and Naselle Exchange, for a total distance of approximately 133.2 miles. The cost incurred or expected to be incurred for this project is estimated to be \$1,250,000, most, if not all, of which is expected to be incurred in 2011, but a portion of which may be incurred in 2012. This project to design construction that will enhance service reliability and capacity for approximately 435 customers along its route, as well as provide backbone capacity to serve other portions of the Company's designated ETC service area.

Except as described above in this Report 4, the Company expects the levels of investment and expenses incurred by it during calendar year 2011 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 further expects that, except as described above in this Report 4, for calendar year 2011 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 2010.

In addition to the specific benefits to customers identified with respect to projects (1), (2), (3) and (4) 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 29, 2011



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2010	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	Pending View	Source
060 Total Loops	1,110	EC
070 Cat. 1.3 Loops	1,100	EC
160 Account 2001	14,842,286	EC
170 Account 1220	43,502	EC
190 Account 3100	10,271,157	EC
195 Account 3400	0	EC
210 Account 4340	673,501	EC
220 Net Plant Investment	3,941,130	EC
230 Account 2210	1,634,138	EC
235 Account 2220	0	EC
240 Account 2230	2,500,125	EC
245 Total Central Office	4,134,263	EC
250 Ckt Equip Cat 4.13	1,844,199	EC
255 Account 2410	9,093,448	EC
260 Account 3100 (2210)	1,558,978	EC
265 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	1,896,037	EC
275 Account 3100 (2210-2230)	3,455,015	EC
280 Account 3100 (2410)	5,577,906	EC
310 Account 4340 (2210)	59,633	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	151,779	EC
325 Account 4340 (2210-2230)	211,412	EC
330 Account 4340 (2410)	438,372	EC
335 Account 6110 Total	20,692	EC
340 Account 6110 Benefits	0	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	64,459	EC
355 Account 6120 Benefits	6,780	EC
360 Account 6120 Rents	0	EC
365 Account 6210 Total	119,867	EC
370 Account 6210 Benefits	24,797	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	99,012	EC
400 Account 6230 Benefits	12,211	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	218,879	EC
430 Account 6410 Total	148,185	EC
435 Account 6410 Benefits	30,506	EC
440 Account 6410 Rents	739	EC
445 Total Plant Specific	452,215	EC
450 Account 6530 Total	471,732	EC
455 Account 6530 Benefits	111,968	EC
510 Account 6560 (2210)	151,173	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	283,827	EC



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2010	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	Pending View	Source
525 Account 6560 (2210-2230)	435,000	EC
530 Account 6560 (2410)	463,824	EC
535 Account 6710 Total	0	EC
540 Account 6710 Benefits	0	EC
550 Account 6720 Total	868,926	EC
555 Account 6720 Benefits	156,477	EC
565 Sum of Lines 535 + 550	868,926	EC
600 Ben. Por. of all Op. Exp.	384,236	EC
610 Rent Por. of all Op. Exp.	739	EC
650 Account 7200 Other Taxes	149,394	EC
700 2410 (C S Total CWF - AV)	8,532,233	EC
710 2410 (C S CWF - Cat.1)	7,884,427	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 PENDING VIEW REPORT

Applies to Period:	Year End 12/2009	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 WAHIAKUM	

Description	Pending View	Source
060 Total Loops	1,141	EC
070 Cat. 1.3 Loops	1,131	EC
160 Account 2001	13,588,493	EC
170 Account 1220	48,472	EC
190 Account 3100	9,280,742	EC
195 Account 3400	0	EC
210 Account 4340	606,631	EC
220 Net Plant Investment	3,749,592	EC
230 Account 2210	1,627,385	EC
235 Account 2220	0	EC
240 Account 2230	2,449,258	EC
245 Total Central Office	4,076,643	EC
250 Ckt Equip Cat 4.13	1,961,825	EC
255 Account 2410	7,971,018	EC
260 Account 3100 (2210)	1,381,483	EC
265 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	1,612,210	EC
275 Account 3100 (2210-2230)	2,993,693	EC
280 Account 3100 (2410)	5,114,081	EC
310 Account 4340 (2210)	97,290	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	189,016	EC
325 Account 4340 (2210-2230)	286,306	EC
330 Account 4340 (2410)	311,762	EC
335 Account 6110 Total	16,451	EC
340 Account 6110 Benefits	0	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	70,877	EC
355 Account 6120 Benefits	11,043	EC
360 Account 6120 Rents	0	EC
365 Account 6210 Total	142,433	EC
370 Account 6210 Benefits	27,089	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	82,200	EC
400 Account 6230 Benefits	14,957	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	224,633	EC
430 Account 6410 Total	167,855	EC
435 Account 6410 Benefits	33,090	EC
440 Account 6410 Rents	739	EC
445 Total Plant Specific	479,816	EC
450 Account 6530 Total	557,355	EC
455 Account 6530 Benefits	134,690	EC
510 Account 6560 (2210)	151,107	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	256,004	EC



Applies to Period:	Year End 12/2009	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 WAHAKIAKUM	

Description	Pending View	Source
525 Account 6560 (2210-2230)	407,111	EC
530 Account 6560 (2410)	413,024	EC
535 Account 6710 Total	0	EC
540 Account 6710 Benefits	0	EC
550 Account 6720 Total	1,058,697	EC
555 Account 6720 Benefits	207,493	EC
565 Sum of Lines 535 + 550	1,058,697	EC
600 Ben. Por. of all Op. Exp.	470,995	EC
610 Rent Por. of all Op. Exp.	739	EC
650 Account 7200 Other Taxes	89,157	EC
700 2410 (C S Total CWF - AV)	7,485,045	EC
710 2410 (C S CWF - Cat.1)	6,899,305	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: