

UT-101271



July 30, 2012

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

RECEIVED
RECORDS MANAGEMENT
2012 JUL 30 PM 3:32
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. Danner:

Re: 2012 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.¹

Sincerely,

Steven D. Hanson
Vice President

Enclosures

¹ Item (1) of the enclosed certifications also includes a certification (in addition to those that have been furnished in prior years) that corresponds to a new certification required of the Commission by 47 C.F.R. § 54.314(a).

**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, and that all federal high-cost support provided to the Company within the State of Washington has been used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which the support is intended;¹

(2) That during the 2011 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);


(3) That during the 2011 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 2011 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, 2012 at Tenino, Washington.

Company: Tenino Telephone Company

By: 
Its: Vice President

¹ As used herein, the terms “preceding calendar year” and “coming calendar year” are intended to have the same meaning as those terms have in 47 C.F.R. § 54.314(a).

**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 480-123-080.¹

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company’s NECA-1 Report for the calendar year 2011,² 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 2010.

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 service area. In addition, during 2011, the Company was engaged in a number of major investment projects within its designated ETC service area, including the following:

- (1) The Company installed Central Office equipment at a cost of approximately \$35,000. This provided growth capacity and improved service for all subscribers.
- (2) The Company installed Digital Subscriber Line (DSL) equipment at a cost of approximately \$31,500. This provided growth capacity and improved service for all subscribers served.
- (3) The Company installed exchange line circuit equipment at a cost of approximately \$138,000. This project improved service for approximately 74 customers, plus allowing for future growth in the area served.

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 attached report replicates National Exchange Carrier Association, Inc. Universal Service Data Collection Form 2011-1.

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 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).

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2011, 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, 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 similar to those investments and expenses the Company has set forth in its information for calendar year 2011 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 2011, 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 2012 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 calendar year 2011. The Company's investment plans directly affecting federal high-cost supported services offered by it in its designated ETC service area also include the following major construction project for 2012:

The Company plans to install exchange line circuit equipment at a cost of approximately \$50,000. This project will improve service for all subscribers, plus allowing for future growth.

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, 2013, through December 31, 2013, 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 2011 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 2011, 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 2013 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 2011. The Company has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2013.

In addition to the specific benefits noted for the above-identified project, the expected benefit to customers from the anticipated investment and expenditures 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 30, 2012

STUDY AREA: 522446
NAME: Tenino Telephone Company
CONTACT: Rick Vitzthum
PHONE: 360-264-2915

Description	Pending View 2011-1 Amount	Prior Year 2010-1
II. WORKING LOOPS		
60 Total Loops (Cat 1.1, 1.2 and 1.3)	3,195	3,398
70 Category 1.3 loops (excluding Cat 1.3 TWX Loops)	3,181	3,312
III. INVESTMENT, EXPENSE AND TAXES		
NET PLANT INVESTMENT		
160 Acct 2001 – Telephone Plant in Service	21,561,256	21,324,507
170 Acct 1220 – Material and Supplies	0	0
190 Acct 3100 – Accumulated Depreciation	17,690,070	16,977,376
195 Acct 3400 – Accumulated Amortization - Tangible	0	0
210 Acct 4340 – Net Noncurrent Deferred Operating Income Taxes	-287,406	-149,314
220 Net Plant Investment	4,158,592	4,496,445
SELECTED PLANT ACCOUNTS		
230 Acct 2210 – Central Office Switching Equipment	1,357,542	1,328,151
235 Acct 2220 – Operator System Equipment	0	0
240 Acct 2230 – Central Office Transmission Equipment	3,788,733	4,210,669
245 Total Central Office Equipment	5,146,275	5,538,820
250 Circuit Equipment - Category 4.13	3,115,553	3,428,547

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Description	Pending View 2011-1 Amount	Prior Year 2010-1
255 Acct 2410 – Cable and Wire Facilities - Total	10,389,545	10,099,559
260 Acct 3100 (2210) – Accumulated Depreciation - Central Office Switching Equipment	1,251,691	1,212,606
265 Acct 3100 (2220) – Accumulated Depreciation - Operator System Equipment	0	0
270 Acct 3100 (2230) – Accumulated Depreciation - Central Office Transmission Equipment	2,920,836	3,184,725
275 Acct 3100 (2210 thru 2230) – Total Accumulated Depreciation - Central Office Equipment	4,172,527	4,397,331
280 Acct 3100 (2410) – Accumulated Depreciation - Cable and Wire Facilities	7,946,006	7,378,646
310 Acct 4340 (2210) – Net Noncurrent Deferred Operating Income Taxes – Central Office Switching Equipment	-17,179	-9,311
315 Acct 4340 (2220) – Net Noncurrent Deferred Operating Income taxes – Operator System Equipment	0	0
320 Acct 4340 (2230) – Net Noncurrent Deferred Operating Income Taxes – Central Office Transmission Equipment	-51,501	-29,518
325 Acct 4340 (2210 thru 2230) – Net Noncurrent Deferred Operating Income Taxes – Central Office Equipment (Sum of 4340 (2210) through (2230))	-68,680	-38,829
330 Acct 4340 (2410) – Net Noncurrent Deferred Operating Income Taxes – Cable and Wire Facilities	-138,657	-70,804

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Description	Pending View 2011-1 Amount	Prior Year 2010-1
PLANT SPECIFIC OPERATION EXPENSE		
335 Acct 6110 – Network Support Expense Total	225,823	174,874
340 Acct 6110 – Benefits Portion of Network Support Expense	15,036	14,633
345 Acct 6110 – Rents Portion of Network Support Expense	23,575	24,757
350 Acct 6120 – General Support Expense Total	394,950	416,591
355 Acct 6120 – Benefits Portion of General support Expense	37,909	38,430
360 Acct 6120 – Rents Portion of General support Expense	233	0
365 Acct 6210 – Central Office Switching Expense –Total	320,393	359,893
370 Acct 6210 – Benefits Portion of Central Office Switching Expense	25,487	34,234
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	323,502	301,947
400 Acct 6230 – Benefits Portion of Central Office Transmission Expense	33,093	31,382
405 Acct 6230 – Rents Portion of Central Office Transmission Expense	0	379

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Description	Pending View 2011-1 Amount	Prior Year 2010-1
410 Acct 6210 – 6230 – Central Office Expense - Total	643,895	661,840
430 Acct 6410 – Cable and Wire Facilities Expense – Total	275,419	284,218
435 Acct 6410 – Benefits Portion of Cable and Wire Facilities Expense	43,989	42,263
440 Acct 6410 – Rents Portion of Cable and Wire Facilities Expense	3,884	3,694
445 Total Plant Specific Expense	1,540,087	1,537,523
PLANT NON-SPECIFIC EXPENSE		
450 Acct 6530 – Network Operations Expense – Total	613,084	607,632
455 Acct 6530 – Benefits Portion of Network Operations Exp	69,937	66,560
DEPRECIATION & AMORTIZATION EXPENSE		
510 Acct 6560 (2210) – Depreciation and Amortization Expense – Central Office Switching Equipment	117,177	134,450
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	415,891	440,774
525 Acct 6560 (2210 thru 2230) – Depreciation and Amortization Central Office Equipment	533,068	575,224
530 Acct 6560 (2410) – Depreciation and Amortization Expense – Cable and Wire Facilities	567,360	544,944

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Description	Pending View 2011-1 Amount	Prior Year 2010-1
CORPORATE OPERATIONS EXPENSE		
535 Acct 6710 – Executive and Planning Expense – Total	152,124	151,968
540 Acct 6710 – Benefits Portion of Executive & Planning Exp	16,174	16,066
550 Acct 6720 – General Administrative Expense – Total	672,645	669,927
555 Acct 6720 – Benefits Portion of General Administrative Exp	73,804	74,958
565 Total Corporate Operations Expense	824,769	821,895
OTHER EXPENSE		
600 Benefits Portion of All Operating Expenses – Total	342,370	349,338
610 Rents Portion of Plant Specific Operating Expenses - Total	28,095	28,830
TAXES		
650 Acct 7200 – Operating taxes	-31,570	-16,315
IV. PART 36 – COST STUDY DATA		
700 Cost Study Average Cable And Wire Facilities - Acct 2410	10,244,552	9,870,405
710 Cost Study Average Cable and Wire Facilities Cat 1 – Total Exchange Line C&WF Excluding Wideband	9,908,070	9,659,022
V. AMORTIZABLE TANGIBLE ASSETS (REFER TO INSTRUCTIONS PRIOR TO COMPLETING THIS SECTION)		
800 Acct 2680 –Amortizable Tangible Assets	0	0

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Description	Pending View 2011-1 Amount	Prior Year 2010-1
805 2680 (2230) – Amortizable Tangible Assets – Central Office Transmission Equipment	0	0
810 Acct 2680 (2230) – Amortizable Tangible Assets – Central Office Transmission Equipment Assigned To Category 4.13	0	0
815 Acct 2680 (2410) – Amortizable Tangible Assets – Cable and Wire Facilities	0	0
820 Acct 2680 (2410) – Amortizable Tangible Assets – Cable and Wire Facilities Assigned to Category 1	0	0
830 Acct 6560 (2680) – Depreciation and Amortization Expense – Amortizable Tangible Assets	0	0
Check Total	111,396,404	111,208,652

Submitted By RAV July 29, 2011
