

UT-121275



TELEPHONE  
TELEVISION

July 30, 2012

**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  
RECORDS MANAGEMENT  
2012 JUL 30 PM 4: 51  
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, Western Wahkiakum County Telephone Company ("Company") hereby requests that the Washington Utilities and Transportation Commission ("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.<sup>1</sup>

Sincerely,

Steven M. Appelo  
Corporate Secretary

Enclosures

<sup>1</sup> 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 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, 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;<sup>1</sup>

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

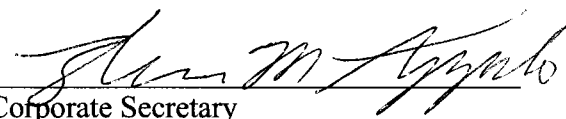
(3) That during the 2011 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and

(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 30<sup>th</sup> day of July, 2012 at Olympia, Washington.

Company: Western Wahkiakum County Telephone Company

By:   
Its: Corporate Secretary

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<sup>1</sup> 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**

Western Wahkiakum County Telephone Company (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.<sup>1</sup>

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report<sup>2</sup> for the calendar year 2011, 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 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.<sup>3</sup> 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 services<sup>4</sup> from the Company within its designated ETC service area. Also, during 2011, the Company was engaged in a number of major construction projects, including the following:

- (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 by the Company in 2011 to complete this project was approximately \$260,000. The project has enhanced service reliability and capacity for approximately 86 customers along its

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<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). Nevertheless, the Company reports that during 2011, 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, 2011, the Company had no unfulfilled requests for service from applicants within the Company's designated ETC service area.

<sup>2</sup> 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.

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

<sup>4</sup> 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).

route, and is expected to enable further enhancements in the future by providing the backbone infrastructure for such enhancements.

- (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 by the Company in 2011 to complete this project was approximately \$229,000. This project has enhanced service reliability and capacity for approximately 48 customers and is expected to enable further enhancements in the future by providing the backbone capacity to serve other portions of the Company's designed 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; approximately 7.55 miles of this project (*i.e.* from approximately Miller Point Road to approximately Fossil Creek Road) was completed in 2011; the remaining approximately 2.65-mile section will be completed in 2012. See Report 4, item 1.) The cost incurred by the Company in 2011 for this project was approximately \$864,000. This project has enhanced service reliability and capacity by providing backbone capacity to serve the bulk of the Company's designated ETC service area.
- (4) A portion of the engineering and staking work for new, buried fiber optic routes to be constructed within the Company's Grays River Exchange and Naselle Exchange, for an ultimate total distance of approximately 133.2 miles. The cost incurred by the Company in 2011 for this project was approximately \$158,000. Not all engineering and staking work for this project was completed in 2011, in part because of pending changes and uncertainties with respect to Federal universal service support funding. This project is to design network 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.

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:

The planned investment and expenses related to Washington state for calendar year 2012 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 2011 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 lower during 2012 than in 2011.

In addition, the following projects have either been completed during 2012 or are in progress and are expected to be completed during 2012:

- (1) Construction of new, buried fiber optic routes from approximately Salme Road to approximately Miller Point Road in the Company's Grays River Exchange, for a distance of approximately 2.65 miles along State Highway 4. The cost incurred or expected to be incurred in 2012 as the company completes this project is estimated to be approximately \$220,000. This project will enhance service reliability and capacity for approximately 4 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 Eden Valley Road in the Company's Grays River Exchange, for a distance of approximately 4.26 miles. The cost incurred or expected to be incurred in 2012 for this project is estimated to be approximately \$250,000. This project will enhance service reliability and capacity for approximately 15 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 and subject to the effects of inflation and other commonly experienced changes in cost of labor and materials, the Company currently expects the levels of investment and expenses incurred by it during calendar year 2012 will be less than those it experienced in calendar year 2011, due to the impact of regulatory changes and the uncertainties of the Federal Communication Commission reforms that are still being developed. The Company further expects that, except as described above in this Report 4, for calendar year 2012 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 2011.

In addition to the specific benefits to customers identified with respect to projects (1) and (2) 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, 2012



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2011	Reg: 6	WESTERN	Subset 3
Contact Name:	Carol Larson	MSM: 020007494	Melody Crane	
Contact Phone:	(360)-465-2211 Ext:	OO: *****		
Release Status:	Special Released	Co: 000002451	Western Wahkiakum County Tel. Co.	
Soft Edit Status:	Passed Edit	SAR: 522451	WESTERN WAHKIAKUM	

Description	Pending View	Source
060 Total Loops	1,075	EC
070 Cat. 1.3 Loops	1,065	EC
160 Account 2001	16,366,413	EC
170 Account 1220	93,910	EC
190 Account 3100	11,229,466	EC
195 Account 3400	0	EC
210 Account 4340	909,014	EC
220 Net Plant Investment	4,321,843	EC
230 Account 2210	1,634,138	EC
235 Account 2220	0	EC
240 Account 2230	2,529,907	EC
245 Total Central Office	4,164,045	EC
250 Ckt Equip Cat 4.13	1,851,124	EC
255 Account 2410	10,593,264	EC
260 Account 3100 (2210)	1,679,851	EC
265 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	2,185,031	EC
275 Account 3100 (2210-2230)	3,864,882	EC
280 Account 3100 (2410)	6,087,218	EC
310 Account 4340 (2210)	17,331	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	97,547	EC
325 Account 4340 (2210-2230)	114,878	EC
330 Account 4340 (2410)	777,597	EC
335 Account 6110 Total	10,669	EC
340 Account 6110 Benefits	7,589	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	57,120	EC
355 Account 6120 Benefits	0	EC
360 Account 6120 Rents	0	EC
365 Account 6210 Total	162,936	EC
370 Account 6210 Benefits	29,557	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	69,342	EC
400 Account 6230 Benefits	14,421	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	232,278	EC
430 Account 6410 Total	160,936	EC
435 Account 6410 Benefits	36,272	EC
440 Account 6410 Rents	772	EC
445 Total Plant Specific	461,003	EC
450 Account 6530 Total	488,891	EC
455 Account 6530 Benefits	133,581	EC
510 Account 6560 (2210)	152,530	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	288,994	EC



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2011	Reg: 6	WESTERN	Subset 3
Contact Name:	Carol Larson	MSM: 020007494	Melody Crane	
Contact Phone:	(360)-465-2211 Ext:	OO: *****		
Release Status:	Special Released	Co: 000002451	Western Wahkiakum County Tel. Co.	
Soft Edit Status:	Passed Edit	SAR: 522451	WESTERN WAHAKIACUM	

Description	Pending View	Source
525 Account 6560 (2210-2230)	441,524	EC
530 Account 6560 (2410)	509,312	EC
535 Account 6710 Total	0	EC
540 Account 6710 Benefits	0	EC
550 Account 6720 Total	887,136	EC
555 Account 6720 Benefits	171,645	EC
565 Sum of Lines 535 + 550	887,136	EC
600 Ben. Por. of all Op. Exp.	433,160	EC
610 Rent Por. of all Op. Exp.	772	EC
650 Account 7200 Other Taxes	96,168	EC
700 2410 (C S Total CWF - AV)	9,843,356	EC
710 2410 (C S CWF - Cat. 1)	9,196,502	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:

Date: 7/18/2012

1. Lines 255, 330, 700 & 710. Growth in accounts related to FTTH buildout.





USF1010 LATEST 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	Latest View
060 Total Loops	1,110
070 Cat. 1.3 Loops	1,100
160 Account 2001	14,842,286
170 Account 1220	43,502
190 Account 3100	10,271,157
195 Account 3400	0
210 Account 4340	673,501
220 Net Plant Investment	3,941,130
230 Account 2210	1,634,138
235 Account 2220	0
240 Account 2230	2,500,125
245 Total Central Office	4,134,263
250 Ckt Equip Cat 4.13	1,844,199
255 Account 2410	9,093,448
260 Account 3100 (2210)	1,558,978
265 Account 3100 (2220)	0
270 Account 3100 (2230)	1,896,037
275 Account 3100 (2210-2230)	3,455,015
280 Account 3100 (2410)	5,577,906
310 Account 4340 (2210)	59,633
315 Account 4340 (2220)	0
320 Account 4340 (2230)	151,779
325 Account 4340 (2210-2230)	211,412
330 Account 4340 (2410)	438,372
335 Account 6110 Total	20,692
340 Account 6110 Benefits	0
345 Account 6110 Rents	0
350 Account 6120 Total	64,459
355 Account 6120 Benefits	6,780
360 Account 6120 Rents	0
365 Account 6210 Total	119,867
370 Account 6210 Benefits	24,797
375 Account 6210 Rents	0
380 Account 6220 Total	0
385 Account 6220 Benefits	0
390 Account 6220 Rents	0
395 Account 6230 Total	99,012
400 Account 6230 Benefits	12,211
405 Account 6230 Rents	0
410 Account 6210-6230	218,879
430 Account 6410 Total	148,185
435 Account 6410 Benefits	30,506
440 Account 6410 Rents	739
445 Total Plant Specific	452,215
450 Account 6530 Total	471,732
455 Account 6530 Benefits	111,968
510 Account 6560 (2210)	151,173
515 Account 6560 (2220)	0
520 Account 6560 (2230)	283,827



USF1010 LATEST 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	Latest View
525 Account 6560 (2210-2230)	435,000
530 Account 6560 (2410)	463,824
535 Account 6710 Total	0
540 Account 6710 Benefits	0
550 Account 6720 Total	868,926
555 Account 6720 Benefits	156,477
565 Sum of Lines 535 + 550	868,926
600 Ben. Por. of all Op. Exp.	384,236
610 Rent Por. of all Op. Exp.	739
650 Account 7200 Other Taxes	149,394
700 2410 (C S Total CWF - AV)	8,532,233
710 2410 (C S CWF - Cat.1)	7,884,427
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: