

UT-121278



ST. JOHN TELEPHONE COMPANY

Service Since 1914



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

July 15, 2012

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Office of Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

Ms. Karen Majcher
Vice President - High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: WC Docket No. 10-90
Request for Certification Pursuant to WAC 480-123-060 and
47 C.F.R. §54.314

Dear Mr. Danner:

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.

OFFICERS

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

For the Commission's information, in addition to the Lifeline advertisement covered in the enclosed certification, St. John Co-operative Telephone and

DIRECTORS

Jerry Schauble
Gary Bailey

STATE OF WASHINGTON
UTIL. AND TRANSPORTATION
COMMISSION
RECEIVED
RECORDS MANAGEMENT
2012 JUL 30 PM 1:45



David Danner
July 15, 2012
Page 2 of 2

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 2011 and had no requests for service from applicants within the Company's designated service area that was unfilled for the calendar year 2011.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Morasch". The signature is fluid and cursive, with a long horizontal stroke at the end.

Greg Morasch
General Manager

Enclosures

**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 Cooperative 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 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 the facilities and services for which the support is intended;

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

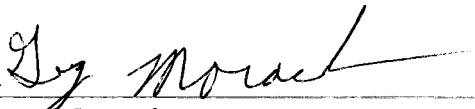
(3) That during the 2011 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and

(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 15 day of July, 2012, at St. John, Washington.

Company: ST. JOHN COOPERATIVE TELEPHONE & TELEGRAPH COMPANY

By: 
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 480-123-080.¹

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company’s NECA-1 Reports for the calendar years 2010 and 2011, 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.² 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 2011, 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, 2012, through December 31, 2012, 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

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.

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, 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 2011.

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, 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 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 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 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 has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2013. 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.



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2011	Reg: 6	WESTERN	Subset 3
Contact Name:	Gregory W. Morasch	MSM: 020007494	Melody Crane	
Contact Phone:	(509)-648-3322 Ext:	OO: *****		
Release Status:	Not Released	Co: 000002442	St. John Tel. Co.	
Soft Edit Status:	Passed Edit	SAR: 522442	ST JOHN TEL CO	

Description	Pending View	Source
060 Total Loops	609	EC
070 Cat. 1.3 Loops	591	EC
160 Account 2001	13,976,003	EC
170 Account 1220	50,934	EC
190 Account 3100	4,470,010	EC
195 Account 3400	0	EC
210 Account 4340	898,946	EC
220 Net Plant Investment	8,657,981	EC
230 Account 2210	1,216,696	EC
235 Account 2220	0	EC
240 Account 2230	1,672,009	EC
245 Total Central Office	2,888,705	EC
250 Ckt Equip Cat 4.13	1,243,727	EC
255 Account 2410	9,971,340	EC
260 Account 3100 (2210)	686,582	EC
265 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	1,601,025	EC
275 Account 3100 (2210-2230)	2,287,607	EC
280 Account 3100 (2410)	1,535,080	EC
310 Account 4340 (2210)	79,195	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	106,639	EC
325 Account 4340 (2210-2230)	185,834	EC
330 Account 4340 (2410)	636,027	EC
335 Account 6110 Total	4,292	EC
340 Account 6110 Benefits	95	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	25,654	EC
355 Account 6120 Benefits	418	EC
360 Account 6120 Rents	0	EC
365 Account 6210 Total	99,022	EC
370 Account 6210 Benefits	12,954	EC
375 Account 6210 Rents	46,712	EC
380 Account 6220 Total	0	EC
385 Account 6220 Benefits	0	EC
390 Account 6220 Rents	0	EC
395 Account 6230 Total	133,213	EC
400 Account 6230 Benefits	17,426	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	232,235	EC
430 Account 6410 Total	182,882	EC
435 Account 6410 Benefits	44,891	EC
440 Account 6410 Rents	20,126	EC
445 Total Plant Specific	445,063	EC
450 Account 6530 Total	12,861	EC
455 Account 6530 Benefits	0	EC
510 Account 6560 (2210)	84,000	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	147,644	EC



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2011	Reg: 6	WESTERN	Subset 3
Contact Name:	Gregory W. Morasch	MSM: 020007494	Melody Crane	
Contact Phone:	(509)-648-3322 Ext:	OO: *****		
Release Status:	Not Released	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)	231,644	EC
530 Account 6560 (2410)	396,353	EC
535 Account 6710 Total	84,024	EC
540 Account 6710 Benefits	15,691	EC
550 Account 6720 Total	175,653	EC
555 Account 6720 Benefits	7,342	EC
565 Sum of Lines 535 + 550	259,677	EC
600 Ben. Por. of all Op. Exp.	117,050	EC
610 Rent Por. of all Op. Exp.	66,838	EC
650 Account 7200 Other Taxes	250,265	EC
700 2410 (C S Total CWF - AV)	9,881,008	EC
710 2410 (C S CWF - Cat.1)	9,693,158	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 LATEST VIEW REPORT

Applies to Period	Year End 12/2010	Reg: 6	WESTERN	Subset 3
Contact Name:	Gregory W. Morasch	MSM: 020007494	Melody Crane	
Contact Phone:	(509)-648-3322 Ext:	OO: *****		
Release Status:	Released	Co: 000002442	St. John Tel. Co	
Soft Edit Status:	Failed Edit	SAR: 522442	ST JOHN TEL CO	

Description	Latest View
060 Total Loops	605
070 Cat. 1.3 Loops	587
160 Account 2001	13,484,522
170 Account 1220	64,007
190 Account 3100	3,764,874
195 Account 3400	0
210 Account 4340	721,284
220 Net Plant Investment	9,062,371
230 Account 2210	910,430
235 Account 2220	0
240 Account 2230	1,679,172
245 Total Central Office	2,589,602
250 Ckt Equip Cat 4.13	1,249,055
255 Account 2410	9,790,674
260 Account 3100 (2210)	597,979
265 Account 3100 (2220)	0
270 Account 3100 (2230)	1,457,984
275 Account 3100 (2210-2230)	2,055,963
280 Account 3100 (2410)	1,105,858
310 Account 4340 (2210)	47,575
315 Account 4340 (2220)	0
320 Account 4340 (2230)	88,693
325 Account 4340 (2210-2230)	136,268
330 Account 4340 (2410)	530,078
335 Account 6110 Total	5,009
340 Account 6110 Benefits	0
345 Account 6110 Rents	0
350 Account 6120 Total	21,944
355 Account 6120 Benefits	37
360 Account 6120 Rents	0
365 Account 6210 Total	90,082
370 Account 6210 Benefits	8,912
375 Account 6210 Rents	36,765
380 Account 6220 Total	0
385 Account 6220 Benefits	0
390 Account 6220 Rents	0
395 Account 6230 Total	152,855
400 Account 6230 Benefits	16,438
405 Account 6230 Rents	0
410 Account 6210-6230	242,937
430 Account 6410 Total	160,974
435 Account 6410 Benefits	38,504
440 Account 6410 Rents	22,003
445 Total Plant Specific	430,864
450 Account 6530 Total	12,485
455 Account 6530 Benefits	93
510 Account 6560 (2210)	81,063
515 Account 6560 (2220)	0
520 Account 6560 (2230)	53,366



USF1010 LATEST VIEW REPORT

Applies to Period	Year End	12/2010	Reg:	6	WESTERN	Subset	3
Contact Name:	Gregory W. Morasch		MSM:	020007494	Melody Crane		
Contact Phone:	(509)-648-3322 Ext:		OO:	*****			
Release Status:	Released		Co:	000002442	St. John Tel. Co.		
Soft Edit Status:	Failed Edit		SAR:	522442	ST JOHN TEL CO		

Description	Latest View
525 Account 6560 (2210-2230)	134,429
530 Account 6560 (2410)	387,354
535 Account 6710 Total	81,632
540 Account 6710 Benefits	13,586
550 Account 6720 Total	168,069
555 Account 6720 Benefits	8,165
565 Sum of Lines 535 + 550	249,701
600 Ben. Por. of all Op. Exp.	104,311
610 Rent Por. of all Op. Exp.	58,768
650 Account 7200 Other Taxes	188,751
700 2410 (C S Total CWF - AV)	9,843,612
710 2410 (C S CWF - Cat.1)	9,697,175
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:

Date: 12/19/2011 Adjustment Type: EC Initiated

1. Revisions due to USF reconciliation.

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 \$10.00 Business \$13.00

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 \$8.42 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

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

The St. John Telephone Company has been the local telephone company 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 high speed internet access, special calling features and voice mail. Our basic services are comprised of several components, which at a minimum include:

<u>Service Provided</u>	<u>Residence</u>	<u>Business</u>
Single party voice grade access to The public network	\$10.00	\$13.00
Access to emergency 911 services State/county mandated surcharges	\$.25/\$.70	\$.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 \$8.50 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.

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**.