



UT-131419-CT
om-9/12/13
Consent
TELEPHONE
TELEVISION

July 31, 2013

BY HAND

Mr. Steven V. King, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

2013 JUL 31 PM 12:00

Dear Mr. King:

Re: 2013 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.

Sincerely,

Steven M. Appelo
Corporate Secretary

Enclosures

**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;¹

(2) That during the 2012 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);

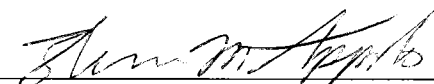
(3) That during the 2012 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and

(4) That during the 2012 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 31st day of July, 2013, at Olympia, Washington.

Company: Western Wahkiakum County Telephone Company

By: 
Its: Corporate Secretary

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**

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 2012, 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 2011.

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 2012, the Company was engaged in a number of major construction projects, including the following:

- (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 by the Company in

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 2012, the Company had one (1) major service outage, within the meaning of that term as defined in WAC 480-120-021, and that as of December 31, 2012, the Company had no unfulfilled requests for service from applicants within the Company's designated ETC service area. The service outage (caused by an outside contractor) occurred on April 5, 2012, from approximately Noon to approximately 2:30 p.m., and potentially affected interexchange and 911 calling from and to all of the Company's customers. Local calling was not affected by the outage, and the Company did not receive any customer complaint or inquiry regarding the outage, which leads the Company to conclude that the actual impact of the outage upon customers was quite limited.

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).

2012 to complete this project was approximately \$216,037. This project has enhanced service reliability and capacity for approximately 4 customers along its route, as well as provided 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 by the Company in 2012 for this project was approximately \$228,355. This project has enhanced service reliability and capacity for approximately 15 customers along its route, as well as provided 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 2012, 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 calendar year 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 2012 filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. While the Company's budgeting process for 2014 is not yet complete, based upon currently known circumstances, the Company expects investment and expense related to Washington state for 2014 that the Company expects to use as a basis to request federal high-cost support to be relatively similar to the calendar year 2013 amounts, again taking into account normal fluctuations in investment and expense levels.

In addition, the following projects have either been completed during 2013, are in progress and are expected to be completed during 2013, or are expected to be constructed during 2014:

2013:

- (1) Construction of new, buried fiber optic routes along Oneida Road in the Company's Grays River Exchange starting at the junction of Oneida Road with State Route 4, and going westerly for a distance of approximately 4.9 miles, together with approximately half a mile along State Route 4. This project is expected to be completed

in 2013, and the cost expected to be incurred in 2013 for this project is estimated to be approximately \$220,000. This project will enhance service reliability and capacity for approximately 17 customers along its route.

- (2) Construction of new, buried fiber optic routes along State Route 4 from approximately MP 3.06 to Holm Lane, then along the length of Holm Lane, then also on State Route 101 from the intersection with Government Road, east to the junction of State Route 101 with State Route 4, and then northerly along State Route 101 to approximately MP 31.48, (together with approximately 3,000 feet along Mill Ranch Road starting at approximately MP 27.18), for a total distance of approximately 7.9 miles. This project is expected to be completed in 2013, and the cost expected to be incurred in 2013 for this project is estimated to be approximately \$250,000. This project will enhance service reliability and capacity for approximately 21 customers along its route, as well as provide backbone capacity to serve other portions of the Company's designated ETC service area.

2014:

- (3) Construction of new, buried fiber optic routes along North Hull Creek Road from its intersection with State Route 4 to the end of North Hull Creek Road, for a distance of approximately 3.31 miles. This project is expected to be executed in 2014, and the cost expected to be incurred in 2014 for this project is estimated to be approximately \$250,000. This project will enhance service reliability and capacity for approximately 14 customers.
- (4) Construction of new, buried fiber optic routes along Loop Road from Fairview Road to Barr Road for a distance of approximately 2.42 miles. This project is expected to be executed in 2014, and the cost expected to be incurred in 2014 for this project is estimated to be approximately \$250,000. This project will enhance service reliability and capacity for approximately 25 customers.

Except as described above in this Report 4 and subject to the effects of inflation and other commonly experienced changes in the cost of labor and materials, the Company currently expects the levels of investment and expenses incurred by it during calendar years 2013 and 2014, respectively, will be relatively the same as those it experienced in calendar year 2012, due to the continuing 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 years 2013 and 2014, respectively, 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 2012.

In addition to the specific benefits to customers identified with respect to projects (1) through (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 help facilitate the Company's efforts to continue to provide the supported services at rates that are reasonably comparable to the rates for such services in urban areas; however, the Company projects that with reductions in intercarrier compensation and associated federal support, as well as other reductions in federal high-cost fund support, that support will need to be supplemented by support from the state universal service fund for the Company to be able to continue to maintain reasonably comparable rates. All customers in the Company's designated ETC service area will benefit from the expected level of federal high-cost fund support by continuing to have available to them services that are reasonably comparable to telecommunications services offered in urban areas at rates that, if adequately supported by other factors, such as the state universal service fund, are reasonably comparable to the rates for such services in urban areas.

Dated: July 31, 2013



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2012	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
060 Total Loops	1,008	EC
070 Cat. 1.3 Loops	998	EC
160 Account 2001	17,363,521	EC
170 Account 1220	78,061	EC
190 Account 3100	12,203,229	EC
195 Account 3400	0	EC
210 Account 4340	882,780	EC
220 Net Plant Investment	4,355,573	EC
230 Account 2210	1,621,475	EC
235 Account 2220	0	EC
240 Account 2230	2,552,826	EC
245 Total Central Office	4,174,301	EC
250 Ckt Equip Cat 4.13	1,880,826	EC
255 Account 2410	11,528,881	EC
260 Account 3100 (2210)	1,679,532	EC
285 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	2,477,250	EC
275 Account 3100 (2210-2230)	4,156,782	EC
280 Account 3100 (2410)	6,670,299	EC
310 Account 4340 (2210)	14,014	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	26,424	EC
325 Account 4340 (2210-2230)	40,438	EC
330 Account 4340 (2410)	834,283	EC
335 Account 6110 Total	9,913	EC
340 Account 6110 Benefits	0	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	52,243	EC
355 Account 6120 Benefits	9,057	EC
360 Account 6120 Rents	0	EC
365 Account 6210 Total	137,832	EC
370 Account 6210 Benefits	29,583	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	97,132	EC
400 Account 6230 Benefits	17,404	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	234,964	EC
430 Account 6410 Total	192,459	EC
435 Account 6410 Benefits	44,155	EC
440 Account 6410 Rents	834	EC
445 Total Plant Specific	489,579	EC
450 Account 6530 Total	552,578	EC
455 Account 6530 Benefits	159,148	EC
510 Account 6560 (2210)	47,093	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	292,219	EC



USF1010 PENDING VIEW REPORT

Applies to Period:	Year End 12/2012	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)	339,312	EC
530 Account 6560 (2410)	583,081	EC
535 Account 6710 Total	0	EC
540 Account 6710 Benefits	0	EC
550 Account 6720 Total	993,023	EC
555 Account 6720 Benefits	209,961	EC
565 Sum of Lines 535 + 550	993,023	EC
600 Ben. Por. of all Op. Exp.	496,436	EC
610 Rent Por. of all Op. Exp.	834	EC
650 Account 7200 Other Taxes	80,526	EC
700 2410 (C S Total CWF - AV)	11,061,073	EC
710 2410 (C S CWF - Cat.1)	10,161,393	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: 6/11/2013

1. Lns. 060,070 Loop loss result of competitive and economic pressures.
2. Lns. 700,710 Growth result of full impact upon the 2012 cost data averaging by the FTTH projects completed in 2011.

Date: 6/12/2013

3. Lns 550 and 555. Result of allocation of overheads in 2012 vs those in 2011. In 2011 overheads were assigned to other accounts to reflect the impact of FTTH projects. No such impact in 2012.

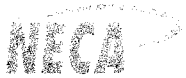


USF1010 LATEST VIEW REPORT

6/25/2013
2:07:49 pm
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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	Latest View
060 Total Loops	1,075
070 Cat. 1.3 Loops	1,065
160 Account 2001	16,366,413
170 Account 1220	93,910
190 Account 3100	11,229,466
195 Account 3400	0
210 Account 4340	909,014
220 Net Plant Investment	4,321,843
230 Account 2210	1,634,138
235 Account 2220	0
240 Account 2230	2,529,907
245 Total Central Office	4,164,045
250 Ckt Equip Cat 4.13	1,851,124
255 Account 2410	10,593,264
260 Account 3100 (2210)	1,679,851
265 Account 3100 (2220)	0
270 Account 3100 (2230)	2,185,031
275 Account 3100 (2210-2230)	3,864,882
280 Account 3100 (2410)	6,087,218
310 Account 4340 (2210)	17,331
315 Account 4340 (2220)	0
320 Account 4340 (2230)	97,547
325 Account 4340 (2210-2230)	114,878
330 Account 4340 (2410)	777,597
335 Account 6110 Total	10,669
340 Account 6110 Benefits	7,589
345 Account 6110 Rents	0
350 Account 6120 Total	57,120
355 Account 6120 Benefits	0
360 Account 6120 Rents	0
365 Account 6210 Total	162,936
370 Account 6210 Benefits	29,557
375 Account 6210 Rents	0
380 Account 6220 Total	0
385 Account 6220 Benefits	0
390 Account 6220 Rents	0
395 Account 6230 Total	69,342
400 Account 6230 Benefits	14,421
405 Account 6230 Rents	0
410 Account 6210-6230	232,278
430 Account 6410 Total	160,936
435 Account 6410 Benefits	36,272
440 Account 6410 Rents	772
445 Total Plant Specific	461,003
450 Account 6530 Total	488,891
455 Account 6530 Benefits	133,581
510 Account 6560 (2210)	152,530
515 Account 6560 (2220)	0
520 Account 6560 (2230)	288,994



USF1010 LATEST 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 WAHAKIAKUM	

Description	Latest View
525 Account 6560 (2210-2230)	441,524
530 Account 6560 (2410)	509,312
535 Account 6710 Total	0
540 Account 6710 Benefits	0
550 Account 6720 Total	887,136
555 Account 6720 Benefits	171,645
565 Sum of Lines 535 + 550	887,136
600 Ben. Por. of all Op. Exp.	433,160
610 Rent Por. of all Op. Exp.	772
650 Account 7200 Other Taxes	96,168
700 2410 (C S Total CWF - AV)	9,843,356
710 2410 (C S CWF - Cat.1)	9,196,502
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: 7/18/2012

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