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**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

IN RE

PETITION OF WESTGATE  
COMMUNICATIONS LLC (DBA  
WEAVTEL) TO RECEIVE SUPPORT  
FROM THE UNIVERSAL SERVICE  
COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

COMES NOW Westgate Communications LLC d/b/a “WeavTel” (the "Company") and, pursuant to Chapter 480-123 of the Washington Administrative Code (“WAC”), including, but not limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to receive support from the Universal Service Communications Program (the "Program") for the Program year 2021.

**I. Demonstration of Eligibility under WAC 480-123-100**

1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC 480-120-021 that serves fewer than forty thousand access lines within the state.

- 1 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined  
2 in 47 U.S.C. Sec. 251(h).
- 3 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange  
4 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 5 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-  
6 123-110, to provide, maintain or enhance broadband service (See II.4, below).
- 7 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an  
8 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal  
9 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for  
10 High Cost Areas with respect to the service areas for which the Company is seeking  
11 Program support.

## 12 13 **II. Demonstration of Eligibility under WAC 480-123-110**

- 14 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications  
15 services and is seeking Program support is as follows: Westgate Communications LLC  
16 d/b/a "WeavTel".
- 17 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between  
18 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. <sup>1</sup>  
19 A detailed description of any transactions between the Company and the affiliates named in  
20 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2. <sup>2</sup>

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23 <sup>1</sup> Pursuant to agreement with Commission Staff, Exhibit 1 is limited to those affiliates having transactions with the  
Company that are to be identified in Exhibit 2.

24 <sup>2</sup> Exhibit 2 also includes transactions between the Company and WeavNet. Pursuant to agreement with the Commission  
25 Staff, Exhibit 2 is limited to transactions other than employment compensation and benefits pursuant to employ benefit  
26 plans.

- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.  
2 63 of the Company's Tariff WN U-2.
- 3 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance  
4 broadband services in its service area is attached hereto as Exhibit 3.
- 5 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the  
6 Company complies with state and federal accounting, cost allocation, and cost adjustment  
7 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 8 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by  
9 the Company as of December 31, 2019, was 47. The number of residential local exchange  
10 access lines served by the Company as of December 31, 2018, was 50. The number of  
11 business local exchange access lines served by the Company as of December 31, 2019, was  
12 38. The number of business local exchange access lines served by the Company as of  
13 December 31, 2018, was 30. The number of broadband connections served by the Company  
14 as of December 31, 2019, was 12. The number of broadband connections served by the  
15 Company as of December 31, 2018, was 13. The unbundled monthly recurring rate charged  
16 by the Company for residential local exchange access service on December 31, 2019, was  
17 \$25.00. The unbundled monthly recurring rate charged by the Company for residential local  
18 exchange access service on December 31, 2018, was \$25.00. The unbundled monthly rate  
19 charged by the Company for single line business local exchange access service on December  
20 31, 2019, was \$35.00. The unbundled monthly rate charged by the Company for single line  
21 business local exchange access service on December 31, 2018, was \$35.00. (The Company  
22 has other business local exchange service rates, but the Company understands that WAC  
23 480-123-110(1)(g) is requesting the single line business local exchange access service  
24 rate.)[Delete this last sentence if the Company has only a single rate for business local  
25  
26



1 exchange access service.] The unbundled monthly rate charged for broadband service as of  
2 December 31, 2019, and as of December 31, 2018, is set out in the attached Exhibit 5.

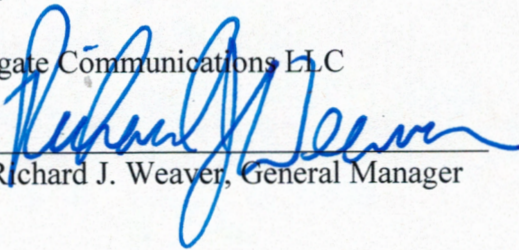
3 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.

4 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the  
5 Company is in compliance with the Federal Communications Commission's obligation for  
6 deployment of broadband at speeds specified by the Federal Communications Commission  
7 applicable to the Company and that the Company meets one of the eligibility criteria set out  
8 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.

9 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.  
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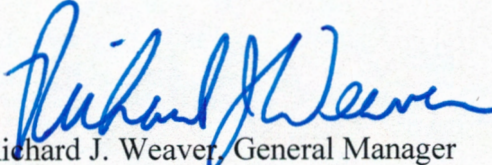
11  
12 Respectfully submitted this 31st day of July, 2020.

13 Westgate Communications LLC

14 By   
15 Richard J. Weaver, General Manager

16 CERTIFICATION

17 I Richard J. Weaver, an officer of the Company that is responsible for the Company's  
18 business and financial operations, hereby certify under penalty of perjury that the information and  
19 representations set forth in the Petition, above, are accurate and the Company has not knowingly  
20 withheld any information required to be provided to the Commission pursuant to the rules  
21 governing the Program.  
22

23  
24   
25 Richard J. Weaver, General Manager  
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**EXHIBIT 1**

**CORPORATE ORGANIZATION CHART**

Westgate Communications LLC

Richard J Weaver  
General Manager

WeavNet LLC

Richard J Weaver  
General Manager

## **EXHIBIT 2**

### **AFFILIATED TRANSACTIONS**

Westgate Communications LLC (dba "WeavTel") had the following affiliated transactions with WeavNet (an affiliate through common ownership) during the year ended December 31, 2019:

- Purchase of tariff services (local voice telephone and broadband services) at tariffed rates by WeavNet from WeavTel.
- WeavTel provided labor to WeavNet for miscellaneous business services (plant construction and maintenance, accounting and billing services) that are recorded in the appropriate Part 32 accounts.



## EXHIBIT 3

### BROADBAND PLAN

This Broadband Plan is being submitted by Westgate Communications LLC ("WeavTel") in compliance with RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d). Under the terms of the legislation incorporated into RCW 80.36.650(3), a recipient of support from the state Universal Service Communications Program is to submit a broadband plan showing how the provider will provide, maintain, or enhance broadband services in its service area. As set out in WAC 480-123-110(1)(d), the broadband plan is to include specific elements, but only to the extent applicable to that particular broadband plan. The broadband plan does not have to include all elements but it can include any of the following elements: (1) a multi-year investment plan; (2) specific projects that are projected to provide or enhance broadband service at speeds required by the Commission or the Federal Communications Commission (FCC); (3) a plan for maintenance of broadband services in the provider's service area; (4) a description of how the provider will enhance broadband services in its service area; and (5) any other supporting information that the Commission may request to assist in the Commission's review and analysis of the provider's broadband plan. Where there are specific projects, the project information is to include an estimated timeline, geographic location, number of locations passed, and upload and download speeds that are projected to be produced by the project.

WeavTel is currently working to meet its broadband deployment obligations as required by the FCC. WeavTel is presently planning or constructing the following capital projects within its Stehekin exchange area to enhance its broadband coverage and provide service at upload and download speeds required to meet the FCC's 25/3 Mbps benchmark. Current and planned projects include the following:

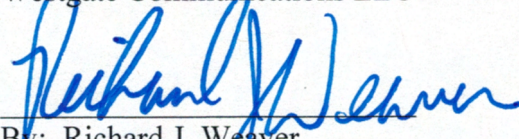
Current Project(s) - WeavTel continues to work on its two-tower projects that were outlined in the company's capital budget report for the second half of 2020. Completing these projects will provide WeavTel with the ability to reach the majority of its service area with 25/3 Mbps broadband service. WeavTel is also working on a new satellite earth station and backhaul contract to have backhaul capability to provision customers with FCC mandated 25/3 Mbps broadband service.

Planned Project(s) - WeavTel will continue to add customers and complete the necessary capital projects in order to meet its FCC customer location count obligations and broadband speed requirements. Of note, WeavTel has serviced its first customers in Lucerne this season and plans to install more customers at this location.



Dated this 31<sup>st</sup> day of July 2020

Westgate Communications LLC



By: Richard J. Weaver  
Title: President & General Manager

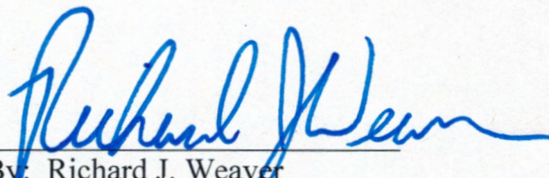


**EXHIBIT 4**

**CERTIFICATION RELATED TO ACCOUNTING STANDARDS**

I, Richard J. Weaver, am an officer of Westgate Communications LLC d/b/a "WeavTel" (the Company as set out in the Petition to which this is an Exhibit). Thereby, I certify that the Company complies with state and federal accounting, cost allocation, and cost adjustment rules pertaining an incumbent local exchange carrier for the period of time that the Company will receive support under the Petition to which this is an Exhibit.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 31st day of July, 2020.



By: Richard J. Weaver

Title: President & General Manager

## EXHIBIT 5

### UNBUNDLED MONTHLY BROADBAND SERVICE RATES

Download Speed	Upload Speed	Prior Year	Current Year	Res	No priority cap
		End of Year Rate 2018	End of Year Rate for 2019	Bus	Priority cap @ 40GB
				Both	Priority cap @ 60GB
				Both	Priority cap @ 100GB
3	1.2	45.00	45.00	Both	No cap
12	3	36.00	36.00	Both	Priority cap @40GB
12	3	61.00	61.00	Both	Priority cap @60GB
12	3	101.00	101.00	Both	Priority cap @100GB



**EXHIBIT 6**

**CONTINUED OPERATIONS CERTIFICATE**

I, Richard J. Weaver, an officer of Westgate Communications LLC, d/b/a "WeavTel", under penalty of perjury, hereby certify that if the Company receives Program support, the Company will continue to provide communications services pursuant to its tariffs on file with the Commission throughout its service territory in Washington for which the company is seeking and receives Program support during the entirety of 2021.

Dated this 31st day of July, 2020.

  
General Manager

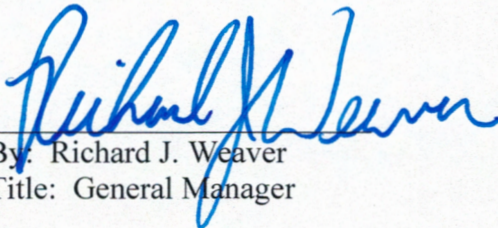
**EXHIBIT 7**

**CERTIFICATION OF ELIGIBILITY**

I, Richard J. Weaver, am an officer of Westgate Communications LLC d/b/a "WeavTel" (the Company as set out in the Petition to which this is an Exhibit) and thereby certify that the Company is in compliance with the Federal Communications Commission's obligation for deployment of broadband at speeds specified by the Federal Communications Commission that apply to the Company.

Further, I certify that the Company commits to the deployment of broadband to the number of locations the Washington Utilities and Transportation Commission determined by order.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 31st day of July, 2020.

  
By: Richard J. Weaver  
Title: General Manager