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7 **BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

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

DOCKET NO.

PETITION FOR SUPPORT

14
15 COMES NOW Westgate Communications LLC d/b/a "WeavTel" (the "Company") and,
16 pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC"), including, but not
17 limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation
18 Commission (the "Commission") to receive support from the Universal Service Communications
19 Program (the "Program") for the Program year 2022.

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

- 22 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
23 480-120-021 that serves fewer than forty thousand access lines within the state.

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26 PETITION OF WESTGATE
COMMUNICATIONS LLC D/B/A WEAVTEL
TO RECEIVE SUPPORT FROM THE
UNIVERSAL SERVICE COMMUNICATIONS
PROGRAM - 1

- 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. ¹
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. ²

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23 ¹ 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 ² Pursuant to agreement with the Commission Staff, Exhibit 2 is limited to transactions other than employment
25 compensation and benefits pursuant to employ benefit plans. Exhibit 2 also includes transactions between the Company
and WeavNet.

- 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, 2020, was 49. The number of residential local exchange
10 access lines served by the Company as of December 31, 2019, was 47. The number of
11 business local exchange access lines served by the Company as of December 31, 2020, was
12 35. The number of business local exchange access lines served by the Company as of
13 December 31, 2019, was 39. The number of broadband connections served by the Company
14 as of December 31, 2020, was 12. The number of broadband connections served by the
15 Company as of December 31, 2019, was 12. The unbundled monthly recurring rate charged
16 by the Company for residential local exchange access service on December 31, 2020, was
17 \$25.00. The unbundled monthly recurring rate charged by the Company for residential local
18 exchange access service on December 31, 2019, was \$25.00. The unbundled monthly rate
19 charged by the Company for single line business local exchange access service on December
20 31, 2020, was \$35.00. The unbundled monthly rate charged by the Company for single line
21 business local exchange access service on December 31, 2019, was \$35.00. The unbundled
22 monthly rate charged for broadband service as of December 31, 2020, and as of December
23 31, 2019, is set out in the attached Exhibit 5.
- 24 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.

- 1 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the
2 Company is in compliance with the Federal Communications Commission's obligation for
3 deployment of broadband at speeds specified by the Federal Communications Commission
4 applicable to the Company and that the Company meets one of the eligibility criteria set out
5 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.
- 6 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.
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9 Respectfully submitted this 30th day of July, 2021.

10 Westgate Communications LLC

11 By 

12 Richard J. Weaver, General Manager

13 CERTIFICATION

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

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21 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". "Company") had the following affiliated transactions with WeavNet (an affiliate through common ownership) during the year ended December 31, 2020:

- 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; (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 Federal Communications Commission (FCC) and the Washington Utilities and Transportation Commission (WUTC). WeavTel is presently working or planning the following capital projects within its Stehekin exchange area to enhance the Company's broadband coverage and provide service at higher upload and download speeds to meet the FCC's 25/3 Mbps benchmark.

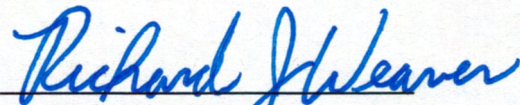
Current Project(s) - WeavTel continues to work on a completing a tower project within its Stehekin Exchange area. Although the project was originally engineered to consist of two towers, the Company completed an agreement to lease land on Buehler's Bluff in the Stehekin exchange that will now require only one tower to serve the Upper Stehekin Valley with 25/3 Mbps broadband service. The Company is currently working on an additional conditional land use permit that will be filed in August 2021. The solar power plant installation for this tower will begin in August 2021. The anticipated completion date of this project is prior to the end of 2022. Once this tower project is completed, it will provide WeavTel with the ability to reach the majority of its service area with 25/3 Mbps broadband service. On December 31, 2020, the cumulative balance in this work order was \$24,081. The Company is also working on a new satellite earth station and related backhaul contract to be able to provision 25/3 Mbps broadband service to its customers. On December 31, 2020, the cumulative balance in this project work order was \$7,048.

Currently WeavTel has last mile connectivity ability with approximately 90 customer locations with 300 Mbps.

Planned Project(s) - WeavTel will continue to add customers and complete the necessary capital projects in order to meet its FCC and WUTC customer location count obligations and broadband speed requirements. The Company is presently planning to construct a tower down lake midway to Chelan. The purpose of this project will be to provide terrestrial back haul to Chelan which will reduce cost and increase the bandwidth available to customers. The Company does not have an exact time frame for completion of this project, although likely in 2023 or 2024, and has estimated the initial project cost to be approximately \$65,000.

Dated this 30th day of July 2021

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 to 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 30th day of July 2021.

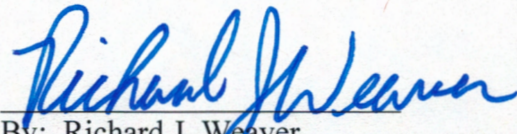

By: Richard J. Weaver
Title: President & General Manager

EXHIBIT 5

UNBUNDLED MONTHLY BROADBAND SERVICE RATES

WeavNet LLC retail to end users

1. 40 GB a month at 12/3 Mbps	\$77.49 a month
2. 60 GB a month at 12/3 Mbps	107.49 a month
3. 100 GB a month at 12/3 Mbps	162.49 a month

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 and will continue to provide broadband services throughout its service territory in Washington for which the Company is seeking and receives Program support during the entirety of the year for which the Company is applying for support from the Program.

Dated this 30th day of July, 2021.

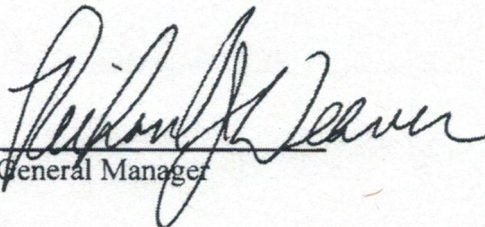

General Manager

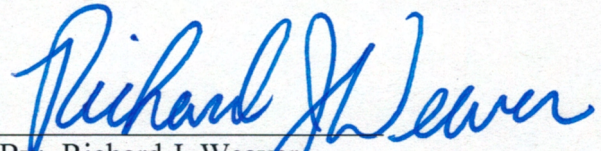
EXHIBIT 7

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 of criterion two and WAC 480-123-110(1)(j)(ii).

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 30th day of July, 2021.


By: Richard J. Weaver
Title: General Manager