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VIA ELECTRONIC FILING

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket UT-_____: *Annual Reporting and Request for Certification of Charter Fiberlink WA-CCVII, LLC as an Eligible Telecommunications Carrier Pursuant to WAC 480-123-060, WAC 480-123-070, WAC 480-123-080, and 47 C.F.R. § 54.314*

Dear Ms. Maxwell,

On May 20, 2021, the Washington Utilities and Transportation Commission (Commission) designated Charter Fiberlink WA-CCVII, LLC (Charter) as an Eligible Telecommunications Carrier (ETC) for the area in which Charter is authorized by the Federal Communication Commission (FCC) to receive support from the Rural Digital Opportunity Fund (RDOF).¹ The FCC authorized Charter for RDOF support in a Public Notice released on March 15, 2022:

Seventh RDOF Authorization PN:

<https://docs.fcc.gov/public/attachments/DA-22-280A1.pdf>

Seventh RDOF Authorization PN Attachment A:

<https://docs.fcc.gov/public/attachments/DA-22-280A2.pdf>

In that Notice, the FCC stated that long-form applicants authorized for RDOF support pursuant to that Notice would be required to file their first FCC Form 481 by **July 1, 2023**. The FCC also stated that state commissions would not be required to file section 54.314 certifications for the ETCs authorized for RDOF support until **October 1, 2023**. As such, Charter will not be filing a Form 481 for its RDOF areas in 2022, and the Commission will not need to certify Charter for high-cost support this year.

¹ *In re Petition of Charter Fiberlink WA-CCVII, LLC For Designation as an Eligible Telecommunications Carrier in the State of Washington Pursuant to 47 U.S.C. § 214(e)(2)*, Docket UT-210008, Order No. 01 (May 20, 2021).

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Moreover, because the Commission is not required to certify Charter's use of federal high-cost funds pursuant to 47 C.F.R. Sec. 54.314 this year, Charter should not be required to file the certification otherwise required by WAC 480-123-060. That said, Charter assures the Commission that Charter will use its federal high-cost universal service fund support provided to Charter in the State of Washington in the coming calendar year only for the provision, maintenance and upgrading of the facilities and services for which the support is intended.

Similarly, because Charter was not authorized to receive RDOF funding during the period January 1st through December 31st of 2021, Charter should not be required to file the annual certifications and reports otherwise required by WAC 480-123-070.

Finally, because the Commission is not required to certify Charter for high-cost support until October 1, 2023, Charter should not be required to file the annual plan for universal service support expenditures otherwise required by WAC 480-123-080.

Please contact this office with any questions or concerns.

Sincerely,

/s/ Lisa Rackner

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