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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

July 26,2022

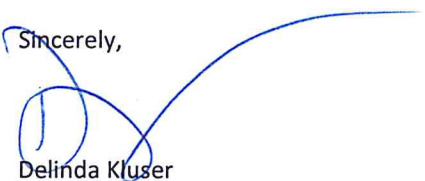
Ms. Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Petition to Receive Support from the State Universal Communications Program
Program Year 2023

Pursuant to WAC 480-123-110 on behalf of Skyline Telecom ("Company"), attached herewith for filing with the Washington Utilities and Transportation Commission ("Commission") is the Company's Petition to receive support from the state universal communication services program established by RCW 80.36.650 ("Petition").

If the Commission has any questions regarding the filing, please feel free to contact me at 541-932-4411 or deedeek@otcconnections.net.

Sincerely,


Delinda Kluser
Vice-Pres, Manager

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6
7 **BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

9
10 PETITION OF SKYLINE TELECOM INC
11 TO RECEIVE SUPPORT FROM THE
12 UNIVERSAL SERVICE
13 COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

14 COMES NOW Skyline Telecom Inc. (the "Company") and, pursuant to Chapter 480-123 of
15 the Washington Administrative Code ("WAC"), including, but not limited to, WAC 480-123-110,
16 hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to
17 receive support from the Universal Service Communications Program (the "Program") for the
18 Program year 2023.

19
20 **I. Demonstration of Eligibility under WAC 480-123-100**

- 21 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
22 480-120-021 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) The Company has been designated as an incumbent local
3 exchange carrier by the Federal Communications Commission.
- 4 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
5 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 6 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-
7 123-110, to provide, maintain or enhance broadband service (See II.4, below).
- 8 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
9 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal
10 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for
11 High Cost Areas with respect to the service areas for which the Company is seeking
12 Program support.

13 14 **II. Demonstration of Eligibility under WAC 480-123-110**

- 15 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
16 services and is seeking Program support is as follows: Skyline Telecom Inc.
- 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

21
22
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 Exhibit 2 also includes transactions between the Company and affiliates. Pursuant to agreement with the
25 Commission Staff, Exhibit 2 is limited to transactions other than employment compensation and benefits

- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet Nos.
2 49 and 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, 2021, was 93. The number of residential local exchange
10 access lines served by the Company as of December 31, 2020, was 99. The number of
11 business local exchange access lines served by the Company as of December 31, 2021, was
12 15. The number of business local exchange access lines served by the Company as of
13 December 31, 2020, was 15. The number of broadband connections served by the Company
14 as of December 31, 2021, was 42. The number of broadband connections served by the
15 Company as of December 31, 2020, was 49. Currently we have 243 locations that have
16 access to the internet. Of these locations, 127 have the ability to achieve speeds greater than
17 or equal to 25/3. The unbundled monthly recurring rate charged by the Company for
18 residential local exchange access service on December 31, 2021, was \$25.00 for Silverton
19 and \$19.50 for Mt Hull. The unbundled monthly recurring rate charged by the Company for
20 residential local exchange access service on December 31, 2020, was \$25.00 for Silverton
21 and \$19.50 for Mt Hull. The unbundled monthly rate charged by the Company for single
22 line business local exchange access service on December 31, 2021, was \$35.00 for Silverton
23 and \$25.00 for MT Hull. The unbundled monthly rate charged by the Company for single
24 line business local exchange access service on December 31, 2020, was \$35.00 for Silverton
25
26

1 and \$25.00 for MT Hull. The unbundled monthly rate charged for broadband service as of
2 December 31, 2021, and as of December 31, 2020, 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.

10
11
12 Respectfully submitted this 26th day of July, 2022.

13 SKYLINE TELECOM INC

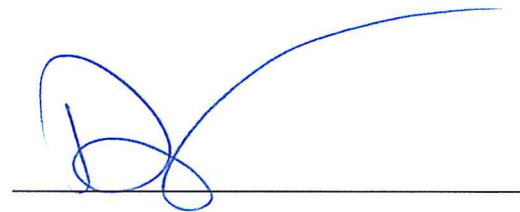
14 By 

15 Delinda Kluser

16 Vice-Pres, Manager

CERTIFICATION

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



Delinda Kluser

Vice-Pres, Manager

EXHIBIT 1

CORPORATE ORGANIZATION CHART



PETITION OF SKYLINE TELECOM, INC TO
RECEIVE SUPPORT FROM THE UNIVERSAL
SERVICE COMMUNICATIONS PROGRAM –

EXHIBIT 2

AFFILIATED TRANSACTIONS

Affiliated Transactions

Oregon Telephone Corporation is the managing company for Skyline Telecom Inc. The business office is located in MT Vernon, OR. All billing, customer support, technical support and financial reporting is performed by the staff of Oregon Telephone Corporation. All labor expenses are direct coded to Skyline by affiliated companies. A management agreement is in place which identifies how expenses are allocated between companies.

Service orders (new installs or changes) or trouble tickets are assigned to employees at either Oregon Telephone Corporation or North-State Telephone. These same technicians also assist with construction projects. These employees also direct codes labor and expenses to Skyline Telecom.

EXHIBIT 3

Broadband Plan

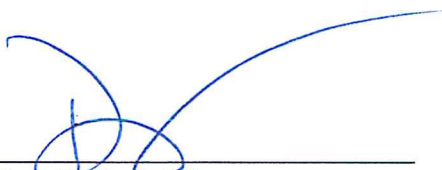
Skyline Telecom Inc. offers broadband services to both of its exchanges, Silverton and Mt Hull. Skyline incurs considerable monthly costs to maintain the backbone connection to the world for each of these areas. In fact, Skyline's broadband operations operate in a net loss position each year due to these costs. Skyline however is committed to continuing to provide quality broadband service to its subscribers and continues to maintain all plant necessary to provide these necessary services.

Beginning in 2020, Skyline engineered a three-phase fiber to the home build for the Mt Hull exchange. This allows for not only a considerable increase in broadband speeds, but also improves the reliability of service when compared to aging copper. Phase 1 was completed in 2020 for a total of \$89,665. Seventeen customers were converted to fiber.

Phase 2 for the Mt Hull exchange was completed in 2021 and brought fiber to 15 potential subscribers at a cost of \$115,723. Phase 3A is planned for 2022 and allows 22 potential subscribers fiber to the home. This phase has a budgeted amount of approximately \$90,000. Phase 3C is slated to begin construction in 2023. 12 subscribers will have fiber to the home capabilities.

Skyline could offer speeds up to 1Gig for these fiber subscribers. Maps and a materials list for Phase 3A have been provided. Maps and bill of materials for Phase 3C have also been included as part of this exhibit.

Funds will also be used in 2022 to secure T-1's into our Silverton exchange. Our current provider notified the Company that the existing circuits would not be available to us due to upgrades to their network. We have secured alternative circuits, however the cost of equipment to provision these circuits will be approximately \$30,000. Skyline Telecom would like to consider constructing a backbone into the Silverton exchange. Current projections for the 12 miles of fiber are almost \$1,000,000.



By: Delinda Kluser
Title: Vice-Pres, Manager



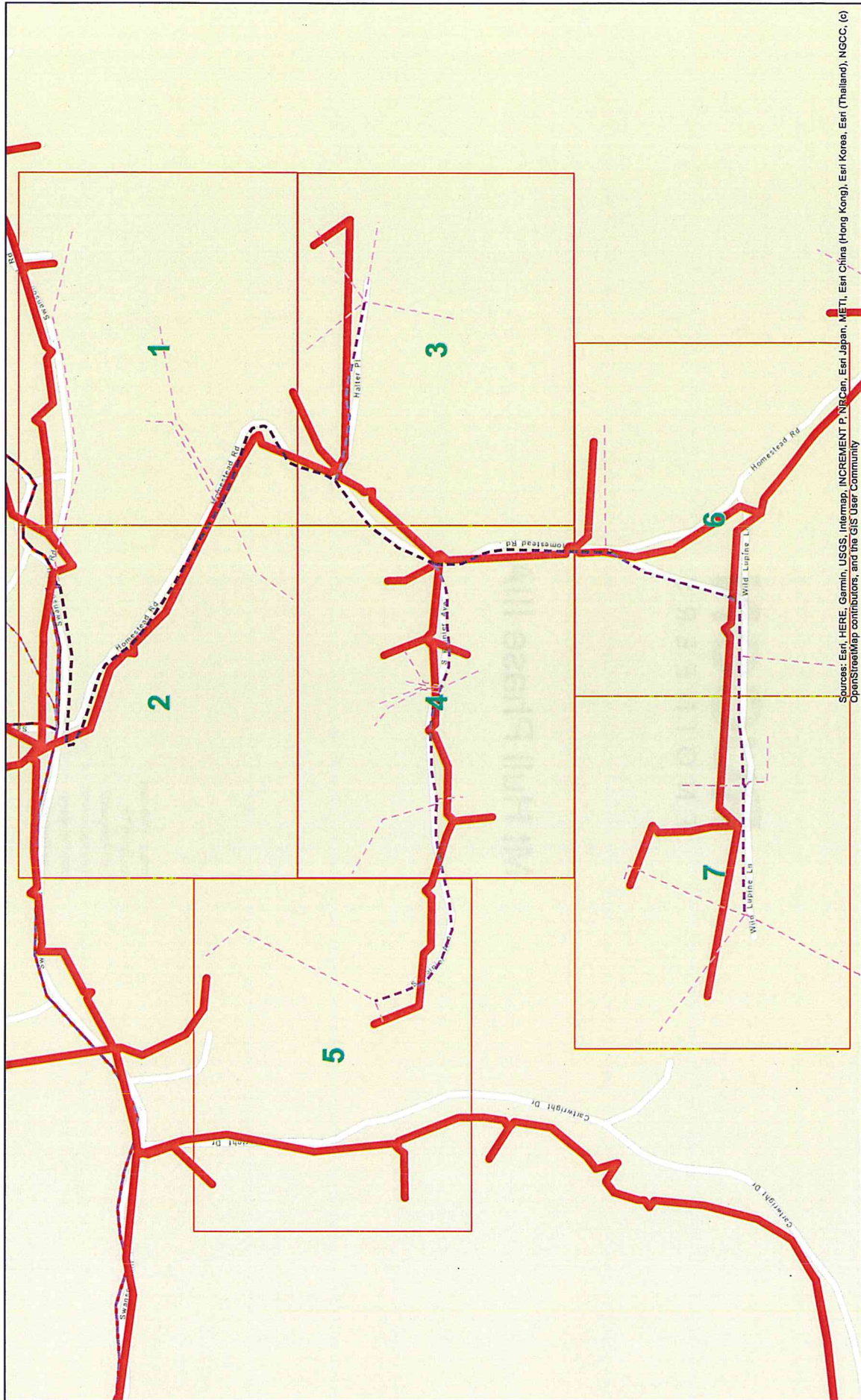
Mt Hull Phase IIIA

status: Proposed
Assigned To:
Date Assigned:
Date Approved:
Date Released:
Date Completed:

May 7, 2022

Authored by: PC-MK20-RUCON\mkhog


Sheet Index
Mt Hull Phase III C

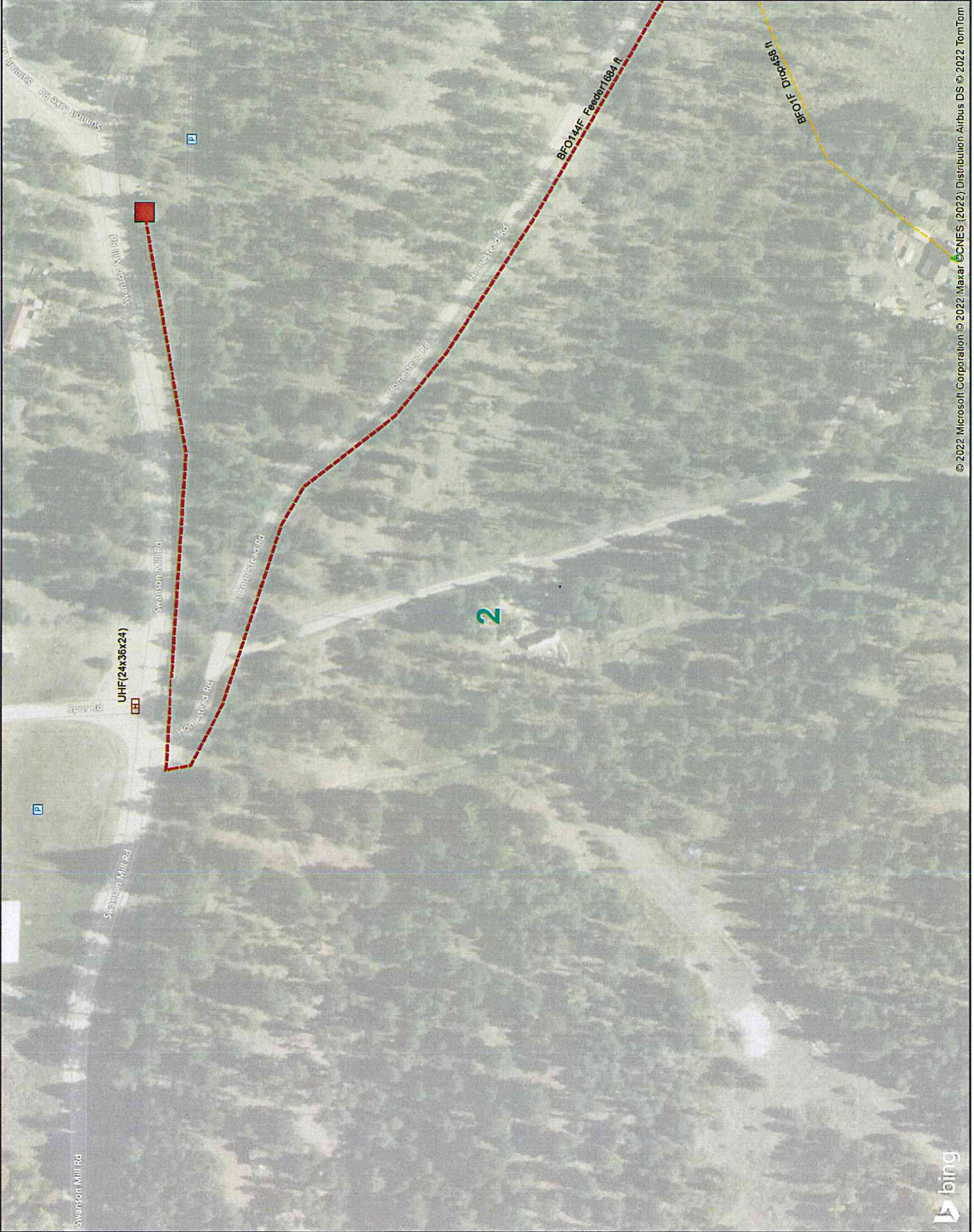


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

OTC
 Sheet: 2 of 7
 Okanogan
 Mt Hull
 As Of: 5/7/2022

1 inch = 100 feet

N 





OTC

Sheet: 3 of 7

Okanogan

Mt Hull

As Of: 5/7/2022

1 inch = 100 feet

N

Halter Pt. **3**

Source: Esri, DigitalGlobe, GeoEye, IGN, Aeriac, AeroGRID, IGN, SCS, Intermap, ...

OTC
 Sheet: 4 of 7
 Okanogan
 Mt Hull
 As Of: 5/7/2022

1 inch = 100 feet

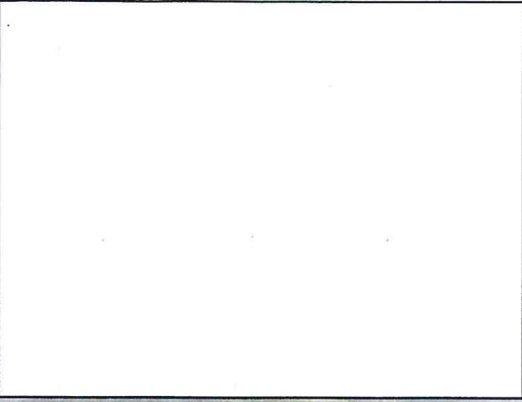
S.E. 1/4 1/4 AVE 4
 Sources: Esri, HERE, Garmin, USGS, Intermap,



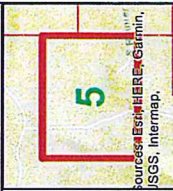
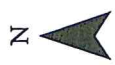
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OTC
Sheet: 5 of 7
Okanogan
Mt Hull
As Of: 5/7/2022



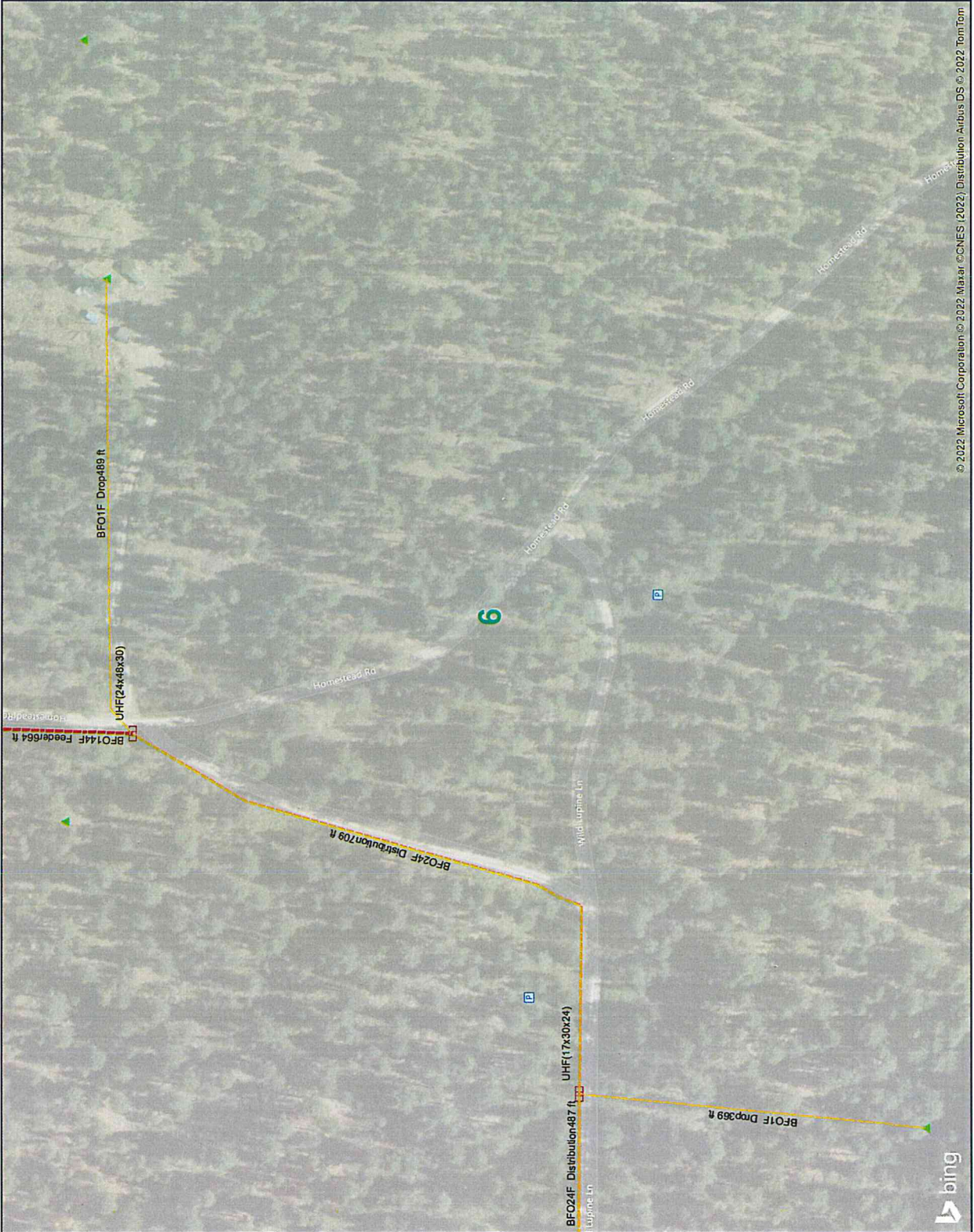
1 inch = 100 feet



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OTC
 Sheet: 6 of 7
 Okanogan
 Mt. Hull
 As Of: 5/7/2022



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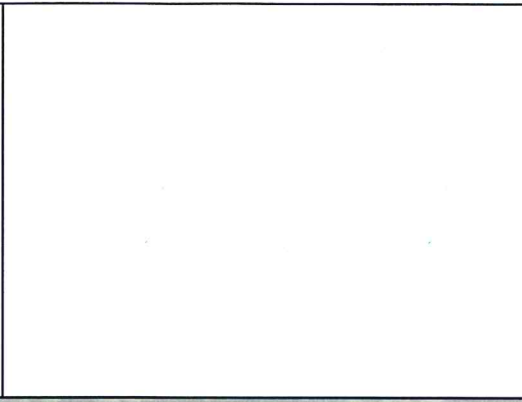
1 inch = 100 feet

N

6

Source: ESRI, HERE, Garmin, USGS, Intermap,

OTC
 Sheet: 7 of 7
 Okanogan
 Mt Hull
 As Of: 5/17/2022



1 inch = 100 feet

N

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Mt Hull Phase IIIA

Subtype	Status	Type	Class	Size	Mode	Gauge	Owner	Quantity
Fiber Cable	Proposed	Loose tube	BFO	1	sm		OTC	8186
Fiber Cable	Proposed	Loose tube	BFO	144	sm		OTC	3765
Fiber Cable	Proposed	Loose tube	BFO	24	sm		OTC	4573
Conduit	Proposed	BFOV(1)(1.25)		1.25"			OTC	4153
Conduit	Proposed	BFOV(2)(1.25)		1.25"			OTC	3524
Handhole	Proposed	UHF(17x30x24)					OTC	7
Handhole	Proposed	UHF(24x36x24)					OTC	4
Structure	Existing						OTC	22



Mt Hull Phase IIIC Path

status: Proposed
Assigned To:
Date Assigned:
Date Approved:
Date Released:
Date Completed:

May 10, 2022

Authored by: PC-MK20-RUCON\mkhag

Company: OTC



Sheet: 1 of 2

County:

Exchange: Mt Hull

As Of: 5/10/2022

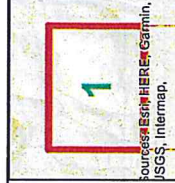
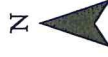
Legend

Handholes Path Type, Status

Subtype

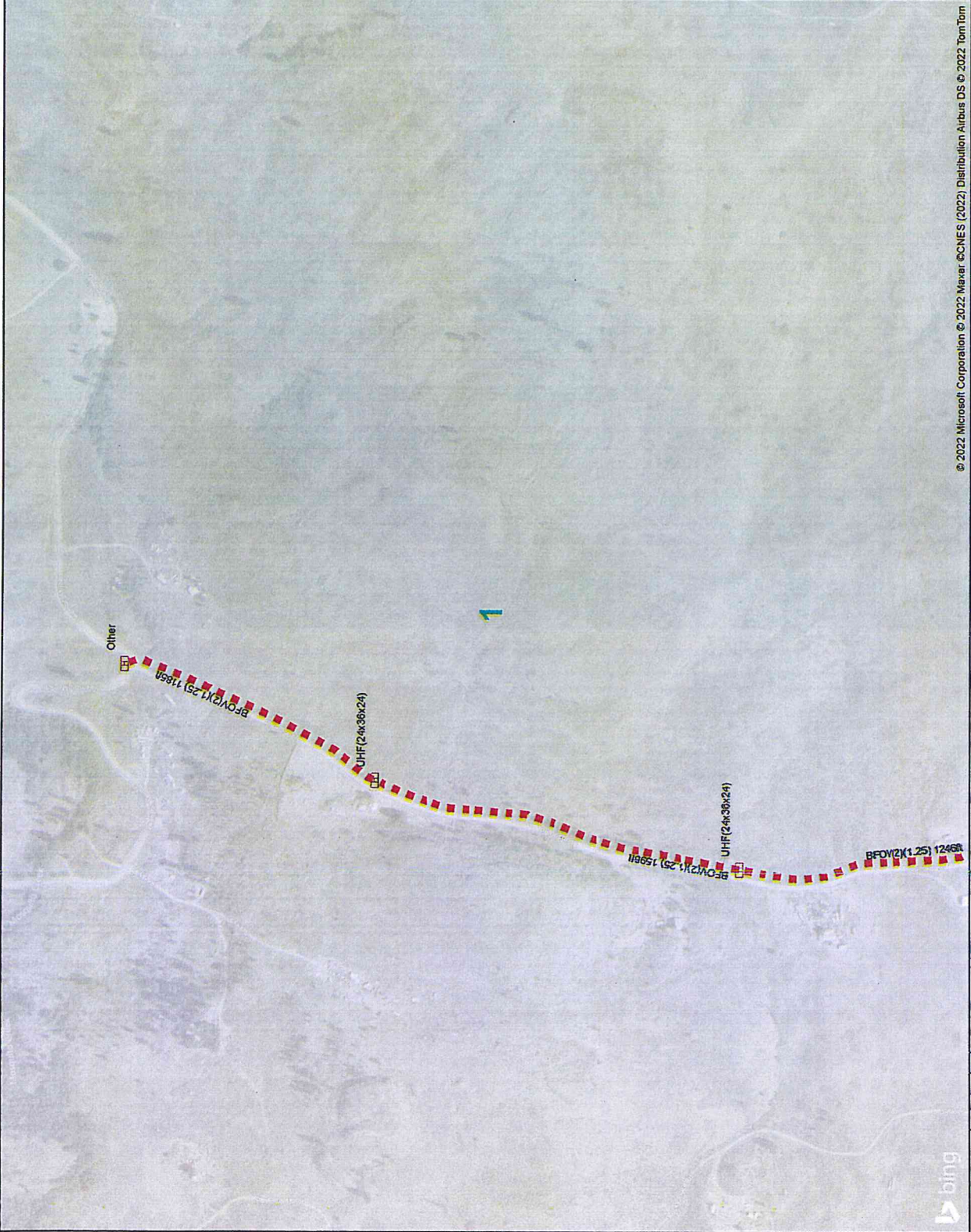
- BFOV(2)(1.25), Proposed
- Handhole
- Sheet

1 inch = 400 feet



sources: Esri, HERE, Garmin, JSCS, Intermap.

RUCOON ENGINEERS



Company: OTC



GIG-CAPABLE PROVIDER



Sheet: 2 of 2

County:

Exchange: Mt Hull

As Of: 5/10/2022

Legend

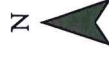
Handholes Path Type, Status

■ BFOV(2)(1,25), Proposed

□ Handhole

□ Sheet

1 inch = 400 feet



2

Sources: Esri, HERE, Garmin, JSC, Intermap.

RUCOON ENGINEERS



Mt Hull Phase IIIC BOM

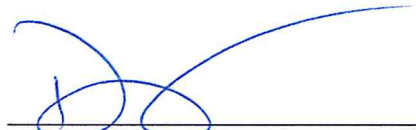
Subtype	Status	Type	Class	Size	ModeGaug	Owner	UsedBy	Quantity
Drop Cable	Proposed	Loose tube	BFO	1	sm	OTC		3675 ft
Fiber Cable	Proposed	Loose tube	BFO	144	sm	OTC		7466 ft
Conduit	Proposed	BFOV(2)(1.25)		1.25"		OTC		7107 ft
Handhole	Proposed	UHF(24x36x24)				OTC		5
Structure	Existing							12

EXHIBIT 4

Certification Relating to Accounting Standards

I, Delinda Kluser, am an officer of Skyline Telecom Inc. (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 26th day of July, 2022.



By: Delinda Kluser
Title: Vice-Pres, Manager

Skyline Telephone

Internet/Phone Bundle			Internet/Phone Bundle			Granite Falls ONLY		
w/phone features			Basic phone			Service:		
Tonasket/Mt Hull/Oroville			Tonasket/Mt Hull/Oroville			Phone Only \$25.00		
Speeds:			Speeds:			512 meg Internet \$39.95		
6 \$75.95			6 \$50.00			Bundle: \$50.00		
15 \$85.95			15 \$60.00					
30 \$90.95			30 \$70.00					
50 \$95.95			50 \$80.00					
100 \$100.95			100 \$90.00					
500 \$145.95			500 \$140.00					
Internet Only			Phone Only					
556			Tonasket/Mt Hull/Oroville					
Speeds:			Residential			Monthly Price: \$19.50		
6 \$49.95			Business			\$25.00		
15 \$59.95								
30 \$69.95								
50 \$79.95								
100 \$89.95								
500 \$139.95								
EXHIBIT 5								
PETITION OF Skyline Telecom Inc.								
TO RECEIVE SUPPORT FROM THE UNIVERSAL								
SERVICE COMMUNICATIONS PROGRAM								

EXHIBIT 6

STATEMENT REQUIRED BY WAC 480-123-110(1)(h)

I, Delinda Kluser, am an officer of Skyline Telephone Company ("Skyline") and make this statement in that capacity. I hereby certify that if Skyline receives program support it will continue to provide communications services throughout its service territory in Washington for which it is seeking and receives program support for the entirety of the year for which Skyline is applying for support from the program. In addition, if Skyline receives program support, I certify that Skyline will continue to provide broadband services throughout its service territory in Washington, as it is or becomes available, during the entirety of the year in which Skyline is applying for support from the program.

This statement is provided under the penalty of perjury as set forth in RCW 9A.72.085.

By:  _____

Its: vice-pres. manager

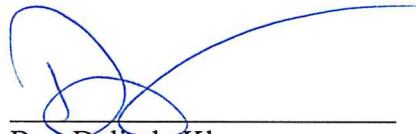
EXHIBIT 7

Certification of Eligibility

I, Delinda Kluser, am an officer of Skyline Telecom Inc. (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.

For (j)(iii): Further, I certify that the Company has already met the Federal Communications Commission's total deployment obligations associated with federal high-cost program support as of the date of the Petition to which this is an Exhibit. Further, I certify that the Company has since January 1, 2018, deployed broadband to the number of locations that Washington Utilities and Transportation Commission has 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 26th day of July, 2022.



By: Delinda Kluser
Title: Vice-Pres, Manager