

REDACTED-Shaded information is designated as confidential per WAC 480-07-160

Attachments

Whidbey Telephone Company
FCC Form 481 (July, 2023), Line 610
Statement Describing Ability to Function in Emergency Situations
Per Instructions for Completing FCC Form 481

SUMMARY

Whidbey Telephone Company (the “Company”) has a long-standing tradition of providing reliable voice telephony services. Since 1961, it has been and continues to be the Company’s policy to bury all local distribution cable and wire. It is also the Company’s policy and standard operating procedure to install, and use when necessary, back-up power systems at all network node installation sites. In regard to the Company’s overall network design, the Company’s practices are consistent with Rural Utility Service (“RUS”) telecommunications industry best practices.

The Company operates and maintains transport transmission equipment of only the highest grade. Equipment specifications, which are consistent with the RUS specifications, require both redundant power and redundant circuit interfaces. All of the Company’s transport and switching equipment is monitored 24x7x365(366) by trained staff located at the Company’s network operations center.

NETWORK REDUNDANCY

The Company is a provider of voice telephony services to two geographically non-contiguous exchanges: the South Whidbey Exchange and the Point Roberts Exchange. The area of the Company’s South Whidbey Exchange service area is more than 67 square miles, and the Company’s Point Roberts Exchange service area includes approximately 6 square miles.

The Company has two Central Offices, South Whidbey and Point Roberts. The switch equipment is manufactured and supported by the manufacturer. The Point Roberts CO is connected to the Company’s South Whidbey CO via multiple diversely routed redundant facilities and is configured to maintain service in the event of a facility failure to the South Whidbey CO. The primary paths consist of a diversely routed optical fiber ring utilizing Synchronous Optical Network (“SONET”) technology. In addition, the Company operates a microwave transmission path between South Whidbey and Point Roberts, providing multiple DS-3s capacity which offers additional back-up capability.

The Company’s voice telephony network has diversely routed paths to multiple points of interconnection with the networks of other voice telephony carriers. The Company also operates an Ethernet optical ring that connects its South Whidbey network with collocation facilities utilized by the Company outside its service area. The combination of the optical ring architecture and the DWDM capability of the Company’s core transport equipment provides a highly reliable circuit network for voice telephony communications with substantial opportunity for augmentation, if demand volumes were to so require.

The Company's presence in collocation facilities allows for multiple points of interconnection with both local and regional carriers, giving the Company the flexibility to route traffic to multiple carriers. During service impairment created by physical damage or extraordinarily high traffic, the Company has the capability to reroute voice telephony traffic through any of those collocation facilities.

The network architecture within the Company's South Whidbey service area is comprised of a host CO and a number of core aggregation points, or Optical Remote Sites ("ORSs"). All of the ORS locations are connected by a physically diverse optical DWDM ring, with any of those locations being capable of maintaining service in the event of a failure of that physical fiber cable.

Connectivity to the end-user customer base is accomplished by the placement of a number of Broadband Loop Carrier remote terminals ("BLCs") that subtend the ORSs or host CO. Each of these BLCs has optical diversity between the main CO and serving ORS. Some of the BLCs also have physical route diversity connected to the CO or ORS that they subtend.

The Company's employees are trained to operate, maintain and/or repair the Company's network facilities. Qualified Company personnel are available for call-out 24x7x365(366) in the event of a service outage. The Company maintains an inventory of critical spare electronic/optronic cards, as well as cabinets, cable and other related materials necessary for restoration on site at both South Whidbey and Point Roberts.

BACK-UP POWER

The Company maintains a power plant at each CO, ORS, BLC and microwave site with batteries capable of carrying the power load for several hours with the load typically transitioning more immediately to a generator back-up power generation. For BLC sites without local generators, portable generators are deployed as needed.

In addition, the Company has installed back-up power generation at its COs, as well as at each of its ORSs and microwave installations. These generators range in size from 5kw to 750kw. Each generator has a dedicated fuel tank onsite designed to carry the power load for multiple days. All of these sites are equipped with automatic transfer switches and have monitoring equipment that provides monitoring visibility with respect to loss of external commercial power and transfer switch status. Upon recognition of loss of the commercial power source, the relevant automatic transfer switch is designed to automatically start the back-up generator and transfer the selected power source. Alarm messages are automatically reported to key personnel, as well as to the Company's 24x7x365(366) network operations center.

The Company has in-house staff trained to perform all maintenance of the power plant and has contract services available for support. Power distribution equipment within the Company's COs is inspected from time to time by vendor representatives to ensure proper maintenance. It is the Company's policy that all power plant maintenance be recorded and stored for future reference.

FCC FORM 481 (JULY 2023), LINE 1010
Descriptive Document for Compliance of Pricing of
Fixed Voice Services with Required Relationship
To Applicable National Average Urban Rate for Voice
Service Benchmark, as required by 47 C.F.R. § 54.313 (a)(10)
Per Instructions for Completing FCC Form 481

Section 54.313 (a)(10) of the rules of the Federal Communications Commission (“FCC”) requires any recipient of high-cost support, such as Whidbey Telephone Company (“Company”), annually to certify that the pricing of the Company’s voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 22-1337, released December 16, 2022, in WC Docket No. 10-90 (“Public Notice”). That public notice includes the following statements, “Based on the survey results, the 2020 rate floor for voice services is \$36.73, [footnote omitted] and the reasonable comparability benchmark for voice services is \$59.62. [footnote omitted]...In addition, each ETC, including competitive ETCs providing fixed voice services, [footnote omitted] must certify in the FCC Form 481 filed no later than July 1, 2023, that the pricing for its basic residential voice services is no more than \$59.62. [footnote omitted]” [Italics added.]

It is the Company’s understanding that the above-mentioned comparability benchmark includes the recurring residential service rate, any applicable State subscriber Line charge rate, any applicable State universal service fund rate, any applicable minimum mandatory Extended Area Service rate, and any applicable Federal subscriber line charge rate.¹

¹ See Note 5 on the “Data Dictionary” tab of the [2016 URS Voice Data.xlsx] located from the FCC webpage having the following URL:

<https://www.fcc.gov/general/urban-rate-survey-data-resources>

Those components for the Company's basic residential voice telephone service as of June 1, 2022, are as follows:

Recurring residential service rate	\$ 22.00
State subscriber line charge rate	0.00
State universal service fund rate	0.00
Minimum mandatory EAS rate	0.00
Federal subscriber line charge	<u>6.50</u>
Total	\$ 28.50

The sum of the above-identified rates (\$28.50) is not more than the voice service comparability benchmark identified in the Public Notice (\$59.62).



*Local Voice Services – High Speed Internet
Long Distance – Security & Alarms – WhidbeyTV*

June 30, 2023

Ms. Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
455 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 10-90 and 14-58
Annual Report Due July 3, 2023, FCC Form 481 for
Rate of Return Carriers Receiving High-Cost Support
47 C.F.R. § 54.313(f)(1)(i) “Public Interest Certification”

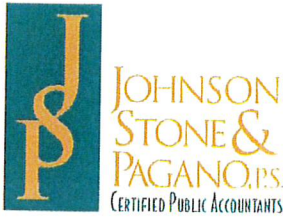
Dear Ms. Dortch:

In compliance with the filing requirements associated with FCC Form 481 due July 3, 2023, and in compliance with Section 53.313(f)(1)(i) of the Commission’s rules, Whidbey Telephone Company (Study Area 522452) hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 25 Mbps downstream/3 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable offerings in urban areas, and the requests for such service were met within a reasonable amount of time.

Sincerely,

WHIDBEY TELEPHONE COMPANY

By 
Gary Ricketts
Secretary /Treasurer



1501 Regents Blvd., Suite 100
Fircrest, WA 98466-6060

Independent Auditor's Report

Board of Directors
Whidbey Telephone Company and Subsidiaries
(A Wholly-owned Subsidiary of Abound Ventures, Inc.)
Langley, Washington

Opinion

We have audited the accompanying consolidated financial statements of Whidbey Telephone Company and Subsidiaries (a wholly-owned subsidiary of Abound Ventures, Inc.) (the "Company"), which comprise the consolidated balance sheets as of December 31, 2022 and 2021, and the related consolidated statements of income, stockholder's equity and cash flows for the years then ended, and the related notes to the consolidated financial statements.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Whidbey Telephone Company and Subsidiaries as of December 31, 2022 and 2021, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America ("U.S. GAAP").

Change in Accounting Principle

As discussed in Note 6 to the consolidated financial statements, the Company has adopted the provisions of Financial Accounting Standards Board Accounting Standards Codification Topic 842, *Leases*, as of January 1, 2022, using the modified retrospective approach with an adjustment at the beginning of the adoption period. Our opinion is not modified with respect to this matter.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America ("U.S. GAAS"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Consolidated Financial Statements section of our report. We are required to be independent of Whidbey Telephone Company and Subsidiaries and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with US GAAP, and for the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Whidbey Telephone Company and Subsidiaries' ability to continue as a going concern within one year after the date that the consolidated financial statements are available to be issued.

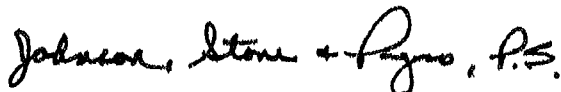
Auditor's Responsibilities for the Audit of the Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not absolute assurance, and, therefore, is not a guarantee that an audit conducted in accordance with U.S. GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements, including omissions, are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the consolidated financial statements.

In performing an audit in accordance with U.S. GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the consolidated financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of Whidbey Telephone Company and Subsidiaries' internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the consolidated financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about Whidbey Telephone Company and Subsidiaries' ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings and certain internal control related matters that we identified during the audit.



JOHNSON, STONE & PAGANO, P.S.

April 27, 2023

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
December 2020

1 of 4

<010> Study Area Code	522452
<015> Study Area Name	WHIDBEEY TEL CO.
<020> Program Year	2024
<030> Contact Name: Person USAC should contact with questions about this data	Moanalei McManus
<035> Contact Telephone Number: Number of the person identified in data line <030>	(360) 321-0068
<035> Ext:	
<039> Contact Email Address: Email of the person identified in data line <030>	lei.mcmanus@whidbeytel.com
Filing Type	High Cost (54.313) and Low Income (54.422)

**(400) Number of Complaints per 1,000 customers
Data Collection Form**

FCC Form 481
OMB Control
December 202

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEE TEL. CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<400> Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.

<410> Complaints per 1000 customers for fixed voice

<420> Complaints per 1000 customers for mobile voice

(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
OMB Control No. 31
December 2020

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360)321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations
Data Collection Form**

**FCC Form 481
OMB Control No. 3060
December 2020**

<010> Study Area Code	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2024
<030> Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039> Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com
<600> Certify compliance regarding ability to function in emergency situations	yes
<610> Descriptive document for Functionality in Emergency Situations	522452wa610.pdf

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<900> Does the filing entity offer tribal land services? (Y/N) N

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

<921>

- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481
OMB Control No. 3060
December 2020

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<1000>	Voice services rate comparability certification	yes
<1010>	Attach detailed description for voice services rate comparability compliance	522452wa1010.pdf <hr/> Name of Attached Document
<1020>	Broadband comparability certification	Yes - no more than the non-promotional price
<1030>	Attach detailed description for broadband comparability compliance	522452wa1030.pdf <hr/> Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-098
December 2020

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360)321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130>

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/C
December 2020

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEE TEL. CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360)321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP https://connect.whidbeytel.com/front_end/products

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.



(2005) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers.

FCC Form 481
OMB Control No
December 2020

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

Select the appropriate responses below to note compliance as a recipient of frozen High Cost support, High Cost support reductions set forth in 47 CFR 54.313(c),(d). The information reported on this form is accurate.

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbe

(3007) Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator?

(3007a) Name of Consultant	(3007b) Name of Consultant

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carrier financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this attached below is accurate.

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)} yes

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

Rate-of-Return Community Anchor Institutions

(3012A) Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year. no

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(f)(1)(ii)

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line

<010> Study Area Code	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2024
<030> Contact Name - Person USAC should contact regarding this data	Moana Lei McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039> Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

Financial Data Summary

(3027) Revenue

14679212

(3028) Operating Expenses

20090349

(3029) Net Income

502152

(3030) Telephone Plant In Service(TPIS)

111846332

(3031) Total Assets

36151080

(3032) Total Debt

9154525

(3033) Total Equity

20477228

(3034) Dividends

0

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbyte1.com

Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

<4001> Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

RBE Community Anchor Institutions

<4003a> Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year

<4003b> Please Provide Attachment: Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by FCC 14-98 (paragraph 79)

Name of Attached Document Listing Required Information

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<6010> Enter the total amount of Phase II Auction Support, if any, the carrier used for capital expenditures.

Phase II Auction and New York Funds Certification

<6011> Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient's penultimate year of support. (Yes/No)

Phase II Auction Community Anchor Institutions

<6012a> Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

<6012b> Please Provide Attachment Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by FCC 14-98 (paragraph 79). Name of Attached Document Listing Required Information

Phase II Auction FCC Form 470 Postings

<6013> For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

Phase II Auction Post-Final Deployment Milestone Performance Certification

<6014> Starting the first July 1st after meeting the final service milestone, certify (yes, no, or not applicable) that the Phase II-funded network that the Phase II auction recipient operated in the prior year meets the relevant performance requirements in § 54.309.

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<7010> **Price Cap Carrier and Fixed Competitive Eligible Telecommunications Carrier Transitional Support Requirement Certification** (Yes/No)

Please provide a response (either yes or no) to this certification request. Any price cap carrier or fixed competitive eligible telecommunications carrier that elects to continue receiving support pursuant to §54.312(d) or §54.307(e)(2)(iii) starting July 1, 2020 and annually thereafter on July 1 for each subsequent year they receive such support, that all such support the company received in the previous year was used to provide voice service throughout the high-cost and extremely high-cost census blocks where they continue to have the federal high-cost eligible telecommunications carrier obligation to provide voice service pursuant to §54.201(d) at rates that are reasonably comparable to comparable offerings in urban areas. This certification is required by 47 C.F.R. § 54.313(m).

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	MoanaLei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<8010> **Uniendo a Puerto Rico Stage 2 Fixed – Capital Expenditures**

Enter the total amount of Uniendo a Puerto Rico Stage 2 fixed support, if any, the carrier used for capital expenditures.

<8011> **Uniendo a Puerto Rico Stage 2 Fixed – Available Funds Certification**

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support.

<8012a> **Uniendo a Puerto Rico Stage 2 Fixed – Community Anchor Institutions**

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

Please Provide Attachment

<8012b> Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(e)(2)(i)(A), attach the document which contains the community anchor institution details.

Name of Attached Document Listing R Information

Uniendo a Puerto Rico Stage 2 Fixed – FCC Form 470 Postings

<8013> For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

<8014> **Uniendo a Puerto Rico Stage 2 Fixed – Post-Final Deployment Milestone Performance Certification**

Starting the first July 1 after meeting the final service milestone, certify (yes or no) that the Uniendo a Puerto Rico Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in § 54.309.

<8020> **Uniendo a Puerto Rico Stage 2 Fixed – Support Reimbursement Certification**

54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

<8030> **Uniendo a Puerto Rico Stage 2 Fixed – Disaster Preparedness and Response Documentation**

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360)321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<9010> **Connect USVI Stage 2 Fixed – Capital Expenditures**

Enter the total amount of Connect USVI Fund Stage 2 fixed support, if any, the carrier used for capital expenditures.

<9011> **Connect USVI Stage 2 Fixed – Available Funds Certification**

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support.

<9012a> **Connect USVI Stage 2 Fixed – Community Anchor Institutions**

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

Please Provide Attachment

<9012b> Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(e)(2)(i)(A), Attach the document which contains the community anchor institution details.

Name of Attached
Document Listing
Information

Connect USVI Stage 2 Fixed – FCC Form 470 Postings

<9013> For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

Connect USVI Stage 2 Fixed – Post-Final Deployment Milestone Performance Certification

<9014> Starting the first July 1 after meeting the final service milestone, certify (yes or no) that the Connect USVI Fund Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in § 54.309.

Connect USVI Stage 2 Fixed – Support Reimbursement Certification

<9020> 54.313(n): Recipients of Connect USVI Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund.

Connect USVI Stage 2 Fixed – Disaster Preparedness and Response Documentation

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	MoanaLei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360)321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

RDOF Capital Expenditures

- <10010> Starting the first July 1 after receiving support until the July 1 after the recipient's support term has ended, recipients of Rural Digital Opportunity Fund support must submit the total amount of support, if any, the recipient used for capital expenditures in the previous calendar year. This is required by 47 C.F.R. § 54.313(e)(2)(i)(B).

RDOF Available Funds Certification

- <10011> Please provide a response (either yes or no) to this certification request for any recipient of Rural Digital Opportunity Fund support that the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support, as required by required by 47 C.F.R. § 54.313(e)(2)(ii).

RDOF Community Anchor Institutions

- <10012a> Recipients of Rural Digital Opportunity Fund support must attach a list containing the number, names, and addresses of community anchor institutions to which the eligible telecommunications carrier newly began providing access to broadband service in the preceding calendar year. This filing is required by 47 C.F.R. § 54.313(e)(2)(i)(A).

Please Provide Attachment

- <10012b> Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(e)(2)(i)(A), Attach the document which contains the community anchor institution details. Name of Attached Document Listing Required Information

RDOF FCC Form 470 Postings

- <10013> For the filing due July 1st following full implementation of this requirement, please provide a response (either yes, no, or not applicable) to this certification request. Recipients of Rural Digital Opportunity Fund must respond affirmatively that they bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries (as described in § 54.501) located within any area in a census block where the carrier is receiving Rural Digital Opportunity Fund, and that such bids were at rates reasonable comparable to rates charged to eligible schools and libraries in urban areas for Instructions for Completing FCC Form 481 OMB Control No. 3060-0986 (High-Cost) OMB Control No. 3060-0819 (Low-Income) November 2020 Page 44 comparable offerings. This filing is required by 47 C.F.R. § 54.313(e)(2)(i)(C). This certification will not be required until the July 1st following the E-Rate program year that this obligation has been fully implemented. Modernizing the E-Rate Program for Schools and Libraries et al., WC Docket. Nos. 13-184, 10-90, 29 FCC Rcd 15538, 15566-67 para 72 (2014)

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEB TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

I certify under penalty of perjury that no universal service support has been or will be used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services produced or provided by any company designated by the Federal Communications Commission as posing a national security threat to the integrity of communications networks or the communications supply chain since the effective date of the designations.

yes

Please Provide Waiver Document
Allowable File Type (pdf only)

Name of Attached Document Listing Required
Information

I certify that no Federal subsidy made available through a program administered by the Commission that provides funds to be used for the capital expenditures necessary for the provision of advanced communications services has been or will be used to purchase, rent, lease, or otherwise obtain, any covered communications equipment or service, or maintain any covered communications equipment or service previously purchased, rented, leased, or otherwise obtained, as required by 47 C.F.R. § 54.10.

yes

Please Provide Waiver Document
Allowable File Type (pdf only)

Name of Attached Document Listing Required
Information

Answer yes or no (I am participating in the reimbursement program and the removal, replacement, and disposal term has not expired) if the reporting ETC does not use covered communications equipment or services published on the Covered List, as required by 47 C.F.R. Section 54.11

no

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 December 2020
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<010> Study Area Code	522452
<015> Study Area Name	WHIDBEY TEL CO.
<020> Program Year	2024
<030> Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035> Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039> Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	<input checked="" type="checkbox"/>
I understand that making willful false statements in any part of this report and/or in these certifications is punishable by fine or imprisonment pursuant to 47 U.S.C. Sections 416(c), 503(b)(1)(B), and 18 U.S.C. Section 1001.	<input checked="" type="checkbox"/>
Name of Reporting Carrier: WHIDBEY TEL CO.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 2023-06-30
Printed name of Authorized Officer: Gary Ricketts	
Title or position of Authorized Officer: Secretary and Treasurer	
Study Area Code of Reporting Carrier: 522452	Filing Due Date for this form: 2023-07-03
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

<010>	Study Area Code	522452
<015>	Study Area Name	WHIDBEY TEL CO.
<020>	Program Year	2024
<030>	Contact Name - Person USAC should contact regarding this data	Moanalei McManus
<035>	Contact Telephone Number - Number of person identified in data line <030>	(360) 321-0068
<039>	Contact Email Address - Email Address of person identified in data line <030>	lei.mcmanus@whidbeytel.com

<813> Upload Operating Company Data 522452wa800.csv

Name of Attached Document

Below is a preview of the CSV file attached for this section. To view all the data, please select "Full OMB Form with Attachments".

<a1>	<a2>	<a3>
Affiliates	SAC	Doing Business As Compan
2012 George T.F. Henny Trust	522452	Abound Ventures, Inc.
2012 George T.F. Henny Trust	522452	Whidbey Telephone Compa
2012 George T.F. Henny Trust	522452	Whidbey Telecom
2012 George T.F. Henny Trust	522452	Whidbey Telecom Interne
2012 Julia Henny DeMartini Trust	522452	Abound Ventures, Inc
2012 Julia Henny DeMartini Trust	522452	Whidbey Telephone Compa
2012 Julia Henny DeMartini Trust	522452	Whidbey Telecom
2012 Julia Henny DeMartini Trust	522452	Whidbey Telecom Interne
Ian P. Henny Irrevocable Trust	522452	Abound Ventures, Inc
Ian P. Henny Irrevocable Trust	522452	Whidbey Telephone Compa
Ian P. Henny Irrevocable Trust	522452	Whidbey Telecom
Ian P. Henny Irrevocable Trust	522452	Whidbey Telecom Interne
Western Long Distance, Inc.	522452	Western Long Distance
Western Long Distance, Inc.	522452	Whidbey Telecom Long Di
Western Long Distance, Inc.	522452	Point Roberts Long Dist
Western Long Distance, Inc.	522452	Hat Island Long Distanc
American Alarm Systems, Inc.	522452	Whidbey Telecom Securit
Hat Island Telephone Company	522452	Hat Island Telephone Co

(30059) Operating Report for Privately-Held Rate of Return Carriers
Balance Sheet - Data Collection Form

FCC Form 481
OMB Control No. 3060-0986

Page 1 of 3

July 2013

<010> Study Area Code		<010>	Whidbey Telephone Company	522452
<015> Program Year		<020>	Gary Ricketts	2024
<030> Contact Name - Person USAC should contact regarding this data		<035>	360-321-0951	
<035> Contact Telephone Number - Number of person identified in data line <030>		<039>	gary.ricketts@whidbeytel.com	
<039> Contact Telephone Email Address - Email Address of person identified in data line <030>				
<input type="checkbox"/> Files as reviewed single company <input type="checkbox"/> Filed as reviewed consolidated company <input type="checkbox"/> Filed as subsidiary of reviewed consolidated company		<input checked="" type="checkbox"/> Filed as audited single company <input type="checkbox"/> Filed as audited consolidated company <input type="checkbox"/> Filed as subsidiary of audited consolidated company		

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

Gary Ricketts
Signature
6/30/13
Date

PART A. BALANCE SHEET

ASSETS		BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY		BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS							
1.	Cash and Equivalents			25.	Accounts Payable		
2.	Cash-RUS Construction Fund			26.	Notes Payable		
3.	Affiliates:			27.	Advance Billings and Payments		
	a. Telecom, Accounts Receivable			28.	Customer Deposits		
	b. Other Accounts Receivable			29.	Current Mat. L/T Debt		
	c. Notes Receivable			30.	Current Mat. L/T Debt-Rur. Dev.		
4.	Non-Affiliates:			31.	Current Mat.-Capital Leases		
	a. Telecom, Accounts Receivable			32.	Income Taxes Accrued		
	b. Other Accounts Receivable			33.	Other Taxes Accrued		
	c. Notes Receivable			34.	Other Current Liabilities		
5.	Interest and Dividends Receivable			35.	Total Current Liabilities (25 thru 34)		
6.	Material-Regulated			LONG-TERM DEBT			
7.	Material-Nonregulated			36.	Funded Debt-RUS Notes		
8.	Prepayments			37.	Funded Debt-RTB Notes		
9.	Other Current Assets			38.	Funded Debt-FFB Notes		
10.	Total Current Assets (1 thru 9)			39.	Funded Debt-Other		
NONCURRENT ASSETS							
11.	Investment in Affiliated Companies			40.	Funded Debt-Rural Develop. Loan		
	a. Rural Development			41.	Premium (Discount) on L/T Debt		
	b. Nonrural Development			42.	Reacquired Debt		
12.	Other Investments			43.	Obligations Under Capital Lease		
	a. Rural Development			44.	Adv. From Affiliated Companies		
	b. Nonrural Development			45.	Other Long-Term Debt		
13.	Nonregulated Investments			46.	Total Long-Term Debt (36 thru 45)		
14.	Other Noncurrent Assets			OTHER LIAB. & DEF. CREDITS			
15.	Deferred Charges			47.	Other Long-Term Liabilities		
16.	Jurisdictional Differences			48.	Other Deferred Credits		
17.	Total Noncurrent Assets (11 thru 16)			49.	Other Jurisdictional Differences		
				50.	Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY AND EQUIPMENT							
18.	Telecom, Plant-in-Service			51.	Cap. Stock Outstanding & Subscribed		
19.	Property Held for Future Use			52.	Additional Paid-in-Capital		
20.	Plant Under Construction			53.	Treasury Stock		
21.	Plant Adj., Nomop. Plant & Goodwill			54.	Membership and Cap. Certificates		
22.	Less Accumulated Depreciation			55.	Other Capital		
23.	Net Plant (18 thru 21 less 22)			56.	Patronage Capital Credits		
				57.	Retained Earnings or Margins		
24.	TOTAL ASSETS (10+17+23)			58.	Total Equity (51 thru 57)		
				59.	TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

<010> Study Area Code	<010>
<015> Study Area Name	<015> <u>Whidbey Telephone Company</u>
<020> Program Year	<020>
<030> Contact Name - Person USAC should contact regarding this data	<030> <u>Gary Ricketts</u>
<035> Contact Telephone Number - Number of person identified in data line <030>	<035> <u>360-321-0051</u>
<039> Contact Telephone Email Address - Email Address of person identified in data line <030>	<039> <u>gary.ricketts@whidbeytel.com</u>

ITEM	PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS	
	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins end-of-Period (31+33+34)-(35+36+37+38)		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio ((14+20-10-11)/7)		
46. Operating Accrual Ratio ((14+20+26)/7)		
47. TIER ((31+26)/26)		
48. DSCR ((31+26+10+11)/44)		

<010> Study Area Code
 <015> Study Area Name
 <020> Program Year
 <030> Contact Name - Person USAC should contact regarding this data
 <035> Contact Telephone Number - Number of person identified in data line <030>
 <099> Contact Telephone Email Address - Email address of person identified in data line <030>

<010> 522452
 <015> Whidbey Telephone Company
 <020> 2024
 <030> Gary Ricketts
 <035> 360-321-0051
 <099> gary.ricketts@whidbeytel.com

PART C. STATEMENTS OF CASH FLOWS

1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)			
CASH FLOWS FROM OPERATING ACTIVITIES				
2.	Net Income			
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities				
3.	Add: Depreciation			
4.	Add: Amortization			
5.	Other (Explain)	Noncash Operating Income		
Changes in Operating Assets and Liabilities				
6.	Decrease/(Increase) in Accounts Receivable			
7.	Decrease/(Increase) in Materials and Inventory			
8.	Decrease/(Increase) in Prepayments and Deferred Charges			
9.	Decrease/(Increase) in Other Current Assets			
10.	Increase/(Decrease) in Accounts Payable			
11.	Increase/(Decrease) in Advance Billings & Payments			
12.	Increase/(Decrease) in Other Current Liabilities			
13.	Net Cash Provided/(Used) by Operations			
CASH FLOWS FROM FINANCING ACTIVITIES				
14.	Decrease/(Increase) in Notes Receivable			
15.	Increase/(Decrease) in Notes Payable			
16.	Increase/(Decrease) in Customer Deposits			
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)			
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits			
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Memberships and Capital Certificates & Other Capital			
20.	Less: Payment of Dividends			
21.	Less: Patronage Capital Credits Retired			
22.	Other (Explain)			
23.	Net Cash Provided/(Used) by Financing Activities			
CASH FLOWS FROM INVESTING ACTIVITIES				
24.	Net Capital Expenditures (Property, Plant & Equipment)			
25.	Other Long Term Investments			
26.	Other Noncurrent Assets & Jurisdictional Differences			
27.	Other (Explain)	Loan/Advances to Affiliates		
28.	Net Cash Provided/(Used) by Investing Activities			
29.	Net Increase/(Decrease) in Cash			
30.	Ending Cash			