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UTIL. AND TRANSP.
COMMISSION

August 30, 2005

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Dear Ms. Washburn:

Re: Docket No. UT-053030 and WAC 480-120-399 -
Eligible Telecommunications Carrier Certification

In accordance with the Order Requiring Filing By Eligible Telecommunications Carriers Receiving Federal High Cost Support, dated July 25, 2001, entered by the Washington Utilities and Transportation Commission in Docket No. UT-013047 ("Certification Order") and with WAC 480-120-399(2), enclosed herewith for filing on behalf of Whidbey Telephone Company ("Company") is a Certification of Use of Federal High-Cost Universal Service Support Funds. The Company hereby respectfully requests that, based upon the enclosed certification and pursuant to 47 C.F.R. §§ 54.314(a), (c) and (d), the Commission make and file, not later than October 1, 2005, with the Administrator of the Federal High-Cost Universal Service Fund and the Federal Communications Commission the certification described in 47 C.F.R. §§ 54.314(a) and (c), and that the Commission include the Company in the list of carriers to which such certification applies.

In accordance with WAC 480-120-399(2)(d), the figure set forth in item (4) of the enclosed certification is the sum of the amounts received by the Company for those Federal universal service support components commonly referred to as "high cost loop support," "long-term support," "local switching support" and "interstate common line support."¹ It is the Company's understanding that amounts associated with some of those components and included in that reported figure may not yet be final.


Lastly, the memorandum, dated May 13, 2005, from Bob Shirley of the Commission Staff to Eligible Telecommunications Carriers ("ETCs") requested that each ETC provide the Commission Staff with copies of the advertising conducted by each ETC in 2004 or 2005 to meet its obligations under Federal law with respect to the advertising of services supported by Federal High-Cost Universal Service Support Funds and the Federal Lifeline and Link-Up programs. Accordingly, enclosed with this letter, as examples, are copies of the following materials:

¹ During calendar year 2004, the Company was not a recipient of what is commonly referred to as "interstate access support."

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- (a) Advertisement published in the December 18, 2004, edition of the South Whidbey Record;
- (b) Public Notice published in the December 2004 edition of the All Point Bulletin;
- (c) Information regarding the Washington Telephone Assistance Program and the Federal Lifeline and Link-Up programs published in the Company's current telephone directory (November 2004-2005); and
- (d) Brochure entitled "Lifeline, Link Up and WTAP" available to the public in the Company's customer service centers;

If additional copies of either this letter or the enclosed certification are required, please let us know.

Sincerely,

Bruce A. Russell
Chief Financial Officer

Enclosure

**CERTIFICATION OF USE OF FEDERAL
HIGH-COST UNIVERSAL SERVICE SUPPORT FUNDS**

I, Bruce Russell, being of lawful age, hereby certify, under penalty of perjury, that I am Chief Financial Officer of Whidbey Telephone Company ("Company"), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief. I hereby certify to the Washington Utilities and Transportation Commission ("Commission"), for use by the Commission in providing the Commission certification required by 47 C.F.R. § 54.314, as follows:

(1) that, during the calendar year 2004, the Company provided the supported services required by 47 U.S.C. § 214(e) and described in the Commission Order granting the Company Eligible Telecommunications Carrier ("ETC") status;

(2) that, during the 2004 calendar year, the Company advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e) and as described in the Commission Order granting the Company ETC status;

(3) that funds received by the Company from the federal high-cost universal service support fund will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended;

(4) that the amount of federal high-cost universal service fund support received by the Company through July 31, 2005 for calendar year 2004 was \$2,981,226; and

(5) that the loop counts on which federal high-cost universal service support received by the Company for the calendar year 2004 was based were as follows: for the first quarter of calendar year 2004, 14,346; for the second

[continued on page 2]

quarter of calendar year 2004, 14,346; for the third quarter of calendar year 2004, 14,346; and for the fourth quarter of calendar year 2004, 14,346.

EXECUTED this 30th day of August, 2005, at Langley, Washington.

Whidbey Telephone Company

By: *Bruce Russell*

Its: Chief Financial Officer

Advertisement

WHIDBEY TELECOM

has been the local telephone company serving the South Whidbey area since approximately 1908. During the intervening years, we have worked hard to build a telephone system that would provide high quality telecommunications services to the communities we serve. We have done this, notwithstanding the higher costs of serving rural areas in the State of Washington and when few, if any, other telephone companies were interested in serving our communities.

We have served and intend to continue to serve both residential and business customers in our service area with high quality telecommunications services at attractive and affordable rates.

In addition to our basic telephone services, we offer throughout our service area advanced telecommunications services, including Internet access, high speed data services, special calling features, voice mail, and caller ID.

The basic services offered by Whidbey Telecom are comprised of several components. At a minimum, these include:

<u>Service Offered</u>	<u>Monthly Charge*</u>	
	Residence	Business
Single-party, voice grade access to the public switched-network, including an unlimited amount of local usage (basic grade of service)	\$9.40**/***	\$16.50**
<u>Charge*</u>		
Dual tone multi-frequency signaling or its functional equivalent (i.e., tone dialing)	No additional charge.	
Access to emergency 911 services	There is no additional charge by Whidbey Telecom to end user customers for the ability to access emergency 911 services.****	
Access to operator services	There is no additional charge by Whidbey Telecom to end user customers for the ability to call the operator. However, the call may involve a charge depending on the service requested and the rates of the company whose operator handles the call.	
Access to interexchange (long distance) services	There is no additional charge by Whidbey Telecom to end user customers for the ability to place and receive calls through long distance networks of interexchange carriers that offer service through our network. However, the call may involve a charge from the interexchange (long distance) carrier depending on the call.	
Access to directory assistance	There is no additional charge by Whidbey Telecom to end user customers for the ability to call Directory Assistance. However, the call may involve a Directory Assistance charge, the amount of which depends on the area called and the rates of the company whose Directory Assistance Service is accessed.	
Toll limitation service for qualifying low-income consumers	There is no additional charge by Whidbey Telecom to qualifying low-income consumers for toll blocking service. Qualifying low-income consumers are generally those participating in the Lifeline program.	

The Company participates in the federal Lifeline and Link-Up programs, as well as the Washington Telephone Assistance Program ("WTAP"). Under these programs, the Company offers to qualifying low-income consumers a discount off of the monthly rate for basic residential exchange service and a discount off of the non-recurring charge to install a basic residential exchange service line. For service on non-tribal reservation lands, the Company's current discounted monthly rate for Lifeline residential service is \$8.00** (plus any applicable taxes), while the installation charge for such service may be discounted under the Link-Up program and WTAP by up to \$44.00**. Additional discounts may apply for service to qualifying low-income consumers on tribal reservation lands.

- * The charges set forth are subject to change, and in some instances are subject to change without notice. Certain non-recurring charges may also apply to installation or change of service.
- ** Applicable Federal, State, County and municipal taxes and surcharges, including a federally-mandated end-user surcharge per line, are in addition to these amounts.
- *** Discounts off of this rate are available to qualifying low-income consumers (see above).
- **** State and County taxes apply per line to fund the provision of this capability.

These services are available to all qualifying subscribers of Whidbey Telecom. The charges for these services are reflected each month on our normal telephone bill, and may be accompanied by charges for other services provided by Whidbey Telecom. The services listed above are those that Whidbey Telecom offers and must advertise in order to be eligible for federal funds that are used to help offset the high cost of serving rural areas and bringing affordable telephone service to residences and businesses in rural areas. Other services are available by contacting Whidbey Telecom's business office at (360) 321-1122.

Whidbey Telecom

PUBLIC NOTICE

WHIDBEY TELECOM has been the local telephone company serving the Point Roberts area since approximately 1988. During the intervening years, we have worked hard to build a telephone system that would provide high quality telecommunications services to the communities we serve. We have done this, notwithstanding the higher costs of serving rural areas in the State of Washington and when few, if any, other telephone companies were interested in serving our communities.

We have served and intend to continue to serve both residential and business customers in our service area with high quality telecommunications services at attractive and affordable rates.

In addition to our basic telephone services, we offer throughout our service area advanced telecommunications services, including Internet access, high speed data services, special calling features, voice mail, and caller ID.

The basic services offered by Whidbey Telecom are comprised of several components. At a minimum, these include:

Service Offered

Single-party, voice grade access to the public switched network, including an unlimited amount of local usage (basic grade of service)

<u>Monthly Charge*</u>	
Residence	Business
\$9.40 **/***	\$16.50**

Dual tone multi-frequency signaling or its functional equivalent (i.e., tone dialing)

Charge.*
No additional charge.

Access to emergency 911 services

There is no additional charge by Whidbey Telecom to end user customers for the ability to access emergency 911 services. ****

Access to operator services

There is no additional charge by Whidbey Telecom to end user customers for the ability to call the operator. However, the call may involve a charge depending on the service requested and the rates of the company whose operator handles the call.

Access to interexchange (long distance) services

There is no additional charge by Whidbey Telecom to end user customers for the ability to place and receive calls through long distance networks of Interexchange carriers that offer service through our network. However, the call may involve a charge from the interexchange (long distance) carrier depending on the call.

Access to directory assistance

There is no additional charge by Whidbey Telecom to end user customers for the ability to call Directory Assistance. However, the call may involve a Directory Assistance charge, the amount of which depends on the area called and the rates of the company whose directory assistance service is accessed.

Toll limitation service for qualifying low-income consumers

There is no additional charge by Whidbey Telecom to qualifying low-income consumers for toll-blocking service. Qualifying low-income customers are generally those participating in the Lifeline program.

The Company participates in the federal Lifeline and Link-Up programs, as well as the Washington Telephone Assistance Program ("WTAP"). Under these programs, the Company offers to qualifying low-income consumers a discount off of the monthly rate for basic residential exchange service and a discount off of the non-recurring charge to install a basic residential exchange service line. For service on non-tribal reservation lands, the Company's current discounted monthly rate for Lifeline residential service is \$8.00*** (plus any applicable taxes), while the installation charge for such service may be discounted under the Link-Up program and WTAP by up to \$44.00.*** Additional discounts may apply for service to qualifying low income consumers on tribal reservation lands.

* The charges set forth are subject to change, and in some instances are subject to change without notice. Certain non-recurring charges may also apply to installation or change of service.

** Applicable Federal, State, County and Municipal taxes and surcharges, including a federally-mandated end user surcharge per line, are in addition to these amounts.

*** Discounts off this rate are available to qualifying low-income consumers (see above).

**** State and County taxes apply per line to fund the provision of this capability.

These services are available to all qualifying subscribers of Whidbey Telecom. The charges for these services are reflected each month on our normal telephone bill, and may be accompanied by charges for other services, provided by Whidbey Telecom. The services listed above are those that Whidbey Telecom offers and must advertise in order to be eligible for federal support funds that are used to help offset the high cost of serving rural areas and bringing affordable telephone service to residences and businesses in rural areas. Other services are available by contacting Whidbey Telecom's business office (360) 945-1122.

Whidbey Telecom



Local Telephone Services



*Lifeline, Link Up
& WTAP*

For more information about the
WTAP Program please contact:

**Washington Telephone
Assistance Program
(WTAP)**

1-888-700-8880 (voice)

For more information about
Lifeline/Link Up please contact:

**Federal Communications
Commission**

1-888-CALL-FCC (voice)

1-888-Tell-FCC (TTY)

www.fc.gov.cgb



Office Locations

14888 SR 525
Langley, WA 98260
360 321 1122

1957 Johnson Road
Point Roberts, WA 98281
360 945 1122

www.whidbey.com



Lifeline, Link Up, & WTAP

Lifeline and Link-Up Programs

Whidbey Telecom and Hat Island Telephone Company participate in the federal Lifeline and Link-Up programs, as well as the Washington Telephone Assistance Program ("WTAP"). Under these programs, we offer to qualifying low-income consumers a discount off of the monthly rate for basic residential exchange service and a discount off of the non-recurring charge to install a basic residential exchange service line.

For service on non-tribal reservation lands, our current discount monthly rate for Lifeline residential service is \$8.00 (plus any applicable taxes). The installation charge for such service may be discounted under the Link-Up program and WTAP by up to \$44.00. Additional discounts may apply for service to qualifying low-income consumers on tribal reservation lands. These charges are subject to change, and in some instances are subject to change without notice. Certain non-recurring charges may also apply to installation or change of service.

WTAP discounts only apply to residential, local telephone service. You will have to pay the full monthly charge for special features such as Call Forwarding and Call Waiting as well as full price for long distance calls.

How Do I Get WTAP Service

To enroll in the Washington Telephone Assistance Program, contact your local Department of Social and Health Services (DSHS) office to confirm your eligibility. DSHS will supply you with a client identification number. Then contact us with your DSHS client identification number so that we can verify your eligibility with DSHS. Benefits begin on the date your eligibility is verified with WTAP. The billing name (subscriber of record) must match the name of the person who qualifies the household for the program.

www.whidbey.com

INFORMATION & TIPS FOR TELEPHONE SERVICE CUSTOMERS



INFORMATION

Ordering Phone Service

One of our Customer Service team members will be happy to assist you in getting your telephone service started. (You'll find contact information on page 2.) Our goal is to make it quick and easy for you to sign up for service.

Information Required

Here is some of the information we'll need when you're ready to order local telephone service:

- Complete street address, including apartment, suite or unit number if applicable
- Your employment status
- Previous telephone service information
- Social Security number(s)
- Credit and banking information
- How you would like your name to appear in the directory (if you want a listed number)

Also, if physical cable installation is required on your property to establish service, and if no previous easement has been granted to us to enable this work, we'll need a legal description of your property in order to secure an easement.

Deposits

Most customers are not asked to pay a deposit. Requirements for a deposit are based on your payment history with previous telecommunications service(s) and are made in accordance with WAC (Washington Administrative Code) rules. Information about these and other WAC rules can be found on the Internet at <http://search.leg.wa.gov/pub/textsearch/ViewRoot.asp?Action=Html&Item=5&X=724180838&p=1>.

If you do need to pay a deposit, we want to return it to you as soon as you establish good credit with us. We'll review your account after you have had service with us for twelve months, and if you

have been making your payments when due, we'll return your deposit - with interest. (Interest on deposits is calculated according to WAC 480-120-128.)

Lifeline and Link-Up Programs

Whidbey Telecom Local Telephone and Hat Island Telephone participate in the federal Lifeline and Link-Up programs, as well as the Washington Telephone Assistance Program ("WTAP"). Under these programs, we offer to qualifying low-income consumers a discount off of the monthly rate for basic residential exchange service and a discount off of the non-recurring charge to install a basic residential exchange service line.

For service on non-tribal reservation lands, our current discount monthly rate for Lifeline residential service is \$8.00 (plus any applicable taxes). The installation charge for such service may be discounted under the Link-Up program and WTAP by up to \$44.00. Additional discounts may apply for service to qualifying low-income consumers on tribal reservation lands. These charges are subject to change, and in some instances are subject to change without notice. Certain non-recurring charges may also apply to installation or change of service.

For more information on programs to help you afford phone service, contact the Federal Communications Commission at 1-888-CALL-FCC (voice) or 1-888-Tell-FCC (TTY), or visit their website at www.fcc.gov.

Disconnecting Phone Service

Please contact a member of our Customer Service team in advance of the date that you want your telephone service to be disconnected. If you wish, charges can be stopped the same business day that you call, except any charges for equipment you lease from us which has not been returned to us.