Law Office of Richard A. Finnigan

Richard A. Finnigan (360) 956-7001 rickfinn@localaccess.com 2112 Black Lake Blvd. SW Olympia, Washington 98512 Fax (360) 587-3852

Kathy McCrary, Paralegal (360) 753-7012 kathym@localaccess.com

January 26, 2012

VIA E-FILING

Mr. David Danner, Executive Director and Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

> Re: St. John Co-operative Telephone and Telegraph Company -Seventh Revision of Sheet No. 21 Cancelling Sixth Revision of Sheet No. 21

DII OU III

Dear Mr. Danner:

Attached you will find the above-referenced tariff sheet. The purpose of this filing is to increase the rate from \$9.50 to \$10.00 effective March 1, 2012, and then to \$14.00 on January 1, 2013.

The purpose of this filing is to conform to FCC Order No. 11-161. In the course of that Order, the Federal Communications Commission adopted new rules concerning the universal service program. The effect of those rules is to penalize any company whose residential rate is less than \$10.00 on July 1, 2012, or \$14.00 on July 1, 2013. The penalty is a dollar-for-dollar reduction in universal service support for the Company's operations.

In Docket UT-110858, the Company filed financial information concerning its operations. In discussion with Commission Staff, this filing will be based upon the information that the Company has filed in Docket UT-110858.

As a result of using the financial information filed by the Company in Docket UT-110858, the Company is requesting a waiver of the filing requirements of WAC 480-07-160.

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The Notice to customers is attached. The Notice has been sent to the customers with the February billing.

Thank you for your attention to this matter?

Sincerely

RICHARD A. FINNIGAN

RAF/km Enclosures

cc: Greg Morasch (via e-mail)