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June 8, 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: Advice Letter - Washington Exchange Carrier Association - WN U-1
- Tenth Revision of Sheet No. 1 Canceling Ninth Revision of Sheet
No. 1; Fourth Revision of Sheet No. 2 Canceling Third Revision of
Sheet No. 2; Tenth Revision of Sheet No. 3 Canceling Ninth
Revision of Sheet No. 3; Seventeenth Revision of Sheet No. 9
Canceling Sixteenth Revision of Sheet No. 9; Ninth Revision of
Sheet No. 9.1 Canceling Eighth Revision of Sheet No. 9.1; Second
Revision of Sheet No. 10 Canceling First Revision of Sheet No. 10;
Original Sheet No. 11; Original Sheet No. 12; Original Sheet No.
13; Original Sheet No. 14; Original Sheet No. 15; Original Sheet
No. 16; Original Sheet No. 17; Original Sheet No. 18; Original
Sheet No. 19; Original Sheet No. 20; Original Sheet No. 21;
Original Sheet No. 22; Original Sheet No. 23; Original Sheet No.
24; Original Sheet No. 25; Original Sheet No. 26; Original Sheet
No. 27; Original Sheet No. 28 - **LESS THAN STATUTORY NOTICE
REQUESTED**

Dear Mr. Danner:

Enclosed are the above-referenced tariff sheets. This filing is made by the Washington Exchange Carrier Association (WECA) on behalf of its member companies. The purpose of this filing is to (1) file reductions in access rates as mandated by the FCC in its Order FCC No. 11-161 and as set forth in 47 C.F.R. § 51.909(b) and (2) to ask the Commission to confirm that the universal service access element charged by WECA member companies and other carriers is to remain in effect as a universal service element and is not a terminating access rate that is to be transitioned.

As set out in 47 C.F.R. § 51.909(b)(2)(i) - (iii), certain calculations are to be undertaken to determine the Step 1 Access Revenue Reduction, as that term is used by the Federal Communications Commission. The methodology utilized by WECA on behalf of its member companies is as follows: WECA made a decision to move the Interim Universal Service carrier common line terminating access rate in WECA Tariff WN U-1 to zero. Then, WECA calculated the terminating access minutes for the Fiscal Year beginning October 1, 2010, and ending September 30, 2011, and provided those minutes to its member companies for utilization in the calculation of the required terminating rate transitions. Based on these minutes of use, each company calculated the revenues produced using its intrastate terminating access rates in effect on December 29, 2011, as well as the revenues produced using its interstate terminating access rates in effect on December 29, 2011. The difference between these two amounts is the required amount that the company must transition out of its intrastate terminating access rates by July 1, 2013. One half of this amount must be transitioned effective July 3, 2012.

Each company then compared its required 2012 transition amount with the amount of its billed revenues that will be eliminated as a result of moving the WECA Interim Universal Service rate to \$0.00000 effective July 3, 2012, again utilizing the terminating access minutes for the Fiscal Year beginning October 1, 2010, and ending September 30, 2011.

If the billed revenues eliminated as a result of moving the WECA Interim Universal Service rate to \$0.00000 exceeds the required 2012 transition amount, the company has calculated a separate stand-alone, company-specific terminating CCL rate which is included in this tariff filing to recover the amount that would otherwise be over-transitioned. If the billed revenues eliminated as a result of moving the WECA Interim Universal Service rate to \$0.00000 are less than the required 2012 transition amount, the company has reduced its other terminating intrastate rates to complete the required transition.

The companies for which an individual company intrastate terminating CCL rate filing is included in this filing are as follows: Beaver Creek Telephone Company,¹ Computers 5*, Inc., d/b/a Localtel, Ellensburg Telephone Company d/b/a FairPoint Communications, Hat Island Telephone Company, Hood Canal Telephone Co., Inc. d/b/a Hood Canal Communications, Inland Telephone

¹ Beaver Creek Telephone Company is now part of Skyline Telecom, Inc. However, the service area is separate from Skyline's legacy service area.

Company, d/b/a Inland Networks, Kalama Telephone Company, Lewis River Telephone Company, Inc. d/b/a TDS Telecom, Mashell Telecom, Inc., d/b/a Rainier Connect, Pend Oreille Telephone Company, d/b/a RTI Pend Oreille Telecom, Pioneer Telephone Company, Skyline Telecom, Inc., St. John Co-operative Telephone and Telegraph Company, Tenino Telephone Company, The Toledo Telephone Co., Inc., Western Wahkiakum County Telephone Company, d/b/a Wahkiakum West, Westgate Communications, LLC, d/b/a WeavTel, Whidbey Telephone Company, d/b/a Whidbey Telecom, and YCOM Networks, Inc. d/b/a FairPoint Communications. The rate sheets for those companies are Second Revised Sheet No. 10 through Original Sheet Nos. 11-28. Work papers setting forth the calculation of the individual company's revenue reduction required to be made pursuant to 47 U.S.C. § 51.909(b), as well as supporting calculations for the rate contained in each company's individual tariff rate sheet are provided as a separate confidential Exhibit 1. The public, redacted version will be filed on June 11, 2012.

Under the direction of the FCC as set out in FCC Order No. 11-161, state commissions are given the task of reviewing intrastate filings to be sure carriers comply with the FCC's framework and rules.² For example, as stated in paragraph 803 of the FCC's Order, ". . . states will oversee changes to intrastate access tariffs to ensure that modifications to intrastate tariffs are consistent with the framework and rules we adopt today." A second statement on this point is found in paragraph 813, ". . . to ensure compliance with the framework and to ensure carriers do not take actions that would enable a windfall and/or double recovery, state commissions should monitor compliance with our rate transition; review how carriers reduce rates to ensure consistency with the uniform framework; and guard against attempts to raise capped intercarrier compensation rates, as well as unanticipated types of gamesmanship." Similar language is found in footnotes 1374 and 1381.

As a result of this delegated responsibility as well as the Commission's own existing statutory authority over intrastate access rates, WECA respectfully requests that the Commission issue an order finding that the filings made by WECA are, in the Commission's opinion, "consistent with" the FCC's adopted framework and rules.

In addition to the foregoing, WECA respectfully requests that the Commission confirm that the traditional universal service access rate element

² It is noted that one part of the FCC's framework and rules is that for the 2012 filing, companies may use any rate design they find useful. 47 C.F.R. § 51.909(b)(iv).

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is a universal service program adopted by the Commission and that the terminating rate for the traditional universal service rate element of \$0.00152 should continue to be assessed and the funds remitted to WECA in its role as administrator of the traditional USF pool.

The universal service program created through the traditional universal service rate element was initially adopted in Docket U-85-23. It was extended when the Washington Carrier Access Plan was adopted in the Ninth Supplemental Order in Docket No. UT-971140 (June 28, 2000). The dollars produced from that program support operations in high cost rural areas in the State of Washington. If this money does not continue to be collected and remitted, WECA's member companies serving rural Washington will see a shortfall in revenues of over three million dollars per year. WECA respectfully requests that the Commission issue an order confirming that carriers continue to have the responsibility of collecting and remitting these funds.

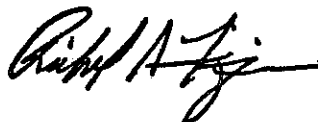
Finally, this advice letter requests LSN treatment. Due to the complexities in collecting the data necessary to make this filing, this filing was not able to be made before June 1, 2012. Under the FCC's Order, the modification in intrastate access rates is to be effective July 3, 2012. Therefore WECA requests that a less than statutory notice effective date of July 3, 2012, be approved.

The interexchange carriers that have provided WECA with current address information have been provided a copy of this filing.

The undersigned has authority to file tariff sheets on behalf of WECA.

Thank you for your attention to this filing.

Sincerely,



RICHARD A. FINNIGAN

RAF/km
Enclosures

cc: WECA Board Members (via e-mail)