

**BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of

Petition of Computer 5, Inc. d/b/a LocalTel Communications and d/b/a SkyFi Wireless Internet for Designation as an Eligible Telecommunications Carrier to Receive Connect America Fund Phase II Auction (Auction 903) Support for Voice and Broadband Services

Docket No. UT-180763

PETITION OF COMPUTER 5, INC. D/B/A LOCALTEL COMMUNICATIONS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO RECEIVE CONNECT AMERICA FUND PHASE II AUCTION (AUCTION 903) SUPPORT FOR VOICE AND BROADBAND SERVICES AND REQUEST FOR EXPEDITED CONSIDERATION

**PETITION OF COMPUTER 5, INC. D/B/A LOCALTEL COMMUNICATIONS
FOR CONDITIONAL DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER TO RECEIVE CONNECT AMERICA FUND PHASE II AUCTION
(AUCTION 903) SUPPORT FOR VOICE AND BROADBAND SERVICES AND
REQUEST FOR EXPEDITED CONSIDERATION**

Computer 5, Inc. d/b/a LocalTel Communications and d/b/a SkyFi Wireless Internet (“LocalTel” or the “Company”) respectfully submits this Petition for designation as an Eligible Telecommunications Carrier (“ETC”) to the Washington Utilities and Transportation Commission (“Commission”) pursuant to 47 U.S.C. § 214(e) of the Communications Act of 1934, as amended (the “Act”), Part 54, Subpart C of the rules of the Federal Communications Commission (“FCC”), and WAC § 480-123-030 through 040. LocalTel seeks designation throughout Adams, Chelan, Douglas, Grant and Lincoln counties (the “Designated Service Area”), for the purpose of receiving federal support for deploying voice and broadband in high-cost areas from the FCC's Connect America Fund Phase II Auction (Auction 903) (the “CAF II Auction”). In the Public Notice issued upon the close of the CAF II Auction on August 28, 2018

(hereinafter the “*Auction Results Notice*”), the FCC identified LocalTel as a winning bidder.¹

However, LocalTel’s receipt of the support is conditioned upon LocalTel obtaining designation as an ETC in the 63 Census Block Groups pertinent to its bid by February 25, 2019.²

Sections 214(e)(2) and 254 of Title 47 of the United States Code expressly authorize the Commission to designate a company that meets the requirements of 47 U.S.C. § 214(e)(1) – such as LocalTel – as an ETC. Moreover, Washington State law requires that the Commission “will approve a petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.” As demonstrated in this Petition, LocalTel meets all state and federal requirements for ETC designation, and, as shown by the description herein of LocalTel's planned voice and broadband deployment projects, designating LocalTel as an ETC in the proposed area would advance the goals of universal service and is in the public interest.

In support of this Petition, LocalTel states as follows:

I. BACKGROUND

LocalTel is a Washington corporation headquartered in East Wenatchee, Washington. LocalTel has been registered with the Washington Secretary of State since 1982, UBI Number 600-456-956. LocalTel is a facilities-based CLEC. LocalTel was classified as a competitive telecommunications carrier by the Commission on November 15, 1999 in docket UT-991575,

¹ *Connect America Fund, et al.*, AU Docket No. 17-182, WC Docket No. 10-90, Public Notice, DA 18-887, __ FCC Rcd __ (released August 28, 2018) (“*Auction Results Notice*”), Attachment A, at 3; *see also* https://auctiondata.fcc.gov/public/projects/auction903/reports/all_assigned_census_blocks (listing winning bidders).

² *Auction Results Notice* at 4, n. 11 (“By February 25, 2019, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683.”).

and has provided voice and Internet service in Central Washington since 2001.³ LocalTel provides broadband via fiber-to-the-premises (FTTP), and has successfully deployed fixed wireless, last mile solutions under its ‘SkyFi Wireless Internet’ brand to provide broadband and VoIP services to unserved and underserved parts of Central Washington since 2012, at prices comparable to or below urban rates. Currently, LocalTel serves about 4,500 customers through its own privately-built consumer broadband SkyFi fixed wireless network. LocalTel has worked to improve its network to deliver broadband speeds, and currently has expanded its footprint to five counties (Grant, Douglas, Chelan, Adams and Okanogan).⁴ LocalTel also deploys consumer broadband over publicly built fiber networks to an additional 20,000 customers across 5 counties in Washington. Altogether, LocalTel currently has over 25,000 residential and business customers served over a variety of technology platforms including fiber, copper, and the largest fixed wireless network in Central Washington. In providing customers with the voice and broadband connectivity, LocalTel employs about 150 people in Washington State.

LocalTel's address and telephone number are set forth below:

Attn: John Seabeck, Vice President
LocalTel Communications
341 Grant Road
East Wenatchee, WA 98802
(509) 888-8888

LocalTel's counsel in this matter is set forth below:

Alan Galloway
Davis Wright Tremaine LLP
1300 SW Fifth Ave, Suite 2400
Portland, OR 97201
(503) 778-5219
alangalloway@dwt.com

³ LocalTel has interconnection agreements with Qwest Corporation, CenturyTel of Washington, Inc., CenturyTel of InterIsland, Inc., CenturyTel of Cowiche, Inc. and GTE Northwest Incorporated (now Frontier Communications Northwest, Inc.).

⁴ LocalTel is not currently seeking ETC designation in Okanogan County.

II. LOCALTEL'S PROPOSED PARTICIPATION IN THE FCC'S CONNECT AMERICA FUND PHASE II AUCTION

A. Background on the CAF II Auction

On January 31, 2018, the FCC issued an *Order on Reconsideration* concerning its Connect America Fund initiative, which enabled the Commission to move forward with the Connect America Fund Phase II auction (Auction 903), in which service providers competed to receive up to \$1.98 billion to offer voice and broadband service in unserved high-cost areas.⁵ The *Order on Reconsideration* followed a series of orders establishing the details of the CAF II Auction.⁶ Under this program the FCC will disburse up to \$198 million annually for providers—including competitive providers such as competitive local exchange carriers, cable operators, fixed wireless ISPs or alternative providers such as electric utilities and governmental entities—to deploy broadband networks in high-cost, unserved price cap areas.

B. LocalTel's Selection as a Winning Bidder

The FCC's August 28, 2018 *Auction Results Notice* announced that LocalTel was among the winners of the recently-concluded CAF II Auction.⁷ Specifically, the FCC designated LocalTel as the winning bidder in 63 Census Block Groups across Adams, Chelan, Douglas, Grant and Lincoln counties – an area that includes 787 individual Census Blocks encompassing 1910 customer locations.⁸ Those 63 Census Block Groups are listed by county in Exhibit A, attached hereto. In order for LocalTel to receive the CAF II support that it has been awarded, it

⁵ *Connect America Fund, et al.*, Order on Reconsideration, 33 FCC Rcd 1380, 1381 (released Jan. 31, 2018), ¶ 1.

⁶ *See, e.g., Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949 (released May 26, 2016) (“*Phase II Auction Order*”); *Connect America Fund, et al.*, Report and Order and Order on Reconsideration, 32 FCC Rcd 1624 (released Mar. 2, 2017) (“*Phase II Auction FNPRM Order*”); *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (released Nov. 18, 2011) (“*USF/ICC Transformation Order*”).

⁷ *Auction Results Notice*, Attachment A, at 3.

⁸ *Id.*; https://auctiondata.fcc.gov/public/projects/auction903/reports/all_assigned_census_blocks (listing winning bidders and corresponding Census areas).

must provide a long-form application to the FCC showing that it has been designated as an ETC in the areas where it was the winning bidder. The FCC’s deadline for submitting proof of the ETC designation is February 25, 2019.⁹

C. Details of LocalTel’s Planned Broadband and Voice Deployment and Services

The services that LocalTel proposed in its winning bid consisted of (1) a fixed wireless network to provide consumers with a baseline of 25 MB Broadband Internet Access, with options for commercial class services in the 300MB-500MB range, and (2) provision of Carrier Grade TDM and VoIP voice services over the public switched telephone network (PSTN), connected to LocalTel’s Class 5 switch with local 911 connections throughout its network footprint, which currently includes Douglas, Chelan, and Grant counties, and will expand to allow LocalTel to serve the Census Block Groups identified in Exhibit A.

LocalTel’s proposed deployment will provide fixed wireless 5 GHz 802.11ac connections at consumer locations to 5 GHz access points on towers across the service area. The wireless customer connections can provide a maximum speed of 100 MB. The access points will connect to Ethernet switches connected to high-speed, 5 GHz, 11 GHz, 18 GHz and 24 GHz radios that will backhaul the traffic at up to 1GB speeds to the LocalTel data center and network operations center (NOC), with traffic going from there to the Internet using 10 GB fiber virtual local area networks (VLANs) to LocalTel’s peered connections and upstream Tier 1 Internet providers. For broadband services, each customer’s radio wireless WAN port will be configured with a

⁹ *Auction Results Notice* at 4, n. 11 (“By February 25, 2019, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683.”); ; *see also* 47 CFR § 54.315(b)(5); *Connect America Fund, et al.*, Public Notice, 33 FCC Rcd 1428, 1519 (released Feb. 1, 2018) (“*Phase II Auction Scheduling Notice*”) at ¶ 310 (“Within 180 days after the release of the Auction 903 closing public notice, a long-form applicant is required to submit appropriate documentation of its high-cost ETC designation in all the areas for which it will receive support.”); *Phase II Auction Order*, 31 FCC Rcd at 6001, ¶ 146 (“First, we require winning bidders in the Phase II competitive bidding process to submit proof of their ETC designation within 180 days of the public notice announcing them as winning bidders”).

public, static IPV4 address. These radios with routers will route to the Internet across LocalTel's fixed wireless network back to the NOC, where LocalTel will route them to the Internet through its multiple upstream Internet feeds utilizing Border Gateway Protocol (BGP). The advanced technologies that LocalTel will deploy, including high-speed backhaul and connections to the broader Internet, will facilitate the provision to LocalTel customers of high-speed, low-latency connections with high usage allowances (over 150 GB's per month per household). The deployment of these technologies will meet all the service requirements established by the FCC in connection with the CAF II Auction.

With respect to voice services, LocalTel will provide Carrier Grade TDM and VoIP circuit-switched voice services from its Class 5 switch, which is connected to the PSTN, local 911 centers, multiple public service answering points (PSAPs), multiple incumbent local exchange carriers (ILECs) and provides all carrier-class features. LocalTel will utilize the G711 Codec, which provides a full 64k bandwidth for voice and fax services. The technologies that LocalTel will utilize will allow for average latency to the home under 20 ms, with enough bandwidth and low enough latency to achieve a 4.0 MOS score, providing customers with high-quality voice service.

D. Need for Expedited ETC Designation

Although applicants need not be designated eligible telecommunications carriers ("ETCs") at the time of application, winning bidders must, within 180 days of being announced as winning bidders, certify they are eligible telecommunications carriers in any areas for which they seek support and submit relevant documentation.¹⁰

¹⁰ See 47 CFR §§ 54.310(e)(1), 54.315(b)(5); *see also In re Connect Am. Fund*, Public Notice, 33 FCC Rcd 1428, 1473 (released Feb. 1, 2018), ¶ 121 (noting decision that "an applicant need not be an ETC as of the initial shortform application filing deadline for Auction 903, but that it must obtain a high-cost ETC designation for the areas covered by its winning bids within 180 days after being announced as a winning bidder"); *Auction Results Notice*, ¶ 34

Again, LocalTel has already been identified as a winner of the CAF II Auction.¹¹

Because the timeframe for winners to obtain ETC designation is short and the consequences of failure to do so are serious, LocalTel respectfully requests that the Commission consider its Petition on an expedited basis, and to grant LocalTel ETC designation in the Designated Service Area without delay.

III. LOCALTEL MEETS THE STATE AND FEDERAL STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION

LocalTel meets all applicable requirements for ETC designation as established under federal law and rules of the FCC, including 47 U.S.C. § 214(e) and 47 C.F.R. § 54.201, *et seq.*, and the WAC 480-123-030.

E. LocalTel Meets All State Requirements For ETC Designation

WAC 480-123-040 states that the Commission "will approve a petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest." As explained below, LocalTel meets all the requirements of WAC 480-123-030 as follows:

- a) In satisfaction of WAC 480-123-030(a), LocalTel identifies the area for which designation is sought as the State of Washington as described in **Exhibit A**.
- b) In satisfaction of WAC 480-123-030(1)(b), LocalTel will offer the services supported by federal universal service support mechanisms using its own facilities or a combination of its own facilities and resale of another carrier's services.

("[B]y February 25, 2019, the long-form applicant must have obtained a high-cost ETC designation(s) from all the relevant states or the Commission that covers its winning bid areas and must submit the required documentation and a certification letter(s) from an officer.")

¹¹ *Auction Results Notice*, Attachment A, at 3; *see also*

https://auctiondata.fcc.gov/public/projects/auction903/reports/all_assigned_census_blocks (listing winning bidders).

- c) In satisfaction of WAC 480-123-030(1)(c), LocalTel describes herein how each supported service will be provided, including a thorough description of its deployment plans and Lifeline service plans, which are discussed in greater detail in below.
- d) In satisfaction of WAC 480-123-030(1)(d), LocalTel directs the Commission to Section II.C, above, which describes the voice and broadband deployments that LocalTel plans to carry out using the funds from the Auction, and which constitutes a substantive investment plan of how support will be spent to benefit customers.
- e) In satisfaction of WAC 480-123-030(1)(e), LocalTel states that it will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers not receiving discounts.
- f) LocalTel is not subject to WAC 480-123-030(1)(f);¹² which pertains only to providers of commercial mobile radio service (“CMRS”) with cell sites.
- g) In satisfaction of WAC 480-123-030(1)(g), LocalTel is able to remain functional in emergencies, as described herein (*see also* WAC 480-120-411(1)), including by maintaining at least five hours back up battery power and backup generators at each Class 5 switch site in Washington State;¹³

¹² WAC 480-123-030(1)(f) asks “wireless petitioners” to provide a “a map in .shp format of proposed service areas (exchanges) with *existing and planned locations of cell sites* and shading to indicate *where the carrier provides and plans to provide commercial mobile radio service signals.*” Although LocalTel is a wireless Internet service provider (“WISP”), the references to “cell sites” and “commercial mobile radio service signals” make it clear that WAC 480-123-030(1)(f) as applicable only to CMRS providers that have cell sites. Because LocalTel is not a CMRS provider, and has no cell sites, the requirement is inapplicable to LocalTel. Should the Commission determine that it is applicable, LocalTel requests a waiver of WAC 480-123-030(1)(f), on the grounds that the wireless services it provides are fixed rather than mobile, and that it has no cell sites.

¹³ The remaining provisions of WAC 480-123-030(g) appear to be directed at Commercial Mobile Radio Service providers, and do not apply to LocalTel, which has no cell sites in Washington State.

- h) In satisfaction of WAC 480-123-030(1)(h), LocalTel commits to abide by all applicable consumer protection and service quality standards of chapter 480-120.
- i) LocalTel provides herein, as **Exhibit B**, the supporting Declaration of John Seabeck certifying the information in this Petition (WAC 480-123-030(2));
- j) LocalTel will fully comply with the annual certification requirements adopted by the Commission in WAC 480-123-060, 480-123-070, and 480-123-080, including requesting certification by July 1st each year, certifying that federal high-cost support is used as intended, and reporting the following information on an annual basis with respect to the Designated Service Area:

- i. Use of federal funds and benefits to customers;
- ii. Local service outages;
- iii. The number and details of unfulfilled service requests;
- iv. Complaints per one thousand connections;
- v. Certification of compliance with applicable service quality standards and consumer protection rules;
- vi. Certification of ability to function in emergency situations;
- vii. Advertising certification, including advertisement on any Indian reservations within the Designated Service Area.

As expressly allowed by WAC 480-123-070, LocalTel reserves the right to refer the Commission to fulfill the reporting requirements of that section by referring the Commission to reports already filed with the FCC or another federal agency.

F. LocalTel Meets All Federal Requirements For ETC Designation.

LocalTel also meets all criteria for designation as an ETC under federal law, including those in 47 U.S.C. § 214(e) and 47 C.F.R. § 54.201, *et seq.* In particular:

- 1) LocalTel is a common carrier (see 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d));
- 2) As required by 47 C.F.R. § 54.101(b), LocalTel will offer the Voice Telephony services supported by federal universal service support mechanisms as defined in 47 C.F.R. § 54.101(a) using its own facilities or a combination of its own facilities and resale of another carrier's services¹⁴ (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)), including the following services:
 - a. Voice grade access to the public switched network or its functional equivalent;
 - b. Minutes of use for local service at no additional charge to end users;
 - c. Access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.
 - d. Toll limitation services to qualifying low-income consumers as provided in subpart E of 47 C.F.R. Part 54;
- 3) As described in greater detail below, LocalTel will make available Lifeline service to qualifying low-income consumers (47 C.F.R. § 54.405(a))
- 4) LocalTel will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service (47 C.F.R. § 54.405(b));
- 5) LocalTel will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)), namely through a combination of media, such as

advertising via television, radio, newspapers, magazines or other print advertisements, outdoor advertising, direct marketing, or the Internet;

- 6) LocalTel will provide the supported services throughout the designated service area (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d));
- 7) LocalTel certifies that, in accordance with 47 U.S.C. § 254(e), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

G. LocalTel Will Provide Lifeline Service to Qualifying Low-Income Consumers

Upon designation as an ETC, LocalTel will make a discounted service offering that meets all applicable Lifeline requirements available to qualified low-income consumers. LocalTel plans to offer the Lifeline discount (currently \$9.25) on all of its service plans that include voice service.

LocalTel will advertise the availability of services supported by federal universal service mechanisms, including its Lifeline offerings. LocalTel's advertisements for Lifeline services will be reasonably calculated to reach qualified low-income consumers not receiving discounts. Both the content of LocalTel's Lifeline advertisements and the modes of advertising selected will be designed to reach qualifying subscribers that would benefit from Lifeline service.

IV. DESIGNATION OF LOCALTEL AS AN ETC IS IN THE PUBLIC INTEREST

Pursuant to WAC 480-123-040, the Commission “will approve a petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.” 47 U.S.C. § 214(e)(2), requires that designation be “in the public interest” only where multiple ETCs are designated for areas served by a rural telephone

company, and otherwise requires only that designation meet the lower threshold of being "consistent with the public interest." Section 214(e)(2) states:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

Granting LocalTel's petition will serve the public interest through the deployment of broadband and voice services to unserved and underserved high-cost areas in Washington State, supporting investment in facilities and equipment, and expanding the number of competitive providers serving rural areas in Washington. Designation of LocalTel as an ETC will permit the company to receive Auction funds, directly advancing the goals of the FCC's Connect America Fund and the Auction. The resulting deployments will bring expanded voice and broadband connectivity to rural areas in Washington, helping to ensure that residents of Washington are not left on the wrong side of the digital divide, and expanding economic opportunity for communities that will benefit from increased connectivity. In the FCC's recent *Order on Reconsideration* concerning the Connect America Fund program, the FCC described holding the Auction as a step to "the goal of closing the digital divide for all Americans, including those in rural areas of our country."¹⁵ FCC Chairman Ajit Pai's statement on the *Order on Reconsideration* described the Auction as a "\$2 billion program to deliver fixed broadband to

¹⁵ *Connect America Fund, et al.*, Order on Reconsideration, 33 FCC Rcd 1380 (released Jan. 31, 2018) ¶ 1.

rural America,” which is exactly what LocalTel plans to deliver.¹⁶ By selecting LocalTel as a recipient of Auction funds, the FCC has recognized that the voice and broadband services that LocalTel proposes to deploy with the funds would advance the goal of the Auction, and thereby advance the goals of universal service. That is, the FCC has itself determined that LocalTel’s proposal has merit and would advance the public interest that the Connect America Fund and the Auction have been designed to serve. Because designating LocalTel as an ETC will allow it to use the CAF II funds as intended to expand voice and broadband service in Washington, designation of LocalTel as an ETC is plainly in the public interest.

V. CONCLUSION

For the reasons stated herein, LocalTel respectfully requests that the Commission expeditiously: (i) designate LocalTel as an ETC in the Designated Service Area, (ii) send the appropriate notice of the Order designating LocalTel as an ETC for the Designated Service Area to the FCC and the Universal Service Administrative Company; and (iii) order such other relief as may be appropriate.

Dated this 10th day of September, 2018.

Respectfully submitted,

Computer 5, Inc. d/b/a LocalTel Communications
and SkyFi Wireless Internet

By: s/ Alan Galloway
Alan Galloway, OSB #083290
Davis Wright Tremaine LLP
1300 SW Fifth Ave, Suite 2400
Portland, OR 97201
(503) 778-5219
alangalloway@dwt.com

Representing LocalTel Communications

¹⁶ *Connect America Fund, et al.*, Order on Reconsideration, Statement of Chairman Ajit Pai. 2018 FCC LEXIS 280, *4

LIST OF EXHIBITS

Exhibit A – Designated Service Area

Exhibit B – Declaration of John Seabeck

EXHIBIT A

DESIGNATED SERVICE AREA

LocalTel requests that the Designated Service Area consist of Adams, Chelan, Douglas, Grant, and Lincoln Counties.

The five counties comprising the Designated Service Area include the Census Block Groups listed below in which LocalTel was identified as a winning bidder by the FCC.

Census Block Groups in which the FCC Selected LocalTel as a Winning Bidder

| Item | Census ID | County | State |
|----------------|--------------|---------|-------|
| WA-001-9501001 | 530019501001 | Adams | WA |
| WA-001-9501002 | 530019501002 | Adams | WA |
| WA-001-9501003 | 530019501003 | Adams | WA |
| WA-001-9502001 | 530019502001 | Adams | WA |
| WA-001-9502002 | 530019502002 | Adams | WA |
| WA-001-9502003 | 530019502003 | Adams | WA |
| WA-001-9503002 | 530019503002 | Adams | WA |
| WA-001-9503003 | 530019503003 | Adams | WA |
| WA-001-9503004 | 530019503004 | Adams | WA |
| WA-001-9504001 | 530019504001 | Adams | WA |
| WA-001-9505001 | 530019505001 | Adams | WA |
| WA-001-9505002 | 530019505002 | Adams | WA |
| WA-007-9601002 | 530079601002 | Chelan | WA |
| WA-007-9603002 | 530079603002 | Chelan | WA |
| WA-007-9603006 | 530079603006 | Chelan | WA |
| WA-007-9603007 | 530079603007 | Chelan | WA |
| WA-007-9604002 | 530079604002 | Chelan | WA |
| WA-007-9605002 | 530079605002 | Chelan | WA |
| WA-007-9605003 | 530079605003 | Chelan | WA |
| WA-007-9605004 | 530079605004 | Chelan | WA |
| WA-007-9605006 | 530079605006 | Chelan | WA |
| WA-007-9612001 | 530079612001 | Chelan | WA |
| WA-017-9501001 | 530179501001 | Douglas | WA |
| WA-017-9501002 | 530179501002 | Douglas | WA |
| WA-017-9501005 | 530179501005 | Douglas | WA |
| WA-017-9501006 | 530179501006 | Douglas | WA |
| WA-017-9502001 | 530179502001 | Douglas | WA |
| WA-017-9503005 | 530179503005 | Douglas | WA |
| WA-025-0101001 | 530250101001 | Grant | WA |
| WA-025-0102001 | 530250102001 | Grant | WA |
| WA-025-0102002 | 530250102002 | Grant | WA |

| | | | |
|----------------|--------------|---------|----|
| WA-025-0103001 | 530250103001 | Grant | WA |
| WA-025-0103002 | 530250103002 | Grant | WA |
| WA-025-0104001 | 530250104001 | Grant | WA |
| WA-025-0104002 | 530250104002 | Grant | WA |
| WA-025-0104003 | 530250104003 | Grant | WA |
| WA-025-0105001 | 530250105001 | Grant | WA |
| WA-025-0105002 | 530250105002 | Grant | WA |
| WA-025-0107001 | 530250107001 | Grant | WA |
| WA-025-0107002 | 530250107002 | Grant | WA |
| WA-025-0108001 | 530250108001 | Grant | WA |
| WA-025-0109011 | 530250109011 | Grant | WA |
| WA-025-0109023 | 530250109023 | Grant | WA |
| WA-025-0111002 | 530250111002 | Grant | WA |
| WA-025-0111003 | 530250111003 | Grant | WA |
| WA-025-0111004 | 530250111004 | Grant | WA |
| WA-025-0112001 | 530250112001 | Grant | WA |
| WA-025-0112002 | 530250112002 | Grant | WA |
| WA-025-0113001 | 530250113001 | Grant | WA |
| WA-025-0114011 | 530250114011 | Grant | WA |
| WA-025-0114021 | 530250114021 | Grant | WA |
| WA-025-0114022 | 530250114022 | Grant | WA |
| WA-025-0114023 | 530250114023 | Grant | WA |
| WA-025-0114024 | 530250114024 | Grant | WA |
| WA-043-9601001 | 530439601001 | Lincoln | WA |
| WA-043-9602001 | 530439602001 | Lincoln | WA |
| WA-043-9602002 | 530439602002 | Lincoln | WA |
| WA-043-9602003 | 530439602003 | Lincoln | WA |
| WA-043-9603001 | 530439603001 | Lincoln | WA |
| WA-043-9603002 | 530439603002 | Lincoln | WA |
| WA-043-9604001 | 530439604001 | Lincoln | WA |
| WA-043-9604002 | 530439604002 | Lincoln | WA |
| WA-043-9604003 | 530439604003 | Lincoln | WA |

EXHIBIT B

DECLARATION OF JOHN SEABECK

**BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of

Petition of Computer 5, Inc. d/b/a LocalTel Communications and d/b/a SkyFi Wireless Internet for Designation as an Eligible Telecommunications Carrier to Receive Connect America Fund Phase II Auction (Auction 903) Support for Voice and Broadband Services

Docket No. UT- _____

DECLARATION OF JOHN SEABECK

I, the undersigned, John Sebeck, do hereby declare under penalty of perjury as follows:

1. I am Vice President of Computer 5, Inc. d/b/a LocalTel Communications and d/b/a SkyFi Wireless Internet ("LocalTel"), a Washington corporation with its headquarters at 341 Grant Road, East Wenatchee, WA 98802
2. This Declaration is submitted in support of the Petition of Computer 5, Inc. d/b/a LocalTel Communications and SkyFi Wireless Internet for Designation as an Eligible Telecommunications Carrier to Receive Connect America Fund Phase II Auction (Auction 903) Support for Voice and Broadband Services (the "Petition").
3. I have reviewed the Petition and that the facts stated therein are true and correct to the best of my knowledge.
4. The federal universal service fund support received by LocalTel, including all support from the Connect America Fund Phase II Auction (Auction 903) will be used only for the purposes for which the support is intended.
5. To the best of my knowledge, LocalTel, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) of the Company are not subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

9/4/18
(Date and Place)

[Handwritten Signature]
(Signature)