BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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In the Matter of State Certification of Support as Required by 47 C.F.R. § 54.314

DOCKET NO. UT-20 _____

ANNUAL ETC CERTIFICATION AND REPORT OF UNITED STATES CELLULAR CORPORATION

Pursuant to WAC 480-123-060, *et seq.*, United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 ("USCC"), seeks recertification as an ETC in the State of Washington based on the following:

1. USCC was designated as an eligible telecommunications carrier ("ETC") by the Washington Utilities and Transportation Commission in Docket No. UT-970345 on December 23, 1997, as supplemented December 30, 1999 and January 27, 2000, May 14, 2008, and September 26, 2013.

2. During the calendar year 2019, USCC provided the services required by 47 U.S.C. § 214(e) consistent with the Commission Orders in Docket No. UT-970345. As certified in **Exhibit A**, funds USCC receives from the federal high-cost universal service support fund were and will be used only for the provision, maintenance and upgrading of the facilities and services for which the support was intended.

3. **Exhibit B** attached is intended to satisfy the requirements of WAC 480-123-070 (1) "Report on use of federal funds and benefits to customers". The 4G LTE investments and expenses provide substantial benefits to consumers in the form of advanced wireless technology to significantly increase both the speed and capacity of mobile networks in USCC's Washington ETC area. 4G LTE – the next generation of cellular technology –

allows customers to surf the web, send and receive pictures, download music and watch videos at speeds up to 10 times faster than 3G. – *Confidential*

4. **Exhibit** C details reportable service outages in 2019.

5. Exhibit D attached is intended to satisfy the requirements of WAC 480-123070 (3) "Report on failure to provide service". - Confidential

6. Exhibit E attached is intended to satisfy the requirements of WAC 480-123070 (4) "Report on complaints per one thousand handsets or lines". - *Confidential*

7. **Exhibit F** certifies USCC is in compliance with the CTIA Consumer Code for Wireless Carriers. This statement is made in response to WAC 480-123-070 (5) "Certification of compliance with applicable service quality standards".

8. In 2019 USCC had a reasonable amount of backup power (fixed, portable or other backup power source) for its cell sites, and backup power for its switches is as prescribed in WAC 480-120-411(3). The certification of compliance in **Exhibit G** is made in response to WAC 480-123-070 (6) "Certification of ability to function in emergency situations".

9. During the calendar year 2019, USCC advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e), and the Commission Orders in Docket No. UT-970345. **Exhibit H** certifies that USCC publicized the availability of supported services, including Lifeline Services and tribal outreach. Samples of advertising are attached as **Exhibit I.** This paragraph is in response to WAC 480-123-070 (7) "Advertising certification, including advertisement on Indian reservations".

10. **Exhibit J,** attached, details USCC's intended investment and expenditures within its ETC boundaries in the State of Washington for the time period October 1, 2020

through September 30, 2021. The planned expenditures will benefit customers by ensuring continued and ongoing mobile voice and data services in high cost areas that otherwise might not be served or served as well without the federal support. This information is provided as a response to WAC 480-123-080. – *Confidential*

Respectfully submitted this 26th day of June, 2020.

LUKAS, LAFURIA, GUTIERREZ & SACHS, LLP

David A. LaFuria Steven M. Chernoff 8300 Greensboro Drive, Suite 1200 Tysons, VA 22102 Direct: (703) 584-8670 <u>schernoff@fcclaw.com</u>

Attorneys for United States Cellular Corporation

Exhibit A – U.S. Cellular - WAC 480-123-070

DECLARATION CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, John C. Gockley, am Senior Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 ("U.S. Cellular"). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission that pursuant to 47 C.F. R. Sec. 54.7, and for purposes of the certification required under 47 C.F.R. Sec. 54.314, that all federal high-cost support provided to U.S. Cellular within Washington state was used in the preceding calendar year [2019] and will be used in the coming calendar year [2021] only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with the principles of universal service set forth in 47 U.S.C. 254.

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

Executed at Chicago, Illinois this <u>19</u> day of <u>June</u>, 2020.

UNITED STATES CELLULAR CORPORATION By: John C. Gockley

Its: Senior Vice President – Legal and Regulatory Affairs (Title)

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U.S. Cellular® Calendar Year				Exhibit B					
Report on Use	of Federal Funds and Benefits to -070 (1)(a) - (b)	Customers							
1110 400 120	010(1)(4) (5)								
A. Support fu	inds received in Calendar Year	2019							
(Per USAC We	ebsite)								
B. Use of Sup	port funds received in Calenda	r Year 2019							
						Support \$\$ Spent			
					Support \$\$ Spent in 2019 Capital	in 2019 Operating	Total 2019		
Location Code		Location City	Zip Code	In Service Date	Expenditures	Expenditures	Spending	Project Status	Purpose of Site
New Cell Sites	s & Repeaters Placed in Service	During Calendar Year							
		1							
Capital and O	perating Expenses for Sites in	the Washington ETC Ar	ea						

				REDAU	<u> </u>					_
Location Code	Location Name	Location City	Zip Code	In Service Date	Support \$\$ Spent in 2019 Capital Expenditures	Support \$\$ Spent in 2019 Operating Expenditures	Total 2019 Spending	Project Status	Purpose of Site	
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Washington 2019 Outage Report

WA USC ETC 2020 CERT Exhibit C

NC	RS Reference number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Service Outage Description - Wireline (including Cable) Voip (Yes/No)	Service Outage Description - Wireline (including Cable) non-Voip (Yes/No)	Service Outage Description -	Service Outage Description - voice Over LTE (Yes/No)	Description -	Service Outage Description - Other (enter up to 50 Characters of text)	Did this Outage Affect Multiple Study Areas (Yes/No)	Service Outage Resolution	Preventative Procedures	Areas impacted
																-
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																-

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xhibit D .S. Cellular			
.S. Cellular /AC 480-123-070 (3)			
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eport on Failure to Provid	e Service		
<u></u>	71.0.1		Build a
<u>City</u>	Zip Code	Address	Resolution

Exhibit E U.S. Cellular State of Washington WAC 480-123-070 (4)

Report on Complaints per One Thousand Handsets or Lines Calendar Year 2019

During calendar year 2019 U.S. Cellular was the named company in five (5) consumer complaints filed with the Federal Communications Commission. Of these complaints, three (3) were related to (1) to

During calendar year 2019 U.S. Cellular was the named company in one (1) consumer complaint filed with the Washington Attorney General. This complaint was related to a billing issue.

The 2019 year-end customer count in Washington State was

FCC Complaints per 1,000 customers in calendar year 2019 equaled

Complaints to the Washington Attorney General per 1,000 customers in calendar year 2019 equaled

Exhibit F - U.S. CELLULAR - WAC 480-123-070 (5)

DECLARATION CERTIFYING COMPLIANCE WITH APPLICABLE SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES

I, John C. Gockley, am Senior Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 ("U.S. Cellular"). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission, pursuant to the requirements of WAC 480-123-070(5), that it has substantially met the applicable service quality standards and consumer protection rules pursuant to WAC 480-123-030(1)(h) by its commitment to comply with the CTIA Consumer Code for Wireless Service in effect as of January 1, 2017.

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

Executed at Chicago, Illinois this 17 day of June 2020.

UNITED STATES CELLULAR/CORPORATION By: John C. Gockley

Its: Senior Vice President, Legal and Regulatory Affairs (Title)

Exhibit G - U.S. CELLULAR - WAC 480-123-070 (6)

DECLARATION CERTIFYING ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

I, John C. Gockley, am Senior Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 ("U.S. Cellular"). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission, pursuant to the requirements of WAC 480-123-070(6), that it had, and has, the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030(1)(g).

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

Executed at Chicago, Illinois this 17 day of June, 2020.

UNITED STATES CELLULAR CORPORATION By: John C. Gockley

Its: Senior Vice President – Legal and Regulatory Affairs (Title)

Exhibit H – U.S. CELLULAR - WAC 480-123-070 (7)

DECLARATION CERTIFYING LIFELINE ADVERTISING

I, John C. Gockley, am Senior Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 ("U.S. Cellular"). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible for the preparation of data, I hereby state as follows:

U.S. Cellular hereby certifies to the Washington Utilities and Transportation Commission, pursuant to the requirements of WAC 480-123-070(7), that it has "publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations" within U.S. Cellular's designated service area. U.S. Cellular's efforts include:

> During the calendar year 2019, U.S. Cellular advertised the availability of supported services and the charges for them as required by 47 U.S.C. Sec. 214(e), and the Commission Orders in Docket No. UT-970345. Outreach activities included newspaper advertising, informational postings at <u>www.uscellular.com</u>, and advertising materials located in retail locations throughout Washington. Select retail locations in the Yakima, Washington area are equipped to allow potential Native American Lifeline customers sign up for service. All potential Lifeline customers in Washington can have their questions answered and sign up for service via a dedicated Lifeline telephone number.

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

Executed at Chicago, Illinois this 17 day of 100, 2020.

UNITED STATES CELLULAR CORPORATION By: ohn C. Gockley

Its: Senior Vice President – Legal and Regulatory Affairs (Title) 8410 W. Bryn Mawr Ave Chicago, IL 60631 Tel: 773 399 8900 Fax: 773 399 7558 www.uscellular.com



GET THE NETWORK

Our Lifeline Calling Plans bring discounted wireless service to participants in certain government-assisted programs — all on the network that works in the Middle of Anywhere.

Visit uscellular.com/lifeline or call 1-800-447-1339 for more information.

Plans starting at \$3425 before Lifeline discount.



Things we want you to know: Lifeline is a federal government benefit program and only qualified persons may participate. Lifeline service may not be transferred to any other individual. Applicants must present documentation of household income or participation in qualifying programs. Lifeline is only available for one phone line per household, whether landine or wireless. The Lifeline Calling Plan/Lifeline discounts are only available to residents in states where U.S. Cellular® is an Eligible Telecommunications Carrier (ETC). Eligibility to receive Lifeline discounts will be verified annually. Lifeline Calling Plans support all of the federal universal services provided for in 47CFR Sec. 54-101. Additional terms and conditions apply. See store or uscellular.com for details. @2017 U.S. Cellular

U.S. Cellular® October 1, 2020 to September 30, 2021 Annual Plan for Universal Service Support WAC 480-123-080 EXHIBIT J