

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

**PETITION OF INLAND TELEPHONE COMPANY
TO RECEIVE SUPPORT FROM THE STATE UNIVERSAL
COMMUNICATIONS SERVICES PROGRAM**

**INLAND TELEPHONE COMPANY - SAC 522423
DUE AUGUST 1, 2023**

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6 **BEFORE THE WASHINGTON**
7 **UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

9 PETITION OF INLAND TELEPHONE
10 COMPANY TO RECEIVE SUPPORT
11 FROM THE UNIVERSAL SERVICE
12 COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

13
14 COMES NOW INLAND TELEPHONE COMPANY (*d/b/a* Inland Networks)(the
15 "Company") and, pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC"),
16 including, but not limited to, WAC 480-123-110, hereby petitions the Washington Utilities and
17 Transportation Commission (the "Commission") to receive support from the Universal Service
18 Communications Program (the "Program") for the Program year 2024.

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20 **I. Demonstration of Eligibility under WAC 480-123-100**

- 21 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
22 480-120-021 that serves fewer than forty thousand access lines within the state.
- 23 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined
24 in 47 U.S.C. Sec. 251(h) or has been designated as an incumbent local exchange carrier by
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26 PETITION OF INLAND TELEPHONE
COMPANY TO RECEIVE SUPPORT FROM
THE UNIVERSAL SERVICE
COMMUNICATIONS PROGRAM - 1

1 the Federal Communications Commission.

2 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
3 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.

4 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-
5 123-110, to provide, maintain or enhance broadband service (See II.4, below).

6 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
7 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal
8 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for
9 High Cost Areas with respect to the service areas for which the Company is seeking
10 Program support.

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12 **II. Demonstration of Eligibility under WAC 480-123-110**

13 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
14 services and is seeking Program support is as follows: Inland Telephone Company

15 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between
16 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. ¹

17 A detailed description of any transactions between the Company and the affiliates named in
18 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2. ²

19 3. WAC 480-123-110(1)(c): Service area maps for the Company can be found at Sheet Nos.
20 501, 502, 503, and 504 of the Company's Tariff WN U-7.

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23 ¹ Pursuant to agreement with Commission Staff, Exhibit 1 is limited to those affiliates having transactions
with the Company that are to be identified in Exhibit 2.

24 ² Pursuant to agreement with the Commission Staff, Exhibit 2 is limited to transactions other than
25 employment compensation and benefits pursuant to employ benefit plans.

- 1 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance
2 broadband services in its service area is attached hereto as Exhibit 3.
- 3 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the
4 Company complies with state and federal accounting, cost allocation, and cost adjustment
5 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 6 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
7 the Company as of December 31, 2022, was 1,194. The number of residential local
8 exchange access lines served by the Company as of December 31, 2021, was 1,214. The
9 number of business local exchange access lines served by the Company as of December 31,
10 2022, was 273. The number of business local exchange access lines served by the Company
11 as of December 31, 2021, was 290. The number of broadband subscribers served by the
12 Company in its regulated service areas as of December 31, 2022, was 2,427. The total
13 number of broadband locations identified where service can be provided by the Company in
14 its regulated service areas as of December 31, 2022, was 3,909; 3,043 locations that are
15 capable of speeds greater than or equal to 25/3 Mbps. The number of broadband subscribers
16 served by the Company in its regulated service areas as of December 31, 2021, was 2,378.
17 The total number of broadband locations identified where service can be provided by the
18 Company in its regulated service areas as of December 31, 2021, was 3,714; 2,828 locations
19 that are capable of speeds greater than or equal to 25/3 Mbps. The unbundled monthly
20 recurring rate charged by the Company for residential local exchange access service on
21 December 31, 2022, was: Dewatto exchange - \$22.00; Prescott exchange - \$18.00; Roslyn
22 exchange - \$18.00; and, Uniontown exchange - \$18.00. The unbundled monthly recurring
23 rate charged by the Company for residential local exchange access service on December 31,
24 2021, was: Dewatto exchange - \$22.00; Prescott exchange - \$18.00; Roslyn exchange -

1 \$18.00; and, Uniontown exchange - \$18.00. The unbundled monthly rate charged by the
2 Company for single line business local exchange access service on December 31, 2022, was:
3 Dewatto exchange - \$27.00; Prescott exchange - \$26.50; Roslyn exchange - \$24.00; and,
4 Uniontown exchange - \$25.00. The unbundled monthly rate charged by the Company for
5 single line business local exchange access service on December 31, 2021, was: Dewatto
6 exchange - \$27.00; Prescott exchange - \$26.50; Roslyn exchange - \$24.00; and, Uniontown
7 exchange - \$25.00. The unbundled monthly rates for broadband services as of December
8 31, 2022, and as of December 31, 2021, are in the attached Exhibit 5.

- 9 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.
- 10 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the
11 Company is in compliance with the Federal Communications Commission's obligation for
12 deployment of broadband at speeds specified by the Federal Communications Commission
13 applicable to the Company and that the Company meets one of the eligibility criteria set out
14 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached as Exhibit 7.
- 15 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.

16
17 Respectfully submitted this 28th day of July, 2023.

18 INLAND TELEPHONE COMPANY

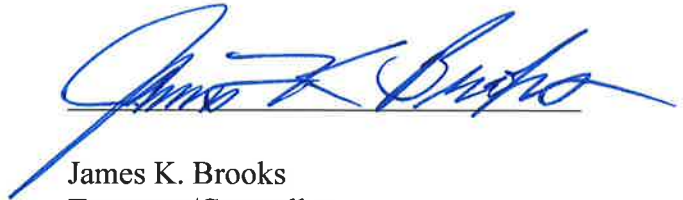
19 By 

20 James K. Brooks
21 Treasurer/Controller

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CERTIFICATION

I, James K. Brooks, an officer of the Company that is responsible for the Company's business and financial operations, hereby certify under penalty of perjury that the information and representations set forth in the Petition, above, are accurate and the Company has not knowingly withheld any information required to be provided to the Commission pursuant to the rules governing the Program.



James K. Brooks
Treasurer/Controller
Inland Telephone Company

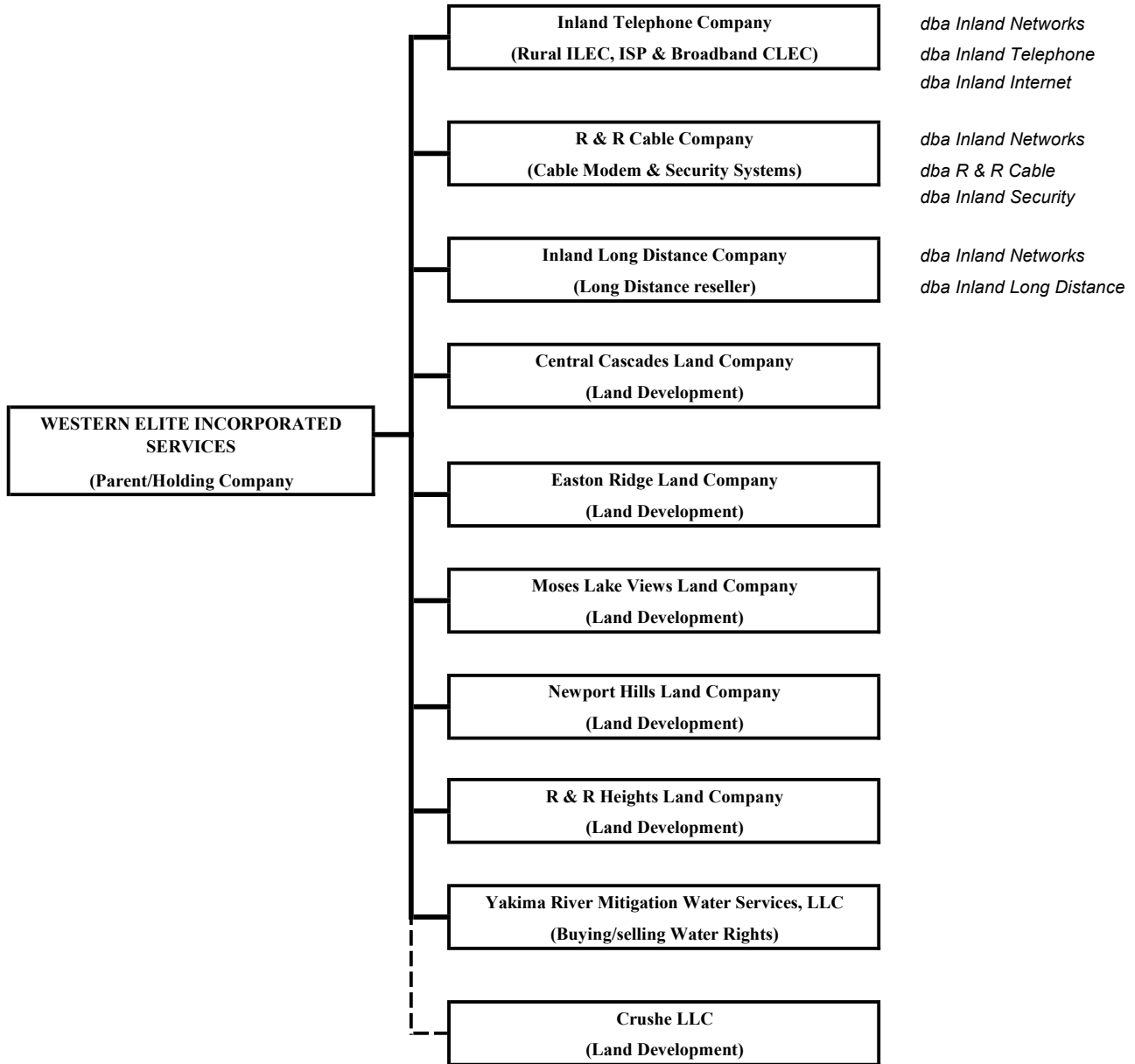
EXHIBIT 1

**CORPORATE STRUCTURE
WAC 480-123-110(1)(b)**

INLAND TELEPHONE COMPANY - SAC 522423

EXHIBIT 1

**CORPORATE ORGANIZATION CHART
AS OF DECEMBER 31, 2022**



NOTE: All of the entities shown above are wholly owned subsidiaries of Western Elite Incorporated Services and are either C-Corporations or limited liability companies. The members of Crushe LLC are also the shareholders of W.E.I.S.

EXHIBIT 2

**AFFILIATED TRANSACTIONS
WAC 480-123-110(1)(b)**

INLAND TELEPHONE COMPANY - SAC 522423

EXHIBIT 2

AFFILIATED TRANSACTIONS

Other than the purchase of tariffed services at tariffed rates, Inland Telephone Company reports the following affiliate transactions for the year ended December 31, 2022:

Shareholders – There are shareholders holding five percent or more of the stock, directly or indirectly, of the Company who are also employees of the Company. These shareholders receive from the Company, employment compensation together with employment associated benefits in accordance with the benefits plan that governs all employees.

Related Party Transactions:

R & R Cable Company (“R & R”) –

- R & R paid Inland Telephone Company (“ITC”) for contracted services for managing R & R’s Internet service via cable modem outside of the ITC service area.
- ITC paid R & R for wholesale cable television service provisioned on ITC’s fiber-to-the-premise network.
- ITC paid R & R for utilizing a portion of R & R’s fiber in order to reach the Noanet point-of-connection.

EXHIBIT 3

**BROADBAND PLAN
WAC 480-123-110(1)(d)**

INLAND TELEPHONE COMPANY - SAC 522423

EXHIBIT 3

BROADBAND PLAN

The Company may soon have a slight change of direction with the release from the Federal Communications Commission (“FCC”) of FCC 23-60 containing the Report and Order adopting the Enhanced Alternative Connect America Cost Model (“Enhanced ACAM”). If the Company accepts what is offered by the FCC, the Company must have 100 Mbps Down/20 Mbps up service available to one hundred percent (100%) of the locations enumerated in the offer and it must be constructed by December 31, 2028. The offer will be made soon as it must be accepted by October 1, 2023; not accepting by October 1 is equivalent to a rejection.

As they are known to the Company at the date of this Report, the following projects exist or are planned by Inland Telephone Company in order to further its broadband footprint. The “Current Projects” are those that the Company is presently working on completing; many have already been mentioned in previous filings (i.e. ETC Filing and SUSF Compliance).

Current Projects:

Dewatto Exchange – The Company is close to completing what Inland refers to as Phase I; providing VDSL service in and around the Tee Lake area. Two VDSL cabinets have been installed on opposite sides of the lake. Both cabinets are fiber fed and Inland should be able to provide a service level of 50 Mbps down/5 Mbps up. The progress of Phase I was slowed by two factors: 1) It took fourteen months to receive the VDSL equipment that was ordered; and 2) re-occurring vandalism which takes up technician time for the repairs. It is estimated per the BDC map, that there are approximately 102 locations in the Tee Lake area. Phase II, which will be fiber-to-the-premise (“FTTP”), has been identified as the Erickson Lake area, the northern portion of NE Elfendahl Pass Road area and the northern portion of NE Toonerville Drive. All of these areas now have a fiber optic backbone or the Company has installed conduit for the backbone. It is estimated per the BDC map, that approximately 132 locations are in these areas. Cost estimates will be developed once the engineering is finalized.

Uniontown Exchange – The Company has been working on FTTP to more rural locations. From July 1, 2022, to current, the Company has constructed FTTP to fifty (50) addresses however, the Company is not certain how many locations the construction covered. The Company does not have a timeframe for full completion of the exchange.

Planned Projects:

Prescott Exchange – The Company is revisiting the expansion of fiber-to-the-premise (“FTTP”) to this area; there is no timeline for conversion from VDSL to FTTP as the Company is working on other exchanges. Cost estimates will be developed once the engineering is complete.

Roslyn Exchange – The Company is revisiting the expansion of FTTP in and around the Anna Belle development to the Night Sky development. The Company currently provides service via a VDSL cabinet. This cabinet provides service from what is known as the Anna Belle development to the Night Sky development (the last development before entering the Wenatchee National Forest). According to the Kittitas County Assessor’s website, there are currently 139 platted lots that are affected of which the BDC map identifies 58 locations. More accurate cost estimates will be developed once the engineering is complete however, the Company believes the cost will be approximately \$500,000.

Dated this 28th day of July, 2023 at Roslyn, Washington.



By: James K. Brooks
Title: Treasurer/Controller

EXHIBIT 4

**CERTIFICATION RELATED TO
ACCOUNTING STANDARDS
WAC 480-123-110(1)(f)**

INLAND TELEPHONE COMPANY - SAC 522423

EXHIBIT 4

CERTIFICATION RELATING TO ACCOUNTING STANDARDS

I, James K. Brooks, am an officer of Inland Telephone Company, (the Company as set out in the Petition to which this is an Exhibit). Thereby, I certify that the Company complies with state and federal accounting, cost allocation, and cost adjustment rules pertaining to an incumbent local exchange carrier for the period of time that the Company will receive support under the Petition to which this is an Exhibit.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 28th day of July 2023.



By: James K. Brooks
Title: Treasurer/Controller

EXHIBIT 5

BROADBAND SERVICE RATES

WAC 480-123-110(1)(g)

INLAND TELEPHONE COMPANY - SAC 522423

EXHIBIT 5

**UNBUNDLED MONTHLY BROADBAND SERVICE RATES
(Rates without Telephone Service)**

Exchange	Downstream Bandwidth	Upstream Bandwidth	2021 Monthly Retail Advertised Rate*	2022 Monthly Retail Advertised Rate*	Data Only Subscribers as of 12/31/22
Dewatto	4 Mbps	1 Mbps	\$ 55.00	\$ 55.00	11
Dewatto	6 Mbps	1 Mbps	\$ 55.00	\$ 55.00	23
Dewatto	10 Mbps	1 Mbps	\$ 65.00	\$ 65.00	68
Prescott	6 Mbps	1 Mbps	\$ 55.00	\$ 55.00	2
Prescott	10 Mbps	1 Mbps	\$ 60.00	\$ 60.00	13
Prescott	15 Mbps	3 Mbps	\$ 65.00	\$ 65.00	1
Prescott	25 Mbps	5 Mbps	\$ 70.00	\$ 70.00	1
Prescott	50 Mbps	10 Mbps	\$ 75.00	\$ 75.00	4
Roslyn	6 Mbps	1 Mbps	\$ 55.00	\$ 55.00	3
Roslyn	10 Mbps	1 Mbps	\$ 60.00	\$ 60.00	274
Roslyn	15 Mbps	3 Mbps	\$ 65.00	\$ 65.00	207
Roslyn	25 Mbps	5 Mbps	\$ 75.00	\$ 75.00	121
Roslyn	50 Mbps	10 Mbps	\$ 85.00	\$ 85.00	214
Roslyn	100 Mbps	50 Mbps	\$ 95.00	\$ 95.00	295
Roslyn	200 Mbps	100 Mbps	\$ 165.00	\$ 165.00	13
Uniontown	6 Mbps	1 Mbps	\$ 55.00	\$ 55.00	6
Uniontown	10 Mbps	1 Mbps	\$ 60.00	\$ 60.00	35
Uniontown	15 Mbps	3 Mbps	\$ 65.00	\$ 65.00	43
Uniontown	25 Mbps	5 Mbps	\$ 75.00	\$ 75.00	31
Uniontown	50 Mbps	10 Mbps	\$ 85.00	\$ 85.00	10
Uniontown	100 Mbps	50 Mbps	\$ 95.00	\$ 95.00	27
Uniontown	200 Mbps	100 Mbps	N/A	\$ 165.00	3

* This list reflects rates that were advertised, however, if a customer requests a non-advertised speed and the Company finds it to be feasible to provision the requested speed, the Company quotes a rate and if agreeable, proceeds with provisioning the service as requested. Except in the case of a facilities change (e.g. copper to fiber), the Company does not force customers from a speed no longer advertised; their monthly rate and service level is grandfathered until the customer requests to change.

EXHIBIT 6

**CONTINUED OPERATIONS CERTIFICATE
WAC 480-123-110(1)(h)**

INLAND TELEPHONE COMPANY - SAC 522423

EXHIBIT 6

CONTINUED OPERATIONS CERTIFICATE

I, James K. Brooks, an officer of Inland Telephone Company, under penalty of perjury, hereby certify that if the Company receives Program support, the Company will continue to provide communications and broadband services pursuant to its tariffs (as/if applicable) on file with the Commission throughout its service territory in Washington for which the company is seeking and receives Program support during the entirety of the year for which the Company is applying for support from the Program.

Dated this 28th day of July 2023 at Roslyn, Washington.



By: James K. Brooks
Title: Treasurer/Controller

EXHIBIT 7

**CERTIFICATION OF ELIGIBILITY
WAC 480-123-110(1)(h)(i)**

INLAND TELEPHONE COMPANY - SAC 522423

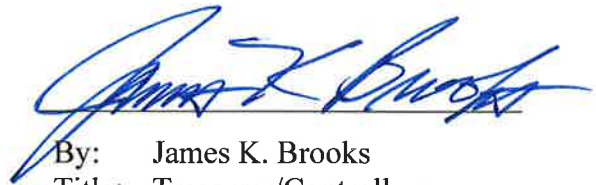
EXHIBIT 7

CERTIFICATION OF ELIGIBILITY

I, James K. Brooks, am an officer of Inland Telephone Company (the Company as set out in the Petition to which this is an Exhibit) and thereby certify that the Company is in compliance with the Federal Communications Commission's obligation for deployment of broadband at speeds specified by the Federal Communications Commission that apply to the Company.

Further, I certify that the Company is meeting the milestones set by the Federal Communications Commission's deployment obligations associated with federal high-cost program support – Alternative Connect America Cost Model II (ACAM II) as of the date of the Petition to which this is an Exhibit. Further, I certify that the Company commits to the deployment of broadband to the number of additional locations the Washington Utilities and Transportation Commission has determined by order. As such, the Company meets the criterion set out in WAC 480-123-110(1)(j)(ii).

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 28th day of July 2023.



By: James K. Brooks
Title: Treasurer/Controller

Progress for Western Elite Incorporated Services



- Locations certified towards target
- Locations saved but not certified
(Not yet counted towards your Target)
- Locations not saved or certified

Locations Overview as of 2023

Locations Information

1622 Total Uploaded

0 Saved But Not Certified

1622 Certified

My Study Areas

Percentage towards Milestone

SAC	Percentage
522423	97.48%

[See all milestones](#)