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

8 IN RE

9 PETITION OF INLAND TELEPHONE  
10 COMPANY [D/B/A INLAND NETWORKS]  
11 TO RECEIVE SUPPORT FROM THE  
12 STATE UNIVERSAL COMMUNICATIONS  
SERVICES PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

13 COMES NOW Inland Telephone Company [d/b/a Inland Networks] (the "Company") and,  
14 pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC") including, but not  
15 limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation  
16 Commission (the "Commission") to receive support from the State Universal Communications  
17 Services Program established in RCW 80.36.650 (the "Program") for the Program year 2016.  
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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 less than forty thousand access lines within the state.  
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26 PETITION OF ~~INLAND TELEPHONE~~  
COMPANY [D/B/A INLAND NETWORKS]\_ TO  
RECEIVE SUPPORT FROM THE STATE  
UNIVERSAL COMMUNICATIONS SERVICES  
PROGRAM - 1

- 1 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined  
2 in 47 U.S.C. Sec. 251(h).
- 3 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange  
4 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 5 4. WAC 480-123-100(1)(d): The Company's rates for residential local exchange service, plus  
6 mandatory extended area service charges, are no lower than the local urban rate floor  
7 established by the Commission as the benchmark rate based on the Federal Communications  
8 Commission's national local urban rate floor pursuant to 47 C.F.R. Sec. 54.318 in effect on  
9 the date of this Petition.
- 10 11 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an  
12 eligible telecommunications carrier for purposes of receiving federal universal services  
13 support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for High Cost  
14 Areas with respect to the service area for which the Company is seeking Program support.

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

- 16 17 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications  
18 services and is seeking Program support is as follows: Inland Telephone Company [d/b/a  
19 Inland Networks].
- 20 21 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between  
22 the Company and all affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1.  
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1 A detailed description of any transactions between the Company and the affiliates named in  
2 Exhibit 1<sup>1</sup> recorded in the Company's operating accounts is attached hereto as Exhibit 2.<sup>2</sup>

- 3 3. WAC 480-123-110(1)(c): Service area maps for the Company can be found at Sheet Nos.  
4 501, 502, 503 and 504 of the Company's Tariff WN U-7.
- 5 4. WAC 480-123-110(1)(d): A demonstration that the Company's customers are at risk of rate  
6 instability or service interruption or cessation in the absence of support from the Program is  
7 attached as Exhibit 3.
- 8 5. WAC 480-123-110(1)(e)(i): On the Commission's prescribed form, attached as Exhibit 4,  
9 are copies of the Company's balance sheet as of December 31, 2014, and December 31,  
10 2013, and copies of the Company's statements of income and retained earnings or margin for  
11 the years ended December 31, 2014 and December 31, 2013.
- 12 6. WAC 480-123-110(1)(e)(ii): A copy of the Company's consolidated annual financial  
13 statements for the years ended December 31, 2014 and December 31, 2013, is attached as  
14 Exhibit 5.
- 15 7. WAC 480-123-110(1)(e)(iii): Information demonstrating the Company's earned rate of  
16 return on a total Washington unseparated regulated operations basis for each of the two prior  
17 years, calculated in the manner prescribed by the Commission, is provided in Exhibit 4.  
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22 <sup>1</sup> Pursuant to agreement with the Commission Staff, Exhibit 1 is limited to those affiliates having transactions with the  
23 Company that are to be identified in Exhibit 2.

24 <sup>2</sup> Exhibit 2 includes transactions between the Company, other Western Elite Incorporated Services affiliates, Inland  
25 Cellular Telephone Company and Inland Cellular LLC. Pursuant to agreement with the Commission Staff, Exhibit 2 is  
26 limited to transactions other than employment compensation and benefits pursuant to employee benefit plans.

- 1 8. WAC 480-123-110(1)(e)(iv): Information demonstrating the Company's earned return on  
2 equity on a total company (regulated and non-regulated) Washington basis for each of the  
3 two prior years, calculated in the manner prescribed by the Commission, is provided in  
4 Exhibit 4.
- 5 9. WAC 480-123-110(1)(e)(v): Information detailing all of the Company's revenues from the  
6 statements of income and retained earnings or margin in the same format and detail as is  
7 required to complete RUS Form 479 for the prior two years is presented on Exhibit 6.
- 8 10. WAC 480-123-110(1)(e)(vi): A statement under penalty of perjury from a Company officer  
9 with personal knowledge and responsibility certifying that no corporate operations  
10 adjustment to existing high-cost loop and interstate common line support mechanisms  
11 required by the Federal Communications Commission applied to the Company for the two  
12 prior years is attached hereto as Exhibit 7.
- 13 11. WAC 480-123-110(1)(e)(vii): Exhibit 4 contains additional supporting information  
14 requested by the Commission.
- 15 12. WAC 480-123-110(1)(e)(viii): A statement under penalty of perjury from a Company  
16 officer with personal knowledge and responsibility certifying that the Company complies  
17 with state and federal accounting, cost allocation, and cost adjustment rules pertaining to  
18 incumbent local exchange companies is attached as Exhibit 8.
- 19 13. WAC 480-123-110(1)(f): A complete copy of the FCC Form 481 filed by the Company or  
20 on its behalf with the Federal Communications Commission for the calendar year preceding  
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1 the current year has already been filed with the Commission. See the Company's filing in  
2 Docket No. UT-150063 filed on or about July 1, 2015.

3 14. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by  
4 the Company as of December 31, 2014, was 1,719, all of which were within the geographic  
5 area for which the Company is seeking support. The number of residential local exchange  
6 access lines served by the Company as of December 31, 2013, was 1,736, all of which were  
7 within the geographic area for which the Company is seeking support. The number of  
8 business local exchange access lines served by the Company as of December 31, 2014, was  
9 624, all of which were within the geographic area for which the Company is seeking  
10 support. The number of business local exchange access lines served by the Company as of  
11 December 31, 2013, was 633, all of which were within the geographic area for which the  
12 Company is seeking support. The monthly recurring rate charged by the Company for  
13 residential local exchange access service on December 31, 2014, was: Dewatto exchange -  
14 \$22.00, Prescott exchange - \$16.50, Roslyn exchange - \$16.00, and Uniontown exchange -  
15 \$16.00. The monthly recurring rate charged by the Company for residential local exchange  
16 access service on December 31, 2013, was: Dewatto exchange - \$22.00, Prescott exchange -  
17 \$16.50, Roslyn exchange - \$14.00, and Uniontown exchange - \$15.00. The rate charged by  
18 the Company for single line business local exchange access service on December 31, 2014,  
19 was: Dewatto exchange - \$27.00, Prescott exchange - \$26.50, Roslyn exchange - \$24.00,  
20 and Uniontown exchange - \$25.00. The rate charged by the Company for single line  
21 business local exchange access service on December 31, 2013, was: Dewatto exchange -  
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1 \$27.00, Prescott exchange - \$26.50, Roslyn exchange - \$24.00, and Uniontown exchange -  
2 \$25.00. (The Company has other business local exchange service rates, but the Company  
3 understands that WAC 480-123-110(1)(g) is requesting the single line business local  
4 exchange access service rate.)

5 15. WAC 480-123-110(1)(h): The requested statement is attached as Exhibit 9.


6 16. All exhibits attached hereto are incorporated in this Petition as though fully set forth.

7 Respectfully submitted this 20<sup>th</sup> day of July, 2015.  
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9  
10 Inland Telephone Company  
11 d/b/a Inland Networks

12 CERTIFICATION

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

18 By:   
19 By: James K. Brooks

20 Title: Treasurer/Controller  
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