

UT-091213-CT

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512
Fax (360) 753-6862

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Kathy McCrary, Paralegal
(360) 753-7012
kathym@localaccess.com

July 29, 2009

David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

RECEIVED
RECORDS MANAGEMENT
2009 JUL 29 PM 4:42
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

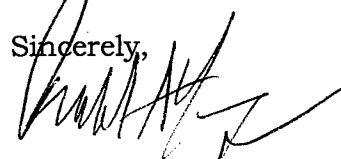
Re: Docket No. UT-037015; Request for Certification Pursuant to WAC 480-123-060 and 47 C.F.R. §54.314

Dear Mr. Danner:

Pursuant to WAC 480-123-060, YCOM Networks, Inc. ("Company") hereby requests that the Washington Utilities and Transportation Commission certify that the Company has met the requirements of 47 C.F.R. §54.314 for eligibility for continued receipt of federal high-cost funds.

The certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 are enclosed. Since the reports contain confidential information, redacted and confidential versions of the reports are included with a claim of confidentiality pursuant to WAC 480-07-160. Since only one copy of the reports and certifications are required to be filed, the Company requests waiver of the requirement to file multiple copies as set out in WAC 480-07-160(3)(c)(iii).

Sincerely,



RICHARD A. FINNIGAN

RAF/km
Enclosures

cc: Chris Barron (via e-mail)
Jana Manterola (via e-mail)
Pat Morse (via e-mail)

**AFFIDAVIT CONTAINING CERTIFICATIONS
PURSUANT TO WAC 480-123-060 AND WAC 480-123-070**

I, Patrick L. Morse, being of lawful age, state that I am the SR/VP Governmental Affairs of YCOM Networks, Inc. ("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit are true to the best of my knowledge, information and belief. On this basis, I hereby certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. §54.314, as follows:

- (1) That the Company will use federal high-cost universal service fund support only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2008 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2008 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and
- (4) That during the 2008 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

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

Dated this 23 day of July, 2009, at Dodge City, KS.

Company: YCOM Networks, Inc.

By: 
Patrick L. Morse

Its: SR/VP Governmental Affairs



USF1010 PENDING VIEW REPORT

7/28/2009
3:17:43 pm
Page 1 of 2

Applies to Period: Year End 12/2008
Contact Name: Mark Ellmer
Contact Phone: (850)-229-7315 Ext.
Release Status: Not Released
Soft Edit Status: Passed Edit

Reg: 6
MSM: 020007494
OO: 200000037
Co: 000002453
SAR: 522453

WESTERN
Melody Crane
FairPoint Communications, Inc.
YCOM Networks, Inc.
YCOM NETWORKS, INC.

Subset 2

Description	Pending View	Source
060 Total Loops	10,929	EC
070 Cat. 1.3 Loops	10,880	EC
160 Account 2001	42,555,059	EC
170 Account 1220	286,579	EC
190 Account 3100	33,505,833	EC
195 Account 3400	29,981	EC
210 Account 4340	430,572	EC
220 Net Plant Investment	8,875,252	EC
230 Account 2210	4,658,814	EC
235 Account 2220	0	EC
240 Account 2230	12,828,720	EC
245 Total Central Office	17,487,534	EC
250 Ckt Equip Cat 4.13	9,865,446	EC
255 Account 2410	19,110,300	EC
260 Account 3100 (2210)	4,658,814	EC
265 Account 3100 (2220)	0	EC
270 Account 3100 (2230)	11,576,796	EC
275 Account 3100 (2210-2230)	16,235,610	EC
280 Account 3100 (2410)	12,803,041	EC
310 Account 4340 (2210)	47,138	EC
315 Account 4340 (2220)	0	EC
320 Account 4340 (2230)	129,801	EC
325 Account 4340 (2210-2230)	176,939	EC
330 Account 4340 (2410)	193,358	EC
335 Account 6110 Total	0	EC
340 Account 6110 Benefits	0	EC
345 Account 6110 Rents	0	EC
350 Account 6120 Total	719,947	EC
355 Account 6120 Benefits	17,124	EC
360 Account 6120 Rents	2,728	EC
365 Account 6210 Total	400,810	EC
370 Account 6210 Benefits	48,347	EC
375 Account 6210 Rents	0	EC
380 Account 6220 Total	0	EC
385 Account 6220 Benefits	0	EC
390 Account 6220 Rents	0	EC
395 Account 6230 Total	70,642	EC
400 Account 6230 Benefits	0	EC
405 Account 6230 Rents	0	EC
410 Account 6210-6230	471,452	EC
430 Account 6410 Total	391,451	EC
435 Account 6410 Benefits	62,569	EC
440 Account 6410 Rents	3,762	EC
445 Total Plant Specific	1,582,850	EC
450 Account 6530 Total	713,642	EC
455 Account 6530 Benefits	127,512	EC
510 Account 6560 (2210)	13,609	EC
515 Account 6560 (2220)	0	EC
520 Account 6560 (2230)	732,310	EC



USF1010 PENDING VIEW REPORT

7/28/2009
3:17:43 pm
Page 2 of 2

Applies to Period:	Year End 12/2008	Reg: 6	WESTERN	Subset 2
Contact Name:	Mark Ellmer	MSM: 020007494	Melody Crane	
Contact Phone:	(850)-229-7315 Ext:	OO: 200000037	FairPoint Communications, Inc.	
Release Status:	Not Released	Co: 000002453	YCOM Networks, Inc.	
Soft Edit Status:	Passed Edit	SAR: 522453	YCOM NETWORKS, INC.	

Description	Pending View	Source
525 Account 6560 (2210-2230)	745,919	EC
530 Account 6560 (2410)	996,297	EC
535 Account 6710 Total	359,617	EC
540 Account 6710 Benefits	608	EC
550 Account 6720 Total	1,055,523	EC
555 Account 6720 Benefits	25,386	EC
565 Sum of Lines 535 + 550	1,415,140	EC
600 Ben. Por. of all Op. Exp.	328,731	EC
610 Rent Por. of all Op. Exp.	6,490	EC
650 Account 7200 Other Taxes	1,307,987	EC
700 2410 (C S Total CWF - AV)	18,735,605	EC
710 2410 (C S CWF - Cat.1)	18,374,638	EC
800 Account 2680 Total	0	EC
805 Account 2680 (2230)	0	EC
810 Account 2680 (Cat. 4.13)	0	EC
815 Acc 2680 (2410) Total CWF	0	EC
820 Acc 2680 (2410)CWF-Cat1	0	EC
830 Account 6560 (2680)	0	EC

Comments:

**REPORTS AS REQUIRED BY WAC 480-123-070
AND WAC 480-123-080**

YCOM Networks, Inc. (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.1

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report for the calendar year 2008, that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund.

Report 2: WAC 480-123-070(1)(b): The company reports that the investments and expenses reported under Report 1, above, benefited customers as follows:

Through the expenditure of these funds, the Company was able to continue to provide services at a level that the Company believes meets the intent set forth in 47 U.S.C. §254 of providing high quality telecommunications services to customers in the service area for which the Company is designated as an ETC. The Company has made substantial investments over the past several years which allow it to provide quality telecommunications services to its customers in its designated ETC service area. Those expenditures and investments, including those reflected in Report 1, above, generally benefit all customers receiving the federal high-cost fund supported services from the Company within its designated service area. In addition, during 2008, the Company was engaged in a major investment project within its designated ETC service area as described below.

The Yelm Exchange has experienced an extraordinary amount of subdivision growth over the past several years. In 2008 the Company made an investment of [REDACTED] in Outside Plant infrastructure to provide service to [REDACTED] new lots and provide service to existing subdivisions. The Company made an investment of [REDACTED] to upgrade its Outside Plant network throughout the serving area. These upgrades provided for a platform to deliver more reliable local service and advanced telecommunications services to the customers throughout the serving area affecting all [REDACTED] subscribers.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2008, the Company received two customer complaints from the Federal Communications Commission and one customer complaint from the Consumer Protection Division of the Office of the Attorney General of the State of Washington.

FCC Complaint #1: *Complaint was related to Internet access speed. Customer was upgraded from DSL Lite to Standard DSL, which resolved the complaint.*

FCC Complaint #2: *Complaint was related to local number portability, and was resolved by explaining the LNP process and rules to the customer.*

AG Complaint: Customer was not receiving monthly statements. This complaint was resolved by verifying the customer's mailing address.

Report 4: WAC 480-123-080(1)(b): The Company reports as follows:

As they are known to the Company at the date of this Report, the present and planned investment and expenses related to Washington state for the period calendar year 2009, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2008, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2008.

The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service. As to the specific investment project identified above, it is expected that customers will benefit by increased reliability of service and the increased availability of a broader range of telecommunications services, including, but not limited to, advanced services.

Report 5: WAC 480-123-080(2): The Company reports as follows:

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the period January 1, 2010, through December 31, 2010, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. The Company expects that levels of expenses will decrease somewhat relatively close to the same as those it experienced in calendar year 2009, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2008. The Company has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2010.

In addition to the foregoing, the Company is planning on upgrading at least two remotes to provide enhanced services in 2010. Other projects will add Fiber to the Home facilities to support new subdivision growth and at least four new proposed business developments.

The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service. As to the specific investment project identified above, it is expected that customers will benefit by increased reliability of service and the increased availability of a broader range of telecommunications services, including, but not limited to, advanced services.