



Skyline Telecom, Inc.

PO Box 609
Mount Vernon, OR 97865-0609
1-888-383-4132

June 24, 2020

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: REVISED 2020 ETC Certification and Reports-
Request for Certification Pursuant to
WAC 480-123-060 and 47 C.F.R. §54.314

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

06/24/20 16:50

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Dear Mr. Johnson:

This is a revised filing for the 2020 ETC Certification. In the original filing, the affidavit containing certifications was not included. This filing contains all necessary items.

Also, as a point of additional clarification, Skyline Telecom had no outages to report for the 2019 reporting period.

Pursuant to WAC 480-123-060, Skyline Telecom ("Company") hereby requests that the Washington Utilities and Transportation Commission ("Commission") certify to the Federal Communications Commission and the Universal Service Administrative Company 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 also submitted. The NECA USF report has also been included with this filing.

Please contact me if you should require any further information.

Sincerely,



Delinda Kluser
Vice-Pres, Manager
dkluser@ortelco.net
541-932-4411

ETC ANNUAL REPORT PER WAC 480-123-070 AND WAC 480-123-080
Contains Certifications Required by WAC 480-123-060 and 070
July 1, 2020

Skyline Telecom (“Company”) hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

1. Report 1: Report on use of funds: WAC 480-123-070(1)(a):

The Company used support from the federal high-cost fund in 2019 as follows: Strictly to provide, maintain, and upgrade facilities and services for which the support is intended.

For 2019 the Company's gross capital expenditures were \$61,222. The Company's 2019 operating expenses were \$496,382. Recent major projects include the replacement of a the softswitch in our Silverton exchange. The new switch offers a large cost savings on annual maintenance fees. Fees are charged on a usage basis rather than a percentage of the cost of the asset.

Per the direction of Commission Staff, the NECA -1 report will be provided as soon as it is available and no later than August 1, 2020.

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

The customers served by the Company benefited from the use of high-cost fund support by continuing to receive high quality telecommunications services.

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 quality telecommunications services to customers in the service area for which the Company is designated as an ETC.¹ 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 ETC service area. The Company has expanded its network over the past several years so that it is capable of providing access to broadband services throughout most of the Company's designated ETC service area. The Company offers services that are comparable to services offered in urban areas at rates that are comparable to rates for such services in urban areas.

¹ The term "ETC" is used in the same sense as the term is used in Chapter 480-123 WAC.

3. Report 3: Local Services Outage Report: WAC 480-123-070(2):

Local outages are disclosed on the FCC Form 481.

4. Report 4: Report on Failure to Provide Service: WAC 480-123-070(3):

None

5. Report 5: Report on Complaints per 1000 Connections: WAC 480-123-070(4):

No complaints were filed during 2019 regarding service quality as reported by the consumer service protection division of the Attorney General's Office. In addition, no complaints were received from the FCC for calendar year 2019.

6. Report 6: Annual Plan: WAC 480-123-080(1):

The Company has not yet started the budgeting process for 2021 and therefore does not have the final numbers prepared for investments and expense levels for the period January 1, 2021, through December 31, 2021. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2019, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and increased depreciation on new investment placed in service. The Company does not anticipate major adjustments in staffing levels for the relevant period.

7. Report 7: Plan of Investments and Expenditures: WAC 480-123-080(2):

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, 2021, through December 31, 2021, will remain relatively the same as those it experienced in calendar year 2019, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and increased depreciation on new investment placed in service. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2021. The Company expects that the continued receipt of federal high-cost support will allow the Company to continue to provide the supported services at rates that are comparable to the rates for such services in urban areas. All customer in the Company's designated ETC service area will benefit from the expected level of support by continuing to have available to them services that are comparable to the telecommunications services offered in urban areas at rates that are comparable to the rates for such services in urban areas.

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

I, Delinda Kluser, being of lawful age, state that I am Vice-Pres, Manager of Skyline Telecom 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 in 2019 used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;

(2) That during the 2019 calendar year, the Company met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h);

(3) That during the 2019 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 2019 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 24th day of June, 2020 at MT Vernon, Oregon.

Company: Skyline Telecom Inc.

By: _____

Type Name: Delinda Kluser

Its: Vice-Pres, Manager



USF1010 ERROR REPORT

Applies to Period:	Year End 12/2019	Reg: 6	WESTERN	Subset 3
Contact Name:	Garrin Bott	MSM: 000052439	Dan Hintz	
Contact Phone:	(541)-932-4411 Ext:	OO: *****		
Release Status:	Released	Co: 000005801	Skyline Telecom Company	
Soft Edit Status:	Passed Edit	SAR: 520581	SKYLINE TELECOM CO.	

Description	Pending View	Message
060 Total Loops	102	
070 Cat. 1.3 Loops	102	
090 CBO Loops	0	
160 Account 2001	2,844,927	
170 Account 1220	474	
190 Account 3100	2,357,862	
195 Account 3400	0	
210 Account 4340	64,832	
220 Net Plant Investment	422,707	
230 Account 2210	356,354	
235 Account 2220	0	
240 Account 2230	262,255	
245 Total Central Office	618,609	
250 Ckt Equip Cat 4.13	212,653	
255 Account 2410	2,066,522	
260 Account 3100 (2210)	295,131	
265 Account 3100 (2220)	0	
270 Account 3100 (2230)	262,255	
275 Account 3100 (2210-2230)	557,386	
280 Account 3100 (2410)	1,698,728	
310 Account 4340 (2210)	6,178	
315 Account 4340 (2220)	0	
320 Account 4340 (2230)	4,547	
325 Account 4340 (2210-2230)	10,725	
330 Account 4340 (2410)	52,402	
335 Account 6110 Total	0	
340 Account 6110 Benefits	0	
345 Account 6110 Rents	0	
350 Account 6120 Total	6,118	
355 Account 6120 Benefits	0	
360 Account 6120 Rents	0	
365 Account 6210 Total	72,085	
370 Account 6210 Benefits	2,713	
375 Account 6210 Rents	0	
380 Account 6220 Total	0	
385 Account 6220 Benefits	0	
390 Account 6220 Rents	0	
395 Account 6230 Total	8,990	
400 Account 6230 Benefits	26	
405 Account 6230 Rents	0	
410 Account 6210-6230	81,075	
430 Account 6410 Total	73,856	
435 Account 6410 Benefits	5,784	
440 Account 6410 Rents	0	
445 Total Plant Specific	161,049	
450 Account 6530 Total	5,949	
455 Account 6530 Benefits	429	
510 Account 6560 (2210)	0	
515 Account 6560 (2220)	0	



USF1010 ERROR REPORT

Applies to Period:	Year End 12/2019	Reg: 6	WESTERN	Subset 3
Contact Name:	Garrin Bott	MSM: 000052439	Dan Hintz	
Contact Phone:	(541)-932-4411 Ext:	OO: *****		
Release Status:	Released	Co: 000005801	Skyline Telecom Company	
Soft Edit Status:	Passed Edit	SAR: 520581	SKYLINE TELECOM CO.	

Description	Pending View	Message
520 Account 6560 (2230)	12,108	
525 Account 6560 (2210-2230)	12,108	
530 Account 6560 (2410)	122,933	
535 Account 6710 Total	0	
540 Account 6710 Benefits	0	
550 Account 6720 Total	145,417	
555 Account 6720 Benefits	19,920	
565 Sum of Lines 535 + 550	145,417	
600 Ben. Por. of all Op. Exp.	29,777	
610 Rent Por. of all Op. Exp.	0	
650 Account 7200 Other Taxes	16,913	
700 Account 2410 (CWF)	2,066,522	
710 Account 2410 (CWF-Cat.1)	1,629,764	
800 Account 2680 Total	0	
805 Account 2680 (2230)	0	
810 Account 2680 (Cat. 4.13)	0	
815 Acc 2680 (2410) Total CWF	0	
820 Acc 2680 (2410)CWF-Cat1	0	
830 Account 6560 (2680)	0	
850 Account 6310	0	
860 Account 6510	0	
870 Account 6610	0	
880 Account 6620	24,859	
Control Total:	16,738,563	

Comments: