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UTIL. AND TRANSP.
COMMISSION

July 1, 2022

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Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Subject: United States Cellular Corporation – 2022 Annual ETC Recertification
Docket UT-22_____**

Dear Ms. Maxwell:

Pursuant to WAC 480-123-070, *et seq.*, U. S. Cellular Corporation ("USCC") hereby files its annual certifications and reports in Docket No. UT-22_____, as follows:

ANNUAL ETC CERTIFICATION AND REPORT, with listed Exhibits -

- Exhibit A Declaration Certifying Use of Universal Service Funds
- Exhibit B Report on use of federal funds and benefits to customers
Confidential
- Exhibit C Local service outage report - ***Confidential***
- Exhibit D Report on failure to provide service - ***Confidential***
- Exhibit E Report on complaints per one thousand handsets or lines
Confidential
- Exhibit F Declaration Certifying Compliance with Applicable Service
Quality Standards and Consumer Protection Rules
- Exhibit G Declaration Certifying Ability to Function in Emergency
Situations
- Exhibit H Declaration Certifying Lifeline Advertising
- Exhibit I Samples of advertising and outreach materials

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Ms. Amanda Maxwell
July 1, 2022
Page 2

Exhibit J Annual plan for Universal Service support – *Confidential*

Pursuant to WAC 480-07-140, we are making this filing electronically. In the confidential portion of the filing, each electronic file will contain, as part of the file name, the word "CONFIDENTIAL." Additionally, each page in the confidential electronic and paper files will be labeled "Confidential Per WAC 480-07-160." A redacted copy of each confidential exhibit will also be filed electronically.

Pursuant to RCW §80.04.095 enclosures designated as "confidential" contain valuable commercial information, including trade secrets and confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information. Accordingly, pursuant to RCW §80.04.095 such information should not be subject to inspection or copying under RCW Chapter 42.56. Moreover, the records designated as "confidential" contain valuable formulae, designs, and research data, the disclosure of which would produce private gain and public loss and should be exempt from public disclosure pursuant to RCW 42.56.270(1).

In addition to the undersigned, the following might be directly affected by disclosure of the confidential information:

U. S. Cellular Corporation
8410 West Bryn Mawr Avenue
Suite 700
Chicago, IL 60631
Phone: (773) 399-7940
E-mail: Stephanie.Cassioppi@uscellular.com
Attention: Stephanie Cassioppi

If you have any questions please contact the undersigned directly.

Sincerely,

LUKAS, LAFURIA, LANTOR & SACHS, LLP



Steven M. Chernoff
LUKAS, LAFURIA, LANTOR & SACHS, LLP
8350 Broad Street, Suite 1450
Tysons, VA 22102

cc: Mr. Tim Zawislak
Ms. Stephanie Cassioppi

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

)	
)	DOCKET NO. UT-22 _____
In the Matter of State)	
Certification of Support as)	ANNUAL ETC CERTIFICATION AND
Required by 47 C.F.R. § 54.314)	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 2021, 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 listed 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. - *Confidential*

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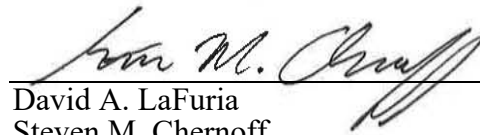
4. **Exhibit C** details reportable service outages in 2021.
5. **Exhibit D** attached is intended to satisfy the requirements of WAC 480-123-070 (3) “Report on failure to provide service.” - **Confidential**
6. **Exhibit E** attached is intended to satisfy the requirements of WAC 480-123-070 (4) “Report 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 2021 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 2021, 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, 2022, through September 30, 2023. The planned expenditures will benefit customers by ensuring continued and ongoing mobile voice and data services in high cost areas that otherwise might

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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 1st day of July 2022.

LUKAS, LAFURIA, LANTOR & SACHS, LLP



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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 Sr. 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 [2021] and will be used in the coming calendar year [2023] 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 7th day of June, 2022.

UNITED STATES CELLULAR CORPORATION

By: _____

John C. Gockley

Its: Sr. Vice President – Legal and Government Affairs (Title)

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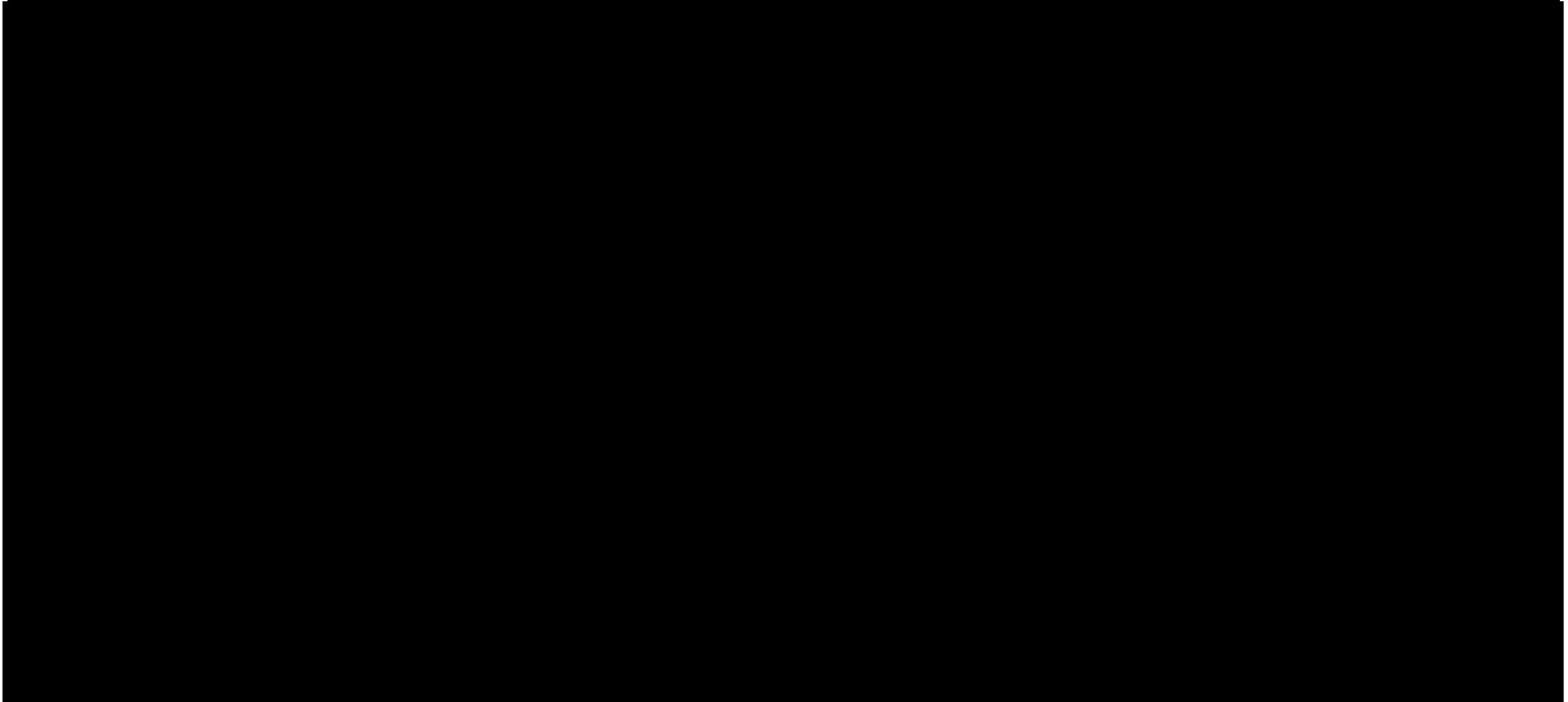
U.S. Cellular®					<i>Exhibit B</i>				
Calendar Year 2021									
Report on Use of Federal Funds and Benefits to Customers									
WAC 480-123-070 (1)(a) - (b)									
A. Support funds received in Calendar Year 2021									
(Per USAC Website)									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
B. Use of Support funds received in Calendar Year 2021									
Location Code	Location Name	Location City	Zip Code	In Service Date	Support \$\$ Spent in 2021 - Capital Expenditures	Support \$\$ Spent in 2021 - Operating Expenditures	Total 2021 Spending	Project Status	Purpose of Site
New Cell Sites & Repeaters Placed in Service During Calendar Year									
[REDACTED]									
[REDACTED]									
Capital and Operating Expenses for Sites in the Washington ETC Area									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
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Location Code	Location Name	Location City	Zip Code	In Service Date	Support \$\$ Spent in 2021 Capital Expenditures	Support \$\$ Spent in 2021 Operating Expenditures	Total 2021 Spending	Project Status	Purpose of Site

WA USC ETC 2022 CERT Exhibit C

NORS Reference number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	Service Outage Description - Wireline (including Cable) Voip (Yes/No)	Service Outage Description - Wireline (including Cable) non-Voip (Yes/No)	Service Outage Description - Cellular (Yes/No)	Service Outage Description - voice Over LTE (Yes/No)	Service Outage Description - 911,E911 or NG911 Services only (Yes/No)	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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NORS Reference number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	Service Outage Description - Wireline (including Cable) Voip (Yes/No)	Service Outage Description - Wireline (including Cable) non-Voip (Yes/No)	Service Outage Description - Cellular (Yes/No)	Service Outage Description - voice Over LTE (Yes/No)	Service Outage Description - 911,E911 or NG911 Services only (Yes/No)	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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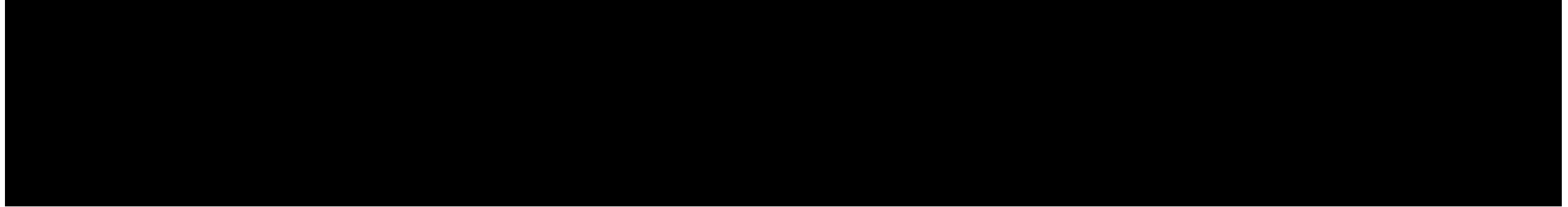
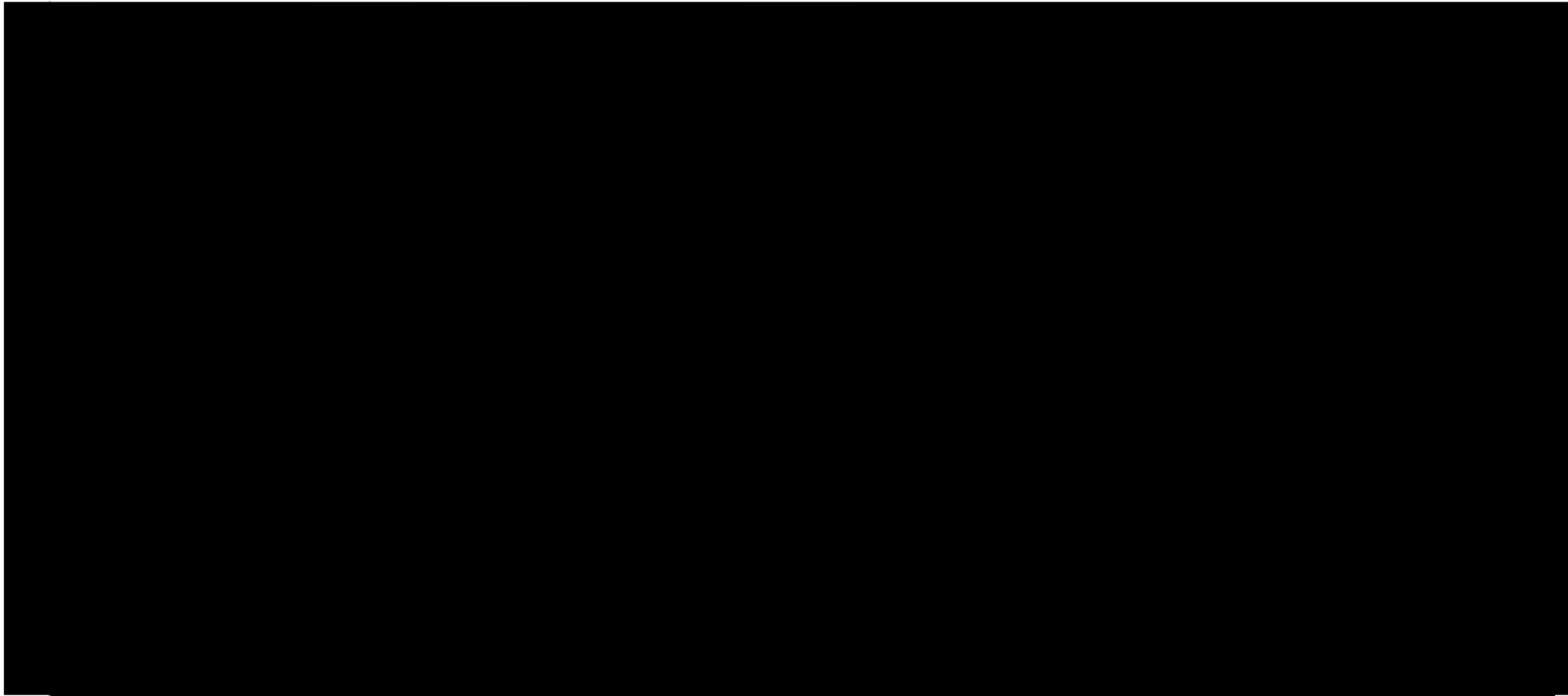


Exhibit D
U.S. Cellular

WAC 480-123-070 (3)

Report on Failure to Provide Service

<u>City</u>	<u>Zip Code</u>	<u>Address</u>	<u>Resolution</u>
-------------	-----------------	----------------	-------------------



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City

Zip Code

Address

Resolution

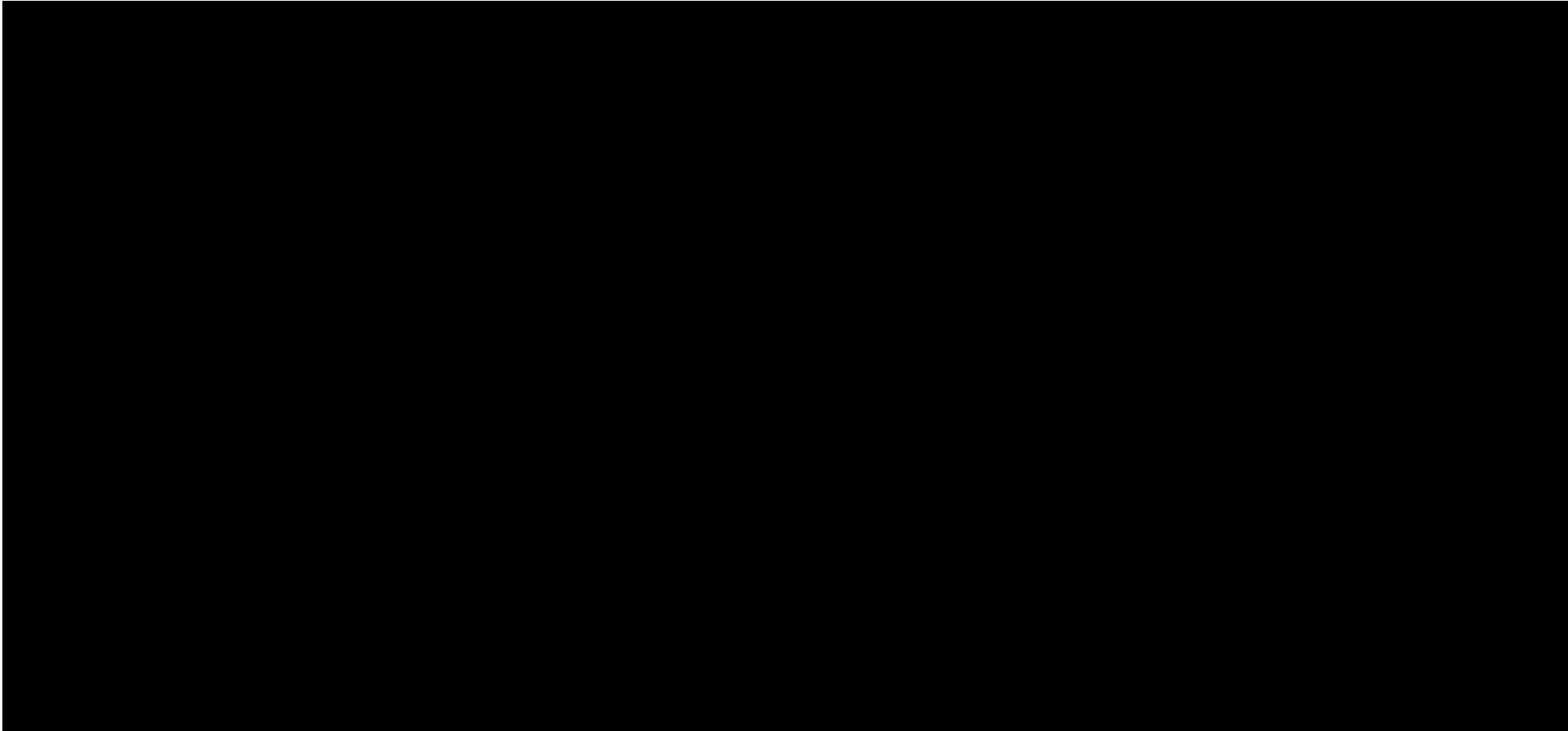


Exhibit E
U.S. Cellular
State of Washington
WAC 480-123-070 (4)

Report on Complaints per One Thousand Handsets or Lines
Calendar Year 2021

During calendar year 2021 U.S. Cellular was the named company in six (6) consumer complaints filed with the Federal Communications Commission. Of these complaints, one (1) was related to a [REDACTED]; one (1) to a [REDACTED]; one (1) to a [REDACTED]; one (1) to a [REDACTED]; and two (2) to [REDACTED].

During calendar year 2021 U.S. Cellular was the named company in three (3) consumer complaints filed with the Washington Attorney General. Of these complaints, one (1) was related to a coverage issue; and two (2) were related to billing issues.

The 2021 year end customer count in Washington State was [REDACTED].

FCC Complaints per 1,000 customers in calendar year 2021 equaled [REDACTED].

Complaints to the Washington Attorney General per 1,000 customers in calendar year 2021 equaled [REDACTED].

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 Sr. 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 7th day of June, 2022.

UNITED STATES CELLULAR CORPORATION

By: _____


John C. Gockley

Its: Sr. 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

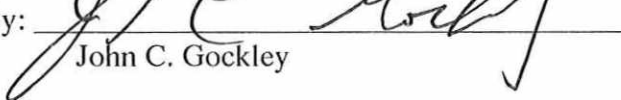
I, John C. Gockley, am Sr. Vice President, Legal and Regulatory Affairs for United States Cellular Corporation, 8410 West Bryn Mawr, Suite 700, Chicago, IL 60631 (“U.S. Cellular”). I have the authority to make representations herein. Based upon information known to me or provided to me by employees responsible 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 7th day of June, 2022.

UNITED STATES CELLULAR CORPORATION

By: 
John C. Gockley

Its: Sr. 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 Sr. 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 2021, 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 www.uscellular.com, 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 7th day of June, 2022.

UNITED STATES CELLULAR CORPORATION

By: _____

John C. Gockley

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

8410 W. Bryn Mawr Ave

Chicago, IL 60631

Tel: 773 399 8900 Fax: 773 399 2558

www.uscellular.com

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GET THE NETWORK — THAT WORKS — AS HARD AS YOU DO

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.



LG K8[®]

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 landline 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

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Colors Spec'd	By/W			Copy Edit	TBD			
Special Instr.	None			Mac	mdanish			
Publications	None							

CONTENT

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BY SHOWING YOUR INITIALS ABOVE, YOU ARE SIGNING THAT YOU HAVE READ AND APPROVE THIS WORK.

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EXHIBIT J

U.S. Cellular®
October 1, 2022 to September 30, 2023
Annual Plan for Universal Service Support
WAC 480-123-080

