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

8 IN RE

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

DOCKET NO.

PETITION FOR SUPPORT

14 COMES NOW Whidbey Telephone Company (the "Company") and, pursuant to Chapter
15 480-123 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC
16 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the
17 "Commission") to receive support from the Universal Service Communications Program (the
18 "Program") for the Program year 2023.

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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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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: Whidbey 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
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20 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2. ²
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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 Exhibit 2 also includes transactions between the Company and Affiliates. Pursuant to agreement with the
25 Commission Staff, Exhibit 2 is limited to transactions other than employment compensation and benefits
pursuant to employ benefit plans.
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- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet Nos.
2 300 and 301 in Schedule 42 of the Company's Tariff WN U-5.
- 3 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance
4 broadband services in its service area is attached hereto as Exhibit 3.
- 5 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the
6 Company complies with state and federal accounting, cost allocation, and cost adjustment
7 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 8 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
9 the Company as of December 31, 2021, was 831. The number of residential local exchange
10 access lines served by the Company as of December 31, 2020, was 934. The number of
11 business local exchange access lines served by the Company as of December 31, 2021, was
12 420. The number of business local exchange access lines served by the Company as of
13 December 31, 2020, was 385. The number of broadband connections served by the
14 Company as of December 31, 2021, was 8808. The number of broadband connections
15 served by the Company as of December 31, 2020, was 8414. In 2020, of the approximately
16 15,160 serviceable locations the Company has, roughly 12,580 are capable of broadband
17 speeds of 25 Mbps downstream /3 Mbps upstream, or better. The unbundled monthly
18 recurring rate charged by the Company for residential local exchange access service on
19 December 31, 2021, was 18.00. The unbundled monthly recurring rate charged by the
20 Company for residential local exchange access service on December 31, 2020, was 18.00.
21 The unbundled monthly rate charged by the Company for single line business local
22 exchange access service on December 31, 2021, was 18.00. The unbundled monthly rate
23 charged by the Company for single line business local exchange access service on December
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1 31, 2020, was 18.00. The unbundled monthly rate charged for broadband service as of
2 December 31, 2021, and as of December 31, 2020, is set out in the attached Exhibit 5.

3 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.

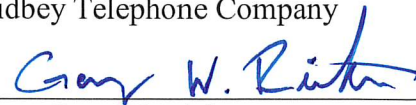
4 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the
5 Company is in compliance with the Federal Communications Commission's obligation for
6 deployment of broadband at speeds specified by the Federal Communications Commission
7 applicable to the Company and that the Company meets one of the eligibility criteria set out
8 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.

9 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.
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12 Respectfully submitted this 26th day of July, 2022.

13 Whidbey Telephone Company

14 By

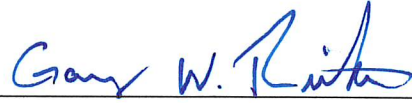


15 Gary W. Ricketts
16 Secretary & Treasurer
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21 CERTIFICATION

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

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7 Gary W. Ricketts

8 Secretary & Treasurer
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EXHIBIT 1

EXHIBIT 1

CORPORATE ORGANIZATIONAL CHART

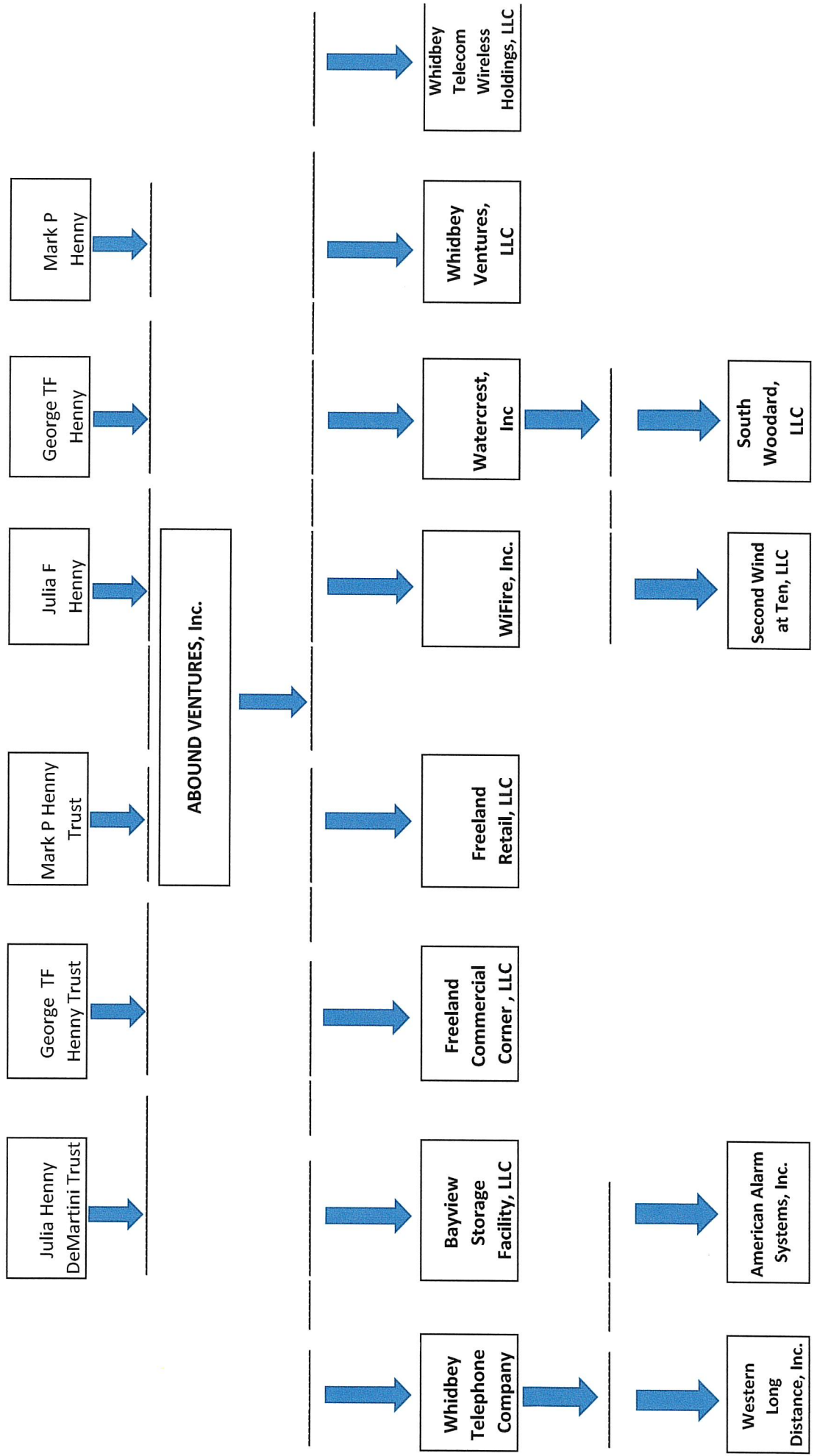


EXHIBIT 2

EXHIBIT 2

DESCRIPTION OF TRANSACTIONS BETWEEN COMPANY AND AFFILIATES

The following are transactions between Whidbey Telephone Company (“Company”) and the Company affiliates or the holding company that are shown in Exhibit 1, as well as officers and directors, that are recorded on the books of the Company:

Ownership and Abound Ventures, Inc.

- Certain shareholders holding, directly or indirectly, five percent or more of the stock of Abound Ventures, Inc. are also employees of the Company and receive from the Company employment compensation and employment-associated benefits in accordance with benefit plans that are in place.

The Company and Abound Ventures, Inc.

- The Company is a wholly owned subsidiary of Abound Ventures, Inc., which is a holding company.

The Company and Western Long Distance, Inc.

- The Company provides billing and collection services on behalf of Western Long Distance, Inc. (WLD). These services are billed to WLD, and are treated as Carrier Billing and Collection Revenue by the Company. To the extent that these services are jurisdictionally intrastate, they are priced at rates equal to the billing and collection rates specified in the Company’s Tariff WN U-5; to the extent that these services are jurisdictionally interstate, they are charged (to the extent applicable) at the same rate charged to other IXC(s) to whom the Company provides Billing and Collection services.
- WLD provides long distance carrier service to the Company. This service is billed to the Company at WLD’s price list rates. The Company records General and Administrative Expenses for this service.

The Company and American Alarm Services, Inc.

- The Company provides American Alarm Services, Inc. (AAS) with local telephone service at rates and charges set forth in the Company’s Tariff WN U-5.
- AAS provides alarm and monitoring services for the Company. The Company records Regulated Land & Building Expense subject to Part 64 allocations.

The Company and Bayview Storage Facility, LLC

- Bayview Storage Facility provides storage for rent on a monthly basis. The Company occasionally will perform maintenance on the building and records Non-Regulated Land & Building Expense on its books. The Company rents several storage units on a monthly basis and records the appropriate expense on its books, depending on the use of the storage unit.

The Company and Freeland Commercial Corner, LLC

- Freeland Commercial Corner rents small office space for tenants. The Company occasionally will perform maintenance on the building and records Non-Regulated Land & Building Expense on its books.

EXHIBIT 3



EXHIBIT 3
BROADBAND PLAN

This Broadband Plan, as contemplated by RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d), is being adopted by **Whidbey Telephone Company** (“Company”) with the expectation that it will be submitted to the Washington Utilities and Transportation Commission (“Commission”) as one component of a petition by the Company for support from the state Universal Communications Services Program established by RCW 80.36.650 (“Program”). Pursuant to RCW 80.36.650(3), a recipient of support from the Program is to have adopted a plan to provide, enhance, or maintain broadband services in its service area. As set out in WAC 480-123-110(1)(d), the broadband plan is to include specific elements, but only to the extent applicable to that particular broadband plan. The broadband plan does not have to include all elements, but potential elements include the following: (1) a multi-year investment plan; (2) specific project(s) that are projected to provide or enhance broadband services at speeds required by the Commission or the Federal Communications Commission; (3) a plan for maintenance of broadband services in the provider’s service area; (4) a description of how the provider will enhance broadband services in its service area; and (5) any other information that the Commission may request to assist in the Commission's review and analysis of the provider's broadband plan. Where there are specific projects, the project information is to include an estimated timeline, geographic location, number of locations passed, and upload and download speeds that are projected to be produced by the project.

The Company has already constructed facilities sufficient for it to satisfy criterion three of WAC 480-123-110 and, as a result, has placed into service robust broadband infrastructure throughout all populated portions of its service area. Consequently, the Company intends to apply

for Program support to allow it to continue to provide telecommunications services and broadband services at or above the levels that it is providing today. Accordingly, the Company's broadband plan includes the following elements:

Broadband Plan:

This plan includes the strategic deployment of fiber in various areas of our service area. The Company's plan anticipates for 2023 investment and expenses to be projected at: \$4,400,000 for gross capital expenditures and \$5,500,000 for repair and maintenance expenses. The repair and maintenance expense include labor for our Outside Plant employees who maintain the copper and fiber plant in the field. We anticipate continued demand for broadband on our copper network in places where fiber isn't yet available, which increases our labor and material costs as we upgrade the broadband speed to the premise. The repair and maintenance expense include network administration employees who maintain the switch and network electronics both in our central office and cabinets in the field, along with our technology team who maintain the internal and external delivery of broadband to our customers.

The deployment of fiber is a critical investment to remain competitive in our market and to provide our customers with the highest quality broadband and reliable service. The company has capital expenditure plans to build out fiber down several main corridors in our service area which will allow us to continue to expand our fiber footprint quickly and efficiently. The strategic areas include these locations (subject to change), Bailey road mainline, Cultus Bay road mainline, Possession road mainline, French road mainline, and Maxwellton road mainline. The Company expects to pass several hundred houses, with those houses capable of receiving high speed internet exceeding 25/3 mbps upload and download speeds with a projected completion date before the end of 2023. In 2023, the Company also plans on installing fiber in three neighborhoods (subject to change); Lakeview Terrace with 282 homes, Goss Lake with 230 homes, along with additional

portions of Point Roberts with 150 homes. At the time of this report, the estimated cost to build out these strategic areas will exceed \$4 million dollars.

In addition to the foregoing, the Company's broadband plan includes continued investment by the Company in the maintenance and enhancement of its telecommunications and broadband network.

The Company anticipates that, if its application for support from the Program during the coming Program year is granted, its expenditures during that period in providing, enhancing and maintaining broadband services in its service area, including payments in support of the above-mentioned RUS financing, will exceed the funding that it expects to receive from the Program for that period. This expectation reflects the Company's belief that it will continue to be guided by its goal of providing robust broadband capability wherever such capability is needed within the Company's service area.

The foregoing Broadband Plan was adopted by Whidbey Telephone Company on July 31, 2020.

EXHIBIT 4

Certification Relating to Accounting Standards

I, Gary W. Ricketts, am an officer of Whidbey 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 26th day of July, 2022.



Gary W. Ricketts
Secretary & Treasurer

EXHIBIT 5

For Exhibit 5
 Unbundled Monthly Rate Charge for Broadband Services
 WHIDBEY TELEPHONE COMPANY

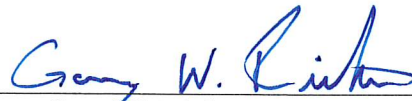
Download Speed (Mbps) (up to)	Upload Speed (Mbps) (up to)	Type	Prior Year End of Year 2020	Current Year End of Year 2021
10	3	DSL	\$43.00	\$43.00
20	3	DSL	\$50.00	\$50.00
30	3	DSL	\$60.00	\$60.00
30	10	DSL	\$70.00	\$70.00
50	10	DSL	\$80.00	\$80.00
50	20	DSL	\$90.00	\$90.00
100	100	Fiber	\$60.00	\$60.00
300	300	Fiber	\$80.00	\$80.00
1000	1000	Fiber	\$90.00	\$90.00

EXHIBIT 6

CONTINUED OPERATIONS CERTIFICATE

I, Gary W. Ricketts, an officer of Whidbey Telephone Company (the Company as set out in the Petition to which this is an Exhibit), under penalty of perjury, hereby certify that if the Company receives Program support, the Company will continue to provide communications services pursuant to its tariffs on file with the Commission and will continue to provide broadband services throughout its service territory in Washington for which the Company is seeking and receives Program support during the entirety of 2023.

Dated at Langley, Washington this 26th day of July, 2022.

A handwritten signature in blue ink that reads "Gary W. Ricketts". The signature is written in a cursive style and is positioned above a horizontal line.

By: Gary W. Ricketts

Title: Secretary & Treasurer

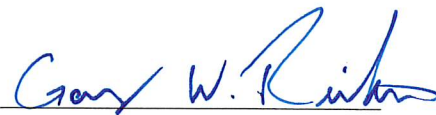
EXHIBIT 7

Certification of Eligibility

I, Gary W. Ricketts, am an officer of Whidbey 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 has already met the Federal Communications Commission's total deployment obligations associated with federal high-cost program support as of the date of the Petition to which this is an Exhibit. I certify that since January 1, 2018, the Company has been deploying broadband to additional locations and certifies that it will deploy broadband to the remaining number of locations as determined by the Washington Utilities and Transportation Commission by order.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 26th day of July, 2022.



By: Gary W. Ricketts

Title: Secretary & Treasurer