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July 31, 2023

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

Re: Petition to Receive Support from the State Universal Communications Services Program  
Pursuant to WAC 480-123-100 and 480-123-110

CLAIM OF CONFIDENTIALITY

Dear Ms. Maxwell:

Pursuant to WAC 480-123-100 and WAC 480-123-110, by this letter and its accompanying documents, St John Telephone, Inc. ("Company") hereby petitions the Washington Utilities and Transportation Commission ("WUTC") to receive support from the state Universal Communications Services Program for the Program year 2024.

The petition for support and exhibits that are specified in WAC 480-123-100 and WAC 480-123-110 accompany this letter and, together with this letter, are being filed electronically. The electronic filing includes .pdf format files for this letter, the petition and the exhibits.

Please note that portions of the information in the accompanying exhibits are being filed on a confidential basis pursuant to WAC 480-07-160, in that certain of the information contained therein constitutes valuable and confidential commercial information, including financial information. Both confidential (unredacted) and redacted versions accompany this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Dennis", is written over the typed name and title.

Joseph Dennis  
Vice President of Operations

Accompanying documents

**OFFICERS**

Gary Bailey • *President*  
Mac W. Mills • *Vice President*  
Jessiann Loomis • *Secretary*

**DIRECTORS**

Jerry Schauble  
Drew Gordon

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**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

IN RE

PETITION OF ST. JOHN TELEPHONE,  
INC. TO RECEIVE SUPPORT FROM THE  
STATE UNIVERSAL COMMUNICATIONS  
SERVICES PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

COMES NOW St. John Telephone, Inc. (the "Company") and, pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to receive support from the state Universal Communications Services Program (the "Program") for the Program year 2024.

**I. Demonstration of Eligibility under WAC 480-123-100**

1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC 480-120-021 that serves fewer than forty thousand access lines within the state.
2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined in 47 U.S.C. Sec. 251(h).

- 1 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange  
2 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 3 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-  
4 123-110, to provide, maintain or enhance broadband service (See II.4, below).
- 5 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an  
6 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal  
7 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for  
8 High Cost Areas with respect to the service areas for which the Company is seeking  
9 Program support.

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

- 12 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications  
13 services and is seeking Program support is as follows: St. John Telephone, Inc.
- 14 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between  
15 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. A  
16 detailed description of any transactions between the Company and the affiliates named in  
17 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2.
- 18 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.  
19 14 of the Company's Tariff WN U-3.
- 20 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance  
21 broadband services in its service area is attached hereto as Exhibit 3.
- 22 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the  
23 Company complies with state and federal accounting, cost allocation, and cost adjustment  
24 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.

6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by the Company as of December 31, 2022, was 267. The number of residential local exchange access lines served by the Company as of December 31, 2021, was 294. The number of business local exchange access lines served by the Company as of December 31, 2022, was 112. The number of business local exchange access lines served by the Company as of December 31, 2021, was 118. The Company as of December 31, 2022 was capable of serving 615 locations with broadband speeds at or above 25/3 Mbps. The number of existing broadband connections served by the Company as of December 31, 2022, was 481. The number of existing broadband connections served by the Company as of December 31, 2021, was 469. Currently, of an estimated approximately 615 potential broadband locations in the Company's service area, approximately 615 of such locations have actually available broadband service with capability of broadband speeds of 25/3 Mbps, or better, provided by the Company or a Company affiliate.<sup>1</sup> The unbundled monthly recurring rate charged by the Company for residential local exchange access service on December 31, 2022 and 2021, was \$18.00. The unbundled monthly rate charged by the Company for single line business local exchange access service on December 31, 2022 and 2021, was \$18.00. (The Company has other business local exchange service rates, but the Company understands that WAC 480-123-110(1)(g) is requesting the single line business local exchange access service rate.) The

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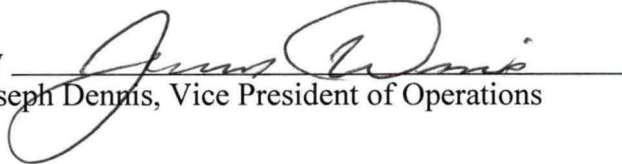
<sup>1</sup> The definition of the term "actually available," as used in the sentence to which this footnote is attached, is consistent with the meaning of that term found in Paragraph 13 of the FCC's Digital Opportunity Data Collection Report and Order (FCC 19-79) – service is actually available in an area (to a location) if the reporting fixed provider has a current broadband connection to such location, or could provide such a connection within ten business days of a customer request, without an extraordinary commitment of resources, and without construction charges or fees exceeding an ordinary service activation fee.

1 unbundled monthly rate charged for broadband service as of December 31, 2022, and as of  
2 December 31, 2021, 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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11  
12 Respectfully submitted this 31st day of July, 2023.

13 ST. JOHN TELEPHONE, INC.

14  
15 By   
16 Joseph Dennis, Vice President of Operations

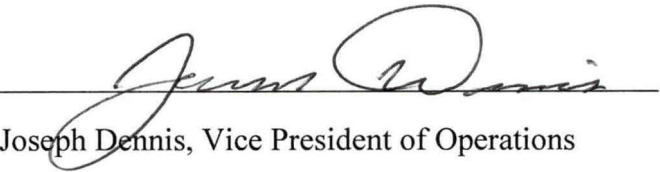
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19 CERTIFICATION

20 I, Joseph Dennis, an officer of the Company that is responsible for the Company's business  
21 and financial operations, in that capacity hereby certify that the information and representations set  
22 forth in the Petition, above, are accurate and the Company has not knowingly withheld any  
23

1 information required to be provided to the Commission pursuant to the rules governing the  
2 Program.

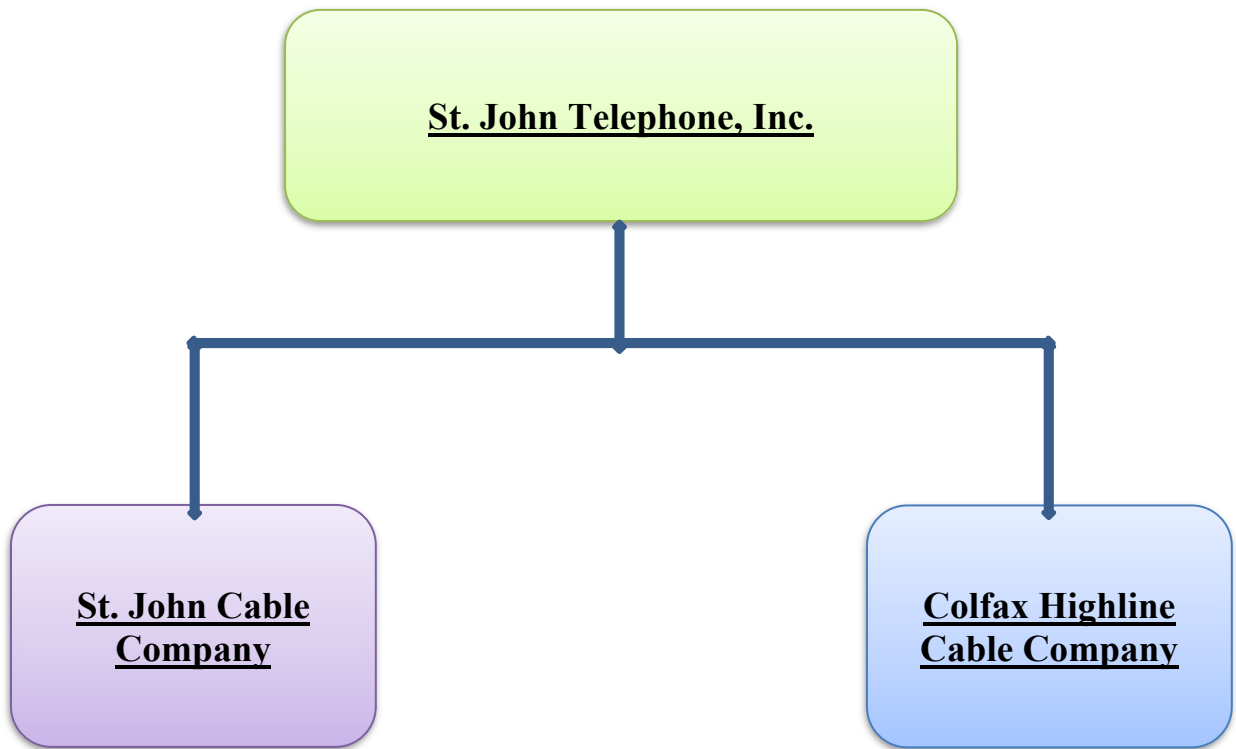
3 I declare under penalty of perjury under the laws of the State of Washington that the  
4 foregoing is true and correct.

5 Signed this 31st day of July, 2023, at St. John, Washington.

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8   
9 Joseph Dennis, Vice President of Operations

# EXHIBIT 1

## CORPORATE ORGANIZATION CHART



## **EXHIBIT 2**

### **AFFILIATED TRANSACTIONS**

The Company has affiliated transactions with its subsidiary companies St. John Cable Company and Colfax Highline Cable Company. The nature of these transactions for 2022 among these entities consists of loan advances and telecommunication services. The Company advances funds to the affiliates and provides wholesale interstate special access DSL services to St. John Cable Company, bills the Company's subscribers on behalf of St. John Cable Company for retail broadband services. All affiliates pay their share of federal income taxes to the Company. The Company records these transactions to the proper affiliated payable or receivable account.



**EXHIBIT 3**

**BROADBAND PLAN**

This Broadband Plan is being submitted by St. John Telephone, Inc. (“Company”) in compliance with RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d). Under the terms of the legislation incorporated into RCW 80.36.650(3), a recipient of support from the state Universal Communications Services Program (“Program”) is to submit a broadband plan showing how the provider will provide, maintain, or enhance 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 it can include any of the following elements: (1) a multi-year investment plan; (2) specific projects that are projected to provide or enhance broadband service 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.

St. John Telephone, Inc. has constructed sufficient facilities for it to fall into either criterion three or criterion four of WAC 480-123-110 and as a result has constructed substantial broadband infrastructure throughout much or all of its service territory. This means that the Company is looking for Program support to allow it to continue to provide telecommunications services and broadband services at the levels that are provided today, with enhancements becoming available where appropriate. St. John Telephone, Inc.’s plan anticipates for 2024 planned investment and expenses to be projected at \$ [REDACTED] for gross capital expenditures, \$ [REDACTED] for repair and maintenance expenses and \$ [REDACTED] for repayment of loan funds that were used in previous years to complete the fiber-to-the-home project.

Capital expenditures projected for 2024 will be used to purchase other work equipment, a vehicle and central office equipment, make minor building improvements and installing new fiber drops. Typically, the Company installs one to two fiber drops per year in response to customer request and costs are significant due to the terrain and length of the drops. Repair and maintenance estimated expenditures include plant specific related expenses to the building and vehicle costs, central office switching and several transport equipment support maintenance, middle mile costs, performance testing monitoring and fiber repairs, as well as non-specific related expenses for plant administration and operations labor and associated overhead by company personnel.

The foregoing Broadband Plan was initially adopted by St. John Telephone, Inc. on July 30, 2020. The Company management reviews the Broadband Plan annually.

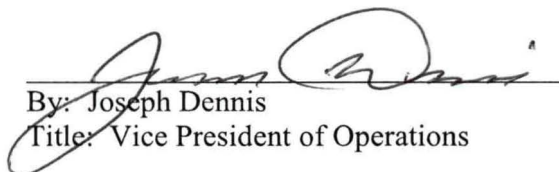
**EXHIBIT 4**

**CERTIFICATION RELATING TO ACCOUNTING STANDARDS**

I, Joseph Dennis, an officer of St. John Telephone, Inc. (the “Company” as set out in the Petition to which this is an Exhibit), in that capacity hereby certify that the Company complies with state and federal accounting, cost allocation, and cost adjustment rules pertaining to incumbent local exchange carriers.

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

Signed this 31<sup>st</sup> day of July, 2023, at St. John, Washington.

  
By: Joseph Dennis  
Title: Vice President of Operations

## EXHIBIT 5

### UNBUNDLED MONTHLY RATE CHARGE FOR BROADBAND SERVICES

#### ST. JOHN TELEPHONE, INC.

Download Speed*	Upload Speed*	End of Year Rate 2021	End of Year Rate 2022	Res/ Bus/ Both
25	25	\$ 38.00	\$ 40.00	Both
100	100	\$ 45.00	\$ 50.00	Both
250	250	\$ 85.00	\$ 85.00	Both

\*mbps

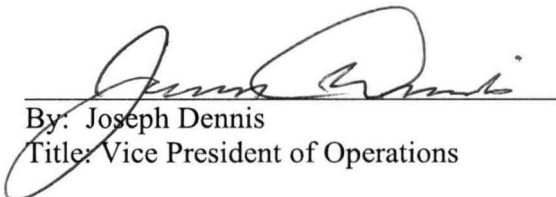
## EXHIBIT 6

### CONTINUED OPERATIONS CERTIFICATE

I, Joseph Dennis, an officer of St. John Telephone, Inc. (the "Company" as set out in the Petition to which this is an Exhibit), in that capacity hereby certify that if the Company receives Program support for the Program Year to which the Petition to which this Exhibit 6 is a part pertains, during that Program Year, (i) the Company will continue to provide communications services pursuant to its tariffs on file with the Commission throughout its service territory in Washington for which the Company is seeking and receives such Program support and (ii) the Company or its affiliate will continue to provide broadband services during the entirety of the year in which the Company is applying for support from the Program.

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

Signed at St. John, Washington this 31<sup>st</sup> day of July, 2023.

  
By: Joseph Dennis  
Title: Vice President of Operations

**EXHIBIT 7**

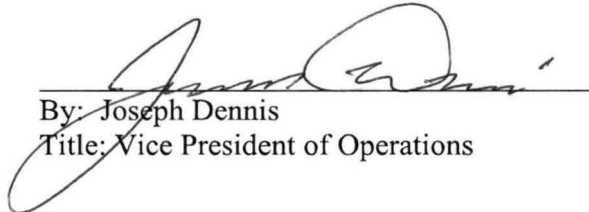
**CERTIFICATION OF ELIGIBILITY**

I, Joseph Dennis, an officer of St. John Telephone, Inc. (the "Company" as set out in the Petition to which this is an Exhibit), in that capacity hereby 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.

For WAC 480-123-110 (1)(j)(iv): Further, I hereby certify that the Company has broadband service available to one hundred percent of locations within the Company's service area and the Company commits to making broadband service available to any new locations within the Company's service area if such arise.

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

Signed at St. John, Washington this 31<sup>st</sup> day of July, 2023.

  
By: Joseph Dennis  
Title: Vice President of Operations