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

8 IN RE

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10 PETITION OF HOOD CANAL
11 TELEPHONE CO., INC. TO RECEIVE
12 SUPPORT FROM THE UNIVERSAL
13 SERVICE COMMUNICATIONS
PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

14
15 COMES NOW Hood Canal Telephone Co., Inc. (the "Company") and, pursuant to Chapter
16 480-123 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC
17 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the
18 "Commission") to receive support from the Universal Service Communications Program (the
19 "Program") for the Program year 2021.

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

- 22 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
23 480-120-021 that serves fewer than forty thousand access lines within the state.

- 1 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined
2 in 47 U.S.C. Sec. 251(h).
- 3 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
4 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 5 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-
6 123-110, to provide, maintain or enhance broadband service (See II.4, below).
- 7 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
8 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal
9 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for
10 High Cost Areas with respect to the service areas for which the Company is seeking
11 Program support.

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: Hood Canal Telephone Co., Inc.
- 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. A
17 detailed description of any transactions between the Company and the affiliates named in
18 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2.
- 19 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet
20 No.105 of the Company's Tariff WN U-2.
- 21 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance
22 broadband services in its service area is attached hereto as Exhibit 3.

- 1 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the
2 Company complies with state and federal accounting, cost allocation, and cost adjustment
3 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 4 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
5 the Company as of December 31, 2019, was 468. The number of residential local exchange
6 access lines served by the Company as of December 31, 2018, was 537. The number of
7 business local exchange access lines served by the Company as of December 31, 2019, was
8 205. The number of business local exchange access lines served by the Company as of
9 December 31, 2018, was 211. The number of broadband connections served by the
10 Company as of December 31, 2019, was 1,104. The number of broadband connections
11 served by the Company as of December 31, 2018, was 1,063. The unbundled monthly
12 recurring rate charged by the Company for residential local exchange access service on
13 December 31, 2019 and 2018, was \$18.00. The unbundled monthly rate charged by the
14 Company for single line business local exchange access service on December 31, 2019 and
15 2018, was \$19.50. (The Company has other business local exchange service rates, but the
16 Company understands that WAC 480-123-110(1)(g) is requesting the single line business
17 local exchange access service rate.) The unbundled monthly rate charged for broadband
18 service as of December 31, 2019, and as of December 31, 2018, is set out in the attached
19 Exhibit 5.
- 20 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.
- 21 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the
22 Company is in compliance with the Federal Communications Commission's obligation for
23 deployment of broadband at speeds specified by the Federal Communications Commission
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1 applicable to the Company and that the Company meets one of the eligibility criteria set out
2 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.

3 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.
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6 Respectfully submitted this 30th day of July, 2020.

7 HOOD CANAL TELEPHONE CO., INC.

8 By Richard Buechel
9 Richard Buechel, President

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12 CERTIFICATION

13 I Richard Buechel, an officer of the Company that is responsible for the Company's business
14 and financial operations, hereby certify under penalty of perjury that the information and
15 representations set forth in the Petition, above, are accurate and the Company has not knowingly
16 withheld any information required to be provided to the Commission pursuant to the rules
17 governing the Program.
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21 Richard Buechel

22 Richard Buechel, President
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EXHIBIT 1

CORPORATE ORGANIZATION CHART

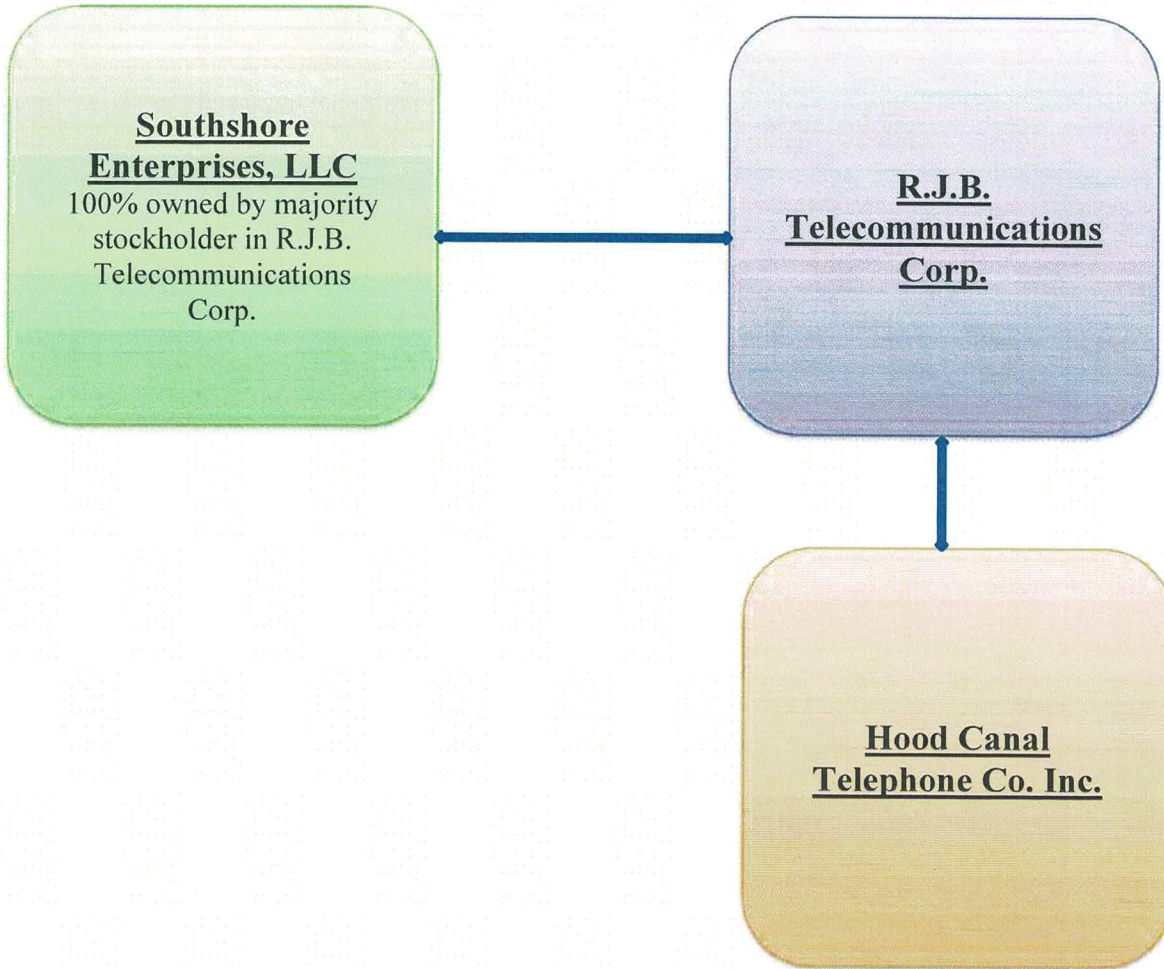


EXHIBIT 2

AFFILIATED TRANSACTIONS

The Company has affiliated transactions with its parent holding company R.J.B. Telecommunications Corp. These transactions consist of advances between the two entities. The Company records these transactions to the proper affiliated payable or receivable account.

The Company has transactions with Southshore Enterprises, LLC which is 100% owned by a majority stockholder of R.J.B. Telecommunications, Corp. These transactions consist of rents on certain real properties and equipment. The Company records these rents to the appropriate plant specific expense account and proper payable account.

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

EXHIBIT 3

BROADBAND PLAN

This Broadband Plan is being submitted by Hood Canal Telephone Co., Inc. 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 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.

Hood Canal Telephone Co., 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. Hood Canal Telephone Co., Inc. plan anticipates for 2021 planned investment and expenses to be projected at [REDACTED] for gross capital expenditures and [REDACTED] for repair and maintenance expenses. The specific projects planned for 2021 are to install passive optical network (PON) fiber-to-the-home electronics to Union Park and Downtown Union locations to provide higher quality broadband to approximately 100 and 45 subscriber respectively for an estimated cost of [REDACTED]. Timeline for project is to be complete by year-end 2021 and to provide up to 100/100 speed tier. The Company plans to complete the Alderbrook PON fiber-to-the-home electronics project that started in 2020 to provide higher quality broadband to approximately 150 subscribers by mid-year for approximately [REDACTED] at the 100/100 speed tier in 2021.

The foregoing Broadband Plan was adopted by Hood Canal Telephone Co., Inc. on July 30, 2020.

EXHIBIT 4

CERTIFICATION RELATING TO ACCOUNTING STANDARDS

I, Richard Buechel, am an officer of Hood Canal Telephone Co., Inc. (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 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 30th day of July, 2020.



By: Richard Buechel

Title: President

**EXHIBIT 5
UNBUNDLED MONTHLY RATE CHARGE FOR BROADBAND SERVICES**

HOOD CANAL TELEPHONE CO., INC.

Download Speed*	Upload Speed*	Type	Prior Year End of Year Rate 2018	Current Year End of Year Rate 2019	Res/ Bus/ Both
6	1	DSL Copper	\$ 39.95	\$ 39.95	Both
10	1	Fiber/Cable Modem	\$ 42.95	\$ 42.95	Both
25	3	Fiber/Cable Modem	\$ 48.95	\$ 48.95	Both
35	5	Cable Modem	\$ 63.95	\$ 63.95	Both
50	20	Cable Modem	\$ 79.95	\$ 79.95	Both
100	100	Fiber	\$ 63.95	\$ 63.95	Both
100	100	DSL Fiber	\$ 41.45	\$ 41.45	Both
1000	1000	Fiber	\$ 83.95	\$ 83.95	Both

*mbps

EXHIBIT 6

CONTINUED OPERATIONS CERTIFICATE

I, Richard Buechel, an officer of Hood Canal Telephone Co., Inc. (the "Company"), 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 2021.

Dated at Union, Washington this 30th day of July, 2020.



By: Richard Buechel

Title: President

EXHIBIT 7

CERTIFICATION OF ELIGIBILITY

I, Richard Buechel, am an officer of Hood Canal Telephone Co., Inc. (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.

For WAC 480-123-110 (1)(j)(iv): Further, I 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.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 30th day of July, 2020.



By: Richard Buechel

Title: President