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

8 IN RE

9
10 PETITION OF ST. JOHN TELEPHONE,
11 INC. TO RECEIVE SUPPORT FROM THE
12 STATE UNIVERSAL COMMUNICATIONS
SERVICES PROGRAM

DOCKET NO.
PETITION FOR SUPPORT

13 COMES NOW St. John Telephone, Inc. (the "Company") and, pursuant to Chapter 480-123
14 of the Washington Administrative Code ("WAC") including, but not limited to, WAC 480-123-110,
15 hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to
16 receive support from the State Universal Communications Services Program established in RCW
17 80.36.650 (the "Program") for Program year 2017.
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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 less 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).
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- 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's rates for residential local exchange service, plus
4 mandatory extended area service charges, are no lower than the local urban rate floor
5 established by the Commission as the benchmark rate based on the Federal Communications
6 Commission's national local urban rate floor pursuant to 47 C.F.R. Sec. 54.318 in effect on
7 the date of this Petition.
- 8 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
9 eligible telecommunications carrier for purposes of receiving federal universal services
10 support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for High Cost
11 Areas with respect to the service area for which the Company is seeking Program support.
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13 **II. Demonstration of Eligibility under WAC 480-123-110**

- 14 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
15 services and is seeking Program support is as follows: St. John Telephone, Inc.
- 16 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between
17 the Company and all affiliates as defined in RCW 80.16.010, is attached hereto as Exhibit 1.
18 A detailed description of any transactions between the Company and the affiliates named in
19 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2.
- 20 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.
21 20 of the Company's Tariff WN U-1.
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- 1 4. WAC 480-123-110(1)(d): A demonstration that the Company's customers are at risk of rate
2 instability or service interruption or cessation in the absence of support from the Program is
3 attached as Exhibit 3.
- 4 5. WAC 480-123-110(1)(e)(i): On the Commission's prescribed form, attached hereto as
5 Exhibit 4, are copies of the Company's balance sheet as of December 31, 2015, and
6 December 31, 2014, and copies of the Company's statements of income and retained
7 earnings or margin for the years ended December 31, 2015 and December 31, 2014. In
8 addition, certain service information requested by the Commission is included in Exhibit 4.
- 9 6. WAC 480-123-110(1)(e)(ii): A copy of the Company's consolidated annual financial
10 statements for the years ended December 31, 2015 and December 31, 2014, are attached
11 hereto as Exhibit 5.
- 12 7. WAC 480-123-110(1)(e)(iii): Information demonstrating the Company's earned rate of
13 return on a total Washington unseparated regulated operations basis for each of the two prior
14 years, calculated in the manner prescribed by the Commission, is provided in Exhibit 4
15 hereto.
- 16 8. WAC 480-123-110(1)(e)(iv): Information demonstrating the Company's earned return on
17 equity on a total company (regulated and non-regulated) Washington basis for each of the
18 two prior years, calculated in the manner prescribed by the Commission, is provided in
19 Exhibit 4 hereto.
- 20 9. WAC 480-123-110(1)(e)(v): Information detailing all of the Company's revenues and assets
21 from the balance sheets, statements of income and retained earnings or margin in the same
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1 format and detail as is required to complete USDA-RUS Operating Report for the prior two
2 years is presented on Exhibit 6 attached hereto.

3 10. WAC 480-123-110(1)(e)(vi): A statement under penalty of perjury from a Company officer
4 with personal knowledge and responsibility certifying that no corporate operations
5 adjustment to existing high-cost loop and interstate common line support mechanisms
6 required by the Federal Communications Commission applied to the Company for the two
7 prior years is attached hereto as Exhibit 7.
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9 11. WAC 480-123-110(1)(e)(vii): Exhibit 4 contains additional supporting information
10 requested by the Commission.

11 12. WAC 480-123-110(1)(e)(viii): A statement under penalty of perjury from a Company
12 officer with personal knowledge and responsibility certifying that the Company complies
13 with state and federal accounting, cost allocation, and cost adjustment rules pertaining to
14 incumbent local exchange companies is attached hereto as Exhibit 8.
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16 13. WAC 480-123-110(1)(f): A complete copy of the FCC Form 481 filed by the Company or
17 on its behalf with the Federal Communications Commission for the calendar year preceding
18 the current year has already been filed with the Commission. See the Company's filing in
19 Docket No. UT-160030 filed on or about July 1, 2016.

20 14. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
21 the Company as of December 31, 2015, was 391, all of which were within the geographic
22 area for which the Company is seeking support. The number of residential local exchange
23 access lines served by the Company as of December 31, 2014, was 412, all of which were
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1 within the geographic area for which the Company is seeking support. The number of
2 business local exchange access lines served by the Company as of December 31, 2015, was
3 136, all of which were within the geographic area for which the Company is seeking
4 support. The number of business local exchange access lines served by the Company as of
5 December 31, 2014, was 137, all of which were within the geographic area for which the
6 Company is seeking support. The monthly recurring rate charged by the Company for
7 residential local exchange access service on December 31, 2015 and 2014, was \$16.00. The
8 monthly recurring rate charged by the Company for residential local exchange access
9 service on June 1, 2016, was \$18.00. The rate charged by the Company for single line
10 business local exchange access service on December 31, 2015 and 2014, was \$16.00. The
11 rate charged by the Company for single line business local exchange access service on June
12 1, 2016, was \$18.00. (The Company has other business local exchange service rates, but the
13 Company understands that WAC 480-123-110(1)(g) is requesting the single line business
14 local exchange access service rate.)
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17 15. WAC 480-123-110(1)(h): The requested statement is attached hereto as Exhibit 9.

18 16. The 2011 Rate of Return Carrier Base Period Revenue amount on line 4 of the CAF ICC
19 Data Collection Report for the period of July 1, 2016 to June 30, 2017 has not changed from
20 prior filings for St. John Telephone, Inc.

21 17. All exhibits attached hereto are incorporated in this Petition as though fully set forth.

22 Respectfully submitted this 29th day of July, 2016.

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24 ST. JOHN TELEPHONE, INC.
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CERTIFICATION

I, Eric Trump, an officer of St. John Telephone, Inc. (the "Company") that is responsible for the Company's business and financial operations, hereby certify under penalty of perjury that the information and representations set forth in the Petition, above, are accurate and the Company has not knowingly withheld any information required to be provided to the Commission pursuant to the rules governing the Program.

Dated at St. John, Washington this 29th day of July, 2016.

By: _____

Title: Eric Trump, General Manager