

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKET UT-121524
)	
Total Call Mobile, Inc.,)	ORDER 01
)	
Petitioner,)	
)	
Seeking Designation as an Eligible)	
Telecommunications Carrier in the)	ORDER GRANTING ELIGIBLE
state of Washington pursuant to)	TELECOMMUNICATIONS CARRIER
47 U.S.C. § 214(e)(2) (Low Income)	DESIGNATION WITH CONDITIONS
Only))	AND EXEMPTION FROM RULE
.....)	

BACKGROUND

- 1 On September 18, 2012, Total Call Mobile, Inc. (Total Call or Company) filed its original petition (petition) with the Washington Utilities and Transportation Commission (Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) in the state of Washington under the Communications Act of 1934,¹ applicable FCC rules, and WAC 480-123. Total Call proposes to provide qualified Washington consumers with Lifeline services, which are federal Universal Service Fund (USF) supported services.² ETC designation would allow the Company to receive federal low-income universal service support for prepaid wireless service applicable to Lifeline services. In support of its petition, Total Call filed its FCC-approved compliance plan with the Commission³ and a list of Washington wire centers for which the company requests ETC designation.⁴
- 2 On February 21, 2014, Total Call filed an amended petition with the Commission to request an exemption from WAC 480-123-030(1). The amended petition also updated the Company’s terms of service, including a detailed description of its no charge Lifeline offerings for specified customer plans. Total Call also filed a revised exhibit listing the actual Washington exchanges for which the company requests ETC designation.⁵

¹ 47 U.S.C. § 214 (e)(2).

² The USF subsidizes monthly and initial connection charges for qualified low-income households.

³ Petition, Exhibit 5. The FCC approved Total Call’s compliance plan on May 25, 2012.

⁴ *Id.*, Exhibit 6.

⁵ Amended Petition, Revised Exhibit 6.

3 Total Call states that designating the Company as an ETC will further the public interest by providing Washington's low-income consumers with lower prices and higher quality services. The Company contends that adding Total Call to the marketplace will significantly benefit low-income consumers in Washington by providing:

- 1) A larger local calling area (as compared to traditional wireline carriers);
- 2) The convenience and security afforded by mobile telephone service;
- 3) The opportunity for customers to control cost by receiving a pre-set amount of monthly airtime at no charge with the ability to purchase additional low-cost usage at flexible and affordable amounts in the event that included usage has been exhausted; and
- 4) 911 and, where available, enhanced 911 service in accordance with current FCC requirements, even if a handset has a zero balance.⁶

Total Call also points out that granting its petition would serve the public interest by increasing competitive choice and by offering a range of six Lifeline service plans to its customers.⁷

4 Total Call proposes to resell wireless service from Sprint to provide Lifeline services. Therefore, Total Call's petition also seeks an exemption from the following provisions of WAC 480-123-030(1):

- WAC 480-123-030(1)(d) requires high-cost program participants to file a substantive plan of the investments to be made with initial federal support for the first two years of their programs. Total Call indicates that it does not seek ETC designation for the purpose of participating in the USF high-cost program, making the substantive investment plan inapplicable to its petition.⁸
- WAC 480-123-030(1)(f) requires submission of cell site maps of geographic service areas. Total Call states that it does not own, control, or plan to develop cell sites, but instead will rely on those owned and operated by Sprint in

⁶ Petition at 19-20.

⁷ Amended Petition at 3-4.

⁸ Amended Petition at 7-8.

Washington. Therefore, Total Call requests a waiver of this requirement to provide coverage maps.⁹

- WAC 480-123-030(1)(g) requires ETCs to demonstrate the ability to remain functional in emergency situations. As noted above, Total Call resells facilities owned by Sprint and therefore relies on those carriers' facilities for backup battery power at each cell site, backup generators at each microwave hub, and backup battery and generators at each switch located in Washington. Again, Total Call seeks a waiver of this filing requirement.¹⁰

5 Commission Staff (Staff) agrees with Total Call that the Company meets all applicable regulatory requirements to be designated as an ETC. However, Staff presented, and the Company agreed to comply with, a list of conditions the Commission previously imposed on other similarly situated Lifeline ETCs seeking to operate in Washington. These include compliance filings, customer communications, customer eligibility audits with the Department of Social and Health Services, and quarterly reports to be filed with the Commission. A complete list of these conditions is set forth in Appendix A to this order.

6 Staff also agrees with and recommends granting Total Call's request for exemptions from the filing requirements of WAC 480-123-030(1)(d), (f), and (g).

DISCUSSION

7 Common carriers receiving designation as ETCs under 47 U.S.C. § 214 are eligible to receive funds from the federal USF for Lifeline services. State utility commissions are responsible for designating common carriers as ETCs for the purpose of receiving such funds, and may impose conditions on a common carrier so designated.¹¹ The Commission will approve petitions from carriers requesting ETC designation if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.¹²

⁹ Petition at 14-15.

¹⁰ Petition at 15-16.

¹¹ *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d),(f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund*, Order 03 (June 24, 2010), UT-093012, ¶ 78.

¹² WAC 480-123-040.

- 8 State commissions may designate more than one carrier as an ETC in an area if such designation is consistent with the public interest, convenience, and necessity and the carrier seeking ETC designation meets these two requirements of 47 U.S.C. § 214(e)(1):
- (A) Offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
 - (B) Advertise the availability of such services and the charges therefor using media of general distribution.
- 9 We agree with Staff that Total Call is capable of providing services supported by federal universal service mechanisms, as defined in 47 C.F.R. § 54.101(a), by reselling wireless service from Sprint, its underlying network carrier. If the FCC approves a carrier's compliance plan, the FCC does not apply the Act's "own facilities" requirement to carriers that seek limited ETC designation solely to participate in the Lifeline program. The compliance plan must demonstrate that the ETC applicant commits to fight waste, fraud, and abuse in the Lifeline program and will adhere to federal Lifeline rules. Here, Total Call seeks ETC designation for the limited purpose of participating in the Lifeline program, and the FCC approved Total Call's compliance plan on May 25, 2012.¹³ Further, Total Call commits to advertise its Lifeline services.¹⁴
- 10 Staff is correct that certain additional conditions should be imposed on Total Call as we have done when designating other similarly situated ETCs in Washington. Appendix A to this order provides the Company specific guidance on our expectations for regulatory compliance, customer service, consumer protection, and various reporting requirements that will ensure Staff can monitor Total Call's operations for strict adherence to all ETC requirements.
- 11 We also agree that Total Call has demonstrated that the requirements of WAC 480-123-030(1)(d) should not apply to the Company because the rule only applies to high-cost program participants and Total Call is not a high-cost program participant. WAC 480-123-030(1)(f) and (g) also do not apply to Total Call's proposed operations as an ETC because the Company will not use its own facilities to provide service; rather, Total Call

¹³ *Wireline Competition Bureau Approved the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, FCC Public Notice, WC Docket Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

¹⁴ Petition at 12-13.

will rely on an underlying carrier's facilities and backup services. The Company's request for exemption from these portions of WAC 480-123-030 should be granted.

FINDINGS AND CONCLUSIONS

- 12 (1) The Commission has jurisdiction over the subject matter of this order and is authorized to designate Eligible Telecommunications Carriers in Washington under 47 U.S.C. § 214(e)(2), 47 C.F.R. §54.201(b)-(c), and WAC 480-123.
- 13 (2) Total Call Mobile, Inc. is a telecommunications company seeking to do business in the state of Washington. Total Call meets the requirements for designation as an ETC because the FCC has approved Total Call's compliance plan and Total Call has committed to advertise the availability of its services and the charges therefor using media of general distribution. Total Call's designation as an ETC will advance the purpose of universal service because Total Call will offer voice telephony services, which facilitate universal service. Total Call has also demonstrated that its designation as an ETC is in the public interest.
- 14 (3) The Commission may grant an exemption from any of its rules if consistent with the public interest, the purposes underlying regulation, and applicable statutes. Total Call has demonstrated that the requirements of WAC 480-123-030(1)(d), (f), and (g) should not apply to the Company and that granting the requested exemption is in the public interest and consistent with applicable laws and rules.
- 15 (4) This matter came before the Commission at its regularly scheduled meeting on March 27, 2014.

ORDER

THE COMMISSION ORDERS:

- 16 (1) Total Call Mobile, Inc.'s request for designation as an ETC is hereby GRANTED, subject to the conditions set out in Appendix A and limited to the list of Washington exchanges set forth in Appendix B to this order.
- 17 (2) Total Call Mobile, Inc.'s request for exemption from WAC 480-123-030(1)(d), (f), and (g) is hereby GRANTED.
- 18 (3) The Commission retains jurisdiction over this matter for purposes of effectuating this order.

DATED at Olympia, Washington, and effective March 27, 2014.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

JEFFREY D. GOLTZ, Commissioner

APPENDIX A

Washington State Conditions on Designation of Total Call Mobile, Inc. as an Eligible Telecommunications Carrier

1. Within 30 days of approval of its ETC designation in Washington and prior to offering Lifeline services, Total Call Mobile, Inc.'s (Total Call or Company) must make a compliance filing for approval by the commission containing the following:
 - a. Total Call's Lifeline rate plans, terms and conditions. The rates, terms and conditions shall include all provisions that apply to the Lifeline services offered by Total Call in Washington State and detailed procedures explaining how customers can participate in a particular Lifeline plan.
 - b. Total Call's proposed language to be used in all advertising of Lifeline services and on its websites. The language shall include information directing customers to the Washington State Office of the Attorney General for complaints regarding any Lifeline service issues.
 - c. Total Call's Lifeline Customer Application Form.

Commission staff shall review Total Call's compliance filing and recommend to the commission whether it should be approved or rejected within ten business days. Total Call shall not offer Lifeline services until the commission has approved its compliance filing.

2. Total Call shall utilize federal default eligibility criteria only, i.e., not utilizing Washington Telephone Assistance Program eligibility criteria that are not on the federal list.
3. Total Call shall file with the Commission any future changes to its rates, terms, conditions or Lifeline customer application form at least one day prior to the effective date of the change.
4. The information on Total Call's rates, key terms and conditions, e.g., return policy, usage definition, refill methods, annual recertification requirement, and customer service contact, shall be provided in a package sent or given to Lifeline customers after enrollment in Total Call's Lifeline program, as well as at Total Call's official Lifeline website.
5. For the rate plans free of charge to customers, Total Call must offer at least one plan with a minimum of 250 minutes per month. The Company may invoke Condition

- No. 2 only for the purpose of increasing the number of minutes or enhancing the features in the Lifeline plan, but not decreasing the number of minutes.
6. Total Call shall deactivate a Lifeline account if the customer has no usage for 60 consecutive days pursuant to 47 C.F.R. § 54.407(c)(2). No fewer than eight business days before deactivation, Total Call shall send the customer a written notice by mail about the potential deactivation and ways to avoid unwanted deactivation. The customer shall have a 30 day grace period from the deactivation date to reactivate the Lifeline account by incurring “usage” as defined in 47 C.F.R. § 54.407(c)(2). When a customer reactivates the account, Total Call must deposit the minutes the customer is entitled to for the grace period.
 7. On a quarterly basis, Total Call shall provide the number of Lifeline customers that it enrolls each month. Total Call shall also report the number of deactivated Lifeline customers each month by service plan and the reasons for deactivation, e.g., no usage for 60 consecutive days, annual verification unsuccessful, or voluntary exit. Quarterly reports shall be filed with the Commission no later than 30 days after the end of each quarter.
 8. Total Call shall respond within 30 days to Commission Staff’s information requests on Total Call’s Lifeline operations, including but not limited to Lifeline customers’ usage patterns and Lifeline customer records.
 9. Total Call shall cooperate with the commission and the Department of Social and Health Services (DSHS) to work out a procedure to verify Total Call Lifeline customers’ eligibility. Total Call shall maintain access to DSHS’s online query database to verify the eligibility of Lifeline applicants who qualify based on their participation in Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income and Temporary Assistance for Needy Families. This condition shall be required until the national Lifeline eligibility database is fully functional.
 10. Total Call must not deduct airtime minutes for calls to customer care made from the customer’s handset by dialing 611. Total Call shall explicitly state the policy of free 611 calls in its Lifeline service agreements. Total Call may require the customer to call the toll-free customer care number from another phone if necessary to resolve technical issues related to the handset or its programming.
 11. Total Call shall have DSHS audit its Washington Lifeline customers’ eligibility at least once a year. By January 31 of each year, Total Call shall provide DSHS with its complete Washington Lifeline customer records of the prior calendar year. The records must have all the necessary information and be in an electronic format required by DSHS. After DSHS notifies Total Call of the results of the review, Total Call must take appropriate measures to either correct the customer records or stop

providing services to ineligible customers and report the resolutions to the commission and DSHS within 60 days of the DSHS notice. This condition shall be required until the national accountability database for duplicate Lifeline claims and the national Lifeline eligibility database are fully functional.

12. Total Call shall provide the commission a copy of its annual Lifeline Re-certification results within 30 days it files with the Universal Service Administration Company (USAC) each year.
13. Total Call shall file with the commission, by March 31 of each year, a report on the number of complaints, categorized by the different nature of complaints that it received from Washington Lifeline customers during the prior calendar year, e.g., billing disputes and service quality complaints. This report shall include complaints filed with Total Call, the commission's Consumer Protection and Communications Section, the Washington State Office of the Attorney General, and the Federal Communications Commission (FCC). This report shall not include calls from customers with regard to general inquiries such as account balance, additional purchases, service availability or technical support. The Commission reserves the rights to revoke Total Call's ETC designation if Total Call fails to provide reasonable quality of service.
14. Total Call shall cooperate with the Washington State Enhanced 911 Program (E911) and all Public Safety Answering Points on E911 issues and shall, upon request, designate a representative to serve as a member or alternate member of the Washington State E911 Advisory Committee or its Communications Sub-committee.
15. Total Call shall comply with rules on cessation of business as specified in WAC 480-120-083.
 - a. Prior to cessation of business, Total Call shall make arrangements with its underlying carriers to provide minutes already sold to customers under the same terms and conditions it has with the customers, or provide refunds to the existing customers.
 - b. Total Call shall provide written notice to the following persons at least 30 days in advance of cessation of service:
 - i. The Commission;
 - ii. The state 911 program;
 - iii. Each of its customers;
 - iv. The national number administrator.

- c. The notice to the Commission and the state 911 program must include the same information required by WAC 480-120-083(3).
 - d. The notice to the customers must include the same information required by WAC 480-120-083(4).
 - e. The notice to the national number administrator must include the same information required by WAC 480-120-083(7).
 - f. Total Call shall file with the Commission at least 30 days in advance of its cessation of business and request the relinquishment of its ETC designation in Washington.
16. Total Call shall collect and maintain necessary records and documentation to ensure its compliance with the applicable FCC and Commission requirements, including existing requirements and any future modifications. The records and documentation shall be provided to Commission Staff upon request.
17. Total Call shall cooperate with Commission Staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
18. Total Call shall comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions.
19. Total Call shall file with the Commission of the results of any audits (including in-depth data validations) or investigations on the Company's Lifeline operation in any states or jurisdictions conducted by the FCC or USAC within 14 calendar days from the receipt of results. The Company must also notify the Commission of any ongoing investigation that has resulted in monetary or administrative penalty (e.g., suspension of Universal Service Fund reimbursement, suspension of Lifeline program operation) within 14 calendar days of the occurrence of such events. To the extent the Company deems the above information confidential, the Company may submit the notification on a confidential basis consistent with Commission rules.

APPENDIX B

**Total Call Mobile, Inc.
Areas for Eligible Telecommunications Carrier Designation**

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
ASOTIN TELEPHONE CO.	
	ANATONE
	ASOTIN
CENTURYTEL OF COWICHE, INC.	
	COWICHE
	RIMROCK
	TIETON
CENTURYTEL OF INTER-ISLAND, INC.	
	BLAKELY ISLAND
	EAST SOUND
	FRIDAY HARBOR
	LOPEZ
CENTURYTEL OF WASHINGTON, INC.	
	ALMIRA
	AMES LAKE
	ARLETTA
	ASHFORD
	BASIN CITY
	CARNATION
	CATHLAMET
	CHENEY
	CHEWELAH
	CHINOOK
	CONNELL
	COULEE CITY
	CRESTON
	CURTIS
	DAVENPORT
	EDWALL-TYLER
	ELMA
	ELTOPIA
	EUREKA
	FALL CITY

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	FORKS
	FOX ISLAND
	GIG HARBOR
	HARRINGTON
	HUMPTULIPS
	HUNTERS
	KAHLOTUS
	KETTLE FALLS
	KINGSTON
	LAKEBAY
	LAKE QUINAULT
	LIND
	LONG BEACH
	MATHEWS CORNER
	MCCLEARY
	MEDICAL LAKE
	MESA
	MONTESANO
	MORTON
	NEAH BAY
	NESPELEM
	NORTH BEND
	OCEAN PARK
	OCOSTA
	ODESSA
	ORTING
	OTHELLO
	PACIFIC BEACH
	PACKWOOD
	PUGET ISLAND
	RANDLE
	REARDAN
	RITZVILLE-BENGE
	SNOQUALMIE PASS
	SOUTH BEND
	SOUTH PRAIRIE
	SPANGLE

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	SPRAGUE
	STARBUCK
	TWISP
	VADER
	VASHON
	WASHTUCNA
	WILBUR
	WILSON CREEK
	WINTHROP
	YACOLT
ELLENSBURG TELEPHONE CO.	
	ELLENSBURG
	KITTAS
	SELAH
	THORP
	VANTAGE
FRONTIER COMMUNICATIONS NORTHWEST INC.	
	ACME-DEMING-WHATCOMCTY
	ALGER
	ANACORTES
	ARLINGTON
	BENTON CITY
	BIG LAKE
	BLAINE-BIRCH BAY-GTLD
	BOTHELL
	BURLINGTON
	BREWSTER
	BRIDGEPORT
	CAMAS-WASHOUGAL
	CASHMERE
	CHELAN
	CONCRETE
	CONWAY
	CUSTER-GTLD
	DEMING-WHATCOMCTY
	EDISON
	ENTIAT
	EVERETT

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	EVERSON-GTLD
	FAIRFIELD
	FARMINGTON
	FERNDALE-GTLD
	GARFIELD
	GEORGE
	GRANITE FALLS
	GRAYLAND
	HALLS LAKE
	KENNEWICK
	KIRKLAND
	LA CONNER
	LATAH
	LAUREL-WHATCOMCTY
	LEAVENWORTH
	LOOMIS
	LYMAN-HAMILTON
	LYNDEN
	MANSFIELD
	MAPLE FALLS
	MARBLEMOUNT
	MARYSVILLE
	MONROE
	MOLSON
	MOUNT VERNON
	NACHES
	NEWPORT
	NILE
	OAK HARBOR
	OAKESDALE
	PALOUSE
	PULLMAN
	QUINCY
	REPUBLIC
	RICHLAND
	RICHMOND BEACH
	ROCKFORD

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	ROSALIA
	SEDRO WOOLLEY
	SEDRO WOOLLEY-CONTEL
	SILVER LAKE
	SKYKOMISH
	SNOHOMISH
	SOAP LAKE
	STEVENS PASS
	SULTAN
	SUMAS-GTLD
	TEKOA
	TONASKET
	WATERVILLE
	WENATCHEE
	WESTPORT
	WOODLAND
HAT ISLAND TELEPHONE CO.	
	HAT ISLAND
HOOD CANAL TELEPHONE CO.	
	UNION
INLAND TELEPHONE CO.	
	DEWATO
	PRESCOTT
	ROSLYN
	UNION TOWN
KALAMA TELEPHONE CO.	
	KALAMA
LEWIS RIVER TELEPHONE CO., INC.	
	AMBOY
	COUGAR
	LA CENTER
	YALE
MASHELL TELECOM, INC.	
	EATONVILLE
MCDANIEL TELEPHONE CO.	
	MOSSYROCK
	SALKUM

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
PEND OREILLE TELEPHONE CO.	
	CUSICK
	IONE
	METALINE FALLS
PIONEER TELEPHONE CO.	
	ENDICOTT
	LACROSSE
QWEST CORPORATION	
	ABERDEEN-HOQUIAM
	AUBURN
	BAINBRIDGE ISLAND
	BATTLE GROUND
	BELFAIR
	BELLEVUE
	BELLINGHAM-GTLD
	BLACK DIAMOND
	BREMERTON
	BUCKLEY
	CASTLE ROCK
	CENTRALIA
	CHEHALIS
	CLARKSTON
	CLE ELUM
	COLFAX
	COLVILLE
	COPALIS
	COULEE DAM
	CRYSTAL MT.
	DAYTON
	DEER PARK
	DES MOINES
	EASTON
	ELK
	ENUMCLAW
	EPHRATA
	GRAHAM
	GREEN BLUFF

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	HOODSPORT
	ISSAQUAH
	KENT
	LIBERTY LAKE
	LONGVIEW-KELSO
	LOON LAKE
	MAPLE VALLEY
	MOSES LAKE
	NEWMAN LAKE
	NORTHPOINT
	OLYMPIA
	OMAK
	OROVILLE
	OTHELLO
	PASCO
	PATEROS
	POMEROY
	PORT ANGELES
	PORT LUDLOW
	PORT ORCHARD
	PORT TOWNSEND
	PUYALLUP
	RENTON
	RIDGEFIELD
	ROCHESTER
	ROY
	SEATTLE
	SEQUIM
	SHELTON
	SILVERDALE
	SPOKANE
	SPRINGDALE
	SUMNER
	TACOMA
	TACOMA WAVERLY
	TOUCHET
	VANCOUVER

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	WAITSBURG
	WALLAWALLA
	WARDEN
	WINLOCK
	YAKIMA
SKYLINE TELECOM COMPANY	
	MT. HULL
ST. JOHN TELEPHONE CO.	
	ST JOHN
TENINO TELEPHONE CO.	
	BUCODA
	TENINO
TOLEDO TELEPHONE CO., INC.	
	TOLEDO
UNITED TELEPHONE - NORTHWEST	CHIMACUM-CENTER
	COLUMBIA
	DALLESFORT
	GLENWOOD
	GOLDENDALE
	GRANDVIEW
	GRANGER
	HARRAH
	HOOD CANAL
	KLICHTITAT
	LYLE
	MABTON-BICKLETON
	MATTAWA
	PATERSON
	PORT ANGELES-GARDINER
	POULSBO
	PROSSER
	ROOSEVELT
	STEVENSON
	SUNNYSIDE
	TOPPENISH-ZILLAH

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	TROUT LAKE
	WAPATO
	WHITE SALMON
	WHITE SWAN
	WHITSTRAN
	WILLARD
WESTERN WAHKIAKUM COUNTY TELEPHONE CO.	
	GRAYS RIVER
	NASELLE
WESTGATE COMMUNICATIONS	
	STEHEKIN
WHIDBEY TELEPHONE CO.	
	POINT ROBERTS
	SOUTH WHIDBEY
YCOM NETWORKS, INC.	
	RAINIER
	YELM