

Computer 5, Inc. d/b/a/ LocalTel Communications (“hereinafter referred to as LocalTel Communications”) (SAC 529026) Annual Eligible Telecommunications Carrier Report for 2021 Annual Plan

LocalTel Communications, study area code (“SAC”) 529026,¹ submits its Annual Eligible Telecommunications Carrier Report for 2021 (“2021 Report”) and Annual Plan for 2021 in accordance with WAC 480-123-060 to WAC 480-123-080.

I. LOCALTEL COMMUNICATIONS ETC REPORT FOR 2021

A. Annual Certification of Eligible Telecommunications Carriers

With this filing LocalTel Communications requests continued certification as an eligible telecommunications carrier (“ETC”) in Washington. In accordance with WAC 480-123-060, LocalTel Communications **Exhibit A** contains the certification that all federal high-cost universal service support was used in the preceding calendar year (2019) and will be used in the coming calendar year’s (2021-2026) for the “provision, maintenance, and upgrading of facilities and services for which the support is intended.”

B. Report as Required by WAC 480-123-070 for Calendar Year 2019

Computer 5 Inc. d/b/a LocalTel Communications, used federal high-cost CAF II support funds to purchase a Wireless ISP operating predominately in Lincoln and Adams County. The acquisition allowed Computer 5 to acquire 80 tower sites that brings the Computer 5 network closer to our CAF II targeted locations in Lincoln and Adams County. Computer 5 is upgrading the backhuls and targeting new potential tower sites to bring our network services closer to CAF II target areas throughout a five county area.

1. Report on use of federal universal service funds and benefits to consumers (WAC 480-123-160 (1), WAC 480-123- 070(1)(a) and (b))

Field service work is underway to identify CAF census tracts and locations within each tract. Upon identification of targeted locations, path analysis will take place and tower locations will be developed. Upgrades and expansion of the LocalTel wireless network, known as “SkyFi” is bringing fixed wireless internet service, voice service and limited streaming video services to rural area consumers in Washington State, including CAF II locations and adjacent properties, at speeds and service levels these areas have not been able to experience previously. For details on how CAF II funds were used in 2019 see attached **Confidential Exhibit B**.

2. Local Service Outage Reports (WAC 480-123-070(2))

NONE. LocalTel had no service outages of at least 30 minutes in duration which may have affected:

- (i) Ten percent of the LocalTel end users
- (ii) A 911 special Facility

3. Report on failure to provide service (WAC 480-123-070(3))

LocalTel Communications had no (0) unfulfilled requests for service in calendar year 2019.

4. Report on complaints per one thousand connections (WAC 480-123-070(4))

LocalTel Communications report with separate totals for the numbers of complaints from customers, in Washington made to the FCC and the consumer protection division of the office of the attorney general of Washington along with the complaint category is attached hereto as **Confidential Exhibit D**.

5. Compliance with applicable service quality standards (WAC 480-123-070(5))

For wireline carriers the rule requires a commitment to comply with applicable consumer protection and

service standards of chapter 480-120 WAC. Included in **Exhibit A** is LocalTel Communications certification of substantial compliance with this requirement.

6. Certification of the ability to function in emergency situations (WAC 480-123-070(6))

To comply with this requirement an ETC must certify that it has adhered to the requirements in WAC 480-123-030(1)(g) and outlined in WAC 480-120-411. Per WAC 480-123-030(1)(g) LocalTel Communications central office has permanently installed emergency power facilities. LocalTel Communications central office is equipped with an automatic start generator with an automatic transfer switch. In addition, LocalTel Communications has six hours of reserve battery capacity. The required minimum for central offices equipped with automatic start generators is three hours of reserve battery. LocalTel has redundant Network Equipment in key locations, with redundant routing in place, redundant backhauls to most Tower sites and battery backup at key tower sites and at network edge locations.

7. Advertising certification, including advertisements on Indian reservations (WAC 480-123- 070(7)).

The certification for this section is included in **Exhibit A**.

LocalTel was authorized as an ETC in Washington state January 2019. At that time Washington State was not included in the National Verifier Database. The National Verifier was soft launched in Washington State in October 2019. USAC approval and functionality in the Lifeline Program for LocalTel did not occur until after December 2019. Functional reliability for Washington state in the National Verifier did not occur until January 2020. Therefore, LocalTel Communications did not service any Lifeline Program subscribers during 2019.

LocalTel Communications is committed to publicizing the availability of its Lifeline Service in a manner that is reasonably designed to reach those likely to qualify for the service. In that regard, during 2020 LocalTel Communications is engaged in the activities listed below to support its Lifeline Service program.

- Designated Customer Service Representatives have been trained to assist customers who inquire about the Lifeline Program or indicate the need for financial assistance.
- Links to information about the Lifeline Program and National Verifier are on the LocalTel.com website. Exhibit #3
- Notification of the availability of the Lifeline Program has been included in customer statements. Exhibit #4
- Notice of Lifeline Benefit availability included on both English and Spanish flyers mailed to residences in the LocalTel Communications service area. Exhibit #5

LocalTel Communications service area does not include Indian Reservations/Tribal Lands.

II. Annual Plan for Universal Service Support Expenditures as Required by WAC 480-123-080

Confidential Exhibit C contains LocalTel Communications projected receipt of federal high cost support in 2021 and its plans to utilize such support.

Exhibit A

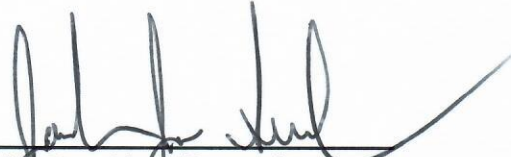
Computer 5 Inc. A Washington Corporation d/b/a LOCALTEL COMMUNICATIONS ANNUAL CERTIFICATION 2019

I, John J Seabeck, being of lawful age and duly sworn, state that I serve as Vice President and General Manager for Computer 5 Inc. d/b/a/ LocalTel Communications.

I certify to the Washington Utilities and Transportation Commission ("Commission") under penalty of perjury under the laws of the State of Washington that the following is true and correct to the best of my knowledge:

1. The Commission designated LocalTel Communications as an eligible telecommunications carrier ("ETC") in certain areas in Washington by Order dated January 31, 2019 in Docket UT-180763.
2. Federal high-cost CAF II support received by LocalTel Communications was used in 2019 and will also be used in 2021 only for the provision, maintenance, and upgrading of the facilities and services to deliver high speed broadband internet access for which the support is intended in accordance with WAC 480-123-060;
3. During calendar year 2019, LocalTel Communications provided the supported high cost services to areas identified in its Connect America Fund Phase II Authorized Support Winning Bid as awarded in FCC Docket DA 19-1030 and has provided detailed information on the use of funds in accordance with WAC 480-123-070;
4. During calendar year 2019, LocalTel Communications met the applicable service quality standards and consumer protection rules by complying substantially with the consumer protection and service standards of chapter 480-120 WAC as required by WAC 480-123-070(5);
5. During calendar year 2019, LocalTel Communications had the ability to function in an emergency situation and meet the applicable requirements as required by WAC 480-123-070(6) as described in the **LocalTel Communications Annual ETC Report for 2021 Annual Plan**;

6. During calendar year 2019, LocalTel Communications **did not** publicize the availability of its Lifeline Service in a manner reasonably designed to reach those likely to qualify for service in accordance with WAC 480-123-070(7). Though LocalTel Communications was authorized as an ETC in 2019, approval and functionality through USAC to service Lifeline Program subscribers did not occur until January 2020. Therefore, LocalTel Communications did not service Lifeline Program subscribers during 2019.



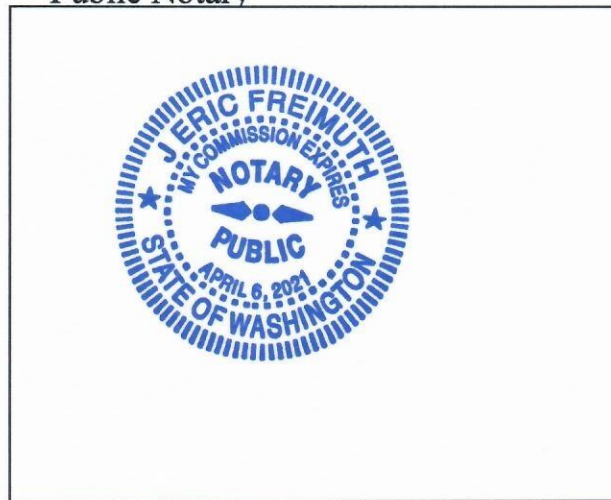
Vice President/General Manager
Computer 5 Inc. d/b/a
LocalTel Communications
June 25th, 2020

Subscribed and sworn to before me
this 25th day of June, 2020



Notary of the Public

Public Notary



REDACTED Per WAC 480-123-160(1), WAC 480-123-070(1)(a)(b)

Exhibit B

Report LocalTel Communications Use of ETC Support in 2019

Washington State Construction 2019	County Sites Cost	Start Date	Completion Date	County	Total Annual Costs

WAC 480-123-70(4)

Exhibit D

Complaints per 1,000 Handsets/Lines

As required by WAC 480-123-070(4), LocalTel Communications provides the following information on the complaints it received during calendar year 2019. Specifically, LocalTel Communications customers in Washington with the FCC filed one complaint. LocalTel Communications customers in Washington State filed zero complaints with the office of the Attorney General (WA AG) of Washington.

The following table includes the complaint received and the outcome with the FCC and WA AG. For the complaint that LocalTel Communications received from the FCC. A specialized customer care group within LocalTel Communications attempts to contact the customer to resolve the matter.

LocalTel Communications Complaints Summary			
Category	FCC	WA AG	Total
Charges & Fees (Billing)	1	0	1
Hardware/Service Orders/Account Changes	0	0	0
Other (Misc)	0	0	0
Technical Issues (Network)	0	0	0
Offers, Promotions, Adjustments (Point of Sale)	0	0	0
Total	1	0	1