

INLAND CELLULAR

June 30, 2020

Via electronic filing

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation
621 Woodland Square Loop SE
Lacey, WA 9850

Re: Inland Cellular 2020 ETC Certification - Eligible Telecommunications Carriers' Annual Re-certification on High Cost Fund Support Pursuant to WAC 480-123-060

Dear Mr. Johnson:

Pursuant to WAC 480-123-060, Inland Cellular LLC (*f/ k/ a* Eastern Sub-RSA Limited Partnership) ("Company"), study area code 529004, hereby requests that the Washington Utilities and Transportation Commission certify to the Federal Communications Commission and the Universal Service Administration Company that the Company has met the requirements of 47 C.F.R. §54.314 for eligibility for continued receipt of federal high-cost funds.

The Washington State certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 are enclosed. If you should have any questions, please call Mike Bly at 208-798-0245 x1222.

Sincerely,



Nathan Weis
President
Inland Cellular, LLC

109 S. 1st Street
PO Box 688
Roslyn, WA 98941
509-649-2500

Enclosures:

529004_WA_Certifications_500&600.pdf
ETC ANNUAL REPORT PER WAC 480-123-070 AND WAC 480-123-080 SAC529004.pdf
ICLLC 529004 Form 481 Certifications June 23 2020.pdf

INLAND CELLULAR

Form 481 Certifications For Filing Due July 1, 2020

I, Nathan Weis, being of lawful age, state that I am President of Inland Cellular LLC (f/k/a Eastern Sub-RSA Limited Partnership) (SAC 529004) ("Company"), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

Compliance with Service Quality Standards

The Company certifies that it is in compliance with applicable service quality standards.

Compliance with Consumer Protection Rules

The Company certifies, pursuant to 47 C.F.R. § 64.2009(e), that the Company's operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009 and the Cellular Communications and Internet Association's Consumer Protection Code for Wireless Service.

Ability to Remain Functional in Emergencies Certification §54.313(a)(6)

The Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. §54.201(a)(2), as such standards relate to functionality of wireless carriers in emergency situations. The Company further certifies that it maintains back-up power to ensure functionality without an external power source in the forms of auxiliary generators and batteries in its central office and auxiliary generators and/or batteries at its cellular tower locations. The Company also certifies that it constantly monitors traffic on its tower locations and that its switching capability is more than adequate to manage the traffic of its subscribers.

The Company further certifies, depending upon the circumstances of the outage, that it is able to re-route traffic around damaged facilities. All Inland Cellular subscribers are defaulted to roam on competitors should an Inland Cellular signal not be obtained.

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

Dated this 30th day of June, 2020 at Roslyn, Washington.

By: 

Nathan R. Weis

President

109 S. 1st Street
PO Box 688
Roslyn, WA 98941
509-649-2500

ETC ANNUAL REPORT PER WAC 480-123-070 AND WAC 480-123-080
Contains Certifications Required by WAC 480-123-060 and 070
June 30, 2020

Inland Cellular LLC Study Area Code 529004 (f/k/a Eastern Sub-RSA Limited Partnership) (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report 1: Report on use of funds: WAC 480-123-070(1)(a):

The Company used support from the federal high-cost fund in 2019 as follows:

We are continuing the process of upgrading our network with next-generation LTE 4G technology. Those investments began in late 2014 with staff training, vendor identification and core switch investments. In 2015 we began a roll out of 4G throughout our network. In 2019, we invested \$1,378,061 in broadcast equipment in Washington during the year. This included 8 additional 4G LTE sites and microwave backhaul upgrades, plus we added fixed wireless internet service in Wilbur as well as in Deer Meadows/Seven Bays in coordination with the Spokane Tribe Telecom Exchange. The Company expects to use all Universal Service Fund support received in order to fund the expenses related to the provisioning, maintenance and services provided over these upgraded facilities as well as existing facilities and to service the debt created in order to make these improvements; improving service quality, coverage and capacity. The Company expects that the continued receipt of Universal Service Fund support will aid the Company's efforts to continue to upgrade its network and to provide the supported services to all customers and potential customers

For 2019 the Company's gross capital expenditures were \$1,856,445 in Washington. The Company's 2019 operating expenses for Washington were \$13,529,200.

Report 2: WAC 480-123-070(1)(b): The Company reports that the investments and expenses report under Report 1, above, benefited the customers as follows:

The customers served by the Company benefited from the use of high-cost fund support by continuing to receive high quality telecommunications services. The Company's investments in next generation mobile technology described above will bring the capability for increased network speeds and enable us to provide mobile broadband services in our service territory.

Through the expenditure of these funds, the Company was able to continue to provide services at a level that the Company believes meets the intent set forth in 47 U.S.C § 254 of providing quality telecommunications services to customers in the service area for which the Company is designated as an ETC.¹ The Company has made substantial

¹ The term "ETC" is used in the same sense as the term is used in Chapter 480-123 WAC.

investments over the past several years which allow it to provide quality telecommunications services to its customers in its designated ETC service area. Those expenditures and investments, including those reflected in Report 1 above, generally benefit all customers receiving the federal high-cost fund supported services from the Company within its designated ETC service area. The Company has expanded its network over the past several years so that it is capable of providing access to broadband services throughout most of the Company's designated ETC service area. The Company offers services that are comparable to services offered in urban areas at rates that are comparable to rates for such services in urban areas.

Report 3: Local Services Outage Report: WAC 480-123-070(2):

None.

Report 4: Report on Failure to Provide Service: WAC 480-123-070(3):

None

Report 5: Report on Complaints per 1000 Connections: WAC 480-123-070(4):

None

Report 6: Certification of Compliance with Service Quality Standards and Consumer Protection Rules: WAC 480-123-070(5):

See "529004_WA_Certifications_500&600"

Report 7: Certification of Ability to Function in Emergency Situations: WAC 480-123-070(6):

See "529004_WA_Certifications_500&600"

Report 8: Advertising Certification, including Advertisement on Indian Reservations: WAC 480-123-070(7):

Company advertised Lifeline in a variety of ways, including: Company website; local newspapers; in-store displays; and, flyers distributed to local public assistance institutions and public areas. See Appendix 1 for a sample newspaper ad, and Appendix 2 for flyer sample.

There are no Indian reservations within the area of this SAC.

Report 9: Annual Plan: WAC 480-123-080(1):

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington State for the period January 1, 2020 through December

31, 2020 are projected to be \$1,950,000 for gross capital expenditures and \$14,500,000 for operating expenses. Planned major projects include: upgrading microwave links for increased backhaul capacity; continuing to upgrade service to 4G LTE in rural areas, including further expansion into southern Ferry and Stevens counties; purchase EcliptixNet Broadband, Inc., a Wireless Internet Service Provider (WISP); and, continue to expand fixed wireless internet a fiber services in several areas, including fiber service in Pomeroy. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2019, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and increased depreciation on new investment placed in service. The Company does not anticipate major adjustments in staffing levels for the relevant period.

Report 10: Plan of Investments and Expenditures: WAC 480-123-080(2):

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the period January 1, 2020, through December 31, 2020, will remain relatively the same as those it experienced in calendar year 2019, subject to the effects of inflation, other commonly experienced changes in cost of labor and materials, and increased depreciation on new investment placed in service. The Company does not anticipate major adjustments in staffing levels for the relevant period. Major projects are referenced in Report 9, above. The Company expects that the continued receipt of federal high-cost support will allow the Company to continue to provide the supported services at rates that are comparable to the rates for such services in urban areas. All customers will benefit from increased broadband speeds in the upgraded areas, and will have services available to them that are comparable to the telecommunications services offered in urban areas at rates that are comparable to the rates for such services in urban areas.

Report 11: Updated Map: WAC 480-123-080(3):

Updated maps are required once every three years, and updated maps were submitted in 2019; therefore, maps are not required this year and were not supplied for this report.

INLAND CELLULAR

AFFIDAVIT CONTAINING CERTIFICATIONS PURSUANT TO WAC 480-123-060 AND WAC 480-123-070

I, Nathan Weis, being of lawful age, state that I am President of Inland Cellular LLC (f/k/a Eastern Sub-RSA Limited Partnership – SAC 529004) (“Company”), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit are true to the best of my knowledge, information and belief. On this basis, I hereby certify to the Washington Utilities and Transportation Commission (“Commission”) for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. §§ 54.307, 54.313, 54.422 and/or 54.314, as follows:

1. That the Company in 2019 used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended (pursuant to WAC 480-123-060);
2. That during the 2019 calendar year, the Company met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h);
3. That during the 2019 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and
4. That during the 2019 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company’s judgment, included advertisements likely to reach those who are not current customers of the Company within the Company’s designated service area (pursuant to WAC 480-123-070).

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Dated this 30th day of June, at Roslyn, Washington.

Company: Inland Cellular LLC

By: 

Name: Nathan R. Weis
Its: President

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PO Box 688
Roslyn, WA 98941
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