

1  
2  
3  
4  
5  
6  
7 **BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

9  
10 PETITION OF SKYLINE TELECOM INC  
11 TO RECEIVE SUPPORT FROM THE  
12 UNIVERSAL SERVICE  
13 COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

14 COMES NOW Skyline Telecom Inc. (the "Company") and, pursuant to Chapter 480-123 of  
15 the Washington Administrative Code ("WAC"), including, but not limited to, WAC 480-123-110,  
16 hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to  
17 receive support from the Universal Service Communications Program (the "Program") for the  
18 Program year 2022.

19  
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 fewer than forty thousand access lines within the state.

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

## **II. Demonstration of Eligibility under WAC 480-123-110**

1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications services and is seeking Program support is as follows: Skyline Telecom Inc.
2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. <sup>1</sup>  
A detailed description of any transactions between the Company and the affiliates named in Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2. <sup>2</sup>

---

<sup>1</sup> Pursuant to agreement with Commission Staff, Exhibit 1 is limited to those affiliates having transactions with the Company that are to be identified in Exhibit 2.

<sup>2</sup> Exhibit 2 also includes transactions between the Company and affiliates. Pursuant to agreement with the Commission Staff, Exhibit 2 is limited to transactions other than employment compensation and benefits

- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet Nos.  
2 49 and 63 of the Company's Tariff WN U-2.
- 3 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance  
4 broadband services in its service area is attached hereto as Exhibit 3.
- 5 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the  
6 Company complies with state and federal accounting, cost allocation, and cost adjustment  
7 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 8 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by  
9 the Company as of December 31, 2020, was 99. The number of residential local exchange  
10 access lines served by the Company as of December 31, 2019, was 87. The number of  
11 business local exchange access lines served by the Company as of December 31, 2020, was  
12 15. The number of business local exchange access lines served by the Company as of  
13 December 31, 2019, was 15. The number of broadband connections served by the Company  
14 as of December 31, 2020, was 49. The number of broadband connections served by the  
15 Company as of December 31, 2019, was 33. Of the approximately 216 serviceable locations  
16 Skyline Telecom has, roughly 93 are capable of broadband speeds of 25 mbps downstream  
17 and 3 mbps upstream, or better. The unbundled monthly recurring rate charged by the  
18 Company for residential local exchange access service on December 31, 2020, was \$25.00  
19 for Silverton and \$19.50 for Mt Hull. The unbundled monthly recurring rate charged by the  
20 Company for residential local exchange access service on December 31,  
21 2019, was \$25.00 for Silverton and \$19.50 for Mt Hull. The unbundled monthly rate  
22 charged by the Company for single line business local exchange access service on December  
23 31, 2020, was \$35.00 for Silverton and \$25.00 for MT Hull. The  
24  
25  
26


1 unbundled monthly rate charged by the Company for single line business local exchange  
2 access service on December 31, 2019, was \$35.00 for Silverton and \$25.00 for MT Hull.  
3 The unbundled monthly rate charged for broadband service as of December 31, 2020, and as  
4 of December 31, 2019, is set out in the attached Exhibit 5.

- 5 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.
- 6 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the  
7 Company is in compliance with the Federal Communications Commission's obligation for  
8 deployment of broadband at speeds specified by the Federal Communications Commission  
9 applicable to the Company and that the Company meets one of the eligibility criteria set out  
10 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.
- 11 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.

12  
13  
14 Respectfully submitted this 1<sup>st</sup> day of Sept, 2021.

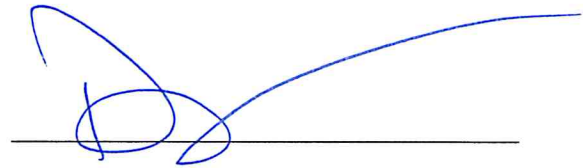
15 SKYLINE TELECOM INC

16 By \_\_\_\_\_

17   
18 Delinda Kluser  
19 Vice-Pres, Manager  
20  
21  
22  
23  
24  
25  
26

CERTIFICATION

I Delinda Kluser, an officer of 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.



Delinda Kluser

Vice-Pres, Manager

EXHIBIT 1

CORPORATE ORGANIZATION CHART



PETITION OF SKYLINE TELECOM, INC TO  
RECEIVE SUPPORT FROM THE UNIVERSAL  
SERVICE COMMUNICATIONS PROGRAM –

## EXHIBIT 2

### AFFILIATED TRANSACTIONS

#### Affiliated Transactions

Oregon Telephone Corporation is the managing company for Skyline Telecom Inc. The business office is located in MT Vernon, OR. All billing, customer support, technical support and financial reporting is performed by the staff of Oregon Telephone Corporation. All labor expenses are direct coded to Skyline by affiliated companies. A management agreement is in place which identifies how expenses are allocated between companies.

Service orders (new installs or changes) or trouble tickets are assigned to employees at either Oregon Telephone Corporation or North-State Telephone. These same technicians also assist with construction projects. These employees also direct codes labor and expenses to Skyline Telecom.

## EXHIBIT 3

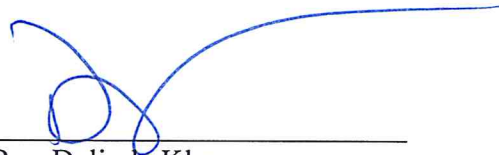
### Broadband Plan

Skyline Telecom Inc. offers broadband services to both of its exchanges, Silverton and Mt Hull. Skyline incurs considerable monthly costs to maintain the backbone connection to the world for each of these areas. In fact, Skyline's broadband operations operate in a net loss position each year due to these costs. Skyline however is committed to continuing to provide quality broadband service to its subscribers and continues to maintain all plant necessary to provide these necessary services.

Beginning in 2020, Skyline engineered a three-phase fiber to the home build for the Mt Hull exchange. This allows for not only a considerable increase in broadband speeds, but also improves the reliability of service when compared to aging copper. Phase 1 was completed in 2020 for a total of \$89,665. Seventeen customers were converted to fiber.

Phase 2 for the Mt Hull exchange will occur in the third quarter of 2021 and will bring fiber to the home to twenty-five additional subscribers. Phase 3 is planned for 2022 and brings 9 additional subscribers fiber to the home.

Skyline could offer speeds up to 1Gig for these fiber subscribers. Maps as well as costs for Phase 2 and preliminary costs for Phase 3 have been included as part of this exhibit.



---

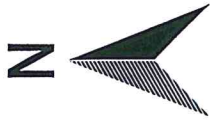
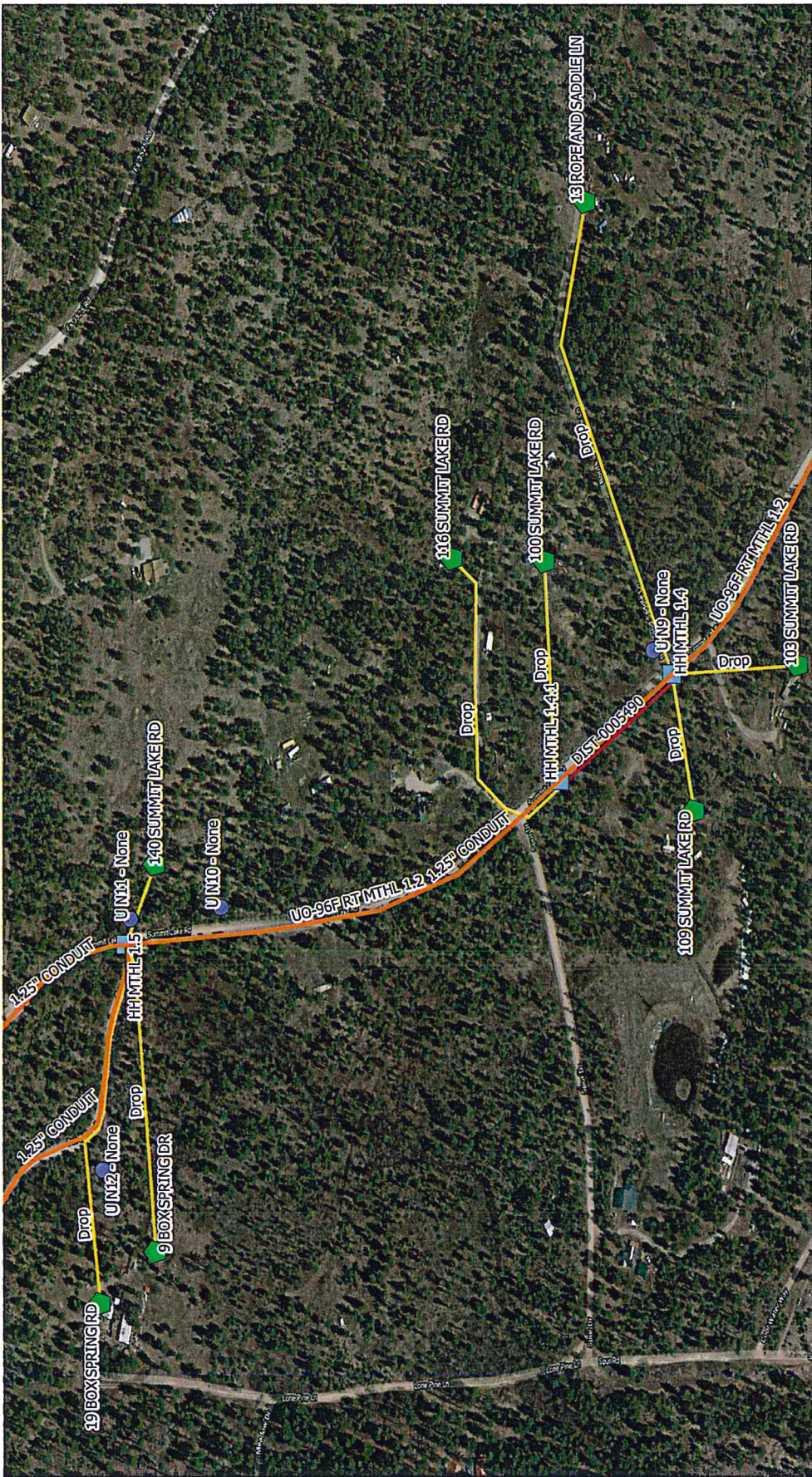
By: Delinda Kluser  
Title: Vice-Pres, Manager









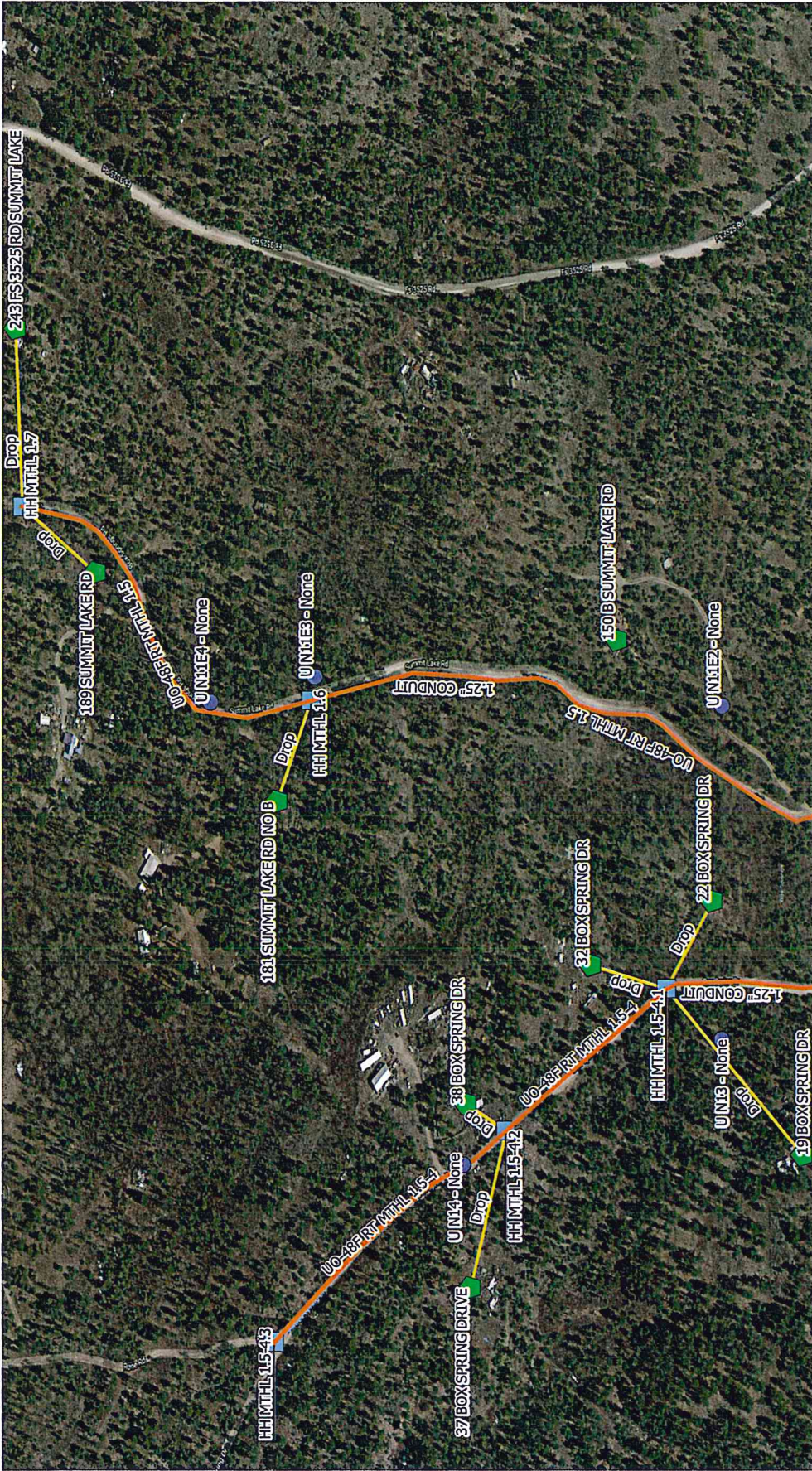
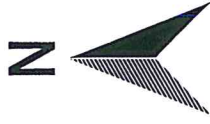


- ▶ Service\_Location
- ▭ Service\_Area
- Pedestal
- Lateral
- ▭ Handhole
- Duct
- Drop
- Distribution
- ▽ CO
- Hybrid

SHEET#	BFO	HH	MARKER POSTS	DROP																		
TOTALS:																						

	OTC CONNECTIONS
	EXCHANGE:
	SERVING AREA: MT HULL
	ROUTE: SUMMIT LAKE RD
	Twp:
	Rtg:
	Sec:
	NOTES: UTILITY LOCATIONS ARE APPROXIMATE.
	FILE NAME: OTC
	ENGINEER: MF
	DRAFTER: MK
	LAST ACCESSED:
	COUNTY: MTHL
	PROJECT: RC21-12
	TAX DISTRICT:
	JOB ORDER:
	AS BUILT:
	SHEET: S-1
	SCALE:
	CONST. SHEET#

- Service\_Location
- Service\_Area
- Pedestal
- Lateral
- Handhole
- Duct
- Drop
- Distribution
- CO
- Hybrid



SHEET#	BFO	HH	MARKER POSTS	DROP	PED/ POLE #	SUB #	SUB #	SUB #	SUB #	OTC CONNECTIONS
										EXCHANGE:
										SERVING AREA: MT HULL
										ROUTE: SUMMIT LAKE RD
										Twp:
										Rng:
										Sec:
										COUNTY: MTHL
										PROJECT: RC21-12
										JOB ORDER:
										AS BUILT:
TOTALS:										

FILE NAME: OTC  
 ENGINEER: MF  
 DRAFTER: MK  
 LAST ACCESSED:  
 PREPARED BY:  
 NOTES: UTILITY LOCATIONS ARE APPROXIMATE.

MT Hull FTTH Phase 3

Unit	Number of Units	Labor	Material	Labor & Materials	Total Cost
BM53F	9	\$15,000	\$28,500	\$43,500	\$391.50
BM61(4)	0	\$30,000	\$0.00	\$30.00	\$0.00
BM66(1.25)	0	\$1,500	\$2,500	\$4.00	\$0.00
BM71	0	\$9,850	\$0.00	\$9.85	\$0.00
BM83	9	\$45,000	\$10,000	\$55.00	\$495.00
UO144	0	\$1,250	\$1,180	\$2.43	\$0.00
NID(4)	9	\$96,000	\$325,000	\$421.00	\$3,789.00
NID(7)	0	\$0.000	\$0.000	\$0.00	\$0.00
HO1	0	\$3,380	\$2,000	\$5.38	\$0.00
HUO(96)	9	\$4,140	\$268,980	\$273.12	\$2,458.08
"HORSE SHOE"	0	\$7,560	\$65,000	\$72.56	\$0.00
PM22	9	\$210,000	\$8,560	\$218.56	\$1,967.04
SEB021	3150	\$0.250	\$0.700	\$0.95	\$2,992.50
SEBV(1.00)	2250	\$1,000	\$0,490	\$1.49	\$3,352.50
SEBV(1.25)	0	\$0.000	\$0.000	\$0.00	\$0.00
UD(1X2-1.25)	14220	\$2,250	\$0,980	\$3.23	\$45,930.60
UHF(24X36X24)	6	\$211,000	\$457,930	\$668.93	\$4,013.58
UHF(24X13X18)	0	\$211,000	\$182,680	\$393.68	\$0.00
UM-XB(30)	0	\$552,000	\$1,600,000	\$2,152.00	\$0.00
UO24	15120	\$0,350	\$0,377	\$0.73	\$10,992.24
UO48	0	\$0,350	\$0,544	\$0.89	\$0.00
TOTAL					\$76,382.04

Electronics  
 0 C7 OLTG card  
 1 OIM SFP

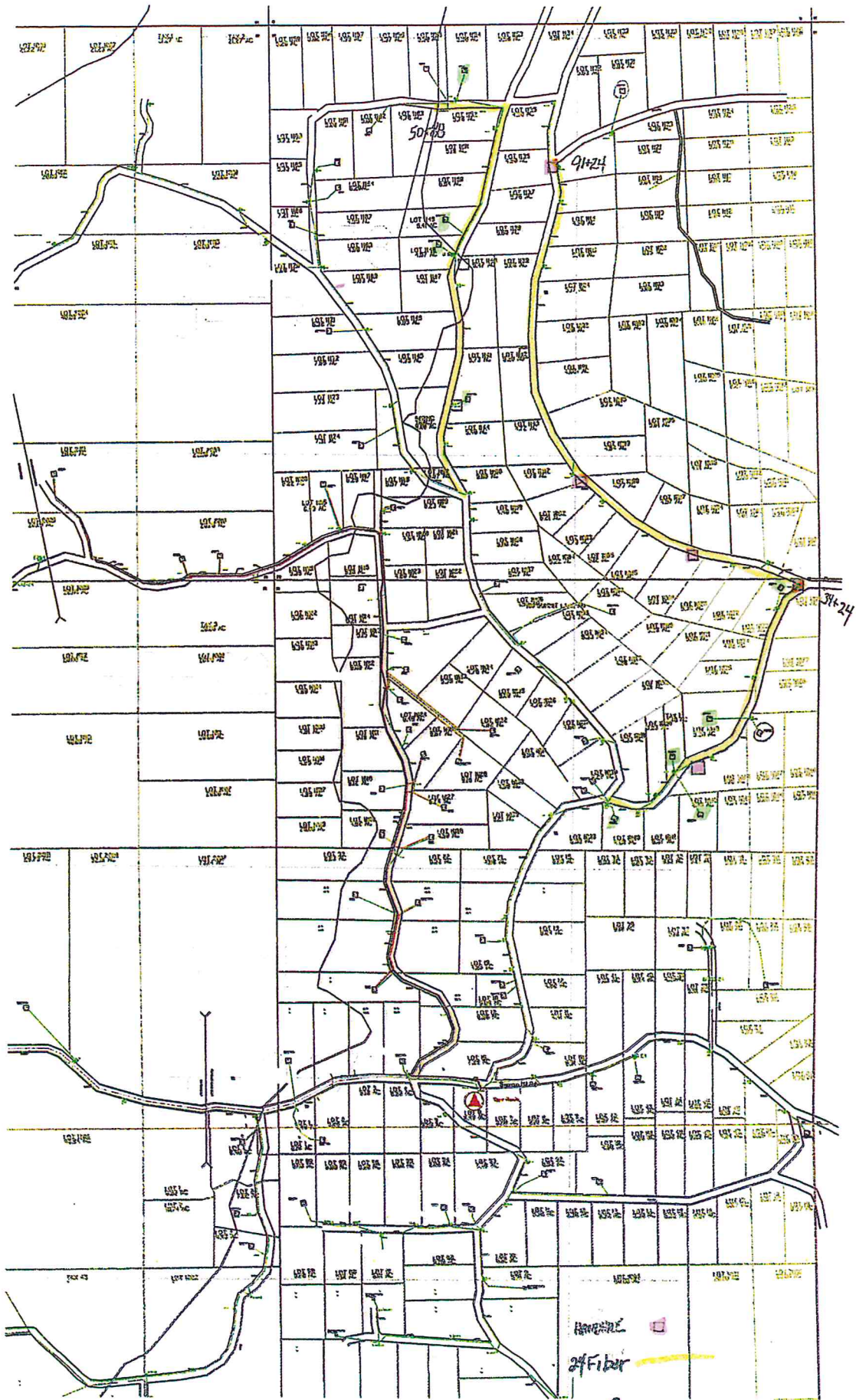
\$ 3,196.00 \$  
 \$ 500.00 \$  
 \$ 500.00

ONT  
 9 711 GE  
 9 UPS

\$ 235.00 \$  
 \$ 81.00 \$  
 2,115.00  
 729.00

\$ 2,844.00

\$ 3,344.00



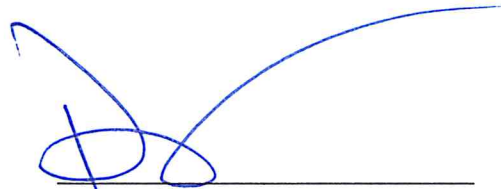
Phase 3

EXHIBIT 4

Certification Relating to Accounting Standards

I, Delinda Kluser, am an officer of Skyline Telecom 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 1<sup>st</sup> day of September, 2021.



By: Delinda Kluser  
Title: Vice-Pres, Manager



**BUNDLE PACKAGES - RESIDENCE ONLY (PHONE, INTERNET, TECH TALK & CUSTOM CALLING FEATURES)**

	VALUE	CLASSIC	IDEAL	EXCEPTIONAL
Bundle Includes:	6 MEG**	15 MEG	30 MEG	50 MEG
Residence Line				
TDN (optional)				
CWT				
Caller ID				
Tech Talk				
DSL				
<b>TOTAL MONTHLY BUNDLE CHARGES (plus applicable taxes and surcharges)</b>	75.95	85.95	90.95	95.95

	ST 556	ST 804
Service Order	10.00	8.00
Line Connection	15.00	8.00
Bundle Downgrade Charge**	10.00	8.00
Internet Activation	15.00	15.00

**ELINE (556 Residence only)**

	6 MEG**	15 MEG	30 MEG	50 MEG
Bundle Includes:				
Residence Line				
TDN (optional)				
DSL				
<b>TOTAL MONTHLY BUNDLE CHARGES (plus applicable taxes and surcharges)</b>	50.00	60.00	70.00	80.00

**Value**      **Classic**      **Ideal**      **Exceptional**

Residential bundle - phone, internet, custom calling features & tech talk.

E-Line Bundle includes TDN, but customer can add LD and custom calling features.

Residential customers only

**INTERNET PACKAGES (556 only)**

	6 MEG**	15 MEG	30 MEG	50 MEG
Bus - add \$10				
<b>TOTAL MONTHLY CHARGES (plus applicable taxes and surcharges)</b>	49.95	59.95	69.95	79.95

Pre-payments required for new or returning customers.

No pre-payments required for existing customers who are up to date on their payments. If they require a high powered router, then equipment pre-pay is required.

**804 - GRANITE FALLS**

Residence Line	25.00
512K Meg (only package available)	39.95
<b>TOTAL MONTHLY CHARGES (plus applicable taxes and surcharges)</b>	64.95

\*\* 556 (Mt. Hull) - 6 meg packages are only available to customer package. These customers are only to be offered their maximum MACC plant records or a tech.

**EXHIBIT 5**

PETTION OF Skyline Telecom Inc.  
TO RECEIVE SUPPORT FROM THE UNIVERSAL  
SERVICE COMMUNICATIONS PROGRAM

Misc Charges	MRC	MRC
Oritelco Mailbox	2.00	2.00
Static IP's - each	20.00	20.00
Managed WiFi Residential	10.95	10.95
Managed Wifi Business	14.95	14.95
Non-returned/damaged lease router	250.00	250.00

\*\*See Misc Charges for leased equipment options

**Premise Visits**      40.00\*      69.00\*\*

\*\$40.00 - flat charge

\*\*\$69.00 per hour - min. \$24.00 for 1st 15 minutes. Each add'l :

**Required Prepayments**

Deposit      75.00      75.00

Phone      25.00      16.00

Internet      Min 15.00 plus appli

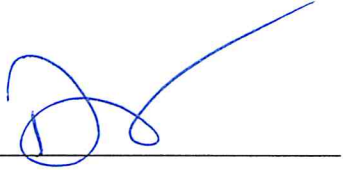
EXHIBIT 6

STATEMENT REQUIRED BY WAC 480-123-110(1)(h)

I, Delinda Kluser, am an officer of Skyline Telephone Company ("Skyline") and make this statement in that capacity. I hereby certify that if Skyline receives program support it will continue to provide communications services throughout its service territory in Washington for which it is seeking and receives program support for the entirety of the year for which Skyline is applying for support from the program. In addition, if Skyline receives program support, I certify that Skyline will continue to provide broadband services throughout its service territory in Washington, as it is or becomes available, during the entirety of the year in which Skyline is applying for support from the program.

This statement is provided under the penalty of perjury as set forth in RCW 9A.72.085.

By: \_\_\_\_\_



Its: vice-pres, manager

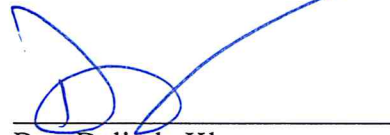
EXHIBIT 7

Certification of Eligibility

I, Delinda Kluser, am an officer of Skyline Telecom 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 (j)(iii): Further, I certify that the Company has already met the Federal Communications Commission's total deployment obligations associated with federal high-cost program support as of the date of the Petition to which this is an Exhibit. Further, I certify that the Company has since January 1, 2018, deployed broadband to the number of locations that Washington Utilities and Transportation Commission has determined by order.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 5<sup>th</sup> day of September, 2021.



By: Delinda Kluser  
Title: Vice-Pres, Manager