

July 13, 2007

Ms. Carole J. Washburn, Executive Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Re: Request for Certification Pursuant to WAC 480-123-060 and

47 C.F.R. §54.314

Dear Ms. Washburn:

Pursuant to WAC 480-123-060, Hood Canal Telephone Co., Inc. ("Company") hereby requests that the Washington Utilities and Transportation Commission certify 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 certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 are enclosed.

For the Commission's information, in addition to the Lifeline advertisement covered in the enclosed certification, the Company runs an advertisement on our local channel continuously, posts Lifeline/WTAP information in both the Union and Shelton offices, distributes Lifeline/WTAP information flyers when door tagging new customers, and posts Tribal Lifeline information at the tribal center and tribal newsletter.

Sincerely,

Richard Buechel

President

Enclosures

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

I, Richard Buechel, being of lawful age, state that I am President of Hood Canal Telephone Co., Inc. ("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. §54.314, as follows:

- (1) That the Company will use federal high-cost universal service fund support only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2006 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2006 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 2006 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.

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

Dated this 13th day of July, 2007 at Union, Washington.

Company: Hood Canal Telephone Co., Inc.

Its: President

REPORTS AS REFERENCED IN WAC 480-123-070 AND WAC 480-123-080

Hood Canal Telephone Co., Inc. (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report 1: WAC 480-123-070(1)(a): Attached are copies of the Company's NECA-1 Reports for the calendar years 2005 and 2006, that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund.

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

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.² The Company has made substantial 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 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 the rates for such services in urban areas.

Report 3: WAC 480-123-070(4): The Company reports that during the calendar year 2006, the Company did not receive from either the Federal Communications Commission or the Consumer Protection Division of the Office of the Attorney General of the State of Washington any complaints against the Company made by the Company's customers.

Report 4: WAC 480-123-080(1)(b): The Company reports as follows:

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, 2007, through December 31, 2007, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2006, subject to the effects of inflation and other commonly experienced changes in cost of

¹ It is the Company's understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3).

² The term "ETC" is used in the same sense as the term is used in Chapter 480-123 WAC.

labor and materials. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company's investment plans directly affecting federal high-cost supported services offered by it in its designated ETC service area do not include a major construction project at the present time. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2006.

Report 5: WAC 480-123-080(2): The Company reports as follows:

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, 2008, through December 31, 2008, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2006, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company's investment plans directly affecting federal high-cost supported services offered by it in its designated ETC service area do not include a major construction project at the present time. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2006. The Company has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2008. 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 in the Company's designated ETC service area will benefit from the expected level of support by continuing to have available to them services 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.

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REG: 5 PACIFIC APPLIES TO PERIOD: YEAR END 12/2006 REG: 5 SST: 3 SUBSET 3 CONTACT NAME: Jennifer Goos

(360)-898-5366 EXT: CONTACT PHONE:

OO: ********
CO: 000002419 Hood Canal Tel. Co. RELEASE STATUS: RELEASED SAR: 522419 HOOD CANAL TEL CO SOFT EDIT STATUS: PASSED EDIT

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525 ACCOUNT 6560 (2210-2230) 205,232 EC				
			-	
530 ACCOUNT 6560 (2410) 138,556 EC				
	530	ACCOUNT 6560 (2410)	138,556	EC

N... E... C... A... INC. 07/11/2007 USF1010 PENDING VIEW REPORT 12:07:32 Page 2/ 2

Page 2/2006 REG: 5 PACIFIC

APPLIES TO PERIOD: YEAR END 12/2006 REG: 5 PACIFIC CONTACT NAME: Jennifer Goos SST: 3 SUBSET 3

CONTACT PHONE: (360)-898-5366 EXT: OO: *******

RELEASE STATUS: RELEASED CO: 000002419 Hood Canal Tel. Co. SOFT EDIT STATUS: PASSED EDIT SAR: 522419 HOOD CANAL TEL CO

	DESCRIPTION	PENDING VIEW	SOURCE
535	ACCOUNT 6710 TOTAL	137,109	EC
540	ACCOUNT 6710 BENEFITS	31,187	EC
550	ACCOUNT 6720 TOTAL	277,960	EC
555	ACCOUNT 6720 BENEFITS	28,105	EC
565	SUM OF LINES 535 + 550	415,069	EC
600	BEN. POR.OF ALL OP. EXP.	242,563	EC
610	RENT POR. OF ALL OP. EXP	31,161	EC
650	ACCOUNT 7200 OTHER TAXES	36,194	EC
700	2410 (C S TOTAL CWF - AV)	2,459,995	EC
710	2410 (C S CWF - CAT.1)	2,042,713	EC
800	ACCOUNT 2680 TOTAL	0	EC
805	ACCOUNT 2680 (2230)	0	EC
810	ACCOUNT 2680 (CAT. 4.13)	0	EC
815	ACC 2680 (2410) TOTAL CWF	0	EC
820	ACC 2680 (2410) CWF-CAT1	0	EC
830	ACCOUNT 6560 (2680)	0	EC

COMMENTS:

N... E... C... A... INC. 07/20/2000 USF1010 PENDING VIEW REPORT 13:00:14 Page 1/ 2

APPLIES TO PERIOD: YEAR END 12/2005 REG: 5 PACIFIC CONTACT NAME: Dawn Thompson SST: 3 SUBSET 3

CONTACT PHONE: (360)-898-3296 EXT: 00: ********

R ASE STATUS: RELEASED CO: 000002419 Hood Canal Tel. Co. SORT EDIT STATUS: PASSED EDIT SAR: 522419 HOOD CANAL TEL CO

	DESCRIPTION	PENDING VIEW	SOURCE
060	TOTAL LOOPS	4 548	
070	CAT. 1.3 LOOPS	1,517	EC
160	ACCOUNT 2001	1,487	EC
170	ACCOUNT 1220	5,922,237	EC
190	ACCOUNT 3100	23,268	EC
195	ACCOUNT 3400	4,520,851	EC ·
210	ACCOUNT 4340	0	EC
220	NET PLANT INVESTMENT	106,835	EC
230	ACCOUNT 2210	1,317,819	EC
235	ACCOUNT 2220	1,026,469	EC
240	ACCOUNT 2230	0	EC
245	TOTAL CENTRAL OFFICE	1,098,279	EC
250		2,124,748	
255	CKT EQUIP CAT 4.13 ACCOUNT 2410	620,438	EC
260		2,430,341	EC
265		819,399	EC
270		0	EC
275		876,724	EC
280	ACCOUNT 3100 (2210-2230) ACCOUNT 3100 (2410)	1,696,123	EC
310		1,747,216	EÇ
		34,225	EC
3.	•	. 0	EÇ
325		31,634	EC
330		65,859	EC
335		47., 484	EC
340	t management and a	13,687	EC
345	ACCOUNT 6110 BENEFITS ACCOUNT 6110 RENTS	3,906	EC
350		0	EC
3 55		114,456	EC
360	ACCOUNT 6120 BENEFITS	5,523	EC
365	ACCOUNT 6120 RENTS	55,077	EC
370	ACCOUNT 6210 TOTAL	189,761	EC
375	ACCOUNT 6210 BENEFITS	35,729	EC
380	ACCOUNT 6210 RENTS	0	EC
385	ACCOUNT 6220 TOTAL	0	EC
	ACCOUNT 6220 BENEFITS	0	EC
390	ACCOUNT 6220 RENTS	0	EC
395	ACCOUNT 6230 TOTAL	81,916	EC
400	ACCOUNT 6230 BENEFITS	12,721	EC
405	ACCOUNT 6230 RENTS	0	EC
410	ACCOUNT 6210-6230	271,677	EC
430	ACCOUNT 6410 TOTAL	166,297	EC
435	ACCOUNT 6410 BENEFITS	26,919	EC
440	ACCOUNT 6410 RENTS	0	EC
445	TOTAL PLANT SPECIFIC	566,117	EC
450	ACCOUNT 6530 TOTAL	51,917	EC
455	ACCOUNT 6530 BENEFITS	12,776	EC
510	ACCOUNT 6560 (2210)	102,694	EC
515	ACCOUNT 6560 (2220)	0	EC
5	ACCOUNT 6560 (2230)	106,547	EC
52 ა	ACCOUNT 6560 (2210-2230)	209,241	EC
530	ACCOUNT 6560 (2410)	147,429	EC
		741,443	EC.

N... E... C... A... INC. USF1010 PENDING VIEW REPORT

07/26/2006 13:00:14

13:00:14 Page 2/ 2

APPLIES TO PERIOD: YEAR END 12/2005 REG: 5 PACIFIC CONTACT NAME: Dawn Thompson SST: 3 SUBSET 3 CONTACT PHONE: (360)-898-3296 EXT: OO: *********

CONTACT PHONE: (360)-898-3296 EXT: OO: ********

R SE STATUS: NOT RELEASED CO: 000002419 Hood Canal Tel. Co.

SOFT EDIT STATUS: PASSED EDIT SAR: 522419 HOOD CANAL TEL CO

	DESCRIPTION	PENDING VIEW	SOURCE
5 35	ACCOUNT 6710 TOTAL	175,633	EC
540	ACCOUNT 6710 BENEFITS	27,722	EC
5 50	ACCOUNT 6720 TOTAL	262,821	EC
55 5	ACCOUNT 6720 BENEFITS	28,833	EC
5 65	SUM OF LINES 535 + 550	438,454	EC
600	BEN. POR.OF ALL OP. EXP.	222,754	EC
61 0	RENT POR. OF ALL OP. EXP	55,077	EC
6 50	ACCOUNT 7200 OTHER TAXES	35,014	EC
700	2410 (C S TOTAL CWF - AV)	2,409,285	
710	2410 (C S CWF - CAT.1)	2,051,567	EC
800	ACCOUNT 2680 TOTAL	0	EC
805	ACCOUNT 2680 (2230)	0	EC
810	ACCOUNT 2680 (CAT. 4.13)	. 0	EC
815	ACC 2680 (2410) TOTAL CWF	0	EC
820	ACC 2680 (2410) CWF-CAT1	0	EC
830	ACCOUNT 6560 (2680)	. 0	EC

COMMENTS: