

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

Whidbey Telephone Company (“Company”) hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.<sup>1</sup>

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company’s NECA-1 Report for the calendar year 2011,<sup>2</sup> that, as of the date of the report, the Company has reported as the basis for support from the federal high-cost fund. That report also includes certain data for the calendar year 2010. The Company further reports that the Company’s gross additions to telecommunications plant during calendar year 2011 were approximately [REDACTED]. Also, of the gross additions to telecommunications plant indicated above, approximately [REDACTED] related to Exchange Line Cable & Wire Facilities - Category 1 in the Company’s designated ETC<sup>3</sup> service area. Other major gross additions to telecommunications plant during the calendar year 2011 included an approximate [REDACTED] for broadband loop carrier (“BLC”) equipment and purchases of motor vehicles, tools and other work equipment, office equipment and general purpose computer equipment.

Report 2: 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 high quality telecommunications services to customers in the service area for which the Company is designated as an ETC. The Company has made substantial expenditures and 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<sup>4</sup> from the Company within its designated ETC service area.

Report 3: WAC 480-123-070(4): During the calendar year 2011, the Company did not receive from the Consumer Protection Division of the Office of the Attorney General of the State of Washington any complaints against the Company made to them by the Company’s customers. However, during the calendar year 2011, the Company did receive from the Federal Communications Commission (“FCC”) notice of seven (7) informal complaints made by Company customers, equating to approximately [REDACTED] complaints per thousand Company lines over which services that are supported by the

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

<sup>2</sup> National Exchange Carrier Association, Inc. Universal Service Data Collection Form 2012-1.

<sup>3</sup> The term “ETC” is used herein with the same meaning as the term is used in Chapter 480-123 WAC.

<sup>4</sup> References herein to the services supported by the federal high-cost fund refer to the services designated for support as set forth in 47 C.F.R. § 54.101(a).

federal high-cost fund are provisioned. One of those complaints related to the rates applied by an interexchange carrier (not a Company affiliate, but a carrier for which the Company provides billing and collection services) and the traffic routing practices of that carrier, with respect to international calls. Prior to the Company's receipt of notice of that informal complaint, the matter was resolved by a credit being applied to the customer's account with the Company.

The remainder of the informal complaints to the FCC of which the Company received notice during the calendar year 2011 pertained to what are sometimes referred to as "rural call completion issues," which reportedly have affected rate-of-return, incumbent local exchange carriers serving rural areas nationwide. In the present context, the subject informal complaints pertained to problems reportedly encountered by the Company customer submitting the complaint, or by persons endeavoring to call that customer's telephone number, consisting of (i) the failure of interexchange calls to complete properly to that telephone number, or (ii) transmission problems experienced on such calls, or (iii) erroneous or incomplete calling number identification. To the best of the Company's information, knowledge and belief, none of these informal complaints to the FCC was the result of any inadequacy or insufficiency in any Company practice or procedure, but rather they were the result of issues introduced by the originating wireless or interexchange carrier, or intermediate interexchange carriers, or their respective subcontractors.

Report 4: WAC 480-123-080(1)(b) and (2): The Company reports as follows:

As they are known to the Company at the date of this Report, the planned investments related to Washington state for the calendar year 2012 that the Company expects to use as a basis to request federal high-cost fund support for that period are expected to be approximately [REDACTED]. The Company expects that its investments related to Washington state for the calendar year 2013 that the Company expects to use as a basis to request federal high-cost fund support for that period will be relatively similar to the amounts for calendar year 2012, subject to normal fluctuations in investment levels. The expenses for calendar year 2012 and calendar year 2013 that the Company expects to use as a basis to request federal high-cost fund support for those periods, respectively, are expected to be similar to the expenses the Company has set forth in its information for calendar year 2011 filed under Report 1, above, taking into account normal fluctuations in expense levels. The Company expects that levels of expenses in each of those years will remain relatively the same as those it experienced in calendar year 2011, subject to the effects of inflation and other commonly experienced changes in the cost of labor and materials, changes in depreciation rates, and changes in the cost of employee benefit plans. The Company does not anticipate major adjustments in staffing levels for either relevant period. The Company expects that, in each of the calendar years 2012 and 2013, it will have relatively the same level of expenditure and investment related to maintenance, replacement and minor upgrades of telecommunications equipment and plant as occurred in calendar year 2011.

The Company's investment and expenditure plans directly affecting federal high-cost fund supported services offered by it in its designated ETC service area include

[REDACTED]

The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service and the new facilities will result in a platform that will provide additional capacity for the provision of existing federal high-cost fund supported services to customers in the Company's designated ETC service area and on which additional telecommunications services, including, but not limited to, advanced telecommunications services, can be provided to customers in the Company's designated ETC service area. The planned investments will improve the quality of service and network capacity available to the Company's customers in the portions of the Company's designated ETC service area in which the new facilities are to be deployed, as well as increase the number of services available to customers in most, if not all, of the Company's designated ETC service area. The Company further expects that the continued receipt of federal high-cost fund support will allow the Company to continue to provide the supported services at rates that are reasonably 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 reasonably comparable to the telecommunications services offered in urban areas at rates that are reasonably comparable to the rates for such services in urban areas.

Dated: July 31, 2012

Universal Service Fund  
2012 Data Collection Form

SAC: 522452

SA Name: WHIDBEY TELEPHONE COMPANY

Region: 5 PACIFIC

## I. EXCHANGE CARRIER/DATA IDENTIFICATION

(010)	Study Area Code	(010)	<u>522452</u>
(020)	Contact Name	(020)	<u>STEPHEN JANTZ</u>
(030)	Contact Telephone Number	(030)	<u>360/321-0088</u>
(040)	USF Data Collection Period	(040)	<u>2012-1</u>

<u>Data Line</u>	<u>Description</u>	<u>Latest View 2011-1 Amount</u>	<u>Data Line</u>	<u>Pending View 2012-1 Amount</u>	<u>Data Source</u>
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## II. WORKING LOOPS

(060)	Total Loops (Cat. 1.1, 1.2 and 1.3)		(060)		<u>Loop Summary</u>
(070)	Category 1.3 Loops (Excluding Cat. 1.3 TWX Loops)		(070)		<u>Loop Summary</u>
(080)	Reserved				

## III. INVESTMENT, EXPENSE AND TAXES

## Net Plant Investment

(160)	Acct. 2001 - Telephone Plant in Service		(160)		<u>Plant Summary</u>
(170)	Acct. 1220 - Materials and Supplies		(170)		<u>Plant Summary</u>
(190)	Acct. 3100 - Accumulated Depreciation		(190)		<u>Reserve Summary</u>
(195)	Acct. 3400 - Accumulated Amortization Tangible		(195)		<u>Reserve Summary</u>
(200)	Reserved				
(205)	Reserved				
(210)	Acct. 4340 - Net Noncurrent Deferred Operating Income Taxes		(210)		<u>Deferred Tax Summary</u>
(220)	Net Plant Investment (Sum of Lines 160 + 170 Minus Lines 190 Through 210)		(220)		<u>SUM</u>

National Exchange Carrier Association, Inc.

Universal Service Fund  
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<u>Data Line</u>	<u>Description</u>	<u>Latest View 2011-1 Amount</u>	<u>Data Line</u>	<u>Pending View 2012-1 Amount</u>	<u>Data Source</u>
Selected Plant Accounts					
(230)	Acct. 2210 - Central Office Switching Equipment		(230)		<u>Plant Summary</u>
(235)	Acct. 2220 - Operator System Equipment		(235)		<u>Plant Summary</u>
(240)	Acct. 2230 - Central Office Transmission Equipment		(240)		<u>Plant Summary</u>
(245)	Total Central Office Equipment (Sum of Lines 230 Through 240)		(245)		<u>SUM</u>
(250)	Circuit Equipment Category 4.13		(250)		<u>COE Categorization</u>
(255)	Acct. 2410 - Cable and Wire Facilities Total		(255)		<u>Plant Summary</u>
(260)	Acct. 3100 (2210) - Accumulated Depreciation Central Office Switching Equipment		(260)		<u>Reserve Summary</u>
(265)	Acct. 3100 (2220) - Accumulated Depreciation Operator System Equipment		(265)		<u>Reserve Summary</u>
(270)	Acct. 3100 (2230) - Accumulated Depreciation Central Office Transmission Equipment		(270)		<u>Reserve Summary</u>
(275)	Acct. 3100 (2210-2230) - Total Accumulated Depreciation Central Office Equipment (Sum of Lines 260 Through 270)		(275)		<u>SUM</u>
(280)	Acct. 3100 (2410) - Accumulated Depreciation Cable and Wire Facilities		(280)		<u>Reserve Summary</u>

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(285)	Reserved		N O E N T R Y	R E Q U I R E D	
(290)	Reserved		N O E N T R Y	R E Q U I R E D	
(295)	Reserved		N O E N T R Y	R E Q U I R E D	
(300)	Reserved		N O E N T R Y	R E Q U I R E D	
(305)	Reserved		N O E N T R Y	R E Q U I R E D	
(310)	Acct. 4340 (2210) - Net Noncurrent Deferred Operating Income Taxes - Central Office Switching Equipment		(310)		<u>Deferred Tax Summary</u>
(315)	Acct. 4340 (2220) - Net Noncurrent Deferred Operating Income Taxes - Operator System Equipment		(315)		<u>Deferred Tax Summary</u>
(320)	Acct. 4340 (2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Transmission Equipment		(320)		<u>Deferred Tax Summary</u>
(325)	Acct. 4340 (2210-2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Equipment (Sum of Lines 310 Through 320)		(325)		<u>SUM</u>
(330)	Acct. 4340 (2410) - Net Noncurrent Deferred Operating Income Taxes - Cable and Wire Facilities		(330)		<u>Deferred Tax Summary</u>

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<u>Data Line</u>	<u>Description</u>	<u>Latest View 2011-1 Amount</u>	<u>Data Line</u>	<u>Pending View 2012-1 Amount</u>	<u>Data Source</u>
Plant-Specific Operation Expense					
(335)	Acct. 6110 - Network Support Expense Total		(335)		<u>Expense Summary</u>
(340)	Acct. 6110 - Benefits Portion of Network Support Expense		(340)		<u>Ben &amp; Rents Sum</u>
(345)	Acct. 6110 - Rents Portion of Network Support Expense		(345)		<u>Ben &amp; Rents Sum</u>
(350)	Acct. 6120 - General Support Expense Total		(350)		<u>Expense Summary</u>
(355)	Acct. 6120 - Benefits Portion of General Support Expense		(355)		<u>Ben &amp; Rents Sum</u>
(360)	Acct. 6120 - Rents Portion of General Support Expense		(360)		<u>Ben &amp; Rents Sum</u>
(365)	Acct. 6210 - Central Office Switching Expense - Total		(365)		<u>Expense Summary</u>
(370)	Acct. 6210 - Benefits Portion of Central Office Switching Expense		(370)		<u>Ben &amp; Rents Sum</u>
(375)	Acct. 6210 - Rents Portion of Central Office Switching Expense		(375)		<u>Ben &amp; Rents Sum</u>
(380)	Acct. 6220 - Operator System Expense - Total		(380)		<u>Expense Summary</u>
(385)	Acct. 6220 - Benefits Portion of Operator System Expense		(385)		<u>Ben &amp; Rents Sum</u>
(390)	Acct. 6220 - Rents Portion of Operator System Expense		(390)		<u>Ben &amp; Rents Sum</u>
(395)	Acct. 6230 - Central Office Expense - Transmission Equipment - Total		(395)		<u>Expense Summary</u>

Universal Service Fund  
2012 Data Collection Form

SAC: 522452

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<u>Data Line</u>	<u>Description</u>	<u>Latest View 2011-1 Amount</u>	<u>Data Line</u>	<u>Pending View 2012-1 Amount</u>	<u>Data Source</u>
(400)	Acct. 6230 - Benefits Portion of Central Office Expense - Transmission Equipment		(400)		<u>Ben &amp; Rents Sum</u>
(405)	Acct. 6230 - Rents Portion of Central Office Expense - Transmission Equipment		(405)		<u>Ben &amp; Rents Sum</u>
(410)	Accts. 6210-6230 - Central Office Expense Total (Sum of Lines 365 + 380 + 395)		(410)		<u>SUM</u>
(415)	Reserved		N O E N T R Y	R E Q U I R E D	
(420)	Reserved		N O E N T R Y	R E Q U I R E D	
(425)	Reserved		N O E N T R Y	R E Q U I R E D	
(430)	Acct. 6410 - Cable and Wire Facilities Expense - Total		(430)		<u>Expense Summary</u>
(435)	Acct. 6410 - Benefits Portion Cable and Wire Facilities Expense		(435)		<u>Ben &amp; Rents Sum</u>
(440)	Acct. 6410 - Rents Portion Cable and Wire Facilities Expense		(440)		<u>Ben &amp; Rents Sum</u>
(445)	Total Plant-Specific Expense (Sum of Lines 335 + 350 + 365 + 380 + 395 + 415 + 430)		(445)		<u>SUM</u>
Plant-Nonspecific Expense					
(450)	Acct. 6530 - Network Operations Expense - Total		(450)		<u>Expense Summary</u>
(455)	Acct. 6530 - Benefits Portion Network Operations Expense		(455)		<u>Ben &amp; Rents Sum</u>



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<u>Data Line</u>	<u>Description</u>	<u>Latest View 2011-1 Amount</u>	<u>Data Line</u>	<u>Pending View 2012-1 Amount</u>	<u>Data Source</u>
(465)	Reserved	N O	E N T R Y	R E Q U I R E D	
(470)	Reserved	N O	E N T R Y	R E Q U I R E D	
(480)	Reserved	N O	E N T R Y	R E Q U I R E D	
(485)	Reserved	N O	E N T R Y	R E Q U I R E D	
(500)	Reserved	N O	E N T R Y	R E Q U I R E D	
(505)	Reserved	N O	E N T R Y	R E Q U I R E D	

## Depreciation and Amortization Expenses

(510)	Acct. 6560 (2210) - Depreciation and Amortization Expense - Central Office Switching Equipment		(510)		<u>Depreciation Expense Summary</u>
(515)	Acct. 6560 (2220) - Depreciation and Amortization Expense - Operator System Equipment		(515)		<u>Depreciation Expense Summary</u>
(520)	Acct. 6560 (2230) - Depreciation and Amortization Expense - Central Office Transmission Equipment		(520)		<u>Depreciation Expense Summary</u>
(525)	Acct. 6560 (2210-2230) Depreciation and Amortization Central Office Equipment (Sum of Lines 510 Through 520)		(525)		<u>SUM</u>
(530)	Acct. 6560 (2410) - Depreciation and Amortization Expense - Cable and Wire Facilities		(530)		<u>Depreciation Expense Summary</u>

## Corporate Operating Expenses

(535)	Acct. 6710 - Executive and Planning Expense - Total		(535)		<u>Expense Summary</u>
(540)	Acct. 6710 - Benefits Portion Executive and Planning Expense		(540)		<u>Ben &amp; Rents Sum</u>

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Region: 5 PACIFIC

<u>Data Line</u>	<u>Description</u>	<u>Latest View 2011-1 Amount</u>	<u>Data Line</u>	<u>Pending View 2012-1 Amount</u>	<u>Data Source</u>
(550)	Acct. 6720 - General Administrative Expense - Total		(550)		<u>Expense Summary</u>
(555)	Acct. 6720 - Benefits Portion - General Administrative Expense		(555)		<u>Ben &amp; Rents Sum</u>
(565)	Total Corporate Operations Expense (Sum of Lines 535 + 550)		(565)		<u>SUM</u>
Other Expenses and Revenues					
(600)	Benefits Portion of All Operating Expenses - Total		(600)		<u>Ben &amp; Rents Sum</u>
(610)	Rents Portion of All Operating Expenses - Total		(610)		<u>Ben &amp; Rents Sum</u>
(620)	Reserved			N O E N T R Y R E Q U I R E D	
(630)	Reserved			N O E N T R Y R E Q U I R E D	
Taxes					
(650)	Acct. 7200 - Operating Taxes		(650)		<u>Expense Summary</u>
(655)	Reserved			N O E N T R Y R E Q U I R E D	
IV. PART 36 - COST STUDY DATA					
(700)	Acct. 2410 - Cost Study Average Cable and Wire Facilities		(700)		<u>C&amp;WF Summary</u>
(710)	Cost Study Average Cable and Wire Facilities Cat. 1 - Total Exchange Line C&WF Excluding Wide Band		(710)		<u>C&amp;WF Summary</u>

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V. AMORTIZABLE TANGIBLE ASSETS (Refer to instructions prior to completing this section)					
(800)	Acct. 2680 - Amortizable Tangible Assets		(800)		<u>Plant Summary</u>
(805)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central Office Transmission Equipment		(805)		<u>Plant Summary</u>
(810)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central Office Transmission Equipment Allocated to Category 4.13		(810)		<u>Plant Summary</u>
(815)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities		(815)		<u>Plant Summary</u>
(820)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and Wire Facilities Allocated to Category 1		(820)		<u>Plant Summary</u>
(830)	Acct. 6560 (2680) - Depreciation and Amortization Expense - Amortizable Tangible Assets		(830)		<u>Depreciation Expense Summary</u>

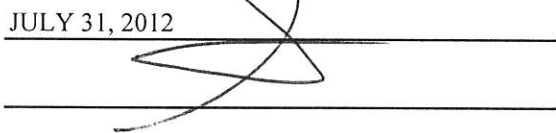
## VI. COMMENTS/SIGNIFICANT CHANGE EXPLANATION

National Exchange Carrier Association, Inc.  
 Universal Service Fund  
 2012 Data Collection Form

VII. CERTIFICATION FORM

I AM CHIEF FINANCIAL OFFICER. I HEREBY CERTIFY THAT I HAVE OVERALL RESPONSIBILITY FOR THE PREPARATION OF ALL DATA IN THE ATTACHED 2010-1 UNIVERSAL SERVICE FUND DATA SUBMISSION FOR WHIDBEY TELEPHONE COMPANY AND THAT I AM AUTHORIZED TO EXECUTE THIS CERTIFICATION. BASED ON INFORMATION KNOWN TO ME OR PROVIDED TO ME BY EMPLOYEES RESPONSIBLE FOR THE PREPARATION OF THE DATA IN THIS SUBMISSION, I HEREBY CERTIFY THAT THE DATA HAVE BEEN EXAMINED AND REVIEWED AND ARE COMPLETE, ACCURATE, AND CONSISTENT WITH THE RULES OF THE FEDERAL COMMUNICATIONS COMMISSION.

DATE: JULY 31, 2012

CERTIFYING SIGNATURE: 

NAME: STEPHEN JANTZ

TITLE: CHIEF FINANCIAL OFFICER

PERIOD COVERED: JANUARY 1, 2011 TO DECEMBER 31, 2011

VII.A. RURAL STATUS: The rural status of this company during calendar year 2013 will be: (Check One)

RURAL  NON-RURAL

VII.B. ACQUISITION CERTIFICATION (Check One)

X	MY COMPANY HAS NOT ACQUIRED AN EXCHANGE DURING THE PERIOD COVERED.	
	MY COMPANY HAS ACQUIRED THE FOLLOWING EXCHANGE(S) DURING THE PERIOD COVERED.	
Exchange Name	Selling Company	No. of Loops

PURSUANT TO FCC RULES, SECTION 69.601(C), EXCHANGE CARRIERS ARE REQUIRED TO CERTIFY UNIVERSAL SERVICE FUND DATA SUBMITTED TO NECA.

(FCC RULES STATE THAT PERSONS MAKING WILLFUL FALSE STATEMENT IN THIS DATA SUBMISSION CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER THE PROVISIONS OF THE U.S. CODE, TITLE 18, SECTION 1001).