8300 Greensboro Dr. Suite 1200 McLean, VA 22102 (703) 584-8678 WWW.FCCLAW.COM Brooks E. Harlow (703) 584-8680 direct (206) 650-8206 mobile bharlow@fcclaw.com NOT ADMITTED IN VA



July 14, 2015

## FILED ELECTRONICALLY VIA WEB PORTAL

Mr. Steven V. King Acting Executive Director & Secretary Washington Utilities and Transportation Commission Post Office Box 47250 1300 S. Evergreen Park Dr. SW Olympia, Washington 98504-7250

## Subject:United States Cellular Corporation – 2014 Annual ETC RecertificationDocket UT-15\_\_\_\_\_And Request for Late Acceptance

Dear Mr. King:

Pursuant to WAC 480-123-060, *et seq.*, U. S. Cellular Corporation ("USCC") hereby files its annual certifications and reports in Docket No. UT-15\_\_\_\_\_, as follows:

ANNUAL ETC CERTIFICATION AND REPORT, with listed Exhibits -

- Exhibit A Declaration Certifying Use Of Universal Service Funds
- Exhibit B Report on use of federal funds and benefits to customers *Confidential*
- Exhibit C Local service outage report<sup>1</sup> *Confidential*
- Exhibit D Report on failure to provide service *Confidential*
- Exhibit E Report on complaints per one thousand handsets or lines *Confidential*
- Exhibit FDeclaration Certifying Compliance With Applicable Service<br/>Quality Standards and Consumer Protection Rules
- Exhibit G Declaration Certifying Ability To Function In Emergency Situations
- Exhibit H Declaration Certifying Lifeline Advertising

<sup>&</sup>lt;sup>1</sup> Incorporated by reference.

Mr. Steven V. King July 14, 2015 Page 2

Exhibit I Samples of advertising and outreach materials

Exhibit J Annual plan for Universal Service support - Confidential

On July 9, 2015, USCC learned for the first time that the due date for this annual report was recently changed from July 31<sup>st</sup> to July 1<sup>st</sup>. USCC did not follow or actively participate in the rulemaking which resulted in the new deadline, as the vast majority of the rule changes proposed were irrelevant to USCC. Moreover, USCC is filing its report within less than a week of learning of this new due date. Additionally, USCC filed its copies of FCC forms 481 and 690 early this year and is otherwise in full compliance with all Federal and state laws and regulations regarding universal service. Accordingly, USCC respectfully requests that its report this year be accepted after the July 1<sup>st</sup> due date. Acceptance of the late report would be strongly in the public interest.

Pursuant to WAC 480-07-140, we are making this filing electronically only. In the confidential portion of the filing, each electronic file will contain, as part of the file name, the word "CONFIDENTIAL." Additionally, each page in the confidential electronic files will be labeled "Confidential Per WAC 480-07-160." A redacted copy of each confidential exhibit will also be filed.

Pursuant to RCW §80.04.095 enclosures designated as "confidential" contain valuable commercial information, including trade secrets and confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information. Accordingly, pursuant to RCW §80.04.095 such information should not be subject to inspection or copying under RCW Chapter 42.56. Moreover, the records designated as "confidential" contain valuable formulae, designs, and research data, the disclosure of which would produce private gain and public loss and should be exempt from public disclosure pursuant to RCW 42.56.270(1).

In addition to the undersigned, the following might be directly affected by disclosure of the confidential information:

U. S. Cellular Corporation 8410 West Bryn Mawr Avenue Chicago, IL 60631 Phone: (773) 864-3167 E-mail: John.Gockley@uscellular.com Attention: John C. Gockley Mr. Steven V. King July 14, 2015 Page 3

If you have any questions please contact the undersigned.

Very truly yours,

Brooks 5. Horlow

Brooks E. Harlow, P.C.

cc: Mr. Tim Zawislak Ms. Stephanie Cassioppi