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6 **BEFORE THE WASHINGTON**
7 **UTILITIES AND TRANSPORTATION COMMISSION**

8 IN RE

9 PETITION OF INLAND TELEPHONE
10 COMPANY [D/B/A INLAND
11 NETWORKS], TO RECEIVE SUPPORT
12 FROM THE STATE UNIVERSAL
13 COMMUNICATIONS SERVICES
14 PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

15 COMES NOW Inland Telephone Company [d/b/a Inland Networks] (the "Company"), and,
16 pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC") including, but not
17 limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation
18 Commission (the "Commission") to receive support from the State Universal Communications
19 Services Program established in RCW 80.36.650 (the "Program") for the fiscal year ending June 30,
20 2017.

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22 **I. Demonstration of Eligibility under WAC 480-123-100**

- 23 1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC
24 480-120-021 that serves less than forty thousand access lines within the state.

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26 PETITION OF INLAND TELEPHONE COMPANY
TO RECEIVE SUPPORT FROM THE STATE
UNIVERSAL COMMUNICATIONS SERVICES
PROGRAM - 1

- 1 2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined
2 in 47 U.S.C. § 251(h).
- 3 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange
4 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.
- 5 4. WAC 480-123-100(1)(d): The Company's rates for residential local exchange service, plus
6 mandatory extended area service charges, are no lower than the local urban rate floor
7 established by the Commission as the benchmark rate based on the Federal Communications
8 Commission's national local urban rate floor pursuant to 47 C.F.R. § 54.318 in effect on the
9 date of this Petition.
- 10 11 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an
12 eligible telecommunications carrier for purposes of receiving federal universal services
13 support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for High Cost
14 Areas with respect to the service area for which the Company is seeking Program support.

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

- 16 17 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications
18 services and is seeking Program support is as follows: Inland Telephone Company.
- 19 20 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between
21 the Company and all affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1.
22 A detailed description of any transactions between the Company and the affiliates named in
23 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2.

- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet Nos.
2 501, 502, 503 and 504 of the Company's Tariff WN U-7.
- 3 4. WAC 480-123-110(1)(d): A demonstration that the Company's customers are at risk of rate
4 instability or service interruption or cessation in the absence of support from the Program is
5 attached as Exhibit 3.
- 6 5. WAC 480-123-110(1)(e)(i): On the Commission's prescribed form, attached as Exhibit 4,
7 are copies of the Company's balance sheet as of December 31, 2015, and December 31,
8 2014, and copies of the Company's statements of income and retained earnings or margin for
9 the years ended December 31, 2015 and December 31, 2014.
- 10 6. WAC 480-123-110(1)(e)(ii): A copy of the Company's consolidated annual financial
11 statements for the years ended December 31, 2015 and December 31, 2014, are attached as
12 Exhibit 5.
- 13 7. WAC 480-123-110(1)(e)(iii): Information demonstrating the Company's earned rate of
14 return on a total Washington unseparated regulated operations basis for each of the two prior
15 years, calculated in the manner prescribed by the Commission, is provided in Exhibit 4.
- 16 8. WAC 480-123-110(1)(e)(iv): Information demonstrating the Company's earned return on
17 equity on a total company (regulated and non-regulated) Washington basis for each of the
18 two prior years, calculated in the manner prescribed by the Commission, is provided in
19 Exhibit 4.
- 20 9. WAC 480-123-110(1)(e)(v): Information detailing all of the Company's revenues from the
21 statements of income and retained earnings or margin in the same format and detail as is
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1 required to complete RUS Operating Report (Form 479) for the prior two years is presented
2 on Exhibit 6.

3 10. WAC 480-123-110(1)(e)(vi): A statement under penalty of perjury from a Company officer
4 with personal knowledge and responsibility certifying that no corporate operations
5 adjustment to existing high-cost loop and interstate common line support mechanisms
6 required by the Federal Communications Commission applied to the Company for the two
7 prior years is attached hereto as Exhibit 7.

8 11. WAC 480-123-110(1)(e)(vii): Exhibit 4 contains additional supporting information
9 requested by the Commission.

10 12. WAC 480-123-110(1)(e)(viii): A statement under penalty of perjury from a Company
11 officer with personal knowledge and responsibility certifying that the Company complies
12 with state and federal accounting, cost allocation, and cost adjustment rules pertaining to
13 incumbent local exchange companies is attached as Exhibit 8.

14 13. WAC 480-123-110(1)(f): A complete copy of the FCC Form 481 filed by the Company or
15 on its behalf with the Federal Communications Commission for the calendar year preceding
16 the current year has already been filed with the Commission. See the Company's filing in
17 Docket No. UT-160030 filed on or about June 29, 2016.

18 14. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by
19 the Company as of December 31, 2015, was 1,755 all of which were within the geographic
20 area for which the Company is seeking support. The number of residential local exchange
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1 access lines served by the Company as of December 31, 2014, was 1,719, all of which were
2 within the geographic area for which the Company is seeking support.

3 The number of business local exchange access lines served by the Company as of December
4 31, 2015, was 631, all of which were within the geographic area for which the Company is
5 seeking support. The number of business local exchange access lines served by the
6 Company as of December 31, 2014, was 624, all of which were within the geographic area
7 for which the Company is seeking support.

8 The monthly recurring rate charged by the Company for residential local exchange access
9 service on December 31, 2015, was: Dewatto exchange - \$22.00, Prescott exchange -
10 \$16.50, Roslyn exchange - \$16.00, and Uniontown exchange - \$16.00. The monthly
11 recurring rate charged by the Company for residential local exchange access service on
12 December 31, 2014, was: Dewatto exchange - \$22.00, Prescott exchange - \$16.50, Roslyn
13 exchange - \$16.00, and Uniontown exchange - \$16.00.

14 The rate charged by the Company for single line business local exchange access service on
15 December 31, 2015, was: Dewatto exchange - \$27.00, Prescott exchange - \$26.50, Roslyn
16 exchange - \$24.00, and Uniontown exchange - \$25.00. The rate charged by the Company
17 for single line business local exchange access service on December 31, 2014, was: Dewatto
18 exchange - \$27.00, Prescott exchange - \$26.50, Roslyn exchange - \$24.00, and Uniontown
19 exchange - \$25.00. (The Company has other business local exchange service rates, but the
20 Company understands that WAC 480-123-110(1)(g) is requesting the single line business
21 local exchange access service rate.)
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1 15. WAC 480-123-110(1)(h): The requested statement is attached as Exhibit 9.

2 16. The amount on Line 4, labeled 2011 ROR Carrier Base Period Revenue, of the CAF ICC
3 Data collection Report for the period 7/1/2016 - 6/30/2017 is \$1,223,317 and has not
4 changed from the last filing.

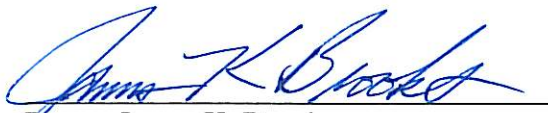
5 17. All exhibits attached hereto are incorporated in this Petition as though fully set forth.

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7 Respectfully submitted this 20th day of July, 2016.
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11 Inland Telephone Company
12 d/b/a Inland Networks
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14 CERTIFICATION

15 I, James K. Brooks, an officer of the Company that is responsible for the Company's
16 business and financial operations, hereby certify under penalty of perjury that the information and
17 representations set forth in the Petition, above, are accurate and the Company has not knowingly
18 withheld any information required to be provided to the Commission pursuant to the rules
19 governing the Program.

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21 By: James K. Brooks
22 Title: Treasurer/Controller
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