



*Local Voice Services – High Speed Internet
Long Distance – Security & Alarms – WhidbeyTV*

July 1, 2017

**BY ELECTRONIC FILING
VIA WUTC WEB PORTAL**

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Drive, SW
Olympia, WA 98504-7250

Dear Mr. King:

Re: 2017 ETC Certification -
Request for Certification Pursuant to
WAC 480-123-060 and 47 C.F.R. § 54.314 –
Annual Reports and Certification on High Cost Fund Pursuant to
WAC 480-123-060, -070 and -080

Pursuant to WAC 480-123-060, Whidbey Telephone Company (“Company”) hereby requests that the Washington Utilities and Transportation Commission (“Commission”) certify to the Federal Communications Commission and the Universal Service Administrative Company that the Company has met the requirements of 47 C.F.R. § 54.314 for eligibility for receipt of federal high-cost funds.

The certifications and reports (“Reports”) that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 accompany this letter of transmittal.¹

Because of the CONFIDENTIAL nature of the information set forth in portions of the accompanying Reports, including the attachments thereto, pursuant to RCW 80.04.095 and WAC 480-07-160 the Company hereby asserts a claim of confidentiality with respect thereto. The basis for this claim is that the Reports and their attachments contain valuable commercial information, including confidential marketing, cost and financial information. Accordingly, in compliance with WAC 480-07-160(3)(c), unredacted and redacted versions of those documents accompany this letter. As specified

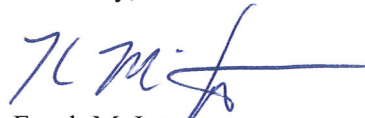
¹ Item (1) of the enclosed certifications also includes an additional certification that corresponds to a certification required of the Commission by 47 C.F.R. § 54.314(a).

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in WAC 480-07-160(3)(b)(i), all copies (both redacted and unredacted) of materials claimed to be confidential have been marked "CONFIDENTIAL PER WAC 480-07-160. The redacted versions have been marked "REDACTED." The unredacted versions have been marked "UNREDACTED," and the information thereon that is claimed to be confidential has been highlighted with grey shading.

If the Commission has any questions regarding the enclosed materials, please do not hesitate to call me at 360/321-0088.

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank McIntyre", with a long horizontal flourish extending to the right.

Frank McIntyre
Secretary/Treasurer

Accompanying Documents

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

**July 1, 2017
Whidbey Telephone Company**

I, Frank McIntyre, being of lawful age, state that I am Secretary/Treasurer of Whidbey Telephone Company ("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 in 2016 used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;

(2) That during the 2016 calendar year, the Company met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h);

(3) That during the 2016 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 2016 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 1st day of July, 2017, at Langley, Washington

Company: Whidbey Telephone Company

By: 

Name: Frank McIntyre

Its: Secretary/Treasurer