

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300
August 20, 2012

Idaho Public Utilities Commission
Office of the Secretary
RECEIVED

AUG 21 2012

Boise, Idaho



Via email in .PDF format to jean.jewell@puc.idaho.gov

Idaho Public Utilities Commission
Commission Secretary
472 W. Washington
P.O. Box 83720
Boise, ID 83720-0074

GNR-T-12-06

Re: Report and Certification Pursuant to IPUC Order No. 29841 and
47 C.F.R. §§ 54.307, 54.313 and/or 54.314

Dear Ms. Jewell:

Inland Cellular Telephone Company, as general partner of and on behalf of Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular) ("Company") hereby submits the enclosed certifications and reports that are specified in IPUC Order No. 29841. The Company requests that the Idaho Public Utilities 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. §§ 54.307, 54.313 and/or 54.314 for eligibility for continued receipt of federal high-cost funds.

Since the Company serves the Nez Perce Reservation and/or tribal members thereof, these documents have also been sent to the Tribal Chairman. If you should have any questions, please call me at (509) 649-2500 or contact me by email at jbrooks@inlandnet.com.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. Brooks".

James K. Brooks
Treasurer/Controller

Enclosures

Jean Jewel
August 20, 2012
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CERTIFICATE OF SERVICE

I, James K. Brooks, hereby certify that I have, on this 20th day of August, 2012, served the foregoing ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL RE-CERTIFICATION upon all parties believed to be of interest in this proceeding. A copy of the foregoing ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL RE-CERTIFICATION filed today was placed in the United States mail, first-class postage pre-paid, overnight delivery service or electronically, as applicable, to the following:

Ms. Jean Jewel, Executive Secretary
Idaho Public Utilities Commission
472 W. Washington Street
Post Office Box 83720
Boise, Idaho 83720-0074
Electronically to: *jean.jewel@puc.idaho.gov*

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capital Heights, MD 20743
Via Federal Express overnight delivery

Ms. Karen Majcher
Vice President-High Cost and Low Income Division
2000 L Street, NW, Suite 200
Washington, DC 20036
Electronically to: *hccerts@usac.org*

Nez Perce Tribal Executive Committee
Silas C. Whitman, Chairman
Post Office Box 305
Lapwai, ID 83540
Via USPS



James K. Brooks

ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL RE-CERTIFICATION

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Section 1: Eligible Telecommunication Carrier Information

Date of ETC Annual Report: August 20, 2012

Company Name: Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular)

Address: 103 S 2nd Street
P.O. Box 688
Roslyn, WA 98941

Company Contact Person/Title: James K. Brooks, Treasurer/Controller of the General Partner,
Inland Cellular Telephone Company

Telephone Number: (509) 649-2500
Email Address: jbrooks@inlandnet.com

Service Area Code (SAC): 479007

Number of Idaho Telephone Service Assistance Program (ITSAP) recipients: 89 (6/2012)
(Use number from last report submitted to the ITSAP Administrator)

Section 2: Description of Carrier's Local Usage Plan-- Competitive Eligible Telecommunications Carrier (CETC) Only

ETCs must submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline and ITSAP subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public website outlining the terms and conditions of such plan. C.F.R. § 54.202(a)(5).

Description: A "local usage plan" that is comparable to the ILEC is difficult for a cellular provider since the ILEC customer generally does not have toll included in their calling plan, does not have the vast territory providing local service and cannot take their phone on the road. With that said, Inland Cellular's least cost post-pay plan is \$29.99 per month. This calling plan includes 400 prime-time weekday minutes, unlimited incoming calls on the Home Network, Unlimited Inland Cellular mobile-to-mobile calling on the Home Network, unlimited nights and weekends on the Home Network and voicemail. Nationwide long distance on the Home Network is no additional charge, however, minutes are charged against the calling plan; additional minutes are \$0.25 per minute and roaming is at \$0.25 per minute. Text messaging is \$0.10 per message, data service at \$1.99/MB and multimedia messaging (pictures & video) is \$0.25 per message. This is similar to a wireline customer that can call his neighbor within the same exchange except an Inland Cellular customer has the ability to call another Inland Cellular customer in a much larger calling area (within Washington RSA 5 (B2)(WA), Washington RSA 8 (B)(WA), South Idaho RSA 1 (B2)(ID) and Idaho RSA 2 (B2)(ID) – the Home Network). 200 additional minutes can be added at \$9.99 per month or 500 additional minutes at \$19.99 per month.

Section 3: Detailed Outage Information §54.313(a)(2)

Provide detailed information on any outage, as that term is defined in 47 C.F.R. § 4.5, of at least thirty (30) minutes in duration for each service area in which an ETC is designated for any facilities it owns, operates, leases or otherwise uses that potentially affect (a) at least ten percent of the end users served in a designated service area; or (b) a 9-1-1 special facility, as defined in 47 C.F.R. § 4.5(e). Specifically, the annual report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the steps taken to prevent a similar situation in the future; and (f) the number of customers affected. Reporting period is January–December. See Order No. 29841, page 18.

Number of outages: one (1)

Additional outage information: On 10/26/11 at 3:41 pm – Error message “Heartbeat not received from subsystem” received from 10 cellular sites; T1 MUX out of service in Uniontown (switch location); approximately 12,000 subscribers were without Inland Cellular service; T1 MUX card replaced; service restored at approximately 5:01 pm; card failures are unexpected and back-up cannot be provided; no steps can be taken to prevent a similar situation in the future. Customers without service from the Company are defaulted to roam on wireless competitors during an outage.

Section 4: Unfulfilled Service Requests §54.313(a)(3)

Provide the number of requests for service from potential customers within the ETC's service area(s) that were unfulfilled in the previous year (January–December). The ETC shall also detail how it attempted to provide service to those potential customers. See Order No. 29841, page 19.

The number of unfulfilled service requests from potential customers within the ETC's service area: There were zero (0) unfulfilled service requests

Additional information: _____

Section 5: Customer Complaints §54.313(a)(4)

Provide the number of complaints per 1,000 handsets or lines for the previous year (January–December).

The number of customer complaints per 1,000 handset or working access lines: zero (0)

Additional information: During the 2011 calendar year, the Company received one customer complaint through the Federal Communications Commission (Complaint #11-C00327012-1). The complaint (with a Serve Start Date of 09/07/2011 and a return response from the Company on 09/14/2011) stems from a customer that was disconnected for non-pay in August of 2009. The customer's mother, who is not listed on the account or listed as an authorized user, made the complaint. The customer's mother was trying to get details about her sons

past account and it was explained to her that the information could not be shared with her and could only be released to her son as the only person on the account; the Company followed CPNI protocol. The Company did not receive from the Consumer Protection Division of the Office of the Attorney General for the State of Idaho or the Consumer Assistance Section of the Idaho Public Utilities Commission ("IPUC), any complaints against the Company concerning the services provided to its customers by the Company that are either subject to the regulatory jurisdiction of the IPUC or among the services supported by the federal high-cost fund. The Company had 24,423 customers in Idaho as of December 31, 2011.

Section 6: Service Quality and Consumer Protection Certification
§54.313(a)(5)

Provide certification that the carrier is complying with applicable service quality standards and consumer protection rules.

Section 7: Ability to Remain Functional in Emergencies Certification
§54.313(a)(6)

ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Cellular Telephone Company, as general partner of and on behalf of Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular)("Company"), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

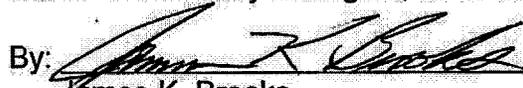
On this basis, the Company certifies to the Idaho Public Utilities Commission, pursuant to 47 C.F.R. § 64.2009(e), that the Company's operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009 and the Cellular Communications and Internet Association's Consumer Code for Wireless Service.

The Company further certifies that it maintains back-up power to ensure functionality without an external power source in the forms of auxiliary generators and batteries in its central office and at cellular tower locations. The Company also certifies that it constantly monitors traffic on its tower locations and that its switching capability is more than adequate to manage the traffic of its subscribers; purchased a new switch in 2010.

The Company further certifies, depending upon the circumstances of the outage, like the one that is reported in Section 3 where the T1 mux that carries the signal for 10 of the 29 cellular sites in Idaho went down, that it is able to re-route traffic around damaged facilities. All Inland Cellular subscribers are defaulted to roam on competitors if an Inland Cellular signal cannot be obtained.

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

Dated this 20th day of August, 2012 at Roslyn, Washington.

By: 
James K. Brooks
Treasurer/Controller
Inland Cellular Telephone Company

Section 8: Additional Voice Rate Data §54.313(h)

All incumbent local exchange carrier recipients of high-cost support must report all of their flat rates for residential local service, as well as state fees as defined pursuant to §54.318(e) of this subpart. Carriers must also report all rates that are below the local urban rate floor as defines in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

Not applicable since Washington RSA No. 8 Limited Partnership (d/b/a Inland Cellular) is a Competitive Eligible Telecommunications Carrier.

Section 10: Two-Year Network Improvement Plan and Progress Report

The annual report must include a progress report on the carrier's two-year service quality improvement plan, including maps detailing its progress toward meeting the plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled. This information shall be submitted at the wire center level. The annual report must also include an updated two-year network improvement plan indicating plans for future investment.

Inland Cellular has made substantial investments over the years, having approximately 29 cellular sites, three customer service offices, and eight agent locations in its Idaho service area, which allows Inland Cellular to provide quality telecommunications services to its customers in its designated ETC service area. Inland Cellular completed the following projects during 2011:

- Ahsahka – New cellular site; upgraded EVDO
- Clearwater Casino – New cellular site
- Cottonwood – Upgraded radio, antenna and microwave
- Lapwai – New co-location cellular site; upgraded EVDO
- McGregors – Upgrade to antenna and microwave
- Moscow – Leased new customer service location
- Nuxoll – Upgrade microwave
- Teakean Butte – Upgraded EVDO
- Voicemail – Purchased and installed new system
- Switch – Upgrades

Total additions for Idaho operations for 2011 – Approximately \$2,834,000
Operating expenses for Idaho operations for 2011, excluding Toll, Roaming and Cost of Goods Sold were approximately \$10,284,000.

Inland Cellular has in its budget the following projects for 2012 and 2013:

- Deary - New cell site including Microwave and EVDO (Est. \$350,000)
- Kamiah – Upgrade data (Est. \$75,000)
- Kooskia – Upgrade data (Est. \$75,000)
- Mason Butte - Upgrade data (Est. \$75,000)
- West Twin – Upgrade microwave and data (Est. \$200,000)
- Pre-pay System – New (Est. \$200,000)
- Switch – Upgrades (Est. \$500,000)

Budgeted operating expenses for Idaho operations for January 1, 2012 through December 31, 2012 and January 1, 2013 through December 13, 2013, excluding Toll, Roaming and Cost of Goods Sold are approximately \$10,521,000 and \$10,627,000, respectively.

These projects represent what has been approved in the budget process however, since Inland Cellular operates on a cash flow basis and sites are dependent upon need,

suitability and negotiation, some of these projects may not be completed until 2013 or 2014 or the budgeted funds may be re-directed to other sites where need is warranted. An actual 2013 capital budget will not be developed until November of this year, however, Inland Cellular will continue to place investments and incur expenses related to the provisioning, maintenance and upgrading facilities for the services supported by USF into these areas as it has done in the past.

Through the expenditure of these funds as well as past investments, the Company is 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.

The Company reports that it has not received any Interstate Access or High Cost Universal Service Support for SAC 479007.

Section 11: References and Filing Instructions

Links:

FCC Report and Order 05-46

Idaho Commission Order No. 29841

Idaho Telephone Customer Relations Rules: IDAPA 31.41.01

IPUC Rules of Procedure: Information Exempt From Public Review—Definitions—Form—Procedures.

Instructions: Company documents and forms may be attached to comply with any of the reporting sections.

To comply with the certification requirements, the company may use the sample affidavit attached as "Example A" or one of its own. The affidavit must certify the company's: 1) appropriate use of federal universal support funds, 2) compliance with service quality and customer protection provisions, and, 3) ability to remain functional in an emergency.

Due Date: September 1 of each year. This year's report is due by 5PM, MDT on **September 3, 2012.**

Submit one (1) copy to: Idaho Public Utilities Commission
Commission Secretary
472 W. Washington
PO Box 83720
Boise, Idaho 83720-0074

Or email to: jean.jewell@puc.idaho.gov

Questions/Comments: Grace Seaman
IPUC Utilities Analyst
Phone: 208.334.0352
FAX: 208.334.3762
Email: grace.seaman@puc.idaho.gov