

September 21, 2016

Via email in .pdf format to [jean.jewell@puc.idaho.gov](mailto:jean.jewell@puc.idaho.gov)

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

Re: **WC Docket No. 14-58 & PUC Case # GNR-T-16-01** – FCC Form 481-  
Carrier Annual Report and Report and Certification Pursuant to IPUC Order  
No. 29841

Dear Ms. Jewel:

Enclosed is a copy of the Federal Communications Commission ("FCC"), Form 481 that was electronically completed and submitted to the Universal Service Administrative Company ("USAC"). This submission is for Inland Cellular LLC (f/k/a Washington RSA No. 8 Limited Partnership), Study Area Code 479007 and includes all attachments that were submitted to USAC and the FCC.

Please review the attached filing and include Inland Cellular LLC in your Annual Use Certification Letter to USAC and the FCC. If you should have any questions, please call me at (509) 649-2500.

Sincerely,

A handwritten signature in blue ink that reads "Nathan R. Weis". The signature is written in a cursive, flowing style.

Nathan Weis, President  
Inland Cellular LLC

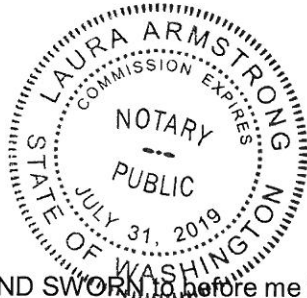
State of Washington )  
 ) ss  
County of Kittitas )

CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER  
OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER  
PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN EMERGENCIES,  
AND USE OF FEDERAL HIGH-COST SUPPORT.

**AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER**

The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers (ETC) certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Inland Cellular LLC (f/k/a Washington RSA No. 8 LP), an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Inland Cellular LLC is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.201(a)(2).
5. I also certify that all federal universal service support funds received by Inland Cellular LLC during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2017, through December 31, 2017, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.



Nathan Weis  
Nathan Weis, President

9/22/16  
Date

SUBSCRIBED AND SWORN to before me this 22nd day of September

Laura Armstrong - LAURA ARMSTRONG  
Notary Public for WASHINGTON, residing at Roslyn, WA  
My Commission expires 7/31/19

<b>INLAND CELLULAR LLC</b>						
<b>IDAHO MARKET - 479007</b>						
<b>FIVE YEAR FORECAST - NETWORK ADDITIONS</b>						

As they are known to the Company at the date of this Report, the planned investments and forecasted expenses related to the Idaho Market (Study Area Code 479007) for the period January 1, 2016 through December 31, 2020, are listed below. We are in the process of upgrading our network with next-generation LTE 4G technology and have listed those investments in the line below labeled "LTE 4G Network Deployment". The Company has also listed what is known for the provisioning of voice services. The Company expects to use all Universal Service Fund support received in order to fund the expenses related to the provisioning, maintenance and services provided over these upgraded facilities as well as existing facilities and to service the debt created in order to make these improvements; improving service quality, coverage and capacity. The Company (SAC 479007) received zero (\$0) in federal high-cost support for the calendar year ended December 31, 2015. The Company expects that any future Universal Service Fund support will aid the Company's efforts to continue to upgrade its network and to provide the supported services to all customers and potential customers.

SITE	DESCRIPTION	2015	2016	2017	2018	2019	2020
Teakean Butte	TEAKEAN BUTTE	9,000					
Stoney Point	STONE POINT UPGRADE	22,000					
Grangeville	GRANGEVILLE UPGRADE	32,000					
Mason Butte	ADDITIONS TO MASON		225,000				
West Twin	ADDITIONS TO WEST TWIN	15,000					
Julietta	JULIETTA CELL SITE	180,000	195,000				
5th St	ADDITIONS TO 5TH						
Orchards East	ADDITIONS TO ORCHARDS						
Elk Butte	ELK BUTTE SITE	20,000	20,000				
G St	ADDITIONS TO G ST CELL						
Juliaitta	New Site EVDO M/W		200,000				
Potato Hill	New Site EVDO M/W		200,000				
White Bird	New Site EVDO M/W		200,000				
Weipe	New Site EVDO M/W		175,000				
Lenore	New Site EVDO M/W		175,000				
Carlton	Upgrade		40,000				
New Site	Cell Site and CO Equipment	650,000	650,000	500,000	500,000	500,000	100,000
	<b>Total</b>	<b>928,000</b>	<b>2,080,000</b>	<b>500,000</b>	<b>500,000</b>	<b>500,000</b>	<b>100,000</b>
<b>FORECASTED OPERATING EXPENSES</b>							
Direct Telecommunications Expense		2,356,363	2,450,617	1,655,965	1,648,971	1,643,917	1,676,796
Plant Operations and Maintenance Expense		1,214,287	1,262,859	1,611,720	1,760,125	1,922,194	1,960,638
Depreciation Expense		665,862	692,496	348,112	278,673	223,085	227,547
<b>Subtotal Operating Expenses</b>		<b>4,236,512</b>	<b>4,405,972</b>	<b>3,615,797</b>	<b>3,687,768</b>	<b>3,789,196</b>	<b>3,864,980</b>
Direct Telecom - Toll Expense	Costs included in Direct Telecommunications Expense above						
Roaming Expense		2,850,386	2,964,401	4,569,018	5,262,026	6,086,709	6,208,443
Universal Service Fund Expense		438,303	455,835	519,136	524,328	529,571	540,162
Mobile Media Expense		107,995	112,314	127,402	133,772	140,461	143,270
Engineering		6,640	6,906	9,528	10,397	11,346	11,573
Sales and Advertising Expense		2,619,394	2,724,170	2,700,735	2,733,629	2,766,923	2,822,261
Customer Service Expense		882,073	917,356	835,985	821,025	806,333	822,460
Billing Expense		853,892	888,047	843,681	847,006	850,345	867,351
Accounting		137,548	143,050	158,435	165,037	171,914	175,353
General & Administrative Expense		509,253	529,623	626,997	667,791	711,239	725,464
Commercial Building Expenses		16,216	16,864	18,057	18,599	19,157	19,540
Cost of Equipment Sold		5,690,555	5,918,177	8,646,737	9,403,261	10,020,297	10,220,703

	Tax Expense (Other than Income)	63,993	66,553	72,550	75,174	77,893	79,451
	<b>TOTAL PROJECTED OPERATING EXPENSES</b>	<b>18,412,760</b>	<b>19,149,270</b>	<b>22,744,059</b>	<b>24,349,814</b>	<b>25,981,384</b>	<b>26,501,011</b>

**MEMORANDUM OF UNDERSTANDING  
WASHINGTON RSA # 8 LIMITED PARTERSHIP *d/b/a* INLAND CELLULAR  
and NEZ PERCE TRIBE**

This Memorandum of Understanding (hereinafter "Agreement") is between the Nez Perce Tribe ("Tribe") and Inland Cellular Telephone Company as general partner of and on behalf of Washington RSA #8 Limited Partnership, *d/b/a* Inland Cellular ("Inland Cellular"), a mobile communications provider. This Agreement is intended to outline a mutual understanding that will mutually benefit both the Tribe and Inland Cellular through establishing a process for cooperation between Inland Cellular and the Tribe to enhance the wireless communications across the Nez Perce Tribe's Reservation that is within the licensed service area of Inland Cellular.

**RECITALS**

WHEREAS, Inland Cellular owns, operates and maintains a Federal Communications Commission licensed mobile communications network; and

WHEREAS, the Tribe owns, operates and maintains a not-for-profit fixed wireless communications network; and

WHEREAS, the Tribe has need to expand its fixed wireless communications coverage within the boundaries of the Nez Perce Reservation and desires expansion of mobile communications within the boundaries of the Nez Perce Reservation; and

WHEREAS, Inland Cellular and the Tribe hereby mutually agree that it is desirable to collaborate in better utilizing the resources of all parties while providing additional communications capacity within the Nez Perce Reservation; therefore,

IN CONSIDERATION of the mutual promises contained herein, the parties hereto do mutually understand as follows:

The Tribe:

The Tribe will pursue funding to continue to build-out its fixed wireless equipment ("infrastructure") which includes tower locations ("Sites") to unserved and underserved areas across the Nez Perce Reservation.

The Tribe shall maintain its existing and any newly constructed fixed wireless infrastructure.

The Tribe may resell Inland Cellular's mobile communications services and establish a retail outlet within the Nez Perce Reservation. The term "resell" in this context may mean either becoming an agent of Inland Cellular or becoming a non-facilities based reseller of mobile communications service. Either "resell" option will have a contract governing the respective details.



### Inland Cellular

Inland Cellular will pursue funding to continue to build-out its mobile communications equipment ("infrastructure") which includes tower locations ("Sites") to unserved and underserved areas across the Nez Perce Reservation that are within the licensed service area of Inland Cellular.

Inland Cellular shall maintain its existing and any newly constructed mobile communications infrastructure.

### The Tribe and Inland Cellular (singularly, Party; collectively, Parties):

In the pursuit of funding to continue the build-out of fixed wireless and mobile communications infrastructures across the Nez Perce Reservation, the Parties agree to mutually support each other's endeavors with third party financing. Such support shall be in the form of written encouragement to third parties and shall not bind or encumber the other Party monetarily; there shall be no monetary support involving third party financing which includes but is not limited to letters of credit, loaning, co-signing or mortgaging.

When funding is established by either Party, the Parties mutually agree to work together in determining mutually beneficial Sites for placement of fixed wireless and mobile infrastructures. If a Site is established by either Party that has not been agreed to being beneficial to the other Party, the other Party shall not be bound to co-locate infrastructure at that Site. Acknowledgement that a Site is mutually beneficial or not, must be in writing.

Ownership of any land that is purchased for a Site shall always be considered to be owned by the purchaser of record. The Parties shall each bear the cost (capital investment, installation, maintenance, etc.) of their respective infrastructure. Co-location of infrastructure benefits both Parties. Mutually agreed upon co-location rates will be applied to new Sites.

### TERM

This Agreement term shall be five years. The Agreement will be reevaluated prior to additional five year increments unless either party gives notice of its intent to terminate the Agreement. The renewal evaluation shall consider all terms and conditions of the Agreement. The Agreement may only be modified by written agreement with updated signatures by both parties.

## TERMINATION

This Agreement may be terminated only upon 90 days written notice by either party to the other, and then only because of a breach of the Agreement or because the recited purpose of the contract becomes inapplicable.

## PARTIES

Both parties shall carry out their responsibilities under this Agreement as independent agencies and neither, by virtue of this Agreement, shall be regarded as an agent of the other.

## NOTICES

Any notices under this Agreement shall be in writing and delivered in person or by public or private courier service (including the U.S. Postal Service Express Mail) or certified mail with return receipt requested or by facsimile or by email. All notices shall be addressed to the parties at the following addresses or at such other addresses as the parties may from time to time direct in writing.

For the Tribe:

Nez Perce Tribe Technology Services  
120 Bever Grade  
P.O. Box 365  
Lapwai, ID 83540  
Attn: Danae Wilson  
Email: [danaew@nezperce.org](mailto:danaew@nezperce.org)  
Phone: 208-843-7307  
Fax: 208-843-7309

For Inland Cellular:

Inland Cellular Telephone Company  
103 South 2<sup>nd</sup> Street  
P.O. Box 688  
Roslyn, WA 98941  
Attn: James K. Brooks  
Email: [jbrooks@inlandnet.com](mailto:jbrooks@inlandnet.com)  
Phone: 509-649-2500  
Fax: 509-649-3300

SEVERABILITY

The terms of this Agreement are severable such that if any term or provision is declared by a court of competent jurisdiction to be illegal, void, or unenforceable, the remainder of the provisions shall continue to be valid and enforceable.

IN WITNESS WHEREOF, the parties agree to the provisions set forth herein as evidenced by the signatures of their authorized representatives below:

NEZ PERCE TRIBE:



Silas Whitman, Chairman

12-17-12  
Date



Allen Slickpoo, Jr., Secretary

12-17-12  
Date

INLAND CELLULAR TELEPHONE COMPANY:



James K. Brooks, Treasurer/Controller

12/19/2012  
Date



## **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, Nathan Weis, being of lawful age, state that I am President and CEO of Inland Cellular LLC (f/k/a Washington RSA No. 8 Limited Partnership)(SAC 479007) ("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 Protection Code for Wireless Service.

The Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. §54.201(a)(2), as such standards relate to functionality of wireless carriers in emergency situations. 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 auxiliary generators and/or batteries at its cellular tower locations. The Company also certifies that it constantly monitors traffic on its tower locations and that it's switching capability is more than adequate to manage the traffic of its subscribers.

The Company further certifies, depending upon the circumstances of the outage, that it is able to re-route traffic around damaged facilities. All Inland Cellular subscribers are defaulted to roam on competitors should 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 30<sup>th</sup> day of June, 2016 at Roslyn, Washington.

By: 

Nathan Weis  
President and CEO  
Inland Cellular LLC

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**

**Deadline: January 31<sup>st</sup> (Annually)**

479007

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for **each** SAC through which it provides Lifeline service).

ID

Inland Cellular LLC

State

ETC Name

Inland Cellular

Inland Cellular Telephone Company

DBA, Marketing or Other Branding Name  
(If same as ETC name, list "N/A" Do not leave blank)

Holding Company Name  
(If same as ETC name, list "N/A" Do not leave blank)

**Does the reporting company have affiliated ETCs?**

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial NW

## Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year  (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year  (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
275	0	7	0	268

### Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible  (This should be a subset of Block G.)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
187	187	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
81	0

**Note:** If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

### Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial NW

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: Community Action Partnership Association (CAPA) of Idaho and US. Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial NW

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial NW

### Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
268	0	0.0%

### Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes ☐ No ☒

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

### Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Certified Online

Signature of Officer

nathan@inlandcell.com

Email Address of Officer

Nathan Weis

Person Completing This Certification Form

Nathan Weis, President

Printed Name and Title of Officer

02/01/2016

Date

509-649-2500

Contact Phone Number



[USAC Home](#) [Lifeline Program](#) [FCC Form 555](#) [FCC Form 555 Menu](#)[sandra@inlandnet.com](mailto:sandra@inlandnet.com)**FCC FORM 555 SEARCH**

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State: ID ▼

SAC: 479007 ▼

If you would like to submit a filing or revision for the 2014 Data Year, please submit the completed 2014 FCC Form 555 to [Liverifications@usac.org](mailto:Liverifications@usac.org).

To view previous year information, click on the expand (+) button

List of SACs based on Search Criteria

SAC	Data Year	State	ETC Name	Updated Date	Filing Status	View/Print	Action
479007	2015	ID	Inland Cellular LLC	Feb 1, 2016	Certified Online		<a href="#">Click to Revise</a>

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