

**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 Telephone Company ("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 Washington Utilities and Transportation 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.

The Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g) and in 47 C.F.R. §54.201(a)(2), as such standards relate to functionality of wireline 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 offices as well as adequate battery back-up in its subscriber carrier cabinets and that its switching capability is more than adequate to manage the traffic of its subscribers.

For calls within the exchange of Uniontown, depending upon where a cut is made, there exists redundant toll routing however, the other exchanges have no redundant toll routing. In all exchanges, customers can continue to make calls within the exchange should the interexchange interconnected facilities get disconnected. The Company does not have ring technology at this time however, it is looking at redundant routing alternatives.

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

Dated this 29<sup>th</sup> day of June, 2015 at Roslyn, Washington.

By: \_\_\_\_\_

  
James K. Brooks  
Treasurer/Controller  
Inland Telephone Company