

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Comcast Cable Communications, LLC,)	
on behalf of its subsidiaries and affiliates)	CSR-8862-E
)	Docket No. 13-313
For Determination of Effective Competition in:)	
Lacey, Washington (WA0166))	
To: Office of the Secretary		
Attn: Chief, Media Bureau		

REPLY TO OPPOSITION

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”), hereby replies to the Opposition submitted by the City of Lacey, Washington (the “City”) in the above-docketed proceedings. The City’s only objection to Comcast’s Petition concerns the household data used by Comcast in calculating the Competing Provider Test penetration rate.¹ The City’s concerns, however, are unsupported and do not otherwise overcome Comcast’s demonstration of effective competition.

The City’s Opposition is predicated entirely upon its assertion that Comcast has relied on outdated household data from the 2010 Census.² The Opposition does not contend that the Census figure for occupied households in the Franchise Area is wrong. Rather, it argues that Comcast should have used “more recent and more accurate housing numbers.”³ This argument is without merit.

¹ See Opposition at 2-3.

² *Id.*

³ *Id.* at 2.

The Commission has consistently approved cable operators' reliance on the most recent Census data available in effective competition cases, and it has upheld such use long after that data was compiled.⁴ Although the Commission has indicated that it will consider more recent household data, it does so only if the alternative data presented by the local franchising authority is "demonstrated to be reliable."⁵ The Commission has made it clear that it will not disregard reliable Census data based on casual claims or competing data that is not carefully defined and fully supported.⁶ In this case, the Opposition does not offer any reliable alternative data.

The Opposition identifies changes in the local housing market, but it does not reconcile these alleged changes with the original 2010 U.S Census data, and it does not even attempt to show that the current DBS penetration rate in Lacey is below the 15 percent threshold. The Opposition initially notes that the Washington State Office of Financial Management ("OFM")

⁴ See, e.g., *Time Warner Cable, Inc. Petition for Determination of Effective Competition in Nine Franchise Areas in New Jersey*, 25 FCC Rcd. 5457, ¶ 11 (2010) ("*Time Warner Cable- 9 New Jersey Franchise Areas*") (The Commission upheld cable operator's use of the most recently available Census household data in determining DBS penetration for the communities at issue); *Comcast Cable Commun., LLC, Petitions for Determination of Effective Competition in 107 Franchise Areas in New Jersey*, 24 FCC Rcd. 1780, ¶ 13 (2009) ("[W]e conclude that the [Rate Counsel's] general allegations about the timeliness of the [household and DBS] data submitted by Petitioner reveal no flaw in the petitions."); *Texas Cable Partners, LP*, 16 FCC Rcd. 4718 (2001) (accepting 1990 Census data until the 2000 replacement data becomes available).

⁵ See, e.g., *Bright House*, 20 FCC Rcd. 16823, ¶ 10 (2005), citing *In the Matter of Adelpia Cable Commun.*, 20 FCC Rcd. 4979, 4982 (2005); *In the Matter of MCC Iowa LLC*, 2005 WL 2513517 (2005).

⁶ See, e.g., *Comcast Cable Commun., LLC Petition for Determination of Effective Competition in Ten Communities in Washington*, 28 FCC Rcd. 16292, at ¶ 15 (2013) ("[T]he City ... has not shown that its proposed estimates are as reliable as the 2000 Census count of households."); *Comcast Cable Commun., LLC Petition for Determination of Effective Competition in Nine Minnesota Franchise Areas*, 28 FCC Rcd. 5499, at ¶ 15 (2013) ("[I]t is unclear how the [LFA] reached its [household] estimates. Accordingly, [the LFA] has not shown that its proposed estimates are as reliable as the 2000 Census counts that Comcast uses."); *Comcast Cable Commun., LLC Petitions for Determination of Effective Competition in Two Communities in Michigan*, 26 FCC Rcd. 3733, at ¶ 8 (2011) (Although we will accept more recent numbers of households that are at least as reliable as the Census', none of the City's other proffered numbers have the reliability of the Census' actual count of households.") (Footnotes omitted).

estimates that “787 new single-family and multi-family housing units were added within the City’s corporate limits between 2010 and 2013.”⁷ But the OFM “Postcensal Estimate[] of Housing Units” is expressed in terms of *total* housing units, rather than *occupied* housing units – which is the relevant measure for effective competition purposes.⁸ Even if the Commission were inclined to otherwise accept the OFM count, it cannot do so, because that 787 housing unit figure necessarily includes *unoccupied* housing units.

The City’s subsequent claims regarding the occupied housing rates are similarly erroneous. The City argues, based on statistics reported in a local newspaper article, that a lower real estate inventory rate for Thurston County (where Lacey is located) and a City apartment vacancy rate of 4.8 percent “raises serious doubt as to a 15% penetration rate by Comcast’s competitors”.⁹ But the Opposition provides no details supporting the derivation and accuracy of these figures. Moreover, *county-wide* real estate inventory rates do not address the inventory rates in the specific community of Lacey, and *City apartment* vacancy rates do not necessarily reflect vacancy rates for *overall* housing units in Lacey.

In the end, the City fails to present a specific alternative to the vacancy rate reported in the 2010 Census. The Opposition is simply asking the Commission to rely on its speculative suggestion that general changes in the housing market might result in a lower DBS penetration rate in Lacey. In the absence of any reliable, alternative factual evidence regarding occupied

⁷ Opposition at 2.

⁸ A copy of the relevant portion of the OFM housing unit data referenced in the Opposition is attached hereto as Exhibit A. The City appears to have arrived at its 787 “new” housing unit figure by subtracting the Lacey housing unit figure reported in the column titled “2010 Base Census Estimates of Total Housing Units” (18,493) from those reported in the column titled “2013 Postcensal Estimates of Total Housing Units” (19,280) (19,280-18,493 = 787).

⁹ Opposition at 3.

households in the Franchise Area, the Commission must rely on the most recently available Census data submitted by Comcast.

In any event, the entire issue is an unnecessary distraction from the fundamental issue that Comcast's showing meets the Commission Competing Provider Test. Even if the Commission were to ignore the Opposition's failings and substitute the housing unit figure most favorable to the City, it would not affect the ultimate outcome of the effective competition analysis. By comparing the undisputed number of DBS subscribers for Lacey (2,864)¹⁰ to the OFM's estimated 2013 *total* housing unit figure (19,280)¹¹ reduced by an (*apartment*-based) vacancy rate of 4.8 percent,¹² the resulting DBS penetration rate of 15.60 percent¹³ still exceeds the required 15 percent in the Franchise Area.¹⁴ Despite the Opposition's professed concerns regarding alleged increases in housing units and decreases in vacancy rates, the City has failed to rebut Comcast's showing that competing DBS subscribership exceeds the 15 percent penetration threshold in Lacey.

¹⁰ See Petition, Exhibits 4 and 6.

¹¹ See Exhibit A.

¹² $(19,280 - (19,280 \times .048) = 18,355)$.

¹³ $(2,864 / 18,355 = .1560)$.

¹⁴ It is presumably for this very reason that the City offers criticisms in its Opposition but never presents a re-calculated penetration figure.

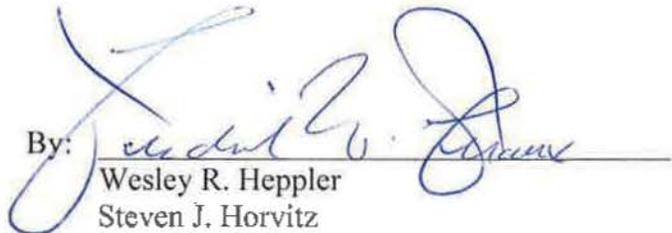
For the foregoing reasons, Comcast respectfully requests that the Commission grant the Petition and confirm that Comcast has satisfied the Competing Provider test in Lacey, Washington.

Respectfully submitted,

**Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates**

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February 27, 2014

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CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the foregoing Reply to Opposition, and to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

**Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates**

By:



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EXHIBIT A

Postcensal Estimates of Housing Units, April 1, 2010 to April 1, 2013
Washington State Office of Financial Management, Forecasting Division

Line	Filter	County	Jurisdiction	2010		2010		2011		2011		2012		2012		2013		2013	
				Base Census Estimates of Total Housing Units	2010 Estimates of One Unit Housing Units	Base Census Estimates of Two or More Unit Housing Units	2010 Postcensal Estimates of Mobile Homes and Specials	Base Census Estimates of Total Housing Units	2011 Postcensal Estimates of One Unit Housing Units	Base Census Estimates of Two or More Unit Housing Units	2011 Postcensal Estimates of Mobile Homes and Specials	Base Census Estimates of Total Housing Units	2012 Postcensal Estimates of One Unit Housing Units	Base Census Estimates of Two or More Unit Housing Units	2012 Postcensal Estimates of Mobile Homes and Specials	Base Census Estimates of Total Housing Units	2013 Postcensal Estimates of One Unit Housing Units	Base Census Estimates of Two or More Unit Housing Units	2013 Postcensal Estimates of Mobile Homes and Specials
1		Adams	Adams County	8,242	3,848	839	1,558	6,277	3,874	836	1,567	6,327	3,907	840	1,580	6,380	3,943	843	1,594
2		Adams	Unincorporated Adams	2,713	1,306	114	1,283	2,731	1,316	114	1,302	2,755	1,328	114	1,313	2,781	1,340	114	1,327
3		Adams	Incorporated Adams	3,529	2,542	722	2,65	3,546	2,559	722	2,65	3,572	2,579	726	2,67	3,589	2,603	729	2,67
4		Adams	Hartan	40	18	0	22	40	18	0	22	41	17	2	41	16	2	23	
5		Adams	Lind	276	190	43	43	275	189	43	43	274	188	43	274	188	43	43	
6		Adams	Othello	2,185	1,564	547	74	2,203	1,582	547	74	2,230	1,605	549	76	2,257	1,630	552	75
7		Adams	Ritzville	902	685	132	85	903	685	132	86	902	684	132	86	902	684	132	86
8		Adams	Washtucna	126	85	0	41	125	85	0	40	125	85	0	40	126	85	0	40
9																			
10		Asotin	Asotin County	9,072	6,900	1,614	1,358	9,901	6,914	1,614	1,373	9,922	6,935	1,614	1,373	9,937	6,943	1,613	1,391
11		Asotin	Unincorporated Asotin	5,924	4,195	577	1,162	5,954	4,201	577	1,176	5,973	4,220	577	1,176	5,982	4,233	578	1,161
12		Asotin	Incorporated Asotin	3,948	2,715	1,037	1,96	3,947	2,713	1,037	1,97	3,949	2,715	1,037	1,97	3,945	2,710	1,035	200
13		Asotin	Asotin	537	393	86	58	538	393	86	58	539	395	86	58	542	396	86	60
14		Asotin	Clarkston	3,411	2,322	951	138	3,409	2,319	951	139	3,410	2,320	951	139	3,403	2,314	949	140
15																			
16		Benton	Benton County	68,618	45,121	14,670	8,627	68,615	46,046	14,666	8,683	70,764	46,613	15,208	8,743	71,837	47,542	15,622	8,673
17		Benton	Unincorporated Benton	11,646	6,724	282	4,640	11,775	6,828	282	4,665	11,905	6,916	282	4,705	11,986	6,988	282	4,716
18		Benton	Incorporated Benton	56,972	38,397	14,388	3,987	57,840	39,218	14,384	4,018	58,859	39,697	14,926	4,038	59,851	40,554	15,340	3,957
19		Benton	Benton City	1,162	844	90	226	1,241	862	90	289	1,263	893	80	290	1,238	898	90	251
20		Benton	Kennewick	29,507	17,821	8,781	2,105	28,745	17,520	8,786	2,036	29,030	18,186	8,788	2,036	29,490	18,455	8,828	1,977
21		Benton	Prosser	2,128	1,606	388	225	2,134	1,610	388	226	2,138	1,611	400	227	2,149	1,618	404	227
22		Benton	Richland	20,878	14,992	6,152	732	21,232	15,321	5,163	748	21,611	15,584	5,468	758	22,253	15,851	5,649	753
23		Benton	West Richland	4,298	3,434	187	687	4,498	3,605	167	716	4,617	3,721	169	727	4,750	3,832	168	749
24																			
25		Chelan	Chelan County	35,485	24,688	8,287	4,530	35,534	24,735	8,289	4,530	35,743	24,829	8,277	4,537	35,938	25,119	8,275	4,544
26		Chelan	Unincorporated Chelan	18,959	12,502	721	3,835	18,849	12,495	719	3,835	18,955	12,508	719	3,853	19,080	12,887	720	3,863
27		Chelan	Incorporated Chelan	18,607	12,186	5,566	895	18,685	12,240	5,550	895	18,788	12,346	5,558	884	18,858	12,422	5,555	881
28		Chelan	Cashmere	1,179	785	319	75	1,185	789	321	75	1,174	785	319	62	1,168	788	318	62
29		Chelan	Chelan	2,517	1,684	754	99	2,535	1,679	756	100	2,550	1,686	784	100	2,559	1,698	784	96
30		Chelan	Entiat	495	246	41	208	502	253	41	208	504	258	41	208	513	267	41	205
31		Chelan	Leavenworth	1,241	783	478	0	1,242	784	478	0	1,242	784	478	0	1,245	787	478	0
32		Chelan	Wenatchee	13,175	8,708	3,954	513	13,221	8,755	3,954	512	13,318	8,845	3,956	517	13,374	8,902	3,954	518
33																			
34		Clallam	Clallam County	35,582	24,984	4,133	6,485	35,787	25,087	4,167	6,533	35,871	25,193	4,233	6,545	36,135	25,331	4,233	6,571
35		Clallam	Unincorporated Clallam	21,168	15,476	578	5,117	21,290	15,566	577	5,147	21,409	15,663	579	5,167	21,529	15,757	579	5,183
36		Clallam	Incorporated Clallam	14,413	9,478	3,557	1,378	14,477	9,501	3,590	1,386	14,662	9,530	3,654	1,378	14,606	9,574	3,654	1,378
37		Clallam	Forks	1,374	672	485	217	1,360	674	201	485	1,385	678	215	482	1,384	681	215	488
38		Clallam	Port Angeles	9,272	6,770	2,076	426	9,301	6,771	2,104	426	9,309	6,788	2,104	417	9,322	6,798	2,104	420
39		Clallam	Sequim	3,767	2,036	1,264	467	3,816	2,068	1,285	475	3,868	2,084	1,335	489	3,900	2,095	1,335	470
40																			
41		Clark	Clark County	167,413	119,120	38,170	10,123	168,416	119,820	38,320	10,176	169,657	120,847	38,779	10,241	170,782	121,516	38,945	10,291
42		Clark	Unincorporated Clark	75,498	60,870	6,967	7,861	75,908	61,226	6,979	7,703	76,348	61,494	7,118	7,736	76,911	61,926	7,205	7,780
43		Clark	Incorporated Clark	91,915	58,250	31,203	2,462	92,508	58,694	31,341	2,473	93,309	59,153	31,661	2,505	93,871	59,590	31,740	2,511
44		Clark	Battle Ground	5,952	4,894	829	239	6,042	4,971	830	241	6,084	5,002	842	240	6,109	5,045	884	240
45		Clark	Camas	7,072	6,236	796	38	7,182	6,348	796	38	7,341	6,453	851	37	7,415	6,518	861	35
46		Clark	La Center	981	854	68	59	986	889	68	58	1,061	919	68	73	1,070	927	69	74
47		Clark	Ridgefield	1,635	1,581	63	51	1,779	1,659	63	57	1,857	1,737	63	57	1,933	1,813	63	57
48		Clark	Vancouver	70,005	39,841	28,502	1,662	70,249	39,843	28,639	1,667	70,683	40,098	28,891	1,674	70,882	40,284	28,918	1,680
49		Clark	Washougal	5,673	4,416	928	329	5,717	4,482	928	327	5,784	4,498	928	340	5,820	4,551	928	341
50		Clark	Woodland city (part)	53	15	0	38	53	15	0	38	53	15	0	38	53	15	0	38
51		Clark	Yacolt	484	421	17	46	490	427	17	46	496	433	17	46	499	436	17	46
52																			
53		Columbia	Columbia County	2,136	1,589	171	367	2,147	1,600	173	374	2,150	1,600	175	375	2,158	1,607	175	376
54		Columbia	Unincorporated Columbia	845	605	8	234	850	608	6	236	853	608	6	238	861	616	6	239
55		Columbia	Incorporated Columbia	1,291	983	165	133	1,297	982	167	138	1,297	991	169	137	1,297	991	169	137
56		Columbia	Dayton	1,200	933	165	102	1,205	932	167	107	1,206	931	169	106	1,206	931	168	106
57		Columbia	Startuck	91	60	0	31	91	60	0	31	91	60	0	31	91	60	0	31
58																			
59		Cowlitz	Cowlitz County	43,450	30,053	7,841	5,556	43,584	30,168	7,847	5,569	43,691	30,253	7,856	5,582	43,811	30,343	7,856	5,612
60		Cowlitz	Unincorporated Cowlitz	17,843	13,264	634	4,045	17,987	13,290	638	4,059	17,970	13,264	632	4,074	18,045	13,328	632	4,087
61		Cowlitz	Incorporated Cowlitz	25,507	16,789	7,207	1,511	25,597	16,878	7,209	1,510	25,721	16,989	7,224	1,508	25,766	17,017	7,224	1,525
62		Cowlitz	Castile Rock	863	582	171	110	871	590	171	110	932	643	177	112	932	644	177	111
63		Cowlitz	Kalama	1,070	673	211	186	1,084	686	211	187	1,088	689	211	189	1,094			

327	4 Snohomish	Brier	2,220	2,162	31	27	2,226	2,188	31	27	2,248	2,191	31	27	2,306	2,248	31	29
329	4 Snohomish	Darrington	644	485	35	124	644	486	35	123	644	486	35	123	645	487	35	123
329	4 Snohomish	Edmonds	18,378	11,685	6,664	29	18,398	11,701	6,666	30	18,414	11,704	6,683	27	18,506	11,707	6,772	26
330	4 Snohomish	Everett	44,609	21,299	22,076	1,234	44,666	21,349	22,088	1,219	44,873	21,436	22,209	1,228	45,068	21,474	22,390	1,225
331	4 Snohomish	Gold Bar	637	525	28	284	631	525	28	278	632	525	28	279	638	525	26	286
332	4 Snohomish	Granite Falls	1,344	990	274	80	1,348	994	274	80	1,351	997	274	80	1,352	998	274	82
333	4 Snohomish	Index	116	103	6	7	117	104	6	7	117	104	6	7	117	104	6	7
334	4 Snohomish	Lake Stevens	10,414	8,240	1,801	373	10,470	8,293	1,804	373	10,583	8,298	1,812	373	10,712	8,321	1,818	373
335	4 Snohomish	Lynnwood	14,939	7,640	6,748	551	14,947	7,648	6,748	551	14,961	7,661	6,748	551	14,987	7,662	6,748	556
336	4 Snohomish	Marysville	22,363	17,187	3,935	1,231	22,649	17,488	3,940	1,221	22,808	17,701	3,940	1,227	23,064	17,830	4,004	1,230
337	4 Snohomish	Mill Creek	7,823	5,060	2,854	9	7,991	5,129	2,854	8	8,005	5,143	2,854	8	8,051	5,188	2,854	8
338	4 Snohomish	Monroe	5,306	3,740	1,477	89	5,328	3,760	1,477	89	5,359	3,783	1,477	89	5,357	3,791	1,477	89
339	4 Snohomish	Mountlake Terrace	8,602	5,283	3,207	102	8,643	5,322	3,220	101	8,684	5,364	3,218	102	8,688	5,368	3,220	101
340	4 Snohomish	Mukilteo	8,547	5,469	3,070	8	8,574	5,496	3,070	8	8,590	5,512	3,070	8	8,603	5,525	3,070	8
341	4 Snohomish	Snohomish	3,959	2,380	1,524	55	4,013	2,411	1,545	57	4,017	2,415	1,545	57	4,019	2,420	1,545	54
342	4 Snohomish	Starwood	2,584	1,851	727	6	2,588	1,854	727	5	2,608	1,877	727	4	2,620	1,886	727	4
343	4 Snohomish	Sultan	1,752	1,168	201	383	1,752	1,168	201	383	1,756	1,169	201	386	1,756	1,169	201	386
344	4 Snohomish	Woodway	468	466	0	0	466	466	0	0	467	467	0	0	464	464	0	0
345																		
348	1 Spokane	Spokane County	20,434	136,295	51,526	13,613	202,465	136,936	51,883	13,660	203,920	137,538	52,613	13,768	206,488	138,316	53,368	13,804
347	2 Spokane	Unincorporated Spokane	54,157	39,423	5,460	9,274	54,582	39,747	5,494	9,351	54,262	39,893	4,990	9,379	54,720	40,285	5,020	9,435
349	3 Spokane	Incorporated Spokane	147,277	96,872	46,066	4,339	147,873	97,189	46,369	4,315	149,658	97,648	47,623	4,389	150,788	98,051	48,349	4,389
349	4 Spokane	Airway Heights	1,727	881	318	528	1,782	920	330	532	1,782	1,050	1,103	534	2,745	1,093	1,123	639
350	4 Spokane	Cheney	4,183	1,729	2,323	131	4,320	1,735	2,455	130	4,338	1,739	2,488	132	4,442	1,744	2,586	132
351	4 Spokane	Deer Park	1,522	1,068	291	172	1,545	1,079	283	173	1,557	1,094	293	170	1,586	1,116	288	169
352	4 Spokane	Fairfield	240	186	11	43	241	187	11	43	241	187	11	43	241	187	11	43
353	4 Spokane	Latah	91	81	0	10	91	81	0	10	91	81	0	10	91	81	0	10
354	4 Spokane	Liberty Lake	3,344	2,121	1,090	133	3,408	2,185	1,090	133	3,475	2,252	1,090	133	3,573	2,348	1,094	133
355	4 Spokane	Medical Lake	1,835	1,274	431	130	1,841	1,280	431	130	1,851	1,289	431	131	1,880	1,297	431	132
356	4 Spokane	Millwood	793	673	106	14	793	673	106	14	793	673	106	14	792	672	106	14
357	4 Spokane	Rockford	213	157	0	56	213	157	0	56	213	157	0	56	213	157	0	56
358	4 Spokane	Spangle	126	83	0	43	126	83	0	43	126	83	0	43	126	83	0	43
359	4 Spokane	Spokane	94,291	63,001	29,755	1,535	94,377	63,086	29,779	1,512	94,901	63,237	30,081	1,583	95,351	63,417	30,381	1,553
360	4 Spokane	Spokane Valley	38,651	25,593	11,741	1,517	38,083	25,698	11,874	1,511	39,331	25,778	12,040	1,512	39,893	25,841	12,337	1,515
361	4 Spokane	Waverly	51	24	0	27	53	25	0	28	53	25	0	28	55	25	0	30
362																		
363	1 Stevens	Stevens County	21,196	14,535	1,125	5,496	21,238	14,591	1,129	5,518	21,301	14,653	1,131	5,517	21,347	14,700	1,135	5,512
364	2 Stevens	Unincorporated Stevens	18,557	11,485	172	4,900	18,631	11,537	172	4,922	18,688	11,595	172	4,921	18,738	11,645	175	4,916
365	4 Stevens	Incorporated Stevens	4,589	3,050	953	596	4,607	3,054	957	596	4,613	3,058	959	596	4,611	3,055	960	596
366	4 Stevens	Chewelah	1,284	800	252	223	1,285	810	252	223	1,287	812	252	223	1,288	813	252	223
367	4 Stevens	Colville	2,221	1,477	539	205	2,229	1,479	543	207	2,232	1,480	545	207	2,230	1,478	546	206
368	4 Stevens	Kettle Falls	726	504	154	68	727	505	154	68	728	506	154	68	725	504	154	67
369	4 Stevens	Marcus	82	57	0	25	82	57	0	25	82	57	0	25	82	57	0	25
370	4 Stevens	Northport	188	142	8	18	188	142	8	18	188	142	8	18	188	142	8	18
371	4 Stevens	Springdale	118	81	0	57	116	81	0	55	116	81	0	55	118	81	0	57
372																		
373	1 Thurston	Thurston County	108,182	74,428	20,080	13,693	109,195	75,346	20,150	13,699	110,366	76,204	20,439	13,723	111,809	77,178	20,896	13,734
374	2 Thurston	Unincorporated Thurston	55,316	41,302	3,452	10,562	55,889	41,649	3,453	10,587	56,059	41,998	3,455	10,608	56,336	42,254	3,456	10,628
375	3 Thurston	Incorporated Thurston	52,866	33,127	16,608	3,131	53,506	33,697	16,697	3,112	54,307	34,208	16,984	3,115	55,473	34,825	17,440	3,108
377	4 Thurston	Buena Vista	543	201	2	40	543	201	2	40	543	201	2	40	543	201	2	40
378	4 Thurston	Lacey	18,493	12,890	4,957	846	18,742	12,934	4,992	846	18,984	13,197	4,951	846	19,280	13,482	4,952	846
378	4 Thurston	Olympia	22,088	12,894	8,439	753	22,277	13,015	8,523	739	22,889	13,126	8,818	744	23,237	13,314	9,186	737
379	4 Thurston	Rainier	717	568	17	134	726	585	17	124	733	581	18	124	741	600	18	123
380	4 Thurston	Tenino	740	512	77	151	743	515	77	151	744	516	77	151	745	516	77	152
381	4 Thurston	Turnwater	8,064	4,354	2,638	1,072	8,184	4,472	2,638	1,074	8,281	4,575	2,638	1,073	8,464	4,704	2,687	1,075
382	4 Thurston	Yelm	2,523	1,910	478	135	2,551	1,975	478	138	2,613	1,998	478	137	2,763	2,106	519	137
383																		
384	1 Wahkiakum	Wahkiakum County	2,087	1,440	83	544	2,080	1,450	83	547	2,092	1,460	83	549	2,098	1,464	83	552
385	2 Wahkiakum	Unincorporated Wahkiakum	1,771	1,236	3	532	1,784	1,246	3	535	1,796	1,256	3	537	1,803	1,260	3	540
386	3 Wahkiakum	Incorporated Wahkiakum	296	204	80	12	296	204	80	12	296	204	80	12	296	204	80	12
387	4 Wahkiakum	Cathlamet	296	204	80	12	296	204	80	12	296	204	80	12	296	204	80	12
388																		
389	1 Walla Walla	Walla Walla County	23,451	16,146	4,732	2,573	23,530	16,209	4,739	2,582	23,850	16,278	4,976	2,596	23,998	16,370	5,013	2,613
390	2 Walla Walla	Unincorporated Walla Walla	8,485	4,933	212	1,350	8,541	4,971	212	1,358	8,590	5,012	212	1,366	8,675	5,052	247	1,376
391	3 Walla Walla	Incorporated Walla Walla	16,856	11,213	4,520	1,223	16,989	11,238	4,527	1,224	17,260	11,266	4,764	1,230	17,321	11,318	4,766	1,237

CERTIFICATE OF SERVICE

I, Deborah D. Williams, do hereby certify on this 27th day of February, 2014 that a true and correct copy of the foregoing "Reply to Opposition" has been sent via U.S. mail, postage prepaid to the following:

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Deborah D. Williams