

**REDACTED- FOR PUBLIC INSPECTION**

June 30, 2014

**VIA OVERNIGHT DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Ms. Dortch:

Westgate Communications LLC dba Weavetel ("WEAVETEL"), a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted financial data, in compliance with 47 C.F.R. §§ 54.313 and 54.422

As specified in the Protective Order issued on November 16, 2012 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,



Eric N. Votaw, Senior Manager for  
Moss Adams LLP

Enclosures

cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division

<b>FCC Form 481 - Carrier Annual Reporting Data Collection Form</b>	FCC Form 481 OMB 3060-0986 OMB 3060-0819 Avg. Burden Estimate per Respondent: 20 Hours
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<b>&lt;010&gt;</b>	Study Area Code	520580
<b>&lt;015&gt;</b>	Study Area Name	WESTGATE COMMUNICATIONS LLC D/B/A WEAUNET
<b>&lt;020&gt;</b>	Program Year	2015
<b>&lt;030&gt;</b>	Contact Name: Person USAC should contact with questions about this data	Richard J. Weaver
<b>&lt;035&gt;</b>	Contact Telephone Number: Number of the person identified in data line <030>	509-682-5556
<b>&lt;039&gt;</b>	Contact Email: Email of the person identified in data line <030>	rick@weavnet.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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			(check box when complete)	
<b>&lt;100&gt;</b>	Service Quality Improvement Reporting	(complete attached worksheet)	X	
<b>&lt;200&gt;</b>	Outage Reporting (voice)	(complete attached worksheet)	X	X
<b>&lt;210&gt;</b>	<input checked="" type="checkbox"/> <-- check box if no outages to report			
<b>&lt;300&gt;</b>	Unfulfilled Service Requests (voice)	\$0	X	
<b>&lt;310&gt;</b>	Detail on Attempts (voice)	(attach descriptive document)		
<b>&lt;320&gt;</b>	Unfulfilled Service Requests (broadband)	\$0	X	
<b>&lt;330&gt;</b>	Detail on Attempts (broadband)	(attach descriptive document)		
<b>&lt;400&gt;</b>	Number of Complaints per 1,000 customers (voice)		X	X
<b>&lt;410&gt;</b>	Fixed	0		
<b>&lt;420&gt;</b>	Mobile	0		
	Number of Complaints per 1,000 customers (broadband)		X	
<b>&lt;440&gt;</b>	Fixed	0		
<b>&lt;450&gt;</b>	Mobile	0		
<b>&lt;500&gt;</b>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	X	X
<b>&lt;510&gt;</b>		(attached descriptive document)	X	X
<b>&lt;600&gt;</b>	Functionality in Emergency Situations	(check to indicate certification)	X	X
<b>&lt;610&gt;</b>		(attached descriptive document)	X	X
<b>&lt;700&gt;</b>	Company Price Offerings (voice)	(complete attached worksheet)	X	
<b>&lt;710&gt;</b>	Company Price Offerings (broadband)	(complete attached worksheet)	X	
<b>&lt;800&gt;</b>	Operating Companies and Affiliates	(complete attached worksheet)	X	X
<b>&lt;900&gt;</b>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	X	
<b>&lt;1000&gt;</b>	Voice Services Rate Comparability	(check to indicate certification)	X	
<b>&lt;1010&gt;</b>		(attach descriptive document)	XX	
<b>&lt;1100&gt;</b>	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	X	
<b>&lt;1110&gt;</b>		(complete attached worksheet)	X	
<b>&lt;1200&gt;</b>	Terms and Condition for Lifeline Customers	(complete attached worksheet)		X

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

<b>&lt;2000&gt;</b>		(check to indicate certification)		
<b>&lt;2005&gt;</b>		(complete attached worksheet)		

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<b>&lt;3000&gt;</b>		(check to indicate certification)	X	
<b>&lt;3005&gt;</b>		(complete attached worksheet)	X	

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986  
OMB Control No. 3060-0819  
April 2014

<010>	Study Area Code	520580
<015>	Study Area Name	WESTGATE COMMUNICATIONS LLC D/B/A/ WEAVTEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Richard J. Weaver
<035>	Contact Telephone Number - Number of person identified in data line <030>	509-982-5556
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@weavenet.com

<110> Has your company received its ETC certification from the FCC? (yes / no ) No  
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "5  
 year plan" filed with the FCC? (yes / no )

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which receives only frozen support, your progress report is only required to address voice telephony service

520580WA112.pdf

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.


<113> Maps detailing progress towards meeting plan targets  
 <114> Report how much universal service (USF) support was received  
 <115> How (USF) was used to improve service quality  
 <116> How (USF) was used to improve service coverage  
 <117> How (USF) was used to improve service capacity  
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0985 OMB Control No. 3060-0819 April 2014
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<010> Study Area Code	520580
<015> Study Area Name	WESTGATE COMMUNICATIONS LLC D/B/A/ WEAVTEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Richard J. Weaver
<035> Contact Telephone Number - Number of person identified in data line <030>	509-982-5556
<039> Contact Email Address - Email Address of person identified in data line <030>	rick@weavenet.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Moss Adams, LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: Moss Adams, LLP	
Name of Reporting Carrier: WESTGATE COMMUNICATIONS LLC D/B/A WEAVTEL	
Signature of Authorized Officer:	Date: <u>6/30/14</u>
Printed name of Authorized Officer: Richard J. Weaver	
Title or position of Authorized Officer: General Manager	
Telephone number of Authorized Officer: 509-682-5556	
Study Area Code of Reporting Carrier: 520580	Filing Due Date for this form: 7/1/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: WESTGATE COMMUNICATIONS LLC D/B/A WEAVTEL	
Name of Authorized Agent or Employee of Agent: Moss Adams, LLP	
Signature of Authorized Agent or Employee of Agent:	Date: <u>6/30/14</u>
Printed name of Authorized Agent or Employee of Agent: Eric N. Votaw	
Title or position of Authorized Agent or Employee of Agent: Senior Manager	
Telephone number of Authorized Agent or Employee of Agent: 209-955-6116	
Study Area Code of Reporting Carrier: 520580	Filing Due Date for this form: 7/1/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 April 2014
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<b>&lt;010&gt;</b> Study Area Code	520580
<b>&lt;015&gt;</b> Study Area Name	WESTGATE COMMUNICATIONS LLC D/B/A/ WEAUTEL
<b>&lt;020&gt;</b> Program Year	2015
<b>&lt;030&gt;</b> Contact Name - Person USAC should contact regarding this data	Richard J. Weaver
<b>&lt;035&gt;</b> Contact Telephone Number - Number of person identified in data line <030>	509-982-5556
<b>&lt;039&gt;</b> Contact Email Address - Email Address of person identified in data line <030>	rick@weavenet.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: WESTGATE COMMUNICATIONS LLC D/B/A WEAUTEL	
Signature of Authorized Officer: <i>Richard J. Weaver</i>	Date 6/30/2014
Printed name of Authorized Officer: Richard J. Weaver	
Title or position of Authorized Officer: General Manager	
Telephone number of Authorized Officer: 509-682-5556	
Study Area Code of Reporting Carrier: 520580	Filing Due Date for this form: 7/1/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

LINE 100 INITIAL FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

REDACTED FOR PUBLIC INSPECTION



Response Line 510  
Westgate Communications LLC d/b/a WeavTel  
Study Area 520580

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Westgate Communications LLC d/b/a WeavTel ("COMPANY") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. COMPANY provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. COMPANY also conducts subscriber outreach regarding CPNI by periodically placing CPNI explanation messages onto its website informing subscribers on CPNI rules and regulations. In addition COMPANY trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

COMPANY also outlines its rates, terms, and conditions under which COMPANY offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. COMPANY keeps its tariffs available for public inspection at its business offices.

Response Line 610  
Westgate Communications LLC d/b/a WeavTel  
Study Area 520580

Functionality in Emergency Situations:

Pursuant to 47 C.F.R. § 54.313(a) (6) and 47 C.F.R § 54.22(b) (4) as set forth in 47 C.F.R. § 54.202(a) (2) Westgate Communications LLC d/b/a WeavTel ("NAME") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Manson Tandem/Earth Station by use of a fixed generator and batteries that provide it with 72 hours of emergency power. In addition, Stehekin Central Office/Earth Station has at least 72 hours of back-up power by use of mobile generators and fixed batteries. Westgate has connectivity to the neighboring exchange of Manson EXCHANGE and has connectivity to the LATA Tandem in Wenatchee which further provides capabilities of handling traffic. Lastly, Westgate is prepared and capable of managing traffic spikes resulting from emergency situations and has established procedures for employees to follow during emergency situations.







**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986  
OMB Control No. 3060-0819  
April 2014

<010> Study Area Code	520580
<015> Study Area Name	WESTGATE COMMUNICATIONS LLC D/B/A/ WEAVTEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Richard J. Weaver
<035> Contact Telephone Number - Number of person identified in data line <030>	509-982-5556
<039> Contact Email Address - Email Address of person identified in data line <030>	rick@weavenet.com

<910> Tribal Land(s) on which ETC Serves \_\_\_\_\_

<920> Tribal Government Engagement Obligation \_\_\_\_\_  
Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each of these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

	Select (Yes, No, NA)
<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	
<922> Feasibility and sustainability planning;	
<923> Marketing services in a culturally sensitive manner;	
<924> Compliance with Rights of way processes	
<925> Compliance with Land Use permitting requirements	
<926> Compliance with Facilities Siting rules	
<927> Compliance with Environmental Review processes	
<928> Compliance with Cultural Preservation review processes	
<929> Compliance with Tribal Business and Licensing requirements.	

Response to Line 1010  
Westgate Communications LLC d/b/a WeavTel  
Study Area 520580

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10 ) Westgate Communications LLC d/b/a Weavtel (“Weavtel”) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$46.96 as specified in Public Notice DA 14-384 issued on March 20, 2014. Weavtel’s current total local end-user rate<sup>1</sup> of \$25.00 (which includes a local fee of \$0.00, mandated state fees of \$0.00 and mandatory extended area service charges of \$0.00) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

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<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”

**(1110) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986  
OMB Control No. 3060-0819  
April 2014

<010>	Study Area Code	520580
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<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Richard J. Weaver
<035>	Contact Telephone Number - Number of person identified in data line <030>	509-982-5556
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@weavenet.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986  
 OMB Control No. 3060-0819  
 April 2014

<010> Study Area Code	520580
<015> Study Area Name	WESTGATE COMMUNICATIONS LLC D/B/A/ WEAVTEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Richard J. Weaver
<035> Contact Telephone Number - Number of person identified in data line <030>	509-982-5556
<039> Contact Email Address - Email Address of person identified in data line <030>	<a href="mailto:rick@weavenet.com">rick@weavenet.com</a>

<1210> Terms & Conditions of Voice Telephony Lifeline Plans Name of attached document (.pdf)

<1220> Link to Public Website HTTP <https://weavtel-public.sharepoint.com/lifeline>

Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

FCC Form 481  
 OMB Control No. 3060-0986  
 OMB Control No. 3060-0819  
 April 2014

**(3005) Rate Of Return Carrier Additional Documentation**  
**Data Collection Form**

<010> Study Area Code 520580  
 <015> Study Area Name WESTGATE COMMUNICATIONS LLC D/B/A/ WEA/VTEL  
 <020> Program Year 2015  
 <030> Contact Name - Person USAC should contact regarding this data Richard J. Weaver  
 <035> Contact Telephone Number - Number of person identified in data line <030> 509-982-5556  
 <039> Contact Email Address - Email Address of person identified in data line <030> rick@weavnet.com

CHECK the boxes below to note compliance on its five year service quality plan pursuant to 47 CFR § 54.202(a) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

**Progress Report on 5 Year Plan**

(3010) Milestone Certification (47 CFR § 54.313(f)(1)(i))  Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313(f)(1)(ii), any rate of return carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(i))  (Yes/No)  
 (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  (Yes/No)

(3014) If yes, does your company file the RUS annual report?   
 Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)   
 (3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation   
 (3018) If the response is no on line 3014, is your company audited?   
 If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications   
 (3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.   
 If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,   
 (3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.   
 (3025) PDF of Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information   
 Name of Attached Document Listing Required Information

LINE 3005 RATE OF RETURN DATA

REDACTED FOR PUBLIC INSPECTION