



STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
P. O. BOX 304260
MONTGOMERY, ALABAMA 36130-4260

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TWINKLE ANDRESS CAVANAUGH, ASSOCIATE COMMISSIONER, PRESIDENT

JOHN A. GARNER, EXECUTIVE DIRECTOR

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

CHRIS "CHIP" BEEKER, JR., ASSOCIATE COMMISSIONER

September 27, 2018

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

USAC
Vice President, High Cost and Low Income Division
200 L Street NW, Suite 200
Washington, DC 20036

Re: CC Docket No. 96-45/WC Docket No. 14-58, Annual State Certification of
Support For Eligible Telecommunications Carriers Pursuant to 47 C.F.R. § 54.314

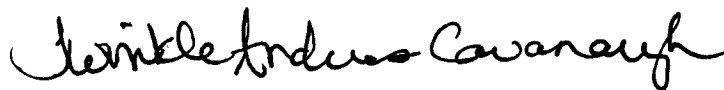
Pursuant to the requirements of 47 C.F.R. § 54.314, the Alabama Public Service Commission (APSC) hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company (USAC) that the telecommunications carriers included in Attachment "A" of this letter are eligible to receive federal High-cost support for the years cited.

The representations and certifications herein provided are largely the product of informal proceedings conducted before the APSC in Docket 25980. The APSC certifies for the carriers listed in Attachment "A" that all federal high-cost support provided to such carriers within Alabama was used in the preceding year (2017) and will be used in the coming calendar year (2019) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

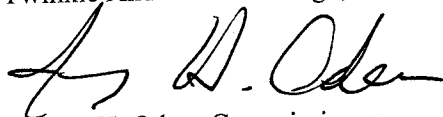
The APSC thanks the Commission and USAC for its diligence and cooperation in this matter. Please date stamp the extra copy of this filing and return it to the APSC in the enclosed, stamped, self-addressed envelope.

No. of Copies rec'd 0
List ABCDE

ALABAMA PUBLIC SERVICE COMMISSION

A handwritten signature in cursive script that reads "Twinkle Andress Cavanaugh".

Twinkle Andress Cavanaugh, President

A handwritten signature in cursive script that reads "J. H. Oden".

Jeremy H. Oden, Commissioner

A handwritten signature in cursive script that reads "C. Beeker, Jr.".

Chris "Chip" Beeker, Jr., Commissioner

ATTACHMENT "A"

ALABAMA PUBLIC SERVICE COMMISSION

CERTIFIED TELECOMMUNICATIONS CARRIERS ELIGIBLE TO RECEIVE
FEDERAL HIGH COST SUPPORT FOR THE CALENDAR YEAR 2018

COMPANY NAME AND STUDY AREA CODE (SAC)

COMPANY	SAC	
ARDMORE TELEPHONE COMPANY, INC.	290280	B
BLOUNTSVILLE TEL CO	250282	A
BRINDLEE MOUNTAIN	250283	A
BUTLER TEL CO	250284	A
CASTLEBERRY TEL CO	250285	B
NATIONAL OF ALABAMA	250286	A
FARMERS TELECOM COOP	250290	B
KNOLOGY OF THE VALLEY, INC.	220371	B
KNOLOGY TOTAL COMMUNICATIONS, INC.	250295	B
GTC, INC	210291	P
GULF TEL CO - AL	250298	P
HAYNEVILLE TEL CO	250299	B
HOPPER TELECOMM. CO.	250300	A
FRONTIER-LAMAR CNTY	250301	P
WINDSTREAM AL	250302	P
MILLRY TEL CO	250304	A
MON-CRE TEL COOP	250305	B
FRONTIER COMM.-AL	250306	B
MOUNDVILLE TEL CO	250307	B
NEW HOPE TEL COOP	250308	B
OAKMAN TEL CO (TDS)	250311	A
OTELCO TELEPHONE LLC	250312	A
PEOPLES TEL CO	250314	A
PINE BELT TEL CO	250315	B
RAGLAND TEL CO	250316	B
ROANOKE TEL CO	250317	A
FRONTIER COMM-SOUTH	250318	P
UNION SPRINGS TEL CO	250322	B
VALLEY TELEPHONE COMPANY, INC.	220324	A
BELLSOUTH TELECOMMUNICATIONS, LLC	255181	P
HAYNEVILLE FIBER TRANSPORT, INC.	259008	F
TROY CABLEVISION, INC.	259025	F
CENTURYTEL OF ALABAMA, LLC		
CENTURYTEL-AL-SOUTH	259788	P
CENTURYTEL-AL-NORTH	259789	P

A- ROR ILECs ACCEPTING ALTERNATIVE COST
ALLOCATION MODEL (ACAM)
B- ROR ILECS NOT ACCEPTING ACAM THUS ARE
BROADBAND LOOP SUPPORT (BLS)
P- PRICE CAF CARRIERS THAT HAVE ACCEPTED THE
CAF II SUPORT
F- CLECS RECEIVING FROZEN SUPPORT UNTIL
COMPETITIVE BIDDING IS FINIALIZED



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ALABAMA PUBLIC SERVICE COMMISSION
P.O. Box 304260
MONTGOMERY, ALABAMA 36130-4260

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JOHN A. GARNER, EXECUTIVE DIRECTOR

IN RE: IMPLEMENTATION OF THE UNIVERSAL SERVICE REQUIREMENTS IN THE TELECOMMUNICATIONS ACT OF 1996, SECTION 254 AND 47 C.F.R § 54.314	DOCKET 25980 CERTIFICATION OF CARRIERS RECEIVING FEDERAL UNIVERSAL SERVICE FUND HIGH COST SUPPORT FOR 2019
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FURTHER REPORT AND ORDER

BY THE COMMISSION:

I. Introduction and Background

By Order entered in this cause on October 25, 2017, Eligible Telecommunications Carriers ("ETCs") in Alabama, that are subject to the Alabama Public Service Commission's ("Commission") jurisdiction, were ordered to file their proposals for utilization of projected 2019 federal high-cost universal service support (the "2019 high-cost support") by no later than July 10, 2018. By order released June 6, 2018, under WC Docket 10-90, the FCC Wireline Competition Bureau, on its own motion granted a brief, limited waiver of the filing deadline, extending it until July 16, 2018. The Commission's Order afforded interested parties the latitude to submit comments in response to those filings no later than July 24, 2018, with any reply comments due on or before July 31, 2018.

The Federal Communication Commission ("FCC") price cap carriers indicate their plan and intent is to make broadband available to eligible living units in the census blocks identified by the FCC pursuant to requirements and benchmarks. The price cap carriers in Alabama are:

1. CenturyTel of Alabama, LLC d/b/a CenturyLink (Southern), CenturyTel of Alabama, LLC d/b/a CenturyLink (Northern) and Gulf Telephone Company LLC d/b/a CenturyLink (collectively "CenturyLink");
2. BellSouth Telecommunications LLC d/b/a AT&T Alabama ("AT&T");
3. Windstream Alabama, LLC ("Windstream");
4. GTC, Inc., d/b/a FairPoint Communications ("FairPoint");
5. Frontier Communications of Alabama, LLC, Frontier Communications of Lamar County, LLC and Frontier Communications of the South, LLC (collectively "Frontier").

The Alabama price cap carrier certifications are attached in Appendix "B".

Beginning with the FCC's November 18, 2011, Connect America Fund ("CAF") Order, the FCC made significant changes to federal universal service support, primarily by redirecting the funds from the support of voice service in rural high-cost areas to the support of broadband capable networks in specific unserved or underserved areas.¹ This transition has taken place in stages, with different implementation schedules for price-cap and rate-of-return carriers. As part of the Transformation Order,² the FCC also created uniform annual compliance and reporting rules for all FCC high-cost support recipients. For price-cap carriers, the transition has culminated in the offer and acceptance of Connect America Phase II ("CAF II") funding.³ Under CAF II, the FCC made specific statewide funding offers to each carrier for the deployment of broadband

¹ *Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011 (the "Connect America Fund Order" or "CAF-ICC Order").

² *USF/ICC Transformation and Rule Clarification and Correction Order*, WC Docket Nos. 10-90, 12-63; CC Docket No. 01-92; DA-13-564, rel. Mar. 27, 2013.

³ *Order In the Matter of Connect America Fund*, WC Docket No. 10-90, rel. May 16, 2013 (the "CAF II Order").

networks capable of at least 10 Mbps download/1 Mbps upload broadband speed in certain eligible areas in each state.⁴ With the acceptance of the CAF II state-level commitment in 2015, the previous federal high-cost funding (CAF I frozen support) ceased for price-cap carriers in Alabama. The public interest obligations, annual reporting requirements and compliance and recordkeeping requirements associated with CAF II support are detailed in the FCC CAF II Orders and codified in Part 54 of the FCC's rules. Specifically, for CAF II, the compliance requirements focus on year-end location milestones beginning in 2017, within which carriers must have enabled 10/1 Mbps broadband speeds to a specified number of locations (i.e., 40% of the locations by end-of-year 2017, 60% by 2018, 80% by 2019, and 100% by 2020⁵). The FCC adopted these detailed reporting mechanisms for filings with the FCC, Universal Service Administrative Company ("USAC") and state commissions to facilitate regulatory oversight and to ensure that the requirements for using the funds are met.

In the *April 2014 Connect America Order/FNPRM*,⁶ the FCC proposed a voluntary election by rate-of-return ("ROR") ETCs to receive model-based support in lieu of the existing (legacy) high-cost support mechanisms. On August 3, 2016, the FCC announced the offer of high-cost support and deployment obligations for each ROR ETC in a state based on the final version of the Alternative Connect America Cost Model ("A-CAM"). The A-CAM is a voluntary path under which rate-of-return carriers may elect model-based support for a term of 10 years in exchange for meeting defined build-out obligations.⁷ In its September 27, 2016 Order, the Commission required

⁴ ETCs receiving CAF II dollars continue to have the obligation to provide voice service in areas where they receive the CAF II support.

⁵ In addition, the rules allow for shortfalls in locations in 2020 to be remedied in 2021.

⁶ *Connect America Fund et al.; Omnibus Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 10-90, 14-58, 07-135; WT Docket No. 10-208; CC Docket No. 01-92; and FCC 14-54, rel. Apr. 23, 2014.

⁷ *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., para. 4 (2016) (*March 2016 Connect America Order and/or FNPRM*).

that ROR carriers electing to receive high-cost support pursuant to the A-CAM report their election to the Commission's Utility Services Division ("USD") of their final acceptance of such funding. Brindlee Mountain Telephone, LLC, Blountsville Telephone, LLC, Otelco Telephone, LLC, Hopper Telephone, LLC, (collectively "Otelco"); Butler Telephone Company, Peoples Telephone Company, Oakman Telephone Company (collectively "TDS"); National Telephone Company, Roanoke Telephone Company (collectively "TEC") informed the Commission's USD of acceptance to receive A-CAM funding. The remaining ROR carriers are subject to the existing (legacy) ROR support and mechanism reforms and receive Broadband Loop Support ("BLS").⁸ The FCC ROR carriers in Alabama certifications are attached in Appendix "C"

The non-incumbent Local Exchange Carriers (Hayneville Fiber Transport, Inc. and Troy Cablevision, Inc.) continue to receive frozen high cost support. Carriers will continue to receive high cost support in an amount equal to its CAF Phase I support until the first month that the winner of any competitive bidding process receives support under CAF II.⁹ The FCC non-incumbent Local Exchange Carriers receiving high-cost support in Alabama certifications are attached in Appendix "D".

On various dates in 2018, all Alabama ETCs identified individually in Appendix "A" hereto submitted certifications regarding their planned utilization of 2019 high-cost support.

II. CenturyLink's Planned Utilization of 2019 High-Cost Support

On August 27, 2015, CenturyLink notified the Commission that it had accepted the FCC's offer of funding to enable access to broadband service for 48,865 locations in Alabama,

⁸*Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., para. 80 (2016) (*March 2016 Connect America Order and/or FNPRM*).

⁹*Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., para. 187 (2014) (*June 2016 Connect America Order and/or FNPRM*).

encompassed by both CenturyTel of Alabama, LLC's and Gulf Telephone Company LLC's service areas

In accordance with its acceptance of the CAF II funding, by filing dated June 16, 2017 and reaffirmed June 12, 2018, CenturyLink submitted a proposal for utilizing its projected 2018 high-cost support.

III. AT&T's Planned Utilization of 2019 High-Cost Support

Based on AT&T's acceptance of CAF II support and associated requirements on August 27, 2015, AT&T's, indicated in filing dated July 10, 2017, that AT&T is currently working to deploy broadband to 60% of the 66,766 CAF II living units in AT&T's service territory by the end of 2018. In its filing of July 10, 2018, AT&T indicated that this effort to achieve the 60% requirement will continue in 2018 with an additional 20% deployment in 2019. This will be accomplished primarily, if not completely, via a fixed wireless platform.

IV. Windstream Alabama, LLC

Windstream Alabama, LLC ("Windstream") Alabama, accepted CAF II funding on August 5, 2015. Windstream's certification was filed with the Commission on June 24, 2015. On September 11, 2017, it filed an affidavit certifying its compliance with, and eligibility under, the FCC rules applicable to USF high-cost support, plus stated that it plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 60% milestone of enabling at least 1133 of the 1,889 locations to be served within the eligible areas with broadband capable of providing 10 Mbps download/1Mbps upload by December 31, 2018. Windstream will utilize the CAF II support in 2018 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment and enabling of broadband service in CAF II eligible

areas. Windstream's June 14, 2018 filing stated that it has already provided broadband to 2,423 locations, which is in excess of the 1,889 locations identified by the FCC required by the CAF II program. In addition, Windstream has provided 87% of these locations with higher speeds than required minimum speed required by the CAF II program.

VI. GTC, Inc., d/b/a FairPoint Communications

GTC, Inc., d/b/a FairPoint Communications ("FairPoint") Alabama accepted CAF II funding on August 18, 2015. On June 29, 2017, it filed a certification of its compliance with, and eligibility under, the FCC rules applicable to USF high-cost support and stated that it plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 60% milestone of enabling at least 960 locations within the eligible areas with broadband capable of providing 10 Mbps download/1Mbps upload by December 31, 2018. On July 5, 2018 FairPoint filed an affidavit stating that it will continue to use the high cost funding pursuant to the FCC rules and regulations. FairPoint will utilize the CAF II support in 2019 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment and enabling of broadband service in CAF II to an additional 20% eligible areas by December 31, 2019.

VII. The Frontier Companies

Frontier Communications of Alabama, LLC, Frontier Communications of Lamar County, LLC and Frontier Communications of the South, LLC (collectively "Frontier") accepted CAF II funding on June 15, 2015. On May 1, 2017, Frontier filed a certification of its compliance with, and eligibility under, the FCC rules applicable to USF high-cost support and stated that it plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 60% milestone of enabling at least 4,425 broadband locations by December 31, 2018. On May 3, 2018 Frontier filed

certification that it will continue to use the high cost funding pursuant to the FCC rules and regulations. Frontier will utilize the CAF II support in 2019 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment and enabling of broadband service in CAF II eligible areas to an additional. 20% by December 31, 2019.

VIII. Staff findings

The FCC has implemented extensive reporting requirements for recipients of the CAF II, ROR A-CAM, ROR legacy, and non-incumbent local exchange carrier funds. These requirements include the annual submission of detailed information on the FCC Form 481, including an Outage Report; Unfilled Requests for Service; Complaints per 1000 Connections; Certifications; Current Price Offerings; Company Identification; Tribal Outreach; Areas with No Terrestrial Backhaul (if applicable); and Additional Voice Rate Data. Further, ETCs receiving high cost funding are required to report quarterly/annually to USAC the specific location and deployment obligation obtained. Further, the Commission's USD, in years prior to 2018, has received the reporting requirements from the ETCs receiving high-cost funding. By order released July 7, 2017, under WC Docket No. 10-90 and WC Docket No. 14-58 ("2017 FCC Order"), the FCC streamlined the annual reporting requirements for ETC's that receive high-cost universal service support by eliminating the requirement that ETC's submit a duplicate copy of the FCC Form 481 filing to state commissions contingent upon USAC providing the capability for state commissions to access the documentation via an online, electronic portal. Based on this the Commission issued an order in this docket to amend its October 25, 2017 Order to remove the requirement that ETC's submit a duplicate copy of their FCC Form 481 to the Commission's USD effective beginning with the July annual filing deadline and applicable annual FCC Form 481 filings thereafter. Staff

believes the Commission will be able to adequately assess high-cost ETC's compliance with the requirements based on a review of its federal reports, as well as location and deployment obligations data submitted to the FCC and USAC. Staff can follow up to address any questions or concerns through data requests or meetings with the company. Subject to these reporting and disclosure requirements, the Commission approves the high cost ETC's 2019 high-cost proposals.

IX. Discussion and Conclusions

We hereby approve the proposals submitted in this cause by FCC designated price cap carriers, ROR carriers, and the non-Incumbent Local Exchange Carrier ETCs governing their expenditure of federal high-cost universal service support during the year 2019. We will certify to the FCC that those plans are compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. § 54.

We specifically note, however, that our approval herein is contingent upon the staff's continued monitoring of the implementation of the aforementioned plans. The Commission specifically reserves the right to conduct any proceedings that may be necessary to determine if the funding is being used for the intended purpose.

In accordance with 47 C.F.R. § 54, any recipient of CAF II, ROR, or non-incumbent local exchange carrier recipient of high-cost funding shall file the information required by the Form 481 with the FCC. The Commission will continue to verify the certifications of the ETCs receiving high cost funding pursuant to the applicable FCC rules.

IT IS, THEREFORE, ORDERED BY THE COMMISSION, That the CAF II, ROR, and non-incumbent local exchange carrier recipients of high-cost funding, attached hereto as Appendix "A", 2018 filings for high-cost support for which they are eligible during the year 2019, are hereby approved as stipulated herein and certified as compliant with the provisions of §254(e) of

the Telecommunications Act of 1996 and 47 C.F.R. § 54. The approval granted herein is, however, contingent on the recipients of high-cost funding compliance with all provisions of this Order.

IT IS FURTHER ORDERED BY THE COMMISSION, That the approval and certifications addressed herein shall be further contingent upon satisfactory results from the Commission's ongoing review as set forth in this Order. To that end, any recipient of high-cost funding shall file the information required by the Form 481 with the FCC.

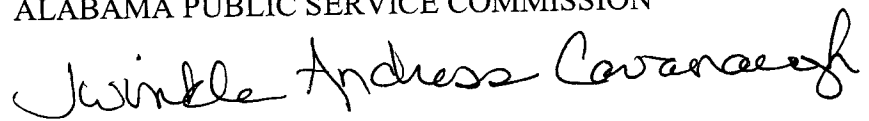
IT IS FURTHER ORDERED BY THE COMMISSION, That any recipient of high-cost funding shall file their proposals for the utilization of the funding for which they are eligible in the year 2020 no later than July 10, 2019. Interested parties may submit comments in response to the foregoing filings no later than July 24, 2019. Reply comments will be considered by the Commission if received on or before July 31, 2019.

IT IS FURTHER ORDERED BY THE COMMISSION, That jurisdiction in this cause is hereby retained for the issuance of any further order or orders as may appear to be just and reasonable in the premises.

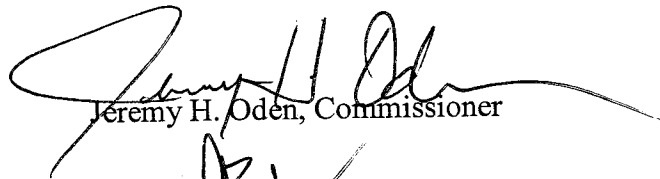
IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DATED at Montgomery, Alabama, this 27th day of September, 2018.

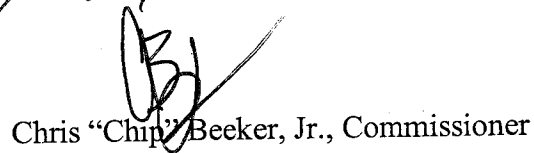
ALABAMA PUBLIC SERVICE COMMISSION



Twinkle Andress Cavanaugh, President

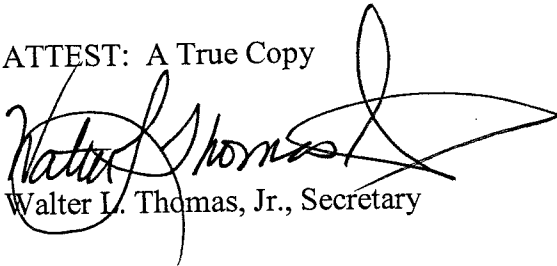


Jeremy H. Oden, Commissioner



Chris "Chip" Beeker, Jr., Commissioner

ATTEST: A True Copy



Walter L. Thomas, Jr., Secretary

APPENDIX "A"

Ardmore Telephone Company, Inc. (290280)
BellSouth Telecommunications, LLC d/b/a AT&T Alabama (255181)
Blountsville Telephone LLC (250282)
Brindlee Mountain Telephone LLC (250283)
Butler Telephone Company, Inc. (250284)
Castleberry Telephone Company, Inc. (250285)
Century of Alabama, LLC d/b/a CenturyLink (259788 and 259789)
Farmers Telecommunications Cooperative, Inc. (250290)
Frontier Communications of Alabama, LLC (250306)
Frontier Communications of Lamar County, LLC (250301)
Frontier Communications of the South, LLC (250318)
GTC, Inc., d/b/a FairPoint Communications (210291)
Gulf Telephone Company (250298)*
Hayneville Telephone Company, Inc. (250299)
Hopper Telecommunications LLC (250300)
Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone (220371)
Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone (250295)
Millry Telephone Company, Inc. (250304)
Mon-Cre Telephone Cooperative, Inc. (250305)
Moundville Telephone Company, Inc. (250307)
National Telephone Company, Inc. (250286)
New Hope Telephone Cooperative, Inc. (250308)
Oakman Telephone Company (250311)
Otelco Telephone, LLC (250312)
Peoples Telephone Company (250314)
Pine Belt Telephone Company, Inc. (250315)
Ragland Telephone Company, Inc. (250316)
Roanoke Telephone Company, Inc. (250317)
Union Springs Telephone Company, Inc. (250322)
Valley Telephone Company, LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone (220324)
Windstream Alabama, LLC (250302)
Hayneville Fiber Transport, Inc., d/b/a Camellia Communications (259008)
Troy Cablevision, Inc. (259025)

APPENDIX "B"



CenturyLink™

100 N. Union Street, Suite 828
Montgomery, AL 36104

June 12, 2018

VIA ELECTRONIC FILING

Mr. Walter Thomas, Secretary
Alabama Public Service Commission
RSA Union Building, Room 850
100 North Union Street
Montgomery, Alabama 36104

Re: Docket 25980 - APSC Certification of Eligibility to Receive
High Cost Support Pursuant to 47 CFR §54.314
CenturyLink's 2019 Plans for Utilization of Connect America Fund Phase II Support

Dear Mr. Thomas:

On August 27, 2015, CenturyLink announced that it would accept the Federal Communications Commission's ("FCC's") offer of Connect America Fund Phase II ("CAF II") support and the commitment to provide access to broadband service for at least 48,865 households and businesses in designated rural census blocks across CenturyLink's Alabama service area. CenturyLink notified the Commission of its acceptance of the FCC's CAF II support on August 27, 2015.

With the acceptance of CAF II support, CenturyLink's 2019 plans for utilization of federal universal service support are based on the requirements of the CAF II program. As established in the Commission's September 2, 2015 Order in the above referenced docket, CenturyLink provides in Attachment A information on its 2019 plans for the utilization of the CAF II support to achieve the requirements of CAF II in Alabama.

Because the CAF II program is based on a state level commitment, the information provided on Attachment A represents a single plan for CenturyLink's Alabama ETCs including Gulf Telephone Company LLC d/b/a CenturyLink, CenturyTel of Alabama, LLC d/b/a CenturyLink (Southern), and CenturyTel of Alabama, LLC d/b/a CenturyLink (Northern).

Please do not hesitate to contact me at (334) 531-2985 or via email at john.j.schremser@centurylink.com should you have any questions regarding this matter.

Sincerely,

/s/John J. Schremser

John J. Schremser

Regulatory/Government Affairs - Alabama

Attachment

**2019 CAF II Support Utilization Plans for
Gulf Telephone Company LLC d/b/a CenturyLink, Study Area Code 250298
CenturyTel of Alabama, LLC d/b/a CenturyLink (Southern), Study Area Code 259788
CenturyTel of Alabama, LLC d/b/a CenturyLink (Northern), Study Area Code 259789**

As established in the Commission's September 2, 2015 Order in Docket 25980, CenturyLink provides the following information on its 2019 plans for the utilization of the CAF II support to achieve the requirements of CAF II in Alabama.

- CenturyLink accepted the FCC's state-level offer for CAF II support in Alabama. As a result, CenturyLink is committed to enabling 48,865 locations with broadband speeds of 10 Mbps download/1 Mbps upload by the end of 2020.
- As of December 31, 2017, CenturyLink has enabled 25,257 locations within the eligible areas with broadband capable of providing 10 Mbps download/1 Mbps upload.
- The CAF II broadband enablement obligation has periodic federal benchmark milestones with the first milestone set at 40% of total supported locations by December 31, 2017. The remaining enablement milestones are 60% of total supported locations by 2018, 80% of total supported locations by 2019, and 100% of total supported locations by 2020.
- In 2018, CenturyLink plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 60% milestone of enabling at least 29,319 cumulative locations within the eligible areas with broadband capable of providing 10 Mbps download/1 Mbps upload by December 31, 2018.
- In 2019, CenturyLink plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 80% milestone of enabling at least 39,092 cumulative locations within the eligible areas with broadband capable of providing 10 Mbps download/1 Mbps upload by December 31, 2019.
- CenturyLink will utilize the CAF II support in 2019 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment, and enabling broadband service in CAF II eligible areas.



THOMAS B. ALEXANDER
Assistant Vice President – Senior Legal Counsel
AT&T Alabama
AT&T Mississippi

AT&T Services, Inc.
Legal Department
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Suite 4326
Atlanta, GA 30308

T: 404-927-5292
F: 404-927-3636
thomas.b.alexander@att.com
Website: www.att.com

July 10, 2018

Via Electronic Filing and Overnight Mail

Honorable Walter Thomas, Secretary
Alabama Public Service Commission
100 N. Union Street-8th Floor
Montgomery, AL 36104

**RE: Implementation of the Universal Service Requirements of Section 254 of the
Telecommunications Act of 1996-(Certification of Non-Rural Carriers Receiving
Federal High-Cost Support)
Docket No. 25980**

Dear Mr. Thomas:

Pursuant to the Alabama Public Service Commission's Order entered in this case on October 25, 2017, Eligible Telecommunications Carriers ("ETCs") in Alabama were ordered to file their proposals for utilization of projected 2019 federal high-cost universal support. BellSouth Telecommunications LLC d/b/a AT&T Alabama ("AT&T") is hereby transmitting information on its plan for the 2019 Connect America Fund Phase II ("CAF II").

As previously indicated in AT&T's correspondence of August 7, 2017, AT&T is currently working to deploy broadband to 60% of the 66,766 of the CAF II living units located within AT&T's service territory by the end of 2018, primarily, if not completely, via a fixed wireless platform.

AT&T is hereby providing information in Attachment "A" to meet Commission requirements set forth in the docket referenced above, as well as FCC requirements. Specifically, Attachment A sets forth AT&T's CAF II plans to deploy the fixed wireless platform to an additional 20% of living units in 2019.

AT&T appreciates the Commission's support of AT&T's network improvement plans over the past years. Please contact us with any questions concerning AT&T's 2019 CAF II plans.

Sincerely yours,


Thomas B. Alexander

TBA/mhs
Attachment

cc: Hon. John Garner, Chief ALJ
Darrell A. Baker, Director (via email)
Mac McArthur (via email)

1188701

ATTACHMENT A

ALABAMA YEAR 2019 CAF FUNDING UTILIZATION BROADBAND INVESTMENTS

I. Broadband deployment and maintenance in substantially unserved areas: Year 2019

On May 29, 2015, the FCC offered AT&T Alabama approximately \$23.2M in annual Connect America Fund, Phase II (CAF II), funding support for 6 years, with an option for a 7th year of funding, to deploy qualifying broadband service in areas identified by the FCC's Connect America Cost Model (CAM). On August 27, 2015 AT&T accepted this offer. Under this offer, AT&T will deploy broadband services to approximately 66,766 living units in areas identified by the FCC.

Work is currently underway to deploy broadband to 60% of the 66,766 CAF II living units in Alabama by the end of 2018 and will deploy to an additional 20% in 2019.

Until recently, all eligible telecommunications carriers (ETC's) requesting federal high-cost or low-income universal service support were required to file annually with the Universal Service Administrative Company (USAC), financial and operations information using Form 481. In the past, AT&T provided the FCC Form 481 to this Commission. The Commission's Order under this Docket, dated October 25, 2017, requires ETC's to submit to the Commission a duplicate copy of their USAC filing. However, pursuant to its Order for *WC Docket Nos. 10-90 and 14-58 adopted July 6, 2017*, the FCC eliminated the requirement that ETCs submit a duplicate copy of the Form to state commissions contingent upon USAC developing a web portal giving state commissions the capability to download the information. That online portal is now operational. Therefore, the Further Order entered today, July 10, 2018, by this Commission, eliminates the duplicate submission requirement from the Commission's October 25, 2017 Order.

Windstream Communications, Inc.
4001 Rodney Parham Road
1170 - B1F2-12A
Little Rock, AR 72212



June 14, 2018

The Honorable Walter Thomas
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

**RE: APSC Certification of Eligibility to Receive High Cost Support
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980**

Dear Mr. Thomas:

In conjunction with the Commission's annual certification requirements, please find attached an original and one copy of an affidavit filed on behalf of Windstream Alabama, L.L.C. This affidavit certifies that Windstream Alabama, L.L.C. is eligible to receive federal high cost support for high-cost universal service support.

Please contact me at the phone number below with questions regarding this filing.

Sincerely,

Danyell Carroll
Consultant - Regulatory Compliance
(501) 748-6546

AFFIDAVIT

STATE OF ARKANSAS)

)

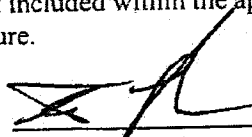
COUNTY OF Pulaski)

I, Tim Loken, being duly sworn upon oath, do hereby depose and state as follows:

I am the Director - Regulatory Reporting of Windstream Alabama, L.L.C. My business address is 4001 N. Rodney Parham Rd., Little Rock, AR 72212. I am authorized by Windstream Alabama, L.L.C. to make this Affidavit on its behalf, and it is given upon my personal knowledge. This Affidavit is given in support of the Company's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in Docket No. 25980.

On Behalf of Windstream Alabama, L.L.C., I declare the following:

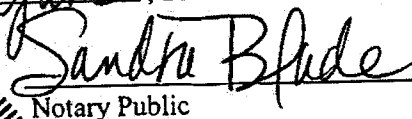
- (1) I fully understand the Federal Communications Commission's ("FCC") rules for ETC qualification and will abide by them;
- (2) I fully understand and will comply with the FCC's rules requiring that the Company provide service through its own facilities or a combination of its own facilities and resale of another carrier's services;
- (3) Regarding Local Exchange Carrier (LEC) from which the Company acquires UNEs and/or resale facilities in Alabama, Windstream Alabama, L.L.C. consents to their releasing to the Alabama Public Service Commission ("Commission") any information the Commission requests for purposes of ensuring future compliance with FCC rules, provided the Commission treats the released information as proprietary, and provided the Commission notifies the Company of any such requests for information; and
- (4) The aforesaid consent supersedes any statement included within the applicable interconnection agreement(s) regarding disclosure.



Tim Loken, Director - Regulatory Reporting

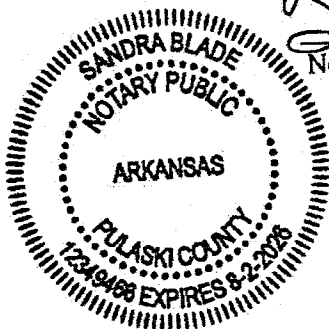
Windstream Alabama, L.L.C.

Subscribed and sworn to before me this 14 day of June, 2018


Notary Public

My Commission expires:

August 2, 2026





4001 Rodney Parham Drive • Little Rock, Arkansas 72212
(501) 748-7000

Tim Loken, Director
Regulatory Reporting
Tim.p.loken@windstream.com
(501) 748-7442 (work)
(501) 748-6583 (fax)

June 26, 2018

Via Electronic Filing and Overnight Mail

Honorable Walter Thomas, Secretary
Alabama Public Service Commission
100 N. Union Street-8th Floor
Montgomery, AL 36104

**RE: Implementation of the Universal Service Requirements of Section 254 of the
Telecommunications Act of 1996 (Certification of Non-Rural Carriers Receiving
Federal High-Cost Support)
Docket No. 25980**


Dear Mr. Thomas:

Pursuant to the Alabama Public Service Commission's Order entered in this case on September 27, 2016, Eligible Telecommunications Carriers ("ETCs") in Alabama were ordered to file their proposals for utilization of projected federal high-cost universal support. Windstream Alabama, LLC ("Windstream") is hereby transmitting information on its plan for the 2019 Connect America Fund ("CAF").

Windstream is currently meeting all its obligations in the deployment of the CAF II locations. Windstream is providing information included in Attachment A as required from Docket No. 25980.

Please let me know if you have any questions or if you would like to discuss.

Sincerely,



Tim Loken

Attachment

Cc: Hon. John Garner, Chief ALD
Darrell A. Baker, Director (email)
Mac McArthur (email)

ATTACHMENT A

ALABAMA YEAR 2019 CAF FUNDING UTILIZATION BROADBAND INVESTMENTS

Broadband deployment and maintenance in substantially unserved areas: Year 2019

On May 29, 2015, the FCC offered Windstream Alabama, LLC (Windstream) approximately \$6.1M in Connect America Fund, Phase II (CAF II). Including a phasedown from Windstream's pre-CAF II support amounts, Windstream's support for 2019 is projected at \$511,000.

By accepting the CAF II offer, Windstream agreed to provide qualifying broadband services to 1,889 locations identified by the FCC.

Windstream provided broadband with speeds of at least 10Mb/1Mb to 704 eligible locations during 2017. As of the date of this filing, Windstream provided broadband to 2,423 locations in excess of the required 1,889 locations identified by the FCC as required by the CAF II program. In addition, Windstream was able to provide some of these locations in excess of the minimum 10/1 Mb speeds as follows: 14% at 10Mb, 24% between 12Mb-20Mb, 29% at 25Mb, 27% between 50Mb-100Mb and 7% at 1Gig.



350 S. Loop 336 W., Conroe, TX 77304 | consolidated.com | NASDAQ: CNSL

July 5, 2018

Secretary
Alabama Public Service Commission
P. O. Box 991
Montgomery, Alabama 36101-099

Re: GTC, Inc. d/b/a Consolidated Communications/GTC - compliance with 47 CFR §54.314

Dear Secretary:

GTC, Inc. d/b/a Consolidated Communications/GTC hereby submits its certified affidavit in support of its use of federal universal service funds and to facilitate certification by the Alabama Public Service Commission to the Federal Communications Commission as contemplated in 47 C.F.R. §54.314.

Please feel free to contact me at the number below or Ms. Beth Westman via email at bwestman@consolidated.com should you have any question concerning this filing.

Sincerely,

A handwritten signature in cursive script that reads "Michael T. Skrivan".

Michael T. Skrivan
Vice President - Regulatory
Consolidated Communications
P: (207) 535-4163

cc: Robert D. Meehan

AFFIDAVIT

STATE OF MAINE
COUNTY OF CUMBERLAND

BEFORE ME, the undersigned authority, appeared Michael T. Skrivan, who deposed and said:

My name is Michael T. Skrivan. I am employed by GTC, Inc. d/b/a Consolidated Communications, as its Vice President of Regulatory. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Alabama Public Service Commission's certification as contemplated in 47 C.F.R. '54.314.

GTC, Inc. d/b/a Consolidated Communications hereby certifies that the federal high-cost universal service support the Company received in 2017 and will receive in 2019 was and will be used for the services and functionalities outlined in 47 C.F.R. §54.101 (a), and that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with section 254(e) of the Act.

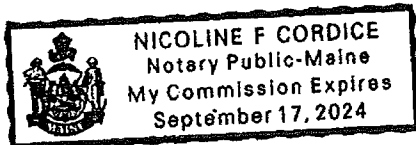
FURTHER AFFIANT SAYETH NOT.

Michael T. Skrivan

Michael T. Skrivan
Vice President of Regulatory
GTC, Inc. d/b/a Consolidated Communications

Subscribed and sworn to before me this 5th day of July, 2018

Nicoline F Cordice
Notary





April 17, 2018

The Honorable Walter Thomas
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

**RE: APSC Certification of Eligibility to Receive High Cost Support
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980.**

Dear Mr. Thomas:

Please find attached the certification on behalf of Frontier Communications of the South, LLC¹ (the "Company"), in conjunction with the Commission's annual certification that the Company is eligible to continue to receive federal high cost support for high-cost universal service support. If any additional information is required, please contact me at (916) 686-3588 or by email at joe.chicoine@ftr.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joe Chicoine", written over a horizontal line.

Joe Chicoine
Sr. Manager, Regulatory Affairs
Frontier Communications

Enclosure

cc: M. McArthur
A. McCall, Frontier

¹ Frontier Communications of Alabama, LLC and Frontier Communications of Lamar County, LLC merged into Frontier Communications of the South, LLC effective January 1, 2018. Refer to Post-Transaction Notification in accordance with Rule T-13, dated January 8, 2018.

CERTIFICATION

In its December 20, 2001 and September 28, 2005 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review.

Due to changes adopted in the FCC's comprehensive order released November 18, 2011^[1], price cap carriers are no longer required to perform cost studies for the purpose of calculating high-cost loop support and local switching support. Frontier did not submit a 2017 USF Data Collection Form for Frontier Communications of the South, LLC² to NECA.

The Company certifies that it will only use the federal high-cost support it receives during 2018-2019 for the continued provision, maintenance and upgrading of facilities and service for which such support is intended as described in 47 C.F.R. Section 54.101. Those services, which are available to any customer in the Company's service area are: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 9-1-1 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, and access to directory assistance, and toll limitation for qualifying low-income customers.

The Company respectfully requests that the Commission notify the FCC prior to October 1 of this year that the Company is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to Cassandra Guinness at 585-777-4557.

Respectfully Submitted,



By: Allison M. Ellis
Vice President, Regulatory Affairs
Frontier Communications of the South, LLC

Date: 4/17/2018

^[1] See Connect America Fund, et al, W.C. Docket No. 10-90 et al, Report and Order and Further Notice of Proposed Rulemaking "FCC 11-161" (Rel. November 18, 2011).

^[2] Frontier Communications of Alabama, LLC and Frontier Communications of Lamar County, LLC merged into Frontier Communications of the South, LLC effective January 1, 2018. See Post-Transaction Notification in accordance with Rule T-13, dated January 8, 2018.



APPENDIX "C"

August 16, 2018

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

RE: Annual USF Certification Filing

Dear Mr. Thomas:

Attached is Ardmore Telephone Company's (Study Area Code 290280) 2018 Annual State Certification of Support for Eligible Telecommunications Carriers Pursuant to C.F.R. § 54.314. These support funds were used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which the support is intended. If you have any questions, please contact me directly.

Sincerely,

Tiffany Myers
Chief Financial Officer
270.856.9988
Tmyers.wk@wk.net


Certification of Ardmore Telephone Company, Inc.

AFFIDAVIT

I, Tiffany Myers, Chief Financial Officer (CFO) of the Ardmore Telephone Company, Inc. hereby certify under penalties of perjury that:

- 1 My name is Tiffany Myers and I am the Chief Financial Officer (CFO) of Ardmore Telephone Company, Inc. (Company). In this position, I am personally familiar with the Federal Universal Service support received by the Company and how the Company uses these funds.
- 2 Ardmore Telephone Company (AL-Study Area 290280) has been designated as an (ETC) eligible telecommunications carrier by the Alabama Public Service Commission.
- 3 The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37);
- 4 All Federal high-cost Universal Service support provided to the Company was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as designated by the Federal Communications Commission consistent with Section 254 (e) of the Federal Telecommunications Act. These funds will be used to provide the supported service -voice telephony service as outlined in 47CFR 54.101 (a), which are available to any customer in the Company's service area. This supported service includes: voice grade access to the public switched network; minutes of use for local service provided at no additional charge; access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in the Company's service area has implemented 911 or enhanced 911 systems.
- 5 Ardmore Telephone Company follows Federal Communications Commission Part 32 accounting requirements for regulated local exchange carriers and Part 36 separations provisions used to determine high cost support amounts. As a regulated utility, Ardmore Telephone Company's accounting and separations procedures are subject to periodic National Exchange Carrier Association and Alabama Public Service Commission reviews.

The matters addressed above are within my personal knowledge and are true and correct.

Signature: 
Print Name: Tiffany Myers
Title: Chief Financial Officer

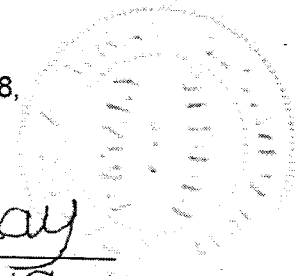
Date: 8-16-18

BEFORE ME, the undersigned Notary in and for the State of Kentucky, on this day personally appeared Tiffany Myers, known to me to be the Declarant, who, being duly sworn, executed the foregoing instrument.

Subscribed and sworn to before me this 16th day of August, 2018,

My Commission expires 3/23/22

Stacy A. Wray
Notary Public # 597919





July 3, 2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

RE: Blountsville Telephone LLC's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Blountsville Telephone LLC's ("Blountsville") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Blountsville is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Red 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dennis K. Andrews".

Dennis K. Andrews
Senior Vice President

Enclosure

CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

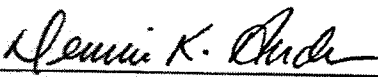
In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Blountsville Telephone LLC ("Blountsville") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Blountsville further certifies that all federal high-cost support provided to Blountsville was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Blountsville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Blountsville is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

BLOUNTSVILLE TELEPHONE LLC

By: 
Dennis K. Andrews
As Its: Senior Vice President
Date: July 3, 2018



July 3, 2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

RE: Brindlee Mountain Telephone LLC's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Brindlee Mountain Telephone LLC's ("Brindlee Mountain") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Brindlee Mountain is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Dennis K. Andrews".

Dennis K. Andrews
Senior Vice President

Enclosure

CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Brindlee Mountain Telephone LLC ("Brindlee Mountain") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Brindlee Mountain further certifies that all federal high-cost support provided to Brindlee Mountain was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Brindlee Mountain respectfully requests that the Commission notify the FCC prior to October 1 of this year that Brindlee Mountain is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

BRINDLEE MOUNTAIN TELEPHONE LLC

By: Dennis K. Andrews
Dennis K. Andrews

As Its: Senior Vice President

Date: July 3, 2018

CASTLEBERRY TELEPHONE COMPANY, INC.

P.O. BOX 37
CASTLEBERRY, ALABAMA 36432
PHONE 251-966-2110

June 28, 2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

RE: Castleberry Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58


Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Castleberry Telephone Company, Inc.'s ("Castleberry") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Castleberry is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (251) 966-2115.

Very truly yours,



Homer Holland
Secretary/Treasurer

Enclosure



525 Junction Rd
Madison, WI 53717
www.tdstelecom.com

June 26, 2018

VIA OVERNIGHT DELIVERY

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
100 North Union Street, STE 950
Montgomery, AL 36104

**RE: APSC Certification of Eligibility to Receive High Cost Support
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980.**

Dear Mr. Thomas:

In conjunction with the Commissioner's annual certification requirements, please find enclosed for electronic filing Butler Telephone Company, Inc., Oakman Telephone Company and Peoples Telephone Company d/b/a TDS Telecom's (the "Companies") certification that the Companies are eligible to continue to receive federal high cost support for high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314 and APSC Docket No. 25980. The original and ten (10) copies have been enclosed.

If additional information is required, please contact me at 865-671-4749.

Very truly yours,

A handwritten signature in dark ink that reads "James Meade" followed by a slanted "KL".

James C. Meade
Manager – State Government Affairs

Enclosure

cc: David Peeler



525 Junction Rd,
Madison, WI 53717
www.tdstelecom.com

June 25, 2018

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
STE 950
100 North Union Street
Montgomery, AL 36104

RE: TDS Telecom's Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing TDS Telecom's ("TDS") certification, on behalf of its Alabama subsidiaries, Butler Telephone Company, Inc., Oakman Telephone Company, and Peoples Telephone Company, that TDS is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

As required under its September 27, 2016 Order, TDS provided notification to the Commission of its acceptance of Alternative Connect America Cost Model ("A-CAM") funding following the FCC's approval, commencing January 1, 2017. Under A-CAM, TDS has an obligation to deploy and offer broadband to 10,940 locations in Alabama and has already begun deploying facilities to meet the first 40% benchmark of total supported locations by December 21, 2020. TDS will utilize the A-CAM support for the 2019 program year for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment.

Please be further advised that, in accordance with 47 C.F.R. § 54.313 and the Commission's *Further Report and Order* of September 27, 2016, in Docket No. 25980, TDS has submitted copies of the FCC Form 481 filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") for the program year 2019, to the Commission's Utility Services Division under separate cover.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (865) 671-4749.

Very truly yours,

A handwritten signature in dark ink, appearing to read "James Meade".
James C. Meade

Manager State Government Affairs

Enclosure
cc: David Peeler

CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, TDS Telecom ("TDS"), on behalf of its Alabama subsidiaries, Butler Telephone Company, Inc., Oakman Telephone Company, and Peoples Telephone Company, certifies that it has timely filed its Form 481 for the program year 2019 with the FCC and USAC and has provided a courtesy copy of the same to the staff of the Commission's Utility Services Division. TDS further certifies that all federal high-cost support provided to TDS was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

TDS respectfully requests that the Commission notify the FCC prior to October 1 of this year that TDS subsidiaries are eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Jim Meade at (865) 671-4749.

Respectfully Submitted,

TDS TELECOM, on behalf of its Alabama subsidiaries:
BUTLER TELEPHONE COMPANY, INC.
OAKMAN TELEPHONE COMPANY
PEOPLES TELEPHONE COMPANY

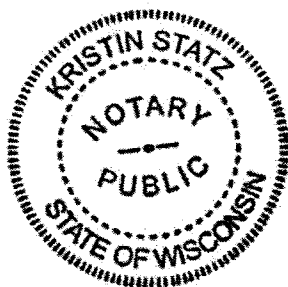
By:

Joel Dohmeier
Joel Dohmeier
Vice President

Subscribed and sworn to before me this 25 day of June, 2018.

Kristin Statz
Kristin Statz - Notary Public
My Commission expires May 24, 2019

Date: June 25, 2018



CASTLEBERRY TELEPHONE COMPANY, INC.

P.O. BOX 37
CASTLEBERRY, ALABAMA 36432
PHONE 251-966-2110

CERTIFICATION

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Accordingly, Castleberry Telephone Company, Inc. ("Castleberry") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Castleberry further certifies that all federal high-cost support provided to Castleberry was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Castleberry respectfully requests that the Commission notify the FCC prior to October 1 of this year that Castleberry is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Homer Holland at (251) 966-2115.

Respectfully Submitted,

CASTLEBERRY TELEPHONE COMPANY, INC.

By: Homer Holland
Homer Holland

As Its: Secretary/Treasurer

Date: June 28, 2018



144 McCURDY AVE. NORTH
P.O. BOX 217
RAINSVILLE, AL 35986
www.farmerstel.com

(256) 638-2144
FAX (256) 638-4830

July 09, 2018

VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Union Building
100 North Union Street
Montgomery, AL 36104

RE: Farmers Telecommunications Cooperative, Inc.'s Certification of Eligibility to Receive High Cost Support for 2019 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58

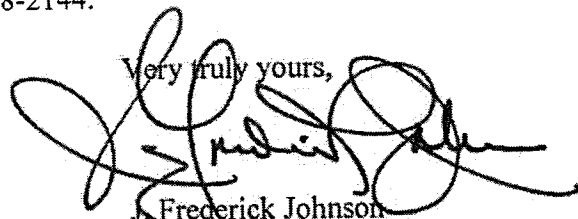
Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Farmers Telecommunications Cooperative, Inc.'s ("Farmers") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2019, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Farmers is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2019, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

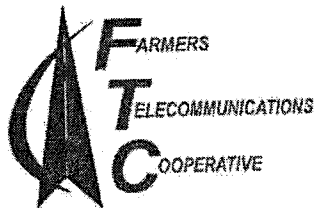
Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 638-2144.

Very truly yours,



J. Frederick Johnson
Executive Vice President and General Manager

Enclosure



"We Keep You Connected"

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Accordingly, Farmers Telecommunications Cooperative, Inc. ("Farmers") certifies its compliance in filing its FCC Form 481 for the program year 2019 as required. Farmers further certifies that all federal high-cost support provided to Farmers was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Farmers respectfully requests that the Commission notify the FCC prior to October 1 of this year that Farmers is eligible to receive federal high-cost support in 2019. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 638-2144.

Respectfully Submitted,

FARMERS TELECOMMUNICATIONS
COOPERATIVE, INC.

By: 

G. Frederick Johnson

As Its: Executive Vice President and General
Manager

Date: 09 July 2018