



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 24, 2016

VIA HAND DELIVERY

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

**Re: WC Docket No. 14-58
2016 ETC Annual Report of PrimeLink, Inc.
Study Area Code 159012**

Dear Ms. Dortch:

On behalf of PrimeLink, Inc., JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Also attached is a letter requesting confidential treatment of section 54.313 outage reporting under Sections 0.457 and 0.459.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² 47 C.F.R. §§ 0.457, 0.459.



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June 24, 2016

Via Hand Delivery

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

**Re: WC Docket No. 14-58
2016 ETC Annual Report of PrimeLink, Inc.
Study Area Code 159012
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client, PrimeLink, Inc. (“Company” or “the Company”), hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the report submitted in fulfillment of the above-referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Eligible Telecommunications Carriers (“ETCs”) must file with the Commission the reporting information which is contained in the attachment to the Report pursuant to Sections 54.313 and 54.422.
3. The information contained in the attachment to the Report for which Company seeks the withholding from public inspection is data pertaining to the Company’s outages provided at FCC Form 481 attachment Line 200, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

4. With respect to identifying the degree to which the attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.
5. With respect to identifying possible exposure to competitive harm, the information contained in the attachment is information that is not customarily released to the public. Because the telecommunications market is highly competitive, release of this information could substantially harm the Company's telecommunications business.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁴ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to FCC Form 481 attachment at Line 200, Service Outage Reporting. Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁴ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	159012
<015> Study Area Name	PRIMELINK, INC.
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Mark Webster
<035> Contact Telephone Number: Number of the person identified in data line <030>	5182982480 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	mwebster@champlaintelephone.com
Form Type	54.313 and 54.422

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	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) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please 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 only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), 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 much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	159012
<015> Study Area Name	PRIMELINK, INC.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Mark Webster
<035> Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line	mwebster@champlaintelephone.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<440>	Complaints per 1000 customers for fixed broadband	
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	159012ny510.pdf

**(600) Functionality in Emergency Situations
Data Collection Form**

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FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	159012ny610.pdf

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

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	159012
<015> Study Area Name	PRIMELINK, INC.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Mark Webster
<035> Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlainelectronics.com

<900> Does the filing entity offer tribal land services? (Y/N) No

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

- <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.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

<1000> Voice services rate comparability certification Not Applicable

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) 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 July 2013
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<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">159012ny1210.pdf</div> Name of Attached Document
---	--

<1220> Link to Public Website	HTTP
-------------------------------	------

“Please check these boxes below to confirm that the attached document(s), 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, | <input checked="" type="checkbox"/> |
|--|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
|---|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlainetelephone.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support	<input style="width: 100%; height: 20px;" type="text"/>	
<2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support	<input style="width: 100%; height: 20px;" type="text"/>	
<2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100%; height: 20px;" type="text"/>	
<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100%; height: 20px;" type="text"/>	
<2024A> Round 2 Recipient of Incremental Support?	<input style="width: 100%; height: 20px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100%; height: 20px;" type="text"/>	Name of Attached Document Listing Required Information
<2025A> Round 1 or Round 2 Recipient of Incremental Support?	<input style="width: 100%; height: 20px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	<input style="width: 100%; height: 20px;" type="text"/>	Name of Attached Document Listing Required Information
<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	<input style="width: 100%; height: 20px;" type="text"/>	

(2000) Price Cap Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010>	Study Area Code	159012
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

Complete the items below to note compliance with 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.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

(3010A) Milestone Certification {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(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 (Yes/No)

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) Document(s) with 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 Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

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 Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion 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) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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

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(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	159012
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

**(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form**

**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013**

<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
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<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	159012
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.com

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
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:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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 - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	159012
<015>	Study Area Name	PRIMELINK, INC.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Mark Webster
<035>	Contact Telephone Number - Number of person identified in data line <030>	5182982480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mwebster@champlaintelephone.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>John Staurulakis, Inc.</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:	John Staurulakis, Inc.
Name of Reporting Carrier:	PRIMELINK, INC.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/20/2016
Printed name of Authorized Officer:	Mark Webster
Title or position of Authorized Officer:	Controller
Telephone number of Authorized Officer:	5182982480 ext.
Study Area Code of Reporting Carrier:	159012 Filing Due Date for this form: 07/01/2016
<small>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.</small>	

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:	PRIMELINK, INC.
Name of Authorized Agent Firm:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/20/2016
Name of Authorized Agent Employee:	Alice Lewis
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	2174986863 ext.
Study Area Code of Reporting Carrier:	159012 Filing Due Date for this form: 07/01/2016
<small>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.</small>	

Attachments

PrimeLink, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

PrimeLink, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to service quality standards and consumer protection obligations under both federal and state law. These standards and obligations include, but are not limited to, the following: (1) providing copies of a tariff, pending tariff, or rate filing which disclose rates, terms and conditions of service to customers in accordance with the New York Code of Rules and Regulations (NYCRR) Title 16, Volume C, Chapter 6, Subchapter A, 602.4; (2) adherence to state service quality standards and consumer protection requirements

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

governing telephone providers under NYCRR Title 16, Volume C, Chapter 6, Subchapter A service, Parts 600, 602, 603, and 609; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, PrimeLink, Inc. certifies compliance with broadband specific consumer protection obligations under both state rule and federal law. The obligation under state rule is NYCRR Title 16, Part 605 as it pertains to common carriage and the delivery of broadband services as a separate service from the provision of content. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

PrimeLink, Inc.’s demonstration of ability to function in emergency situations for voice and broadband services:

PrimeLink, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹ The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel.

The Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

The Company complies with the FCC's backup power requirements, effective October 16, 2015.

PRIMELINK

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> **Business Solutions** <

Lifeline Assistance Program

The Lifeline assistance program offered by PrimeLink is a federal program that provides eligible households with a monthly discount on telephone service. Primelink offers Lifeline on all of its voice packages, including bundles.

Who qualifies for Lifeline?

You are eligible for Lifeline Service if your total household income is at or below 135% of the [Federal Poverty Guidelines](#); or if you, your dependent, or your household participates in one of the following:

- Medicaid
- SSI (not disability)
- Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps
- Home Energy Assistance Program (HEAP)
- Family Assistance
- Safety Net Assistance
- Federal Public Housing Assistance (Section 8)
- National School Lunch Program's Free Lunch Program
- Veterans Disability Pension
- Veterans Surviving Spouse Pension



> **Home Solutions** <



> **Carrier Relations** <

Applicants must provide proof that they meet the income guidelines or receive one of these benefits.

Are there restrictions?

Lifeline is only available on one wire line or one wireless telephone per household. Customers may not transfer their Lifeline benefits to another person, even if the other person is eligible. Each year, Lifeline customers must certify that they are still eligible for the discount. Customers who willfully make false statements in order to obtain the benefits are subject to fine or imprisonment or may be barred from the program.

How do I apply for Lifeline?

Customers must enroll in Lifeline service and must provide proof of eligibility before receiving support. [Complete this application](#) ([Adobe Reader](#) Required) and send it along with proof of your eligibility (for example, a copy of your SNAP or Medicaid card, an SSI

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award letter, last year's tax return, three consecutive months of pay stubs, or any other documentation you have to prove eligibility) to service@primelink1.com or mail to 99 Kansas Ave. Plattsburgh, NY 12901. We encourage you to contact us if you believe you qualify for this program. Please contact us at (518) 324-LINK, toll free at 1-800-398-8145 or come in and talk with one of our customer service representatives at our business office. We will work with you to answer any questions you may have.

primelink1.com

[Site Maintained by Tyler Whitney](#)

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PrimeLink, Inc.
 Local Service Rates
 January 1, 2016

State	Exchange	SAC	Rate Type	Res Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory EAS Calling Charge	Total Per Line Rate and Fee
NY	Plattsburgh	159012	FR	\$ 23.50	\$ -	\$ -	\$ -	\$ 23.50
NY	Plattsburgh		FR	\$ 20.88	\$ -	\$ -	\$ -	\$ 20.88
NY	Plattsburgh		FR	\$ 16.99	\$ -	\$ -	\$ -	\$ 16.99
NY	Plattsburgh		MT	\$ 8.61	\$ -	\$ -	\$ -	\$ 8.61
NY	Plattsburgh		MT	\$ 7.50	\$ -	\$ -	\$ -	\$ 7.50
NY	Cambridge		FR	\$ 16.99	\$ -	\$ -	\$ -	\$ 16.99
NY	Hoosick Falls		FR	\$ 16.99	\$ -	\$ -	\$ -	\$ 16.99
NY	Glens Falls		FR	\$ 23.50	\$ -	\$ -	\$ -	\$ 23.50
NY	Glens Falls		FR	\$ 16.99	\$ -	\$ -	\$ -	\$ 16.99
NY	Rouses Point		FR	\$ 13.23	\$ -	\$ -	\$ -	\$ 13.23