FCC Form 481 - Carrier Annual Reporting Data Collection Form

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

<010>	Study Area Code	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Bruce Schiefelbein
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	bruce.schiefelbein@tdstelecom.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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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<110> Has your company received its ETC certification from the FCC? (yes / no) ○ ●

<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) ○ ○

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.

140058vt112.pdf

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	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

(200) Service Outage Reporting (Voice)
Data Collection Form

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<210> For the prior calendar year, were there any reportable voice service outages? No

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

(300) Unfulfilled Service Request
Data Collection Form

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<300> Unfulfilled service request (voice) [redacted]

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband) [redacted]

140058vt330.pdf

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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	[redacted]
<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.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	[redacted]
<450>	Complaints per 1000 customers for mobile broadband	

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

FCC Form 481
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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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	140058vt510.pdf

(600) Functionality in Emergency Situations
Data Collection Form

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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	140058vt610.pdf

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
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July 2013

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<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees

-- See attached worksheet --

(710) Broadbrand Price Offerings
Data Collection Form

FCC Form 481
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July 2013

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<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	**Total Rate and Fees**	**Broadband Service - Download Speed (Mbps)**	**Broadband Service - Upload Speed (Mbps)**	**Usage Allowance (GB)**	**Usage Allowance Action Taken When Limit Reached {*select*}**
			-- See attached worksheet --					

(800) Operating Companies
Data Collection Form

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**

-- See attached worksheet --

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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:

		Select Yes or No or Not Applicable
<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.	

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	Name of Attached Document
<1020>	Broadband comparability certification	Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form

FCC Form 481
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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes
<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
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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

140058vt1210.pdf

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, ✔

<1222> Details on the number of minutes provided as part of the plan, ✔

<1223> Additional charges for toll calls, and rates for each such plan. ✔

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
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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

<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

<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.

<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.

<2024A> Round 2 Recipient of Incremental Support?

<2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.

Name of Attached Document Listing Required Information

<2025A> Round 1 or Round 2 Recipient of Incremental Support?

<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-

Name of Attached Document Listing Required Information

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

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 cap carrier used for capital expenditures in 2015.

Name of Attached Document Listing Required Information

<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)

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

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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.

Progress Report on 5 Year Plan

(3009)	Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	140058vt3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(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	

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

Data Collection Form

FCC Form 481
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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	

Name of Attached Document Listing Required Information

(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

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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

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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: LUDLOW TEL CO

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/19/2016

Printed name of Authorized Officer: Kevin Hess

Title or position of Authorized Officer: Sr VP Govt & Regulatory Affairs

Telephone number of Authorized Officer: 6086644160 ext.

Study Area Code of Reporting Carrier: 140058 Filing Due Date for this form: 07/01/2016

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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<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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)_____ 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:

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.

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:

Name of Authorized Agent Firm:

Signature of Authorized Agent or Employee of Agent: Date:

Name of Authorized Agent Employee:

Title or position of Authorized Agent or Employee of Agent

Telephone number of Authorized Agent or Employee of Agent:

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.

Attachments

Ludlow Telephone Company, dba TDS Telecom

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

As an Incumbent Local Exchange Carrier (ILEC) and Eligible Telecommunications Carrier (ETC), Ludlow Telephone Company, Inc. has been providing ubiquitous, high-quality voice telecommunications services in its study area for many years. To accomplish and maintain this service level, Ludlow has made significant historical investment to deploy, operate, and maintain an integrated, highly-reliable network. In addition to its own capital spending, Ludlow draws from the federal Universal Service Fund (USF). Universal service support has been (and continues to be) critical in enabling Ludlow's services in its rural markets to be reasonably comparable in quality and price to services in more urban markets, as Congress mandated in the Telecommunications Act. Ludlow draws USF support because the cost of providing voice and data services in its rural study area are substantially higher than those in urban areas, and thus all of the costs cannot be recovered solely from Ludlow's customers while maintaining reasonably comparable prices. Ludlow has made investments to bring high speed data services to its customers when the level of customer revenues and universal service support has made it financially viable to do so.

For Ludlow, federal high cost support is used to help offset ongoing network costs, but the monies received cover only a portion of the cost of updating and operating the network. In 2015, Ludlow received $465,531 in USF support while incurring [redacted] in operating expenses and investing [redacted] in new plant. The attached Schedule A contains a list of specific network improvement projects that were completed in 2015 at the wire center level. Where these projects related to specific DSAs within the wire center, it is so indicated and can be cross-referenced to the exchange map attached as Exhibit 1. The attached Schedule B summarizes Ludlow's actual expenses for 2015. As evidenced by these support and expenditure numbers provided for the current reporting year, the universal service support that Ludlow receives covers only a fraction of its cost to provide service. Continued receipt of USF support is vital to helping Ludlow maintain reasonably comparable rates for local exchange service; and to incrementally upgrade its telecommunications facilities and equipment to help meet evolving service requirements and maintain high quality service.

[redacted]

Ludlow Telephone Company, dba TDS Telecom

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

The content, timing, and specific geographic locations of projects that will be undertaken in the next five years, will be determined based upon careful analysis of the dual pathways, model-based or rate of return, for determining universal service support. The selection of future projects will be based on the evaluation of many factors, including current consumer demand, limited capital resources and estimated amounts of universal service support available to Ludlow under its selected path. Regardless of the path ultimately selected, Ludlow remains committed to utilizing available universal service support to help maintain and improve network quality, and where feasible, deploying advanced technologies and new services, expanding coverage and improving broadband speeds for its customers.

[redacted]

Ludlow Telephone Company dba TDS Telecom **Schedule A**

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

2015 Capital Expenditures

Exchange	DSA	DSA Population	Description	Expenditure
ALL EXCHANGES	All Exchanges	#N/A	[redacted]	[redacted]
LUDLOW	25600	739	[redacted]	[redacted]
LUDLOW	25607	161	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25700	1,303	[redacted]	[redacted]
LUDLOW	25707	27	[redacted]	[redacted]
LUDLOW	25708	#N/A	[redacted]	[redacted]
LUDLOW	25711	70	[redacted]	[redacted]
LUDLOW	Various	#N/A	[redacted]	[redacted]
LUDLOW	Various	#N/A	[redacted]	[redacted]
LUDLOW	Various	#N/A	[redacted]	[redacted]
PROCTORSVILLE	25600	739	[redacted]	[redacted]
PROCTORSVILLE	25600	739	[redacted]	[redacted]
PROCTORSVILLE	25601	97	[redacted]	[redacted]
PROCTORSVILLE	Various	#N/A	[redacted]	[redacted]

Schedule B

Ludlow Telephone Company (SAC 140058)

Line 100 - Service Quality Improvement Reporting

Rule 54.202(a)(1) and 54.313(a)(1)

USF Received in 2015

High Cost Loop Support	$	-
ICLS Support	$	304,410
Safety Net Additive	$	-
Safety Value Additive		
CAF	$	161,121
TOTAL	$	465,531

	2015
Operating Expenses	[redacted]
Capital Expenditures	

REDACTED - AVAILABLE FOR PUBLIC INSPECTION

LUDLOW TEL. CO., VT
Broadband Status

Exhibit 1

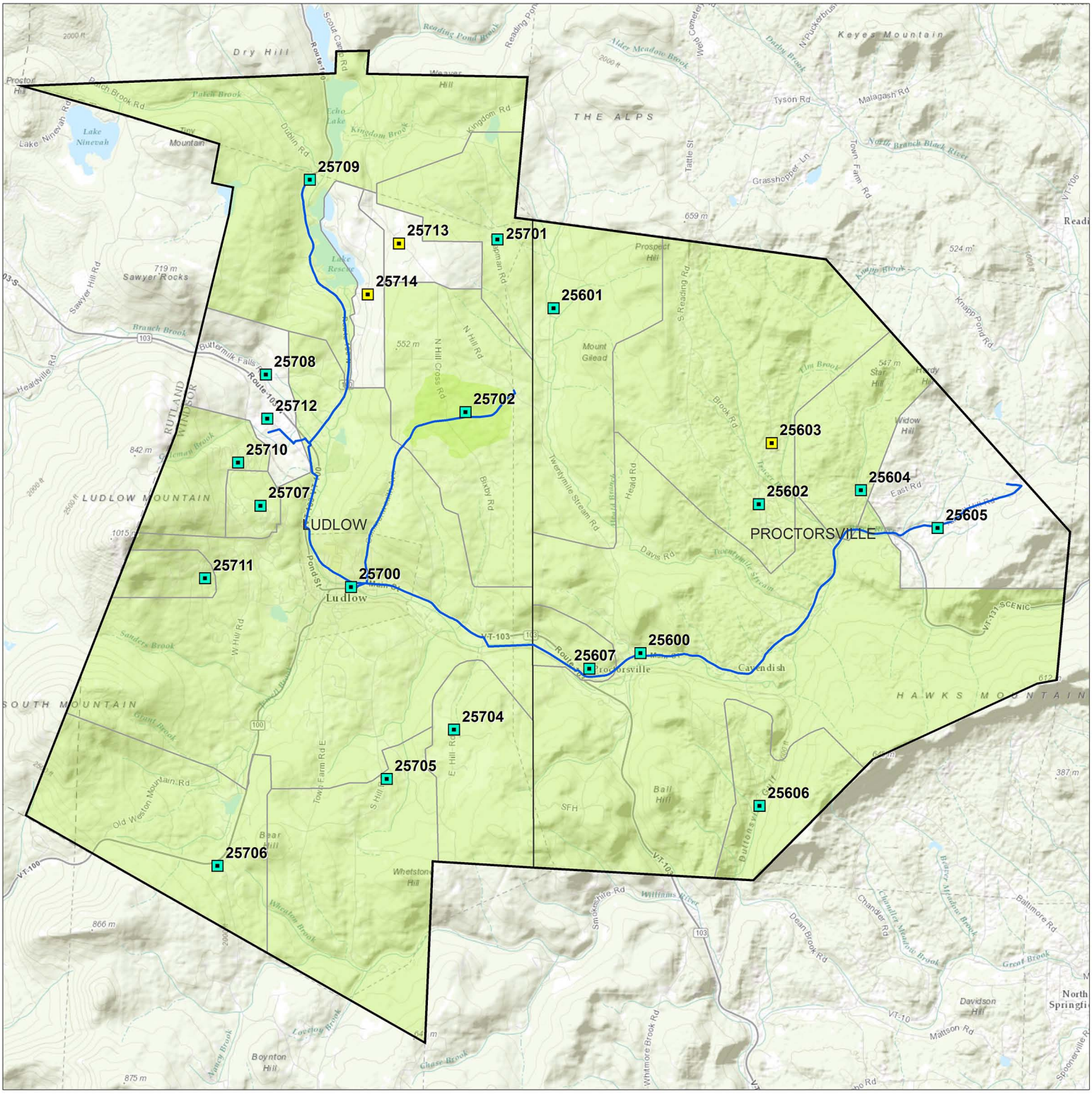
DLC LOCATION | DSA
- Existing
- Proposed | Future
- Broadband Enabled
- No DSL

OTHER FEATURES
- Exchange Boundary
- Existing TDS Fiber

0 1 2 3 4 5
Scale = Miles

N

TDS Telecom Network Services | OSP Records | Date: 5/12/2016



Line 330 – Detail on Attempts (broadband)

Rule 54.313(a)(3)

Carrier has implemented service availability tracking tools and employee training capabilities to respond to direct customer requests for broadband services.

Upon receipt of a new broadband service request, Carrier's service advisors follow these steps for provisioning the service:

1) The Carrier service advisor uses a customized service addressability software tool to determine if broadband service is available to the requested service address. If it is determined that service is offered to the address, an installation order will be initiated and scheduled immediately.
2) If the information in the service addressability tool indicates that extension of broadband service to the service address might be possible, a field service technician is dispatched to the customer premise to perform additional diagnostic testing. Such testing will determine whether there are any reasonable adjustments to the network or customer facilities which can be made to enable the provision of service. If tests confirm that broadband service can be offered at the service address, an order is initiated and service is provisioned.
3) In situations where Carrier's terrestrial broadband service is not available to a requesting customer, Carrier has partnered with Dish Network to offer dishNET satellite broadband service to customers. Carrier's service advisors are trained to discuss and assist the customer in ordering dishNET broadband service.

As the Commission acknowledged[1], some of the service areas served by rate of return carriers, like Carrier, have characteristics that make it highly cost prohibitive to extend broadband service using terrestrial wireline technology. Except as may be noted in Carrier's 5-year plan attached to this filing, any further build-out of terrestrial broadband service to additional locations within its study area will be dependent upon the cost of the technology to be deployed and the capital infrastructure funding level available. After following the steps above, if the service request is still unfulfilled, it is due to the customer's distance from a broadband capable central office or DSA. The capital cost to deploy fiber and other equipment to shorten loop lengths to support broadband at the required levels well exceeds any reasonable projection of revenue and support funding available for such projects.

[1] See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 13-332, released March 3, 2013 at paras 10-11.

Line 510 – Description of Compliance with Service Quality Standards and Consumer Protection

Rule 54.313(a)(5)

TDS Telecommunications Corporation's ILEC companies follow applicable federal and state service quality and consumer protection rules. They comply with quality of service requirements including monitoring and reporting service quality metrics where required. TDS Telecom has implemented numerous consumer protection measures to protect customer information. For example, TDS implemented Customer Proprietary Network Information (CPNI) policies and procedures that are consistent with the FCC's regulations. Employees are required to complete CPNI training and in addition, employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication. Annually, all employees are required to review TDS' Business Code of Conduct which includes information and requirements on protecting sensitive customer information from improper use and disclosure. TDS data privacy and security policies are reinforced through periodic training required of all employees. Additional consumer protection measures include TDS' use of a third-party verifier to prevent unauthorized presubscribed interexchange carrier (PIC) changes ("Slamming") and the elimination of billing and collection arrangements that could have potentially allowed unauthorized third-party charges to be added to customer's bills ("Cramming").

TDS Emergency Operations Plan

Company is able to remain functional in an emergency situation through the use of back-up power to ensure functionality without an external power source. The Company's standard for battery backup is 8 hours in offices with no generator and 4 hours in offices with a generator. This is ensured during semi-annual routine maintenance which includes battery inspection, cleaning, documentation of float voltage and cell temperature, as well as equalization or replacement if necessary. In addition, permanent generators are present at significant wire centers to maintain power in the event a commercial power failure extends beyond battery backup capabilities. Also, portable generators are available for deployment to remote wire centers without permanent generators. The Company's network is engineered to provide maximum capacity in order to handle excess traffic in the event of traffic spikes resulting from emergency situations. Company facilities are remotely monitored and managed by a centralized Network Operations Center which is staffed 24 x 7, 365 days a year. Technicians are able to remotely access and respond to alarm conditions. By design, transport redundancy is built into the telephony and data network on many levels and in the event of a hardware or circuit failure or traffic spike, the networks are able to self-correct in many cases or, at many locations, technicians are able to manually switch network elements to standby facilities both locally and remotely.

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**
VT	Proctorsville		FR	18.0	0.0	0.53	0.0	18.53
VT	Proctorsville		MS	13.012394655704	0.0	0.43	0.0	13.44
VT	Ludlow		FR	18.0	0.0	0.53	0.0	18.53
VT	Ludlow		MS	13.012394655704	0.0	0.43	0.0	13.44

(710) Broadband Price Offerings
Data Collection Form

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	Total Rates and Fees	**Broadband Service - Download Speed (Mbps)**	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
VT	ALL	54.2	0.0	54.2	15.0	2.0	250.0	Other, Require upgrade to higher service offering.
VT	ALL	64.2	0.0	64.2	25.0	5.0	250.0	Other, Require upgrade to higher service offering.
VT	ALL	64.2	0.0	64.2	25.0	10.0	250.0	Other, Require upgrade to higher service offering.
VT	ALL	64.2	0.0	64.2	50.0	10.0	250.0	Other, Require upgrade to higher service offering.
VT	ALL	64.2	0.0	64.2	50.0	20.0	250.0	Other, Require upgrade to higher service offering.

(800) Operating Companies
Data Collection Form

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July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Telephone and Data Systems, Inc.		TDS
TDS Telecommunications Corporation		TDS Telecom
Amelia Telephone Corporation	190217	TDS Telecom
Arcadia Telephone Company	300585	TDS Telecom
Arizona Telephone Company	452171	TDS Telecom
Arvig Telephone Company	361350	TDS Telecom
Northwest Minnesota Special Access LLC		TDS Telecom
Asotin Telephone Company, OR	532404	TDS Telecom
Asotin Telephone Company, WA	522404	TDS Telecom
Badger Telecom, LLC	330844	TDS Telecom
Black Earth Telephone Company, LLC	330849	TDS Telecom
Blue Ridge Telephone Company	220346	TDS Telecom
Bonduel Telephone Company, LLC	330851	TDS Telecom
Bridge Water Telephone Company	361362	TDS Telecom
Burlington, Brighton & Wheatland Telephone Company, LLC	330856	TDS Telecom
Butler Telephone Company, Inc.	250284	TDS Telecom
Calhoun City Telephone Company, Inc.	280448	TDS Telecom
Camden Telephone Company, Inc.	320744	TDS Telecom
Camden Telephone & Telegraph Company, Inc.	220351	TDS Telecom
Central State Telephone Company, LLC	330859	TDS Telecom
Chatham Telephone Company	310685	TDS Telecom
Cleveland County Telephone Company, Inc.	401698	TDS Telecom
Cobbosseecontee Telephone Company	100005	TDS Telecom

(800) Operating Companies
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<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Communications Corporation of Indiana	320776	TDS Telecom
Communication Corporation of Michigan	310672	TDS Telecom
Communications Corporation of Southern Indiana	320809	TDS Telecom
Concord Telephone Exchange, Inc.	290559	TDS Telecom
Continental Telephone Company	300607	TDS Telecom
Contoocook Valley Telephone Company	123321	TDS Telecom
Decatur Telephone Company	401699	TDS Telecom
Delta County Tele-Comm, Inc.	462184	TDS Telecom
Deposit Telephone Company, Inc.	150089	TDS Telecom
Dickeyville Telephone, LLC	330875	TDS Telecom
Eastcoast Telecom of Wisconsin, LLC	330914	TDS Telecom
Edwards Telephone Company, Inc.	150092	TDS Telecom
The Farmers Telephone Company, LLC	330880	TDS Telecom
Grantland Telecom, LLC	330930	TDS Telecom
Hampden Telephone Company	100010	TDS Telecom
Happy Valley Telephone Company	542321	TDS Telecom
Hartland & St Albans Telephone Company	100011	TDS Telecom
Hollis Telephone Company, Inc.	123321	TDS Telecom
The Home Telephone Company of Pittsboro, Inc.	320777	TDS Telecom
Home Telephone Company, Inc. (IN)	320778	TDS Telecom
Hornitos Telephone Company	542322	TDS Telecom
Humphreys County Telephone Company	290566	TDS Telecom
Island Telephone Company (MI)	310677	TDS Telecom

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<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
The Island Telephone Company, Inc. (ME)	100007	TDS Telecom
Kearsarge Telephone Company	120045	TDS Telecom
Mid-State Telephone Company, KMP	361413	TDS Telecom
Leslie County Telephone Company	260411	TDS Telecom
Lewisport Telephone Company	260412	TDS Telecom
Lewis River Telephone Company, Inc.	522427	TDS Telecom
Little Miami communications Corporation	300613	TDS Telecom
Ludlow Telephone Company	140058	TDS Telecom
Mahanoy & Mahantango Telephone Company	170183	TDS Telecom
M.C.T. Communications, Inc.	123321	TDS Telecom
McClellanville Telephone Company, Inc.	240533	TDS Telecom
McDaniel Telephone Company	522430	TDS Telecom
The Merchants and Farmers Telephone Company	320788	TDS Telecom
Merrimack County Telephone Company	120047	TDS Telecom
Mid-Plains Telephone, LLC	330881	TDS Telecom
Mid-State Telephone Company	361433	TDS Telecom
Midway Telephone Company, LLC	330909	TDS Telecom
Mosinee Telephone Company, LLC	330915	TDS Telecom
Mt. Vernon Telephone Company, LLC	330917	TDS Telecom
Myrtle Telephone Company, Inc.	287449	TDS Telecom
Nelson-Ball Ground Telephone Company	220375	TDS Telecom
New Castle Telephone Company	193029	TDS Telecom
New York Access Billing LLC		TDS Telecom

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Northfield Telephone Company	140061	TDS Telecom
Norway Telephone Company, Inc.	240535	TDS Telecom
Oakman Telephone Company, Inc.	250311	TDS Telecom
Oakwood Telephone Company	300645	TDS Telecom
Oklahoma Communications Systems, Inc.	431984	TDS Telecom
Mid-America Telephone, Inc.	432010	TDS Telecom
Oriskany Falls Telephone Corporation	150114	TDS Telecom
Peoples Telephone Company, Inc.	250314	TDS Telecom
Perkinsville Telephone Company, Inc.	140062	TDS Telecom
Port Byron Telephone Company	150118	TDS Telecom
Potlatch Telephone Company	472230	TDS Telecom
Quincy Telephone Company, FL	210338	TDS Telecom
Quincy Telephone Company, GA	220338	TDS Telecom
Riverside Telecom, LLC	330943	TDS Telecom
S&W Telephone Company, Inc.	320816	TDS Telecom
Salem Telephone Company	260417	TDS Telecom
Scandinavia Telephone Company, LLC	330945	TDS Telecom
Shiawassee Telephone Company	310726	TDS Telecom
Somerset Telephone Company	100024	TDS Telecom
Southeast Mississippi Telephone Company, Inc.	283301	TDS Telecom
Southeast Telephone Co. of Wisconsin, LLC	330952	TDS Telecom
Milwaukee SMSA Tower Holding LLC		TDS Telecom
Milwaukee SMSA LP		TDS Telecom

(800) Operating Companies
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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Southwestern Telephone Company	452174	TDS Telecom
The State Long Distance Telephone Company, LLC	330955	TDS Telecom
Stockbridge & Sherwood Telephone Company, LLC	330954	TDS Telecom
Strasburg Telephone Company	462207	TDS Telecom
St. Stephen Telephone Company	240544	TDS Telecom
Sugar Valley Telephone Company	170206	TDS Telecom
TDS Communication Solutions, Inc.		TDS Telecom
TDS Long Distance Corporation		TDS Telecom
TDS METROCOM, LLC		TDS Telecom
TDS Telecom Service Corporation		TDS Telecom
Tellico Telephone Company, Inc.	290578	TDS Telecom
Tennessee Telephone Company	290575	TDS Telecom
Tenney Telephone Company, LLC	330958	TDS Telecom
The Vanlue Telephone Company	300662	TDS Telecom
Tipton Telephone Company, Inc.	320829	TDS Telecom
Township Telephone Company, Inc.	150129	TDS Telecom
Tri-County Telephone Company, Inc.	320830	TDS Telecom
Tri-County Communications Corporation		TDS Telecom
Union Telephone Company	120049	TDS Telecom
UTELCO, LLC	330963	TDS Telecom
Vernon Telephone Company, Inc.	150133	TDS Telecom
Virginia Telephone Company	190253	TDS Telecom
Warren Telephone Company	100031	TDS Telecom

(800) Operating Companies
Data Collection Form

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Waunakee Telephone Company, LLC	330968	TDS Telecom
The West Penobscot Telephone & Telegraph Company	100034	TDS Telecom
West Point Telephone Company, Incorporated	320837	TDS Telecom
Williston Telephone Company	240551	TDS Telecom
Wilton Telephone Company, Inc.	120050	TDS Telecom
Winsted Telephone Company	361507	TDS Telecom
Winterhaven Telephone Company	542323	TDS Telecom
Wolverine Telephone Company	310738	TDS Telecom
Wyandotte Telephone Company	432034	TDS Telecom
United States Cellular Corporation		
Barat Wireless, Inc.		
Carroll PCS, Inc.		
CellVest Inc.		
Eastern North Carolina Cellular Joint Venture		
USCOC of Wilmington, LLC		
Wilmington Cellular Partnership		
Wilmington Cellular Telephone Company	239006	United States Cellular Corporation
USCOC of Jacksonville, LLC		
Jacksonville Cellular Partnership		
Jacksonville Cellular Telephone Company	239006	United States Cellular Corporation
Hardy Cellular Telephone Company	209005	U.S. Cellular (Hardy Cellular Telephone Co.)
Humphreys County Cellular, Inc.		
Iowa RSA #3, Inc.		

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Iowa RSA #12, Inc.		
Farmers Cellular Telephone Company, Inc.	359016	United States Cellular
Farmers Mutual Cellular Telephone Company, Inc.		
Iowa RSA No. 12 Limited Partnership	359016	United States Cellular
Jefferson Cellular Telephone Company, Inc.		
McDaniel Cellular Telephone Company	529001	United States Cellular Corporation
USCC Distribution Co., LLC		
USCC Financial L.L.C.		
USCC Services, LLC		
Lab465, LLC		
USCC Purchase, LLC		
USCC Real Estate Corporation		
USCC Wireless Investment, Inc.		
Advantage Spectrum, L.P.		
Aquinas Wireless, L.P.		
Barat Wireless, LP		
Carroll Wireless, LP		
King St Wireless, LP		
USCOC of Rochester, Inc.		
USCOC of Oregon RSA #5, Inc.	539002	United States Cellular Corporation
USCOC of Washington-4, Inc.	529001	United States Cellular Corporation
Vermont RSA No. 2-B2, Inc.		
United States Cellular Investment Company, LLC		

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<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Central Cellular Telephones LTD		
Madison SMSA Tower Holding LLC		
Iowa RSA #9, Inc.		
Iowa RSA No.9 Limited Partnership	359016	United States Cellular
Minnesota Invoo of RSA #7, Inc.		
Redding MSA Limited Partnership		
Texas Invco of RSA #6, Inc.		
Community Cellular Telephone Company		
Texas TSA 6 Tower Holdings, LP		
Texas RSA 6 Limited Partnership		
USCCI Corporation		
USCIC of Fresno		
Fresno MSA Limited Partnership		
United States Cellular Investment Corporation of Los Angeles		
Los Angeles SMSA Limited Partnership		
USCIC of North Carolina RSA #1, Inc.		
North Carolina RSA 1 Partnership		
United States Cellular Investment Company of Oklahoma City, Inc.		
Oklahoma City SMSA Tower Holding LLC		
Oklahoma City SMSA Limited Partnership		
Venus Cellular Telephone Company, Inc.		
Pennsylvania RSA 1 Limited Partnership		
Pennsylvania RSA No. 6 (I) Limited Partnership		

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<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Pennsylvania RSA No. 6 (II)Limited Partnership		
United States Cellular Operating Company, LLC	339007	United States Cellular Corporation
California Rural Service Area #1, Inc.		
Champlain Cellular, Inc.		
Crown Point Cellular, Inc.		
Indiana RSA #5, Inc.		
Indiana RSA No. 4 Limited Partnership		
Indiana RSA No. 5 Limited Partnership		
Kenosha Cellular Telephone, L.P.	339007	United States Cellular Corporation
Madison Cellular Telephone Company	339007	United States Cellular Corporation
Maine RSA #1, Inc.	109002	United States Cellular Corporation
Maine RSA #4, Inc.	109002	United States Cellular Corporation
NH #1 Rural Cellular, Inc.	129002	United States Cellular Corporation
Oregon RSA #2, Inc. (OR)	539002	United States Cellular Corporation
Oregon RSA #2, Inc. (WA)	529001	United States Cellular Corporation
PCS Wisconsin, LLC	339007	United States Cellular Corporation
Racine Cellular Telephone Company	339007	United States Cellular Corporation
Township Cellular Telephone, Inc.		
St. Lawrence Seaway RSA Cellular Partnership		
United States Cellular Operating Company Of Bangor		
Bangor Cellular Telephone, L.P.	109002	United States Cellular Corporation
United States Cellular Operating Company of Cedar Rapids		
Cedar Rapids Cellular Telephone, L.P.	359016	United States Cellular

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
United States Cellular Operating Company of Chicago, LLC	349007	United States Cellular Corporation
USCOC of Chicago Real Estate Holdings, LLC		
VB Midwest 1, LLC		
United States Cellular Operating Company of Dubuque		
Dubuque Cellular Telephone, L.P.	359016	United States Cellular
United States Cellular Operating Company of Knoxville	299010	Unites States Cellular Telephone Co. (Greater Knoxville) LP
Tennessee RSA No. 3 Limited Partnership	299010	Unites States Cellular Telephone Co. (Greater Knoxville) LP
United States Cellular Telephone Company (Greater Knoxville), LP.	299010	Unites States Cellular Telephone Co. (Greater Knoxville) LP
Texahoma Cellular Limited Partnership		
Newport Cellular, Inc.		
United States Cellular Operating Company of Medford	539002	United States Cellular Corporation
United States Cellular Operating Company of Yakima		
Yakima MSA Limited Partnership	529001	United States Cellular Corporation
USCOC of Central Illinois, LLC	349007	United States Cellular Corporation
VB Midwest 3, LLC		
USCOC of Greater Iowa, LLC (IA)	359016	United States Cellular
USCOC of Greater Iowa, LLC (IL)	349007	United States Cellular Corporation
USCOC of Greater Iowa, LLC (NE)	379019	USCOC of Nebraska/Kansas LLC DBA U.S. Cellular?
USCOC of Greater Iowa, LLC (DE)		
USCOC of Greater Missouri, LLC (IL)	349007	United States Cellular Corporation
USCOC of Greater Missouri, LLC (MO)	429007	United States Cellular Corporation
VB Midwest 2, LLC		
USCOC of Greater North Carolina, LLC	239006	United States Cellular Corporation

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<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
USCOC of Cumberland, LLC		
MSN Communications, Inc.		
USCOC of Greater Oklahoma, LLC	439004	United States Cellular Corporation
USCOC of Greater Oklahoma, LLC	439035	United States Cellular Corp ? CL
USCOC of Jack/Wil, Inc.		
USCOC of LaCrosse, LLC	339007	United States Cellular Corporation
USCOC Nebraska/Kansas, Inc.		
USCOC Nebraska/Kansas, LLC (KS)	419012	USCOC of Nebraska/Kansas LLC
USCOC Nebraska/Kansas, LLC (NE)	379019	USCOC of Nebraska/Kansas LLC DBA U.S. Cellular?
Kansas #15 Limited Partnership		
USCOC of Pennsylvania RSA No. 10-B2, Inc.		
Allentown SMSA Limited Partnership		
USCOC of Richland, Inc.	529001	United States Cellular Corporation
USCOC of South Carolina RSA #4, Inc.		
USCOC of Texahoma, Inc.		
Texahoma Cellular Limited Partnership	439004	United States Cellular Corporation
USCOC of Virginia RSA #3, Inc.	199004	United States Cellular Corporation
Washington RSA #5, Inc.		
Western Sub-RSA Limited Partnership	529001	United States Cellular Corporation
Westelcom Cellular, Inc.		
New York RSA 2 Cellular Partnership		
Affiliate Fund		
Airadigm Communications, Inc.		

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<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
CommVest, Inc.		
GTE Mobilnet of Indiana LP		
MGW Communications, Inc.		
National Telephone & Telegraph Company		
Nelson-Ball Ground Cellular Telephone & Services, Inc.		
New Paris Telephone, Inc.		
Suttle-Straus, Inc.		
Graphic Arts Alliance LLC		
TDSI Corporation		
OneNeck IT Solutions LLC		
OneNeck IT Services Corporation		
OneNeck UK Limited		
Team Technologies LLC		
TEAM Des Moines Partners, LLC		
TEAM Madison Partners, L.L.C.		
VISI Incorporated		
Vital Support Systems, LLC		
Volcano Communications Company	542343	
TDS Broadband, LLC		
TDS Baja Broadband, LLC		
TDS Broadcasting LLC		

-Terms and Conditions of Voice Telephony Lifeline Service – 54.422(a)(2)

Lifeline Service Overview

1. A Lifeline customer may subscribe to any local service offering available to all residential customers. Such local service offerings include:

   - Basic local exchange telephone flat rate service (R1) which entitles the customer to an unlimited number of telephone calls within the exchange and local calling area (including EAS points) without additional charges. Toll charges do not apply.

   - A local measured service (if offered by the Company). The service is priced lower than R1 service but either a per minute or per message rate also applies. The measured service plan may include an allowance of minutes/messages.

   - An expanded local calling service which is priced higher than R1 service but includes a larger local calling service area without incurring toll charges.

   - Any bundle service that includes residential basic local exchange service.

2. For a list of local exchange services and rates, refer to the Company's Local Exchange tariff posted on its website at http://www.tdstelecom.com/CustomerService/TariffSearch.aspx and/or contact the Company at 1-888-CALL TDS (1-888-225-5837). (Note, not all bundles are tariffed)

3. Any of the local service offerings listed above is for a minimum one month period and entitles the customer to telephone calls within the exchange and local calling area (including EAS points). Toll charges do not apply to such calls.

4. Telephone Service including Lifeline service also includes –
   - Touch Tone
   - Access to 911 emergency service along with other N11 services
   - Access to operator services
   - Access to directory assistance
   - Access to toll calling via long distance carrier
   - Toll restriction service at no charge for Lifeline customers

5. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.

6. Applicable taxes levied by state, county and local taxing authorities are added to local service rates.

-Terms and Conditions of Voice Telephony Lifeline Service – 54.422(a)(2)

STAR Packages

STAR Packages are optional service bundles. Each package permits a customer to receive services and features for a flat monthly rate, for each STAR Package subscriber line provided. The STAR Package options include the following services:

1) 3 STAR Package
   Includes: Residential One-Party Line, Caller ID Deluxe, Call Waiting/Cancel Call Waiting, Call Forwarding, and Preferred Call Forwarding (not flat rate service at some companies)

   The 3 STAR Package can be upgraded to include Anonymous Call Rejection, Three-Way Calling, Priority Ringing, Special Call Acceptance, and Personal Voicemail. The charge for this upgrade is set forth under "Residence" below (not flat rate service at some companies).

2) 4 STAR Package
   Includes: Residential One-Party Line, Caller ID Deluxe, Call Waiting/Cancel Call Waiting, Call Forwarding, Preferred Call Forwarding, Anonymous Call Rejection, and 300 Minutes of LATA-Wide and/or Long Distance calling

   The 4 STAR Package can be upgraded to include Three-Way Calling, Priority Ringing, Special Call Acceptance and Personal Voicemail. The charge for this upgrade is set forth under "Residence" below.

3) 5 STAR Package
   Includes: Residential One-Party Line, Caller ID Deluxe, Call Waiting/Cancel Call Waiting, Call Forwarding, 3-Way Calling, Anonymous Call Rejection, Priority Ringing, Special Call Acceptance, Preferred Call Forwarding, Personal Voice Mail, and Unlimited LATA-Wide and/or Long Distance calling

Conditions and Limitations

a. Rules, regulations, and limitations as specified elsewhere in the Company's tariffs for each individual service will apply as part of this Package.

b. STAR Package customers may terminate their Package at any time upon notice to the Company.

c. Unless terminated by the STAR Package customer or the Company, a customer will remain enrolled in the Package, as amended from time-to-time, with any applicable changes in rate, for as long as the Plan continues to be offered by the Company.

d. New Customers that subscribe to one of the STAR Packages will receive a waiver of all installation charges.

-Terms and Conditions of Voice Telephony Lifeline Service – 54.422(a)(2)

Service Charges will not apply when the STAR Package replaces existing Local Exchange Service or if the customer requests a change from the STAR Package back to Local Exchange Service.

e. A Package Change Fee will apply when a customer downgrades from the 4 STAR or 5 STAR Package to the 3 STAR or 4 STAR Package. Customers may upgrade to a higher STAR Package without incurring a charge.

f. The Star Package may not be combined with any other optional toll calling plan service, except for those specified in this offering.

g. Customers who fail to pay the entire Package rate per month will have all STAR Package optional features removed. The customer will then be converted to the tariffed Basic Local service rate. Service Charges will not apply for converting services back to tariff rates. Such customers will not be permitted to re-enroll in this any of the Packages until such time as all associated unpaid balances are satisfactorily paid in full.

Residence

1)	3 STAR Package, per line	$19.99 to $29.99
2)	4 STAR Package, per line	$29.99 to $39.99
3)	5 STAR Package, per line	$39.99 to $49.99

a. Package Upgrade (features added to existing package) $5.00

b. Package Change Fee $7.50

SECURITY LINE SERVICE

1. General

Security Line Service is a bundle for residential customers who have their main telecommunications service with a wireless provider but require a basic access line for back-up and high speed data.

The bundle includes a Residential One-Party Line and up to 1 Mbps high speed data. (Could be an LMS line at companies that provide LMS)

2. Terms and Conditions

a. Security Line Service will be provisioned where facilities are available.

b. Rules, regulations, and limitations as specified elsewhere in the Company's tariffs will apply to this bundle.

c. No other optional services or features are allowed with this bundle, except Toll Restriction, Toll Restriction PIN Override, Non-Published Numbers, and Non-Listed Numbers. These four services will be allowed at the rate listed

-Terms and Conditions of Voice Telephony Lifeline Service – 54.422(a)(2)

elsewhere in the tariff. As stated in the Lifeline Service Overview, charges for toll restriction do not apply to Lifeline Customers.

d. Customers must subscribe to this service for 1 year. Cancellation of the bundle prior to the one year timeframe will cause an early termination fee of $99 to apply.

e. Customers must subscribe to TDS Long Distance Corporation as their long distance provider.

f. Any toll calls will be billed at TDS Long Distance toll rates.

g. Service Connection Charges will not apply.

h. Optional Call plans are not available with this bundle.

i. Seasonal Service is not available with this bundle.

3. Rates and Charges

	Monthly Rate
Bundle Base Rate	$44.20 to 49.20[1]

[1] Other data speeds may be available for an additional charge.

June 13, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: CC Docket No. 14-58
Certification of Reasonable Steps Taken to Provide 10 x 1 Broadband Service

Dear Ms. Dortch:

As part of the FCC's annual reporting requirements for ETC re-certification, Rule 54.313(f)(1)(i) requires carriers to certify that upon receiving a customer's reasonable request for broadband service with speeds of 10 mbps download and 1 mbps upload, the carrier took reasonable steps to provide service at those speeds.

TDS Telecommunications Corporation (TDS Telecom) owns and operates the telephone companies listed on the attachment. Each provides broadband service. Collectively through these companies, TDS Telecom offers broadband service to 94% of its ILEC customers. Most of these customers receive speeds of 5 mbps or faster.

In 2015, TDS Telecom completed a multi-year initiative to extend its broadband coverage to much of its rural serving area. This effort utilized grant funding available through the American Recovery and Reinvestment Act and was administered by the Rural Utility Services (RUS). $100 million in grant funding was received while TDS Telecom invested an additional $25 million of its own capital. At the conclusion of this initiative, broadband service was made available to an additional 32,000 customers who were previously unserved.

At this time, and with today's available technology, TDS Telecom has extended its broadband footprint as far as is economically feasible absent additional funding through universal service support and/or other state and federal grant programs. The 6% of customers that remain unserved live in our most rural and remote service areas. The cost to bring broadband to them, or to increase speeds to 10 x 1 for those who currently have service at slower speeds, would far exceed the revenue received from the sale of those services. We continue to closely monitor emerging technologies and look for affordable ways to serve these customers. As part of that effort, TDS Telecom is evaluating recent changes to the universal service program for rate of return carriers to determine how the funds available going forward can be utilized to efficiently extend broadband to additional customers in unserved areas and meet the evolving speed requirements for customers in underserved areas.

As Executive Vice President of TDS Telecommunications Corporation and an officer authorized to give this certification, I hereby certify that TDS Telecom collectively and through each of

its subsidiaries listed on the attachment, has taken reasonable steps to provide 10 x 1 broadband service upon receipt of a reasonable request from a customer.

Sincerely,

Kevin G. Hess
TDS Telecommunications Corporation

Attachment 1

State	Study Area Name	SAC
AL	Butler Telephone Company	250284
AL	Oakman Telephone Company, Inc.	250311
AL	Peoples Telephone Company, Inc.	250314
AR	Cleveland County Telephone Company, Inc. (sold 12/31/15)	401698
AR	Decatur Telephone Company (sold 12/31/15)	401699
AZ	Arizona Telephone Company	452171
AZ	Southwestern Telephone Company	452174
CA	Happy Valley Telephone Company	542321
CA	Hornitos Telephone Company	542322
CA	Winterhaven Telephone Company	542323
CO	Delta County Tele-Comm, Inc.	462184
CO	Strasburg Telephone Company	462207
FL	Quincy Telephone Company, FL	210338
GA	Blue Ridge Telephone Company	220346
GA	Camden Telephone & Telegraph Company, Inc.	220351
GA	Nelson-Ball Ground Telephone Company	220375
GA	Quincy Telephone Company, GA	220338
ID	Potlatch Telephone Company	472230
IN	Camden Telephone Company, Inc.	320744
IN	Communications Corporation of Indiana	320776
IN	Communications Corporation of Southern Indiana	320809
IN	Home Telephone Company, Inc. (IN)	320778
IN	S&W Telephone Company, Inc.	320816
IN	The Home Telephone Company of Pittsboro, Inc.	320777
IN	The Merchants and Farmers Telephone Company	320788
IN	Tipton Telephone Company, Inc.	320829
IN	Tri-County Telephone Company, Inc.	320830
IN	West Point Telephone Company, Incorporated	320837
KY	Leslie County Telephone Company	260411
KY	Lewisport Telephone Company	260412
KY	Salem Telephone Company	260417
ME	Cobbosseecontee Telephone Company	100005
ME	Hampden Telephone Company	100010
ME	Hartland & St Albans Telephone Company	100011
ME	Somerset Telephone Company	100024
ME	The Island Telephone Company, Inc. (ME)	100007
ME	The West Penobscot Telephone & Telegraph Company	100034
ME	Warren Telephone Company	100031
MI	Chatham Telephone Company	310685
MI	Communication Corporation of Michigan	310672

State	Study Area Name	SAC
MI	Island Telephone Company (MI)	310677
MI	Shiawassee Telephone Company	310726
MI	Wolverine Telephone Company	310738
MN	Arvig Telephone Company	361350
MN	Bridge Water Telephone Company	361362
MN	Mid-State Telephone Company	361433
MN	Mid-State Telephone Company, KMP	361413
MN	Winsted Telephone Company	361507
MS	Calhoun City Telephone Company, Inc.	280448
MS	Myrtle Telephone Company, Inc.	287449
MS	Southeast Mississippi Telephone Company, Inc.	283301
NH	Contoocook Valley Telephone Company	123321
NH	Hollis Telephone Company, Inc.	123321
NH	Kearsarge Telephone Company	120045
NH	Merrimack County Telephone Company	120047
NH	Union Telephone Company	120049
NH	Wilton Telephone Company, Inc.	120050
NY	Deposit Telephone Company, Inc.	150089
NY	Edwards Telephone Company, Inc.	150092
NY	Oriskany Falls Telephone Corporation	150114
NY	Port Byron Telephone Company	150118
NY	Township Telephone Company, Inc.	150129
NY	Vernon Telephone Company, Inc.	150133
OH	Arcadia Telephone Company	300585
OH	Continental Telephone Company	300607
OH	Little Miami communications Corporation	300613
OH	Oakwood Telephone Company	300645
OH	The Vanlue Telephone Company	300662
OK	Mid-America Telephone, Inc.	432010
OK	Oklahoma Communications Systems, Inc.	431984
OK	Wyandotte Telephone Company (sold 12/31/15)	432034
OR	Asotin Telephone Company, OR	532404
PA	Mahanoy & Mahantango Telephone Company	170183
PA	Sugar Valley Telephone Company	170206

State	Study Area Name	SAC
SC	McClellanville Telephone Company, Inc.	240533
SC	Norway Telephone Company, Inc.	240535
SC	St. Stephen Telephone Company	240544
SC	Williston Telephone Company	240551
TN	Concord Telephone Exchange, Inc.	290559
TN	Humphreys County Telephone Company	290566
TN	Tellico Telephone Company, Inc.	290578
TN	Tennessee Telephone Company	290575
VA	Amelia Telephone Corporation	190217
VA	New Castle Telephone Company	193029
VA	Virginia Telephone Company	190253
VT	Ludlow Telephone Company	140058
VT	Northfield Telephone Company	140061
VT	Perkinsville Telephone Company, Inc.	140062
WA	Asotin Telephone Company, WA	522404
WA	Lewis River Telephone Company, Inc.	522427
WA	McDaniel Telephone Company	522430
WI	Badger Telecom, LLC	330844
WI	Black Earth Telephone Company, LLC	330849
WI	Bonduel Telephone Company, LLC	330851
WI	Burlington, Brighton & Wheatland Telephone Company, LLC	330856
WI	Central State Telephone Company, LLC	330859
WI	Dickeyville Telephone, LLC	330875
WI	Eastcoast Telecom of Wisconsin, LLC	330914
WI	Grantland Telecom, LLC	330930
WI	Mid-Plains Telephone, LLC	330881
WI	Midway Telephone Company, LLC	330909
WI	Mosinee Telephone Company, LLC	330915
WI	Mt. Vernon Telephone Company, LLC	330917
WI	Riverside Telecom, LLC	330943
WI	Scandinavia Telephone Company, LLC	330945
WI	Southeast Telephone Co. of Wisconsin, LLC	330952
WI	Stockbridge & Sherwood Telephone Company, LLC	330954
WI	Tenney Telephone Company, LLC	330958
WI	The Farmers Telephone Company, LLC	330880
WI	The State Long Distance Telephone Company, LLC	330955
WI	UTELCO, LLC	330963
WI	Waunakee Telephone Company, LLC	330968