ITCI Interstate Telcom Consulting, Inc.
Independent Telecommunications Consultants

June 27, 2017

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

Re: REDACTED – FOR PUBLIC INSPECTION IN WC DOCKET NO. 14-58:
Form 481 - Annual Reporting Requirements for High-Cost and Low Income Recipients

Pursuant to Section 54.313 and 54.422 of the Federal Communications Commission's rules, enclosed is a redacted version of Form 481 Annual Reporting Requirements and Certifications for Wittenberg Telephone Company, Study Area Code 330973. Wittenberg Telephone Company is a state-designated ETC, and as such, is submitting to the Commission information from FCC Form 481. A confidential "Trade Secret" filing of this information was also made under Docket 14-58.

Should you have any questions, please contact me via e-mail at roxih@interstatetelcom.com or by phone at 320/848-6641.

Sincerely,

Roxi Hacker
Regulatory Consultant

Enclosures:

Cc: Al Mahnke

130 Birch Avenue West • P.O. Box 668 • Hector, Minnesota • 55342-0668
Telephone (320) 848-6641 • Fax (320) 848-2466 • Email: itci@interstatetelcom.com

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	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Roxi Hacker
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address: Email of the person identified in data line <030>	roxih@interstatetelcom.com
	Form Type	54.313 and 54.422

(200) Service Outage Reporting (Voice)
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>	roxih@interstatetelcom.com

<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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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<300> Unfulfilled service request (voice): 0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband): 0

<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

<010>	Study Area Code	330973
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.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.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<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

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<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.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	330973WI510Wittenberg.pdf
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations
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>	roxih@interstatetelcom.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	330973WI610Wittenberg.pdf

(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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<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
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>	roxih@interstatetelcom.com

<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

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

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<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<810>	Reporting Carrier	Wittenberg Telephone Company
<811>	Holding Company	Wittenberg Telephone Company
<812>	Operating Company	Wittenberg 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
OMB Control No. 3060-0986 /OMB Control No. 3060-0819
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<900> Does the filing entity offer tribal land services? (Y/N) Yes

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

Ho-Chunk Nation

<920> Tribal Government Engagement Obligation

330973WI920Wittenberg.pdf

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 PDF, 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.	Yes
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	Yes
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

(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

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<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	330973WI1010Wittenberg.pdf 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	330973WI1030Wittenberg.pdf 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	330973
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.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
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>	roxih@interstatetelcom.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

330973WI1210Wittenberg.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. ✔

(2005) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

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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

<2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.

<2022> Recipient certifies, representing year three 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 three - 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 three - 54.313(b)(2)(ii). Round 2 recipients only.

Name of Attached Document Listing Required Information

<2025A> Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).

Name of Attached Document Listing Required Information

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

(2005) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<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)(1)(ii)(A)

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)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
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>	roxih@interstatetelcom.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure 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)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		330973WI3010Wittenberg.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(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) with Balance Sheet, Income Statement and Statement of Cash Flows		✔
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	330973WI3026Wittenberg.pdf

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

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>	roxih@interstatetelcom.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

[redacted]

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

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
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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:

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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<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.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) ITCI **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: ITCI

Name of Reporting Carrier: WITTENBERG TEL CO

Signature of Authorized Officer: CERTIFIED ONLINE Date: 06/26/2017

Printed name of Authorized Officer: Linda Garbelman

Title or position of Authorized Officer: CFO

Telephone number of Authorized Officer: 7152532115 ext.

Study Area Code of Reporting Carrier: 330973 Filing Due Date for this form: 07/03/2017

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: WITTENBERG TEL CO

Name of Authorized Agent Firm: ITCI

Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/26/2017

Name of Authorized Agent Employee: Roxi Hacker

Title or position of Authorized Agent or Employee of Agent Regulatory Consultant

Telephone number of Authorized Agent or Employee of Agent: 3208486641 ext.231

Study Area Code of Reporting Carrier: 330973 Filing Due Date for this form: 07/03/2017

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

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No.: 510 Compliance with Service Quality Standards and Consumer Protection

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As required by the State of Wisconsin and the Wisconsin Public Service Commission (PSC) Chapter 165 Rules, the local services provided by Wittenberg Telephone Company are provided under internal company operating procedures and publically available tariffs which are in compliance with applicable State of Wisconsin orders and rules including:

Wisconsin State Statute 100.207 & 100.208
REGULATION OF TELECOMMUNICATIONS SERVICES

100.207(2) Advertising.
100.207(3) Sales.
100.207(4) Collection Practices.
100.208 Unfair Trade Practices.

WI Chapter PSC 165
STANDARD FOR TELECOMMUNICATIONS SERVICE

165.010 General.
165.020 Definitions.
165.032 Schedules to be filed with the commission.
165.033 Exchange area boundaries.
165.065 Emergency operation.

Wisconsin State Legislative Department of Agriculture, Trade & Consumer Protection
(ATCP) 123 & 127 BILLING PRACTICES AND DIRECT MARKETING

123.02 Disclosure to subscriber.
123.04 Subscription charges.
123.06 Negative Option Billing
123.08 Automatic renewal or extension.
123.10 Prohibited practices.
123.12 Activities regulated by PSC.

Subchapter II – Telephone Solicitations

127.02 Definitions.
127.04 Opening disclosures.
127.06 Disclosure prior to sale.
127.08 Prize promotions.
127.10 Unauthorized payment.
127.12 Credit card laundering.
127.14 Misrepresentations.
127.16 Prohibited practices.
127.18 Recordkeeping.
127.20 Assisting violations.

Subchapter III – Mail Solicitations

127.30 Definitions.
127.32 Opening disclosures.
127.34 Disclosure prior to sale.
127.36 Prize promotions.
127.38 Unauthorized payment.
127.40 Delivering ordered goods.
127.42 Credit card laundering.
127.44 Misrepresentations.
127.46 Prohibited practices.
127.48 Recordkeeping.
127.50 Assisting violations.

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No.: 510 Compliance with Service Quality Standards and Consumer Protection

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Subchapter IV – Face-to-Face Solicitations

127.60	Definitions.	127.70	Credit card laundering.
127.62	Opening disclosures.	127.72	Misrepresentations.
127.64	Disclosure prior to sale.	127.74	Prohibited practices.
127.66	Prize promotions.	127.76	Recordkeeping.
127.68	Unauthorized payment.	127.78	Assisting violations.

Subchapter V – Telephone Solicitations; State Do-Not-Call Registry

127.80	Definitions.	127.83	Telephone solicitation practices.
127.81	Telephone solicitors; registration.	127.84	Recordkeeping.
127.82	Do-Not-Call Registry.		

Wittenberg Telephone Company certifies it has complied with these requirements and those of the FCC including Lifeline Requirements, and Customer Proprietary Network Information (CPNI) rules.

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No: 610 Description of Functionality in Emergency Situations

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Wittenberg Telephone Company pursuant to Wisconsin Public Service Commission rule "165.065 Emergency Operation" has:

- Established reasonable provisions to meet emergencies resulting from national security requirements, failures of lighting or power service, sudden and prolonged increases in traffic, illness or personnel, or from fire, storm, or similar emergencies. These provisions meet or exceed the rule requirement to provide:
    - Back up battery service in each central office.
    - Mobile power units that can be delivered on short notice and can be readily connected in offices without installed emergency power facilities.
- Informed employees as to procedures to be followed in the event of an emergency in order to prevent or mitigate interruption or impairment of telecommunications service, including rerouting of traffic around damaged facilities and the deployment of emergency power.

(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	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roxi Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<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**
WI	Elderon		FR	18.5	0.0	0.81	0.0	19.31
WI	Wittenberg		FR	18.5	0.0	0.81	0.0	19.31

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roxi Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.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}
WI	Elderon	49.95	0.0	49.95	5.0	1.0	999999.0	Other, N/A
WI	Elderon	69.95	0.0	69.95	10.0	1.0	999999.0	Other, N/A
WI	Elderon	89.95	0.0	89.95	15.0	1.0	999999.0	Other, N/A
WI	Elderon	134.95	0.0	134.95	20.0	1.0	999999.0	Other, N/A
WI	Wittenberg	49.95	0.0	49.95	5.0	1.0	999999.0	Other, N/A
WI	Wittenberg	69.95	0.0	69.95	10.0	1.0	999999.0	Other, N/A
WI	Wittenberg	89.95	0.0	89.95	15.0	1.0	999999.0	Other, N/A
WI	Wittenberg	134.95	0.0	134.95	20.0	1.0	999999.0	Other, N/A

(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	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Roxi Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.231
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<810>	Reporting Carrier	Wittenberg Telephone Company
<811>	Holding Company	Wittenberg Telephone Company
<812>	Operating Company	Wittenberg Telephone Company

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
Wittenberg Wireless		Cirrinty
Wittenberg CATV		Wittenberg CATV
WW Systems		WW Systems

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No.: 920 – Tribal Government Engagement Obligation

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Pursuant to the Federal Communications Commission's rules[1], in calendar year 2016, Wittenberg Telephone Company (Wittenberg) attempted discussions with the Tribal governments for Tribal entities whose boundaries are within Wittenberg's study area. Those engagement efforts addressed the following information:

(a) Assessing communications needs, including the needs of key community anchor institutions;
(b) Assessing the feasibility and sustainability of network investments;
(c) Marketing services in an appropriate and effective manner;
(d) Obtaining rights of way, land use permitting, facilities sighting and obtaining environmental and cultural preservation assessments and approvals; and
(e) Complying with local business and licensing requirements.

Wittenberg did not receive a response during calendar year 2016.

This certification should not be interpreted as Wittenberg making any representations, express or implied, regarding compliance with any Tribal laws or regulations. That is outside the scope of this filing and this certification.

[1] *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-90, FCC 11-161, ¶ 604 (rel. Nov. 18, 2011) ("*Order*").

Wittenberg Telephone Company
104 W Walker Street
PO Box 160
Wittenberg, WI 54499
715-253-2111

7/28/16

Ho-Chunk Nation
Wilford Cleveland
PO Box 667
Black River Falls, WI 54615

Re: FCC Order 11-161, DA 12-1165 Tribal Land Engagement.

Dear Wilford:

Wittenberg Telephone Company serves the Ho-Chunk Nation tribal area with phone and internet service. I am writing you today to initiate conversation with your Tribal government and leaders to discuss any and all options to better serve your lands with high speed technology. Specifically, I would like to discuss your specific communications goals, needs and priorities. We offer services to you today, and would like to initiate a conversation to see if there is anything we can do to assist you with further needs.

Please contact me at your convenience:

Allen Mahnke
104 W. Walker Street
PO Box 160
Wittenberg, WI 54499
715-253-2112
mahnke@witternbergnet.net

Sincerely,

Allen Mahnke
Vice President &CEO
Wittenberg Telephone Company

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is $49.51, which includes the federal subscriber line charge ("SLC").

In all of the exchange served by the Wittenberg Telephone Company, the single-line residential local rate, including any mandatory extended area service charge, is $18.50. When the federal SLC ($6.50) and other state fees are included, the rate becomes $25.81.

Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of $49.51.

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No.: 1030 – Descriptive Document for Broadband Services Rate Comparability

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Download Speed (Mbps)	Upload Speed (Mbps)	Usage Allowance (GB)	Benchmark
10	1	100	$76.47
10	1	150	$76.97
10	1	250	$77.37
10	1	Unlimited	$77.98
25	3	250	$89.92
25	3	Unlimited	$90.53
25	5	250	$90.16
25	5	Unlimited	$90.76

Pursuant to 47 C.F.R. • 54.313 (a) (11) Wittenberg Telephone Company charges a residential rate of $59.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than $77.98 which is the 2017 reasonable comparability benchmark for the same comparable offering established by the Wireline Competition Bureau.[1]

[1] *Wireline Competition Bureau Announces Results of 2017 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes,* Public Notice, WC Docket No. 10-90, DA 17-167 (rel. Feb. 14, 2017).

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No.: 1210 Terms and Conditions of Voice Telephony Lifeline

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- **Wittenberg Telephone Company offers Lifeline Service credit according to basic service requirements listed in Wisconsin Administrative Code 160.03 and 160.04:**

PSC 160.03 Essential telecommunications services.

(1) For purposes of this subsection:
- **(a)** "911" means a service that permits a telecommunications user to use the three-digit code '911', to access emergency services through a public safety answering point operated by a local government.
- **(b)** "Directory assistance" means a service that includes making available to customers, upon request, information contained in directory listings, such as customer address and telephone number.
- **(c)** "Dual tone multi-frequency" means a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time.
- **(d)** "Emergency services" includes services, such as 911 and enhanced 911, provided by local governments or other public safety organizations.
- **(e)** "Enhanced 911" means 911 service that includes the ability to provide automatic numbering information, which enables the public safety answering point to call back if the call if disconnected, and automatic location information, which permits emergency service providers to identify the geographic location of the calling party.
- **(f)** "Interexchange service" means the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless provider, necessary to access an interexchange provider's network.
- **(g)** "Local usage" means an amount of exchange service, prescribed by the commission, provided free of charge to end users.
- **(h)** "Operator services" means any automatic or live assistance to a customer to arrange for billing or completion, or both, of a telephone call.
- **(i)** "Single-party service" means telecommunications service that permits users to have exclusive use of a landline subscriber loop or access line for each call placed, or, in the case of wireless providers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission.
- **(j)** "Voice grade access" means a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call.

(1m) Each eligible telecommunications carrier shall make all essential telecommunications services available to all of its customers.

(2) "Essential telecommunications services" means the service or functionalities listed in 47 CFR 54.101.

PSC 160.04 Call limitation.

(1) Call limitation obligations.
- **(a)** Except as provided in pars. (b) and (c), every local exchange service provider in the state shall offer call limitation capability for each of the following:
  - **1.** Long distance toll calls.

2. Pay-per-call service.
3. Collect toll calls.
4. Toll calls charged to a telephone credit card associated with the telephone number for which call limitation has been requested.
5. Toll calls charged to a third telephone number for which call limitation has been requested.

(b) Federal-only eligible telecommunications carriers are not required to offer any call limitation capabilities to customers who are not low income and need only offer blocking of outgoing toll calls to customers who are low income.

(c) A local exchange service provider is not required to offer the blocking under par. (a) 1., 3., 4., or 5., to a customer that has service that does not include a fee for such calls that is in addition to the per month or per billing cycle price of service.

(2) Charges. A local exchange service provider may not impose a charge for the cost of blocking pay-per-call services the first time a customer requests such blocking.

(3) Emergency service. A local exchange service provider may not impose a call limitation that prevents a customer from reaching the emergency service numbers appropriate for the customer's location.

(4) Public notification and education. An eligible telecommunications carrier shall make reasonable efforts to inform its customers of the availability of and, where charge-free, eligibility requirements for, call limitation services. An eligible telecommunications carrier shall also make reasonable efforts to instruct customers requesting the service in the use of the service.

- **Wittenberg Telephone Company does adhere to all Federal Lifeline eligibility rules and regulations as well as Wisconsin Administrative Code "Chapter PSC 160" which states:**

PSC 160.02 Definitions.

21) "Low-Income" means a household that meets one of the following criteria:

(a) Receives benefits from one or more of the following programs:

1. Wisconsin works.
Note: This includes all programs, including financial and employment assistance, child care subsidy, etc.
2. Medical assistance.
3. Supplemental security income.
4. Food stamps.
Note: As of April 2015, the generic term "food stamps" refers to programs currently known as Supplemental Nutrition Assistance Program (SNAP) and Food Share.
5. The low income household energy assistance program.
6. Unless the provider is a federal-only ETC, Wisconsin homestead tax credit.
7. BadgerCare Plus programs.
8. SeniorCare 1 and 2a.
9. The national school lunch program's free lunch program.
10. Temporary assistance for needy families, other than Wisconsin works.
11. As approved by the commission, other state or federally administered programs for households with income levels less than or equal to 200% of the poverty line.

(b) The customer's income, as defined in 47 CFR 54.400 (f), is at or below 135% of the federal poverty guidelines.

(c) Eligible under any other federal low-income eligibility criteria.

PSC 160.06 Eligibility for low-income programs.

(1) Low income assistance eligibility.

- **(a)** All ETCs shall verify an applicant's eligibility for low-income assistance programs by making timely queries of the applicable databases of the Wisconsin department of health services, the Wisconsin department of revenue, or other government agencies designated by the commission. An ETC shall verify an applicant's eligibility by finding the applicant to be any of the following:
  1. An active client of at least one of the programs listed in s. PSC 160.02 (21) (a).
  2. A member of the active client's household whose low income qualifies the client for benefits under at least one of the programs listed in s. PSC 160.02 (21) (a).
  3. At an income level that meets the conditions in s. PSC 160.02 (21) (b).
  4. At an income level that meets the conditions of any other federal low-income eligibility criteria.
- **(b)** Notwithstanding par. (a), an eligible telecommunications carrier shall verify an applicant as eligible for low-income assistance programs if the applicant qualifies for federal universal service fund support for eligible residents of tribal lands under 47 CFR 54.500 *et seq*.
- **(c)** If an eligible telecommunications carrier cannot verify an applicant's eligibility under par. (a) or (b), in addition to the households considered low-income under the definition in s. PSC 160.02 (21), the ETC shall consider a household that receives benefits from federal public housing assistance (section 8) to be low-income.

(2) Eligibility re-verification. An eligible telecommunications carrier shall re-verify eligibility on at least an annual basis for all customers receiving lifeline assistance. The eligible telecommunications carrier shall first attempt to re-verify eligibility by making timely queries of the applicable databases of the Wisconsin department of health services, the Wisconsin department of revenue, or other government agencies designated by the commission.

(3) Eligibility inquiry. Eligible telecommunications carriers other than federal-only ETCs shall inquire of each customer regarding eligibility of that customer for low-income programs on each order for initial or moved residential service an, orally or in writing, in the first contact with the customer during a year concerning disconnection or payment arrangements.

(4) Query authorization.

- **(a)** Customer shall complete and remit any reasonably required query authorization forms or forfeit eligibility.
- **(b)** Eligible telecommunications carriers shall obtain whatever customer authorization is required by the Wisconsin department of health services, the Wisconsin department of revenue, or other government agencies for the database queries necessary for eligibility verification. The commission may revoke the eligible telecommunications carrier designation and order the forfeiture of reimbursements if it accesses a customer's database information without that customer's authorization. The commission may also refer the eligible telecommunications carrier to the Wisconsin department of justice or other state agency for appropriate action.

(5) Applicant requirements. Notwithstanding any other provision of this section, an applicant is only eligible for low-income assistance programs under this chapter if the applicant provides all of the information required under state and federal law.

PSC 160.061 Link-up program. The commission may fund programs to identify and provide monetary assistance to low-income persons who are unlikely to be able to obtain telecommunications service without such assistance. Such programs may include customers who qualify for federal universal service fund support for eligible residents of tribal lands under 47 CFR 54.400 *et seq*.

PSC 160.062 Lifeline program.

(1) Definitions.
- **(a)** For purposes of subs. (2) to (7), "eligible telecommunications carrier" or "ETC" means only full and low-income ETCs, and does not include federal-only ETCs.
- **(b)** For purposes of this section, "line" means an access line, service to an activated wireless handset, or service to an internet connection used as a substitute for a traditional telecommunications connection.
- **(c)** For purposes of this section, "lifeline monthly rate" means the lifeline base rate under sub. (2) minus the lifeline adjustment under sub (2g) or (2r).

(1g) Applicability. An eligible telecommunications carrier may apply the lifeline adjustment under sub. (2g) to any residential service that includes voice service, including bundles of voice and data services, and bundles that includes optional calling features such as caller identification, call waiting, voice mail and three-way calling.

(1r) Eligibility.
- **(a)** All eligible telecommunications carriers shall offer to all qualified low-income customers a lifeline adjustment to the customer's rate for either of the following:
  - **1.** Essential telecommunications service, whether stand-alone or as part of a service package.
  - **2.** Internet access, if the customer demonstrates that, because of his or her disability other than cognitive impairment, certified under s. PSC 160.071 (1), the customer requires internet access that is adequate to support service that is substitutable for and comparable to essential telecommunications service.
    Note: An example under subd. 2. Is a video relay service.
- **(b)** An ETC taking an application for the lifeline programs shall do the following:
  - **1.** Unless the ETC uses a state or federal duplication prevention database, ask the applicant if he or she is currently receiving a lifeline adjustment on any other line.
  - **2.** Require the applicant to certify that he or she is not currently receiving a lifeline adjustment on any other line or from any other provider.
  - **3.** Only offer and apply the lifeline adjustment on one line.
  - **4.** Ensure that any federal requirements about lifeline are met.
- **(c)** A customer may not request a lifeline adjustment on more than one line. An ETC shall not apply the lifeline adjustment unless the customer has certified under par. (b) that the customer is not receiving a lifeline adjustment on another line or from any other provider.
- **(d)** If an ETC becomes aware that a customer is receiving a lifeline adjustment on more than one line or from more than one provider, the ETC shall provide notice and take action under sub. (4) to ensure that the customer receives a lifeline adjustment on only one line.

(2) Lifeline base rate. The lifeline base rate is one of the following:
- **(a)** For an eligible telecommunications carrier offering local service on a stand-alone basis, the sum of:

1. The in-state charges and fees for stand-alone single-party residential service with touch-tone, including, as applicable, all of the following:
   a. Police and fire protection fee.
   b. State universal service fund assessment.
   c. Remainder assessment.
   d. Telecommunications utility trade practices assessment.
2. Any 911 charges billed on the telephone bill.
3. The federal subscriber line charge.
4. The access recovery charge.
5. The charge for 120 local calls, excluding extended community calling calls.
6. Other charges as approved by the commission.

(b) $25, if the eligible telecommunications carrier does not offer local service on a stand-alone basis, and only offers it as part of a service package.

(c) The commission may authorize a different lifeline base rate based on the particular facts and circumstances concerning an eligible telecommunications carrier's local service or internet access charges.

(2g) Lifeline adjustment.

(a) Except as provided in par. (b) and sub. (2r):

1. If the lifeline base rate is $25 or less, the lifeline adjustment shall be $10.
2. If the lifeline base rate of greater than $25, the lifeline adjustment shall be the lesser of the following:
   a. The amount necessary to reduce the lifeline monthly rate to $15.
   b. The maximum reimbursement available under 47 CFR 54.403, plus $9.25.

(b) If the ETC offers prepaid wireless service, the lifeline adjustment for that service shall be the greater of the following:

1. The number of minutes that, when calculated using the lowest per minute rate the ETC offers to its prepaid wireless customers, equals or exceeds the value of the adjustment under par. (a) that would otherwise apply.
2. The number of minutes recognized by the federal communications commission as an acceptable compliance plan provision for that provider.

(c) The adjustment under par (a) 1. Shall be increased automatically if both of the following occur:

1. A federal communications commission order or a change in federal law causes an increase in a customer's lifeline base rate.
2. The state reimbursement amount after the increased lifeline adjustment is not greater than it was before the federal communications commission order or change in federal law.

(d) Notwithstanding subs. (2g) and (2r), the lifeline adjustment for partial months of service shall follow the policy set by the federal universal service administration corporation or its successors.

(2r) Adjustments for residents of tribal lands.

(a) When a customer qualifies for federal universal service fund support for eligible residents of tribal lands under 47 CFR 54.400 *et seq.*:

1. If the lifeline base rate under sub. (2) is $25 or less, the lifeline adjustment shall be $10, plus whatever federal universal service fund support the customer qualifies for as an eligible resident of tribal lands.

2. If the lifeline base rate under sub. (2) is greater than $25, the lifeline adjustment shall be the amount necessary to reduce the lifeline monthly rate to the level at which the adjustment results in a state reimbursement amount that is equal to what it would be under sub. (2g) (a) 2., plus whatever federal universal service fund support the customer qualifies for as an eligible resident of tribal lands.

(b) The adjustment under par. (a) 1. Shall be increased automatically if both of the following occur:

1. A federal communications commission order or a change in federal law causes an increase in a customer's lifeline base rate.

2. The state reimbursement amount after the increased adjustment is not greater than it was before the federal communications commission order or change in federal law.

PSC 160.063 Outreach for low-income assistance programs.

(1) Funding may be available to fund projects to increase participation of the eligible populations in the universal service fund low-income support programs.

(2) Funding from the universal service fund for projects under sub. (1) may not exceed $250,000 in one year. Funding shall be limited to not more than 6 projects with at least one project focused statewide and one project focused on the Milwaukee area, if feasible.

(3) The commission may periodically review applications and grant funding, when funding is available, based on complete responses to a request for applications. An application may involve disbursement of support during multiple state fiscal years. All applications become public documents upon filing.

(3m) An application for funding under sub. (1) shall include all of the following:

(a) A description of the proposed project.

(b) The name and a description of any project partners and the role of each partner.

(c) A description of the proposed activities and an explanation of how those activities may increase participation of eligible populations in the universal service fund low-income support programs.

(d) A budget showing a breakdown of costs and how a grant under this section would be used.

(e) Any other information that the commission considers necessary.

(4) The commission may authorize funding to conduct or contract for an evaluation of the effectiveness of this program in promoting enrollment in low-income programs and subscribership to telecommunications service. The evaluation shall be completed within 2 years of the date on which the commission grans the project funding. The cost of this evaluation shall not exceed $25,000. The 425,000 shall be included as part of the $250,000 maximum total funding available under this section during the year in which the evaluation occurs.

PSC 160.08 Telecommunications customer assistance program.

The commission may authorize individual telecommunications providers to establish telecommunications customer assistance programs that meet authorized goals and objectives for increasing or stabilizing subscription levels for non-optional, essential telephone service within its service territory or to address avoidance of disconnection or limitation of service to low-income households with payment problems. The customer assistance programs may allow a provider to not make available certain essential services, as defined in s. PSC 160.03(2), in order to keep at least

minimal telephone service to certain low-income households with payment problems. The commission shall determine on a case-by-case basis whether or not a telecommunications customer assistance program may receive universal service fund monies.

- **Wittenberg Telephone Company's Lifeline service offerings are listed in their Local Service Tariff Section 4, sheet 4-8, (attached).**

- **The Lifeline subscribers must meet the terms and conditions of Federal Lifeline Eligibility Rules.**

LIFELINE SERVICE

A. DESCRIPTION

1. Lifeline Service is a residence service offering that provides a discounted monthly rate to customers who qualify for low income assistance programs as defined in s. PSC 160.02(8), Wis Adm. Code.

2. Lifeline Service provides a monthly discount to eligible residence customers that have a network access line (including Extended Area Service), touch-tone service, 911 Service (billed on the customer's telephone bill), and the End User Common Line Charge (EUCL), or through another qualifying service type. If the customer has measured service, 120 local calls are provided. Extended Community Calling (ECC) Service is not included in Lifeline Service. (T)

3. Lifeline Service monthly rates for residence customers are established according to s. PSC 160.062(1), (2) and (3), Wis Adm. Code.

B. REGULATIONS

1. Lifeline Service is only available for residence Customers with a single line Network Access Line, or other qualifying service type, in the same household from a single provider. (T)

2. Lifeline Service is not available to customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the customer is more than 60 years old, or in accordance with rules established by the FCC. (T)

3. Lifeline Service customers must complete and remit any required query authorization forms requested by the Company or forfeit eligibility for Lifeline Service.

LIFELINE SERVICE (Cont'd)

B. REGULATIONS (Cont'd)

4. Eligibility for Lifeline Service must be verified by the Company by finding the Social Security Number and name of the listed Customer in active records of the Department of Workforce Development or the Wisconsin Department of Revenue.

5. Reconfirmation of Eligibility for Lifeline Service

a. Reconfirmation of eligibility for Lifeline Service will be done at least once each year, and in accordance with rules established by the FCC. (T)

b. If a Customer cannot reconfirm eligibility for Lifeline Service, eligibility will continue until the next bill date following failure to meet the eligibility requirements.

c. When the Low Income Household Energy Assistance Program is one of the Customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next December following the close of the heating season. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the Customers bill.

d. When the Wisconsin Homestead Tax Credit is one of the Customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next June following the end of the tax year. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the Customers bill.

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

B. REGULATIONS (Cont'd)

6. Lifeline Service will appear as a credit or rate reduction on the Customer's bill on the next bill date following the date the Customer applied for Lifeline Service. When the Customer's eligibility precedes the previous bill, credit will also be given on one month's prior bill. (D)

(D)

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

B. REGULATIONS (Cont'd)

7. A Lifeline Service Customer cannot be disconnected for the non-payment of toll charges. (T)

8. If Call Blocking Service is available and the Customer has elected Call Blocking Service, a Service Deposit cannot be collected to establish Lifeline Service. If Call Blocking Service is not available, the Company may require a Service Deposit to establish Lifeline Service. (T)

LIFELINE SERVICE (Cont'd)

C. RATES AND CHARGES

The applicable monthly rate for Lifeline Service is determined by the sum of the rates for the services specified in 1, following and applying a credit based on the sum of the credits as specified in 2, following.

1. Lifeline Service

Residence Network Access Line (including EAS) at the rate specified elsewhere in this tariff, or other qualifying service specified under rules established by the FCC (T)

Touch Calling Service (if applicable) at the rate specified elsewhere in this tariff.

911 Service (if billed on the Customer's telephone number).

End User Common Line (EUCL) Charge.

2. Lifeline Service Credits

End User Common Line (EUCL) Charge as specified in the NECA Tariff.

Federal Lifeline support credit as specified by the Federal Communications Commission (FCC) for Universal Service Support for Low-Income Consumers.

State Lifeline support credit as specified by the Public Service Commission of Wisconsin in Wis. Admin. Code PSC 160.062.

3. Lifeline Service Monthly Credit

The Lifeline Service monthly credit is calculated and applied consistent with Wis. Admin. Code PSC 160.062 (I)

SAC: 330973
State: Wisconsin
Wittenberg Telephone Company
Form 481 Line No.: 3010 Milestone Certification

Wittenberg Telephone Company hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/I Mbps upstream.

REDACTED:

Wittenberg Telephone Company

Financial Data 2016 - 2015