REDACTED - FOR PUBLIC INSPECTION

8517 Excelsior Drive
Suite 301
Madison, WI 53717

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www.kiesling.com

June 27, 2016

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

Re: WC Docket No. 14-58
2016 ETC Annual Report of Grafton Telephone Company (SAC 341020)

Dear Ms. Dortch:

On behalf of **Grafton Telephone Company**, Kiesling Associates LLP files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. [1] **Grafton Telephone Company** seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.[2] The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, an attached letter requests confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).[3]

Please direct any questions about this filing to the undersigned at 608-664-9110 or rabrams@kiesling.com.

Sincerely,

KIESLING ASSOCIATES LLP

Robert R Abrams

Robert R. Abrams
Senior Telecommunications Consultant

cc: **Ms. Rolando, Illinois Commerce Commission**

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[1] 47 C.F.R. §§ 54.313, 54.422.

[2] *Connect America Fund et al.,* WC Docket No. 10-90 *et al.,* Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

[3] 47 C.F.R. *§§* 0.457, 0.459, 54.313(a)(1).

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Federal Communications Commission
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Washington, DC 20554

Re: WC Docket 14-58
2016 ETC Annual Report of Grafton Telephone Company (SAC 341020)
Request for Confidentiality

Dear Ms. Dortch:

On behalf of **Grafton Telephone Company** (the "Company"), Kiesling associates LLP hereby requests withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement, pursuant to Sections 0.457 and 0.459 of the Commission's rules,[1]. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).[2]

1. The information for which the Company is seeking confidential treatment is the attachment at Line 112 of the Company's annual reporting information in FCC Form 481, pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").[3]

2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2016 Report.[4]

3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan, as provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

[1] 47 C.F.R. §§ 0.457, 0.459.
[2] 47 C.F.R. § 0.459(b)(1) through (9).
[3] 47 C.F.R. §§ 54.313, 54.422.
[4] 47 C.F.R. §§ 54.313(a)(1).

In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."[5] The Company is a rate-of-return carrier filing its five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to existing and potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Previous versions of this information are not publicly available.

8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.

9. Not applicable.

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[5] *See Connect America Fund et al.*, WC Docket 10-90 *et al*., Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para. 9 *citing* Section 54.202(a) (1) (ii).

Based on the preceding, Kiesling respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned at 608-664-9110 or rabrams@kiesling.com with questions regarding this request.

Sincerely,

KIESLING ASSOCIATES LLP

Robert R Abrams

Robert R. Abrams
Senior Telecommunications Consultant

cc: **Ms. Rolando, Illinois Commerce Commission**

FCC Form 481 - Carrier Annual Reporting Data Collection Form

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Leigh Sickinger
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	lsickinger@gtec.net
	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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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.

341020il112.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.	Yes

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

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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

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(300) Unfulfilled Service Request
Data Collection Form

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net
<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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	341020il510.pdf

(600) Functionality in Emergency Situations Data Collection Form

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	341020il610.pdf

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(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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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 --					

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(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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<810>	Reporting Carrier	Grafon Telephone Company
<811>	Holding Company	Grafton Communications, Inc.
<812>	Operating Company	Grafon Telephone Company

<813>

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

-- See attached worksheet --

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(900) Tribal Lands Reporting
Data Collection Form

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

341020il1210.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
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

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)

(2000) Price Cap Carrier Additional Documentation (Continued)
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?

<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)

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(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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

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	341020il3010.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	341020il3026.pdf

REDACTED – FOR PUBLIC INSPECTION

GRAFTON TELEPHONE COMPANY (SAC 341020)

ATTACHMENT - LINE 3026 and
FINANCIAL SUMMARY INFORMATION – LINES 3027 - 3034

REDACTED IN ENTIRETY

(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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

4005 Rural Broadband Experiment

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

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)
Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

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

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

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

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

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

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

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

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

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

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

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

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) Kiesling Associates LLP **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: Kiesling Associates LLP

Name of Reporting Carrier: GRAFTON TEL CO

Signature of Authorized Officer: CERTIFIED ONLINE Date: 06/24/2016

Printed name of Authorized Officer: Leigh Sickinger

Title or position of Authorized Officer: Vice President

Telephone number of Authorized Officer: 6187863400 ext.

Study Area Code of Reporting Carrier: 341020 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.

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: GRAFTON TEL CO

Name of Authorized Agent Firm: Kiesling Associates LLP

Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/24/2016

Name of Authorized Agent Employee: Kiesling Associates LLP

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

Telephone number of Authorized Agent or Employee of Agent: 6086649110 ext.243

Study Area Code of Reporting Carrier: 341020 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.

Attachments

REDACTED - FOR PUBLIC INSPECTION

(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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<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**
IL	Grafton		FR	9.05	12.45	0.0	0.0	21.5

(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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<711>

<a1> State	<a2> Exchange (ILEC)	<b1> Residential Rate	<b2> State Regulated Fees	<c> Total Rates and Fees	<d1> Broadband Service - Download Speed (Mbps)	<d2> Broadband Service -Upload Speed (Mbps)	<d3> Usage Allowance (GB)	<d4> Usage Allowance Action Taken When Limit Reached {select}
IL	Grafton	49.95	0.0	49.95	5.0	1.0	999999	Other, Other; No Data Caps
IL	Grafton	64.95	0.0	64.95	10.0	1.0	999999	Other, Other; No Data Caps

REDACTED - FOR PUBLIC INSPECTION

(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	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<810>	Reporting Carrier	Grafon Telephone Company
<811>	Holding Company	Grafton Communications, Inc.
<812>	Operating Company	Grafon Telephone Company

<813>	<a1>	<a2>	<a3>
	Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
	Grafton Technologies, Inc.		Grafton Technologies, Ins. - GTi
	Grafton Long Distance		Grafton Long Distance

REDACTED – FOR PUBLIC INSPECTION

GRAFTON TELEPHONE COMPANY (SAC 341020)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ITS ENTIRETY

FCC Form 481 – Line 510 Service Quality Standards & Consumer Protection Compliance

SAC: **341020**
State: **IL**
Name: **Grafton Telephone Company**
Submission: **7/1/2016**

47 CFR §54.313(a)(5) requires an ETC to certify that it complies with applicable service quality standards and consumer protection rules.

Grafton Telephone Company complies with applicable service quality standards for local exchange telecommunications carriers in Title 83 the Illinois Administrative Code *(ILGA §730, Subpart E)* which includes adequacy of service, answer time, service interruptions, outages and notifications.

Grafton Telephone Company complies with consumer protection requirements including those found in federal Customer Proprietary Network Information *(CPNI; WC Docket No. 04-36)*, and those of the Title 83 the Illinois Administrative Code *(ILGA §732)*, covering local exchange service obligations, payment and billing practices, procedures for timely reimbursement of customer credits, customer education programs, and *(ILGA §755)*meeting state requirements regarding telecommunications access for persons with disabilities.

Grafton Telephone Company certifies it has complied with these requirements and will continue to comply with these requirements.

REDACTED - FOR PUBLIC INSPECTION

State of Illinois
Illinois Commerce Commission
Service Quality for Telecommunications Carriers
Code Part 730.115
Quarterly Filing

Grafton Telephone Company
for quarter ending December 31, 2015

Performance Data	October	November	December	Quarterly Average
A. Operator Answering Time - Toll and Assistance [730.510(a)(1)]	3.00	3.70	3.95	3.55
B. Operator Answer Time - Information [730.510(a)(1)]	5.56	6.73	7.25	6.51
C. Repair Office Answer Time [730.510(b)(1)]	4.00	4.00	5.20	4.40
D. Business or Customer Service Answer Time [730.510(b)(1)]	4.00	4.00	5.20	4.40
E. Percent of Service Installations [730.540(a)]	100.00%	100.00%	100.00%	100.00%
F. Percent of Out of Service Lines Repaired in < 30 Hours [730.535(a)]	100.00%	100.00%	100.00%	100.00%
G. Trouble Reports per 100 Access Lines [730.545(a)]	1.27	1.02	2.56	1.62
H. Percent Repeat Trouble Reports [730.545(c)]	0.00%	0.00%	0.00%	0.00%
I. Percent of Installation Trouble Reports [730.545(f)]	0.00%	0.00%	0.00%	0.00%
J. Missed Repair Appointments [730.545(h)]	0	0	0	0
K. Missed Installation Appointments [730.540(d)]	0	0	0	0

Comments

State of Illinois
Illinois Commerce Commission
Service Quality for Telecommunications Carriers
Code Part 730.115
Quarterly Filing

Grafton Telephone Company
for quarter ending December 31, 2015

REDACTED - FOR PUBLIC INSPECTION

State of Illinois
Illinois Commerce Commission
Customer Credits for Telecommunications Carriers
Code Part 732.30
Quarterly Filing

Grafton Telephone Company
for quarter ending December 31, 2015

Out of Service More Than 30 Hours	October	November	December	Totals
A. Total dollar amount of all customer credits paid	$0.00	$0.00	$0.00	$0.00
B. Number of credits issued for repairs - 30 - 48 hours	0	0	0	0
C. Number of credits issued for repairs - 48 - 72 hours	0	0	0	0
D. Number of credits issued for repairs - 72 - 96 hours	0	0	0	0
E. Number of credits issued for repairs - 96 - 120 hours	0	0	0	0
F. Number of credits issued for repairs > 120 hours	0	0	0	0
G. Number of exemptions claimed for each of the categories identified in Section 732.30(e)	0	0	0	0
H. Number of customers receiving alternate phone service rather than receiving a credit	0	0	0	0

Failure to Install Basic Local Exchange Service	October	November	December	Totals
A. Total dollar amount of all customer credits paid	$0.00	$0.00	$0.00	$0.00
B. Number of installations after 5 business days	0	0	0	0
C. Number of installations after 10 business days	0	0	0	0
D. Number of installations after 11 business days	0	0	0	0
E. Number of exemptions claimed for each of the categories identified in Section 732.30(e)	0	0	0	0
F. Number of customers receiving alternate phone service rather than receiving a credit	0	0	0	0

Missed Appointments	October	November	December	Totals
A. Total dollar amount of all customer credits paid	$0.00	$0.00	$0.00	$0.00
B. Number of customers receiving credits	0	0	0	0
C. Number of exemptions claimed for each of the categories identified in Section 732.30(e)	0	0	0	0

Comments

FCC Form 481 – Line 610 Ability To Remain Functional In An Emergency Situation

SAC: **341020**
State: **IL**
Name: **Grafton Telephone Company**
Submission: **7/1/2016**

47 CFR §54.313(a)(6) requires an ETC to certify that it is able to function in emergency situation as set forth in 47 CFR §54.202 (a)(2).

Grafton Telephone Company complies with relevant sections for wireless ETCs in Title 83 the Illinois Administrative Code *(ILGA §730, Subpart C)* requiring it to make provisions to meet emergencies resulting from failures of commercial or power service, sudden and prolonged increases in traffic, illness of personnel, fire, storm, or other natural disasters. The company informs employees as to procedures to be followed in the event of emergency in order to prevent or minimize interruption or impairment of telecommunications service, and maintains an adequate number of hours of reserve battery power.

Central Office batteries are maintained in accordance with Institute of Electrical and Electronic Engineers (IEEE) standards as adopted in Section 730.340, and generators are tested each week.

Designated employees are informed 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.

Grafton Telephone Company certifies it has complied with, and will continue to comply with applicable requirements regarding its ability to remain functional in an emergency situation as set forth in 47 CFR §54.202 (a)(2).

341020il610.pdf

AC POWER OUTAGES

1. Contact Power Company at Ameren CIPS
2. If outage is during after hours contact: Ameren
3. Fixed Generator is located 119 East Main Street & 1250 Grafton Hill Drive
4. Portable Generator is located at 19942 Powerline Road (M. Arnold)
5. Follow 911 Outage Procedure

EMERGENCY COORDINATING CENTER (ECC)

GENERAL RESPONSIBILITIES:

In the event of a major emergency or disaster, the established "Outage Restoral Procedures" will be followed:

OUTAGE RESTORAL PROCEDURE

1. Contact the Dispatch Center at 618-786-3311 or After Hours 618-786-2300

   a. The Dispatch Center will follow their procedures in notifying the Dispatch Supervisor, I & R Supervisor, Central Office Supervisor, Central Office Technician and Network Reliability

2. Contact 911 Coordinators –

   a. Jersey County 911 – 618-498-5571
   b. Jersey County Sheriff – 618-498-6881
   c. QEM Fire Department – 618-786-3300
   d. Jerseyville Police Department – 618-498-2131

3. Contact Home Telephone Company (618-644-2111), Alhambra & Grantfork Telephone Company (618-488-2165), Madison Telephone Company (618-635-3214), if needed.

4. Contact Switch Vendor: Genband –1-866-436-2263 –
   Express Routing Code: 1036; Support Access ID 3898315

Dispatch for all possible personnel and equipment needed. It is better to have too much equipment and personnel on site than to require additional support later, which could lengthen the duration of the outage.

FCC Form 481 – Line 1210 Lifeline Service Terms & Conditions

SAC: **341020**
State: **IL**
Name: **Grafton Telephone Company**
Submission: **7/1/2016**

Grafton Telephone Company offers Lifeline service to qualifying subscribers.

- Qualifying residential subscribers receive a monthly Lifeline credit of $9.25 (via the federal Low Income program), against the regular unlimited monthly service rate. This benefit is limited to one per qualifying household unit, and for service received from a single provider.

- Number of Local Minutes/Calls Provided: Unlimited local calling.

- Additional Charges for Toll Calls: Toll calls and services for Lifeline subscribers are available and are billed at toll carriers' standard rates.

- No monthly or non-recurring charges for toll blocking features for qualified Lifeline subscribers.

- Federal program eligibility for Lifeline service must be confirmed before the credit is issued. All subscribers must be recertified at least once each year.

Lifeline eligibility requires that income be no higher than 135% of the federal Poverty Guideline level, and/or participation in at one of the following programs, verified at least once each year:

- Supplemental Security Income (SSI)
- Supplemental Nutritional Assistance Programs (SNAP) – Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (FPHA)/Section 8
- National School Lunch – Free Lunch Program
- Head Start (if income eligibility criteria are met)

The Company's Lifeline brochure and Illinois Universal Telephone Assistance Programs (UTSAP) tariff with Terms and Conditions for these programs are attached.

Grafton Lifeline Brochure

Do you need Local Phone Service, but can't afford it?

You may be eligible for greatly reduced local phone line installation and a credit each month to lower the cost of your local phone service.

The Link-Up and Lifeline programs provide these benefits to eligible individuals and families.

You're eligible for the Link-Up and Lifeline programs if you participate in any of the following programs:

- Medicaid
- Food Stamps
- Temporary Assistance to Needy Families (TANF)
- Low Income Home Energy Assistance (LIHEAP)
- Supplemental Security Income (SSI)
- Free National School Lunch Program
- Federal Public Housing

To determine your eligibility for Link-Up and Lifeline and to enroll in these programs,

Grafton Telephone Company
119 E. Main St.
Grafton, IL 62037
(618)786-3311

All others: Call your local telephone company

Lifeline Link-Up

UNIVERSAL TELEPHONE ASSISTANCE PROGRAMS

These programs are supported by voluntary contributions. Contributions can be made through monthly donations of between 50 cents and $5 on local phone bills or by sending contributions to UTAC, P.O. Box 1176, Springfield, IL 62705.

Contributions are deductible on income taxes to the extent allowed by law.

A Message from the Universal Telephone Assistance Corporation
P.O. Box 1176, Springfield, Illinois 62705

Grafton UTSAP/Lifeline Tariff Page

TELEPHONE ASSISTANCE PROGRAMS

15. Telephone Assistance Programs (Cont'd.)

15.2 Universal Telephone Service Assistance Program (UTSAP) (T)

A. General (T)

1. A one-time credit of up to $20.00, not to exceed 50% of the total connection charge, will be applied to the telephone installation charge for each eligible subscriber or eligible new subscriber, as defined in B.2 below. (I) (C) (C)

2. To qualify for the program, the applicant must participate in any of the following assistance programs, as required , to establish eligibility. The Illinois Department of Human Services will certify the applicant's participation in assistance programs (a) and (b) below for purposes of determining eligibility: (T)

   a. Medicaid
   b. Supplemental Nutrition Assistance Program (SNAP) – formerly Food Stamps (T)
   c. Supplemental Security Income (SSI)
   d. Federal Housing Assistance Program
   e. Low Income Home Energy Assistance (LIHEAP)
   f. National School Lunch Program's free lunch program
   g. Temporary Assistance to Needy Families (TANF)

3. The Telephone Company's verification form signed by the applicant or verification through the Department of Human Services shall constitute proof of income eligibility. (C)

4. Assistance shall be granted to one access line per low income household. (T)

5. The UTSAP Program is funded through voluntary contributions from Illinois customers as described in 15.3 following. (T)

LIFELINE SERVICES

Customer's with Lifeline Service have unlimited local calling and have access to all long distance company's interexchange carriers) calling plans.

RECEIVED
SEP 24 2013
CHIEF CLERK'S OFFICE
Illinois Commerce Commission

FCC Form 481 – Line 3010 – Milestone Certification, 47 CFR §54.313(f)(1)(i)

SAC: **341020**
State: **IL**
Name: **Grafton Telephone Company**

Grafton Telephone Company hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, 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/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

REDACTED – FOR PUBLIC INSPECTION

GRAFTON TELEPHONE COMPANY (SAC 341020)

ATTACHMENT - LINE 3026 and
FINANCIAL SUMMARY INFORMATION – LINES 3027 - 3034

REDACTED IN ENTIRETY