

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

June 27, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**
WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information – Subject to Protective Order Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Central Texas Telephone Cooperative (the Cooperative), Study Area Code 442052 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Cooperative's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's

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March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Central Texas Telephone Cooperative maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

Five-Year Service Quality Improvement Plan Progress Report

Pursuant to Section 0.459 of the Commission’s rules and Exemption 4 of FOIA, Central Texas Telephone Cooperative requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative maintains as confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with Section 0.459 of the Commission’s rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Cooperative’s access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Cooperative’s access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a

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map of the Cooperative's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Cooperative does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

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- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Cooperative's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Central Texas Telephone Cooperative seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Central Texas Telephone Cooperative is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

¹ *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 (rel. Mar. 22, 2016).

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Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,



Eric Votaw, Senior Manager for
Moss Adams LLP

EV/ch

Enclosures

cc: Jamey Wigley, Central Texas Telephone Cooperative

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

FCC Form 481

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

July 2013

REDACTED FOR PUBLIC INSPECTION

<010> Study Area Code	442052
<015> Study Area Name	CENTRAL TEXAS CO-OP
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Eric N. Votaw
<035> Contact Telephone Number: Number of the person identified in data line <030>	2099556116 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	eric.votaw@mossadams.com
Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

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

<010> Study Area Code 442052
 <015> Study Area Name CENTRAL TEXAS CO-OP
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Eric N. Votaw
 <035> Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mossadams.com

<110> Has your company received its ETC certification from the FCC?
 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)

<111> (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.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	Yes
<114> Report how much universal service (USF) support was received	Yes
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

**(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 442052

<015> Study Area Name CENTRAL TEXAS CO-OP

<020> Program Year 2017

<030> Contact Name - Person USAC should contact regarding this data Eric N. Votaw

<035> Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mossadams.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice) _____
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband) _____
Name of Attached Document

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(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	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.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	

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(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	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.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	442052TX510.pdf

(600) Functionality in Emergency Situations
Data Collection Form

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

REDACTED FOR PUBLIC INSPECTION

<010> Study Area Code	442052
<015> Study Area Name	CENTRAL TEXAS CO-OP
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	442052TX610.pdf

(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	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

<1000>	Voice services rate comparability certification	Yes	
<1010>	Attach detailed description for voice services rate comparability compliance		442052TX1010.pdf
<1020>	Broadband comparability certification		<p style="text-align: center;">Name of Attached Document</p> <p>Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau</p>
<1030>	Attach detailed description for broadband comparability compliance		442052TX1030.pdf
			<p style="text-align: center;">Name of Attached Document</p>

**(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	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Yotaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.yotaw@mossadams.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

<010>	Study Area Code	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Eric N. Votaw 2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<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 442052
 <015> Study Area Name CENTRAL TEXAS CO-OP
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Eric N. Votaw
 <035> Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> eri.c.votaw@mossadams.com

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

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support [Redacted]
- <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 [Redacted]

<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. [Redacted]

<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. [Redacted]

<2024A> Round 2 Recipient of Incremental Support? [Redacted]

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

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

<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- [Redacted]

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

Name of Attached Document Listing Required Information [Redacted]

Name of Attached Document Listing Required Information [Redacted]

(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.

<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)

<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)

REDACTED FOR PUBLIC INSPECTION

[Redacted]

[Redacted]

[Redacted]

Name of Attached Document Listing Required Information

[Redacted]

Name of Attached Document Listing Required Information

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

<010>	Study Area Code	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

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

(3012A) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii)) No - No New Community Anchors

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

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

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

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or
 (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

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

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.
 If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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

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

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

<010> Study Area Code 442052
 <015> Study Area Name CENTRAL TEXAS CO-OP
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data ERIC N. Votaw
 <035> Contact Telephone Number - Number of person identified in data line <030> 209956116 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mosadams.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

<010>	Study Area Code	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
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<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

4005 Rural Broadband Experiment

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

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

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

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

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

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

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

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

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

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

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

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
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<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442052
<015>	Study Area Name	CENTRAL TEXAS CO-OP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.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	
<p>I certify that (Name of Agent) <u>Moss Adams, LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent: <u>Moss Adams, LLP</u>	
Name of Reporting Carrier: <u>CENTRAL TEXAS CO-OP</u>	
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: <u>442052</u>	Filing Due Date for this form: <u>07/01/2016</u>
<p style="font-size: small;">Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</p>	

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	
<p>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.</p>	
Name of Reporting Carrier: <u>CENTRAL TEXAS CO-OP</u>	
Name of Authorized Agent Firm: <u>Moss Adams, LLP</u>	
Signature of Authorized Agent or Employee of Agent:	Date: <u>06/23/2016</u>
Name of Authorized Agent Employee: <u>Eric N. Votaw</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Senior Manager</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>2099556116 ext.</u>	
Study Area Code of Reporting Carrier: <u>442052</u>	Filing Due Date for this form: <u>07/01/2016</u>
<p style="font-size: small;">Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</p>	

Attachments

REDACTED FOR PUBLIC INSPECTION

LINE 112 – Five Year Service Quality Improvement Progress Report

REDACTED FOR PUBLIC INSPECTION

Response Line 510
Central Texas Telephone Cooperative
Study Area 442052

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Central Texas Telephone Cooperative, Inc. (“CTTC”) is in compliance with appropriate Texas CTP Quarterly Filings, FCC Service Quality Standards and Consumer Protection Rules. CTTC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. CTTC also conducts subscriber outreach regarding CPNI by periodically placing CPNI explanation messages into subscriber’s bills. In addition CTTC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) ILEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on CPNI rules on an annual basis. In addition ILEC has placed on its website at <http://www.centex.net/> its network practices and policies regarding Internet services.

ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers (“ISP”). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA’s website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
Central Texas Telephone Cooperative
Study Area 442052

Functionality in Emergency Situations:

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Central Texas Telephone Cooperative, Inc. ("CTTC") meets the requirements to remain functional in emergency situations and has the following capabilities; Back-up power is provided to CTTC central offices by use of fixed generators and batteries that provide it with 8 hours of emergency power. In addition, CTTC field electronics have 8 hours of back-up power by use of generators and batteries. CTTC also has SONET, DWDM, and MPLS technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. Lastly, CTTC is prepared and capable of managing traffic spikes resulting from emergency situations.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Central Texas Telephone Cooperative, Inc. ("CTTC") meets the requirements to remain functional in emergency situations and has the following capabilities; Back-up power is provided to CTTC central by use of fixed generators and batteries that provide it with 8 hours of emergency power. In addition, CTTC field electronics have 8 hours of back-up power by use of generators and batteries. CTTC also has SONET, DWDM, and MPLS technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. Lastly, CTTC is prepared and capable of managing traffic spikes resulting from emergency situations.

Response to Line 1000
Central Texas Cooperative
Study Area 442052

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Central Texas Telephone Cooperative (“CTTC”) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. CTTC’s current total local end-user rate¹ of \$16.59 (which includes a local fee of \$16.00 and mandated state fees of .59) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”

Response to Line 1030
Central Texas Telephone Cooperative
Study Area 442052

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (1) Central Texas Telephone Cooperative charges a residential rate of \$69.95 as of April 1, 2015 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

¹ *Wireline Competition Bureau Announces Results of 2015 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 15-470 (rel. April 16, 2015).

General Exchange Tariff

LOCAL EXCHANGE ACCESS SERVICE TARIFFS

IV. LIFELINE SERVICE

A. General

1. Lifeline Service is a retail local service offering sponsored by the FCC and available to qualifying low-income consumers.
2. Consumers qualifying for Lifeline Service are offered the services or functionalities enumerated in 47 Code of Federal Regulations §54.101(a)(1)-(8) (relating to Supported Services for Rural, Insular and High Cost Areas).
3. The Cooperative shall offer toll restriction at no charge to all qualifying low-income consumers at the time such consumers subscribe to Lifeline Service. If the consumer elects to receive toll restriction, that service shall become part of the consumer's Lifeline Service.
4. A customer otherwise eligible to receive the Lifeline Service shall not be prohibited from obtaining and using telecommunication equipment and services designed to aid such customer in utilizing qualifying telecommunication services.
5. Lifeline Service rate reductions apply only to basic network service and do not apply to non-basic services, such as long distance service, which may or may not be tariffed. Customers may obtain such services, including bundled services where available, at their discretion, although the Lifeline Service reduction will apply only to the basic service charge of the bundled service.
6. The Lifeline Service rate reductions do not apply to service connection charges. D
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7. Lifeline Service will not be available on a retroactive basis unless directed by the Low Income Discount Administrator (LIDA) or the Commission. D
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8. The Cooperative shall waive monthly number portability charges, subject to its tariff, for Lifeline customers. T

FOR PUBLIC UTILITY COMMISSION USE ONLY

Effective: April 2, 2012
Issued By: Jamey Wigley
Title: General Manager

PENDING

MGR: JL AA: pjf
Date Filed: 04/05/2012
Tariff Control#: 40225

General Exchange Tariff

LOCAL EXCHANGE ACCESS SERVICE TARIFFS

IV. LIFELINE SERVICE (Continued)

B. Eligibility Requirements

1. The discounted service will be provided for one (1) residential telephone line per household, at the subscriber's principal place of residence.

2. The applicant establishes eligibility by certifying that their annual household income is at or below 150% of the federal poverty guideline, by being an eligible resident of Tribal lands, or being a participant or having a person or child residing in the customer household who participates in one of the following programs:

- Medicaid
- Food Stamps (Supplemental Nutrition Assistance Program)
- Low-income Home Energy Assistance Programs (HEAP)
- Supplemental Security Income (SSI)
- Federal public housing assistance
- State Child Health Plan
- National School Lunch Program's Free Lunch Program
- Temporary Assistance for Needy Families

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3. Procedures for Establishing Lifeline Discounts

(a) Consumers within the Cooperative's service area identified as eligible for Lifeline Service by LIDA through the automatic enrollment process under Commission Substantive Rule 26.412, shall be provided Lifeline Service discounts unless the Cooperative receives a customer request to be excluded from such discounts. Consumers who are eligible for Lifeline Service but do not have telephone service at the time the LIDA provides its eligibility list to the Cooperative are responsible for contacting the Cooperative and initiating a request for service from the Cooperative.

(b) The LIDA shall provide the Cooperative with a monthly list of consumers eligible for Lifeline Service.

FOR PUBLIC UTILITY COMMISSION USE ONLY

Effective: June 1, 2012
Issued By: Jamey Wigley
Title: General Manager

PENDING

MGR: JL AA: pjf
Date Filed: 04/05/2012
Tariff Control#: 40225

General Exchange Tariff

LOCAL EXCHANGE ACCESS SERVICE TARIFFS

IV. LIFELINE SERVICE (Continued)

B. Eligibility Requirements (Continued)

3. Procedures for Establishing Lifeline Discounts (Continued)

- (c) Consumers who do not participate in one of the designated programs but who meet income qualifications by having an annual household income at or below 150% of the federal poverty guidelines, may establish eligibility for Lifeline Service by contacting the LIDA.
- (d) The discontinuance of the Tel-Assistance program effective September 1, 2001 allows the Cooperative to move Tel-Assistance customers to Lifeline Service. The Cooperative has no exchanges where a customer's local service rate under Tel-Assistance is a greater benefit, therefore, customers will be grandfathered at Lifeline rates. Rates will apply until the customer's service is discontinued or the customer is determined ineligible under this Section.

4. Provision of Service

- (a) The Cooperative shall provide Lifeline Service to all eligible consumers identified by the LIDA within its service area if the consumer is a customer of the Cooperative. The Cooperative shall begin reduced billing for those eligible low-income consumers subscribing to qualifying services.
- (b) If the eligible consumer changes the telephone service to qualifying services or initiates new qualifying service, the Cooperative shall begin reduced billing at the time the change of service becomes effective or at the time the new service is established.

PUBLIC UTILITY COMMISSION OF TEXAS
APPROVED

NOV - 2 '07 DOCKET 34867

CONTROL # _____

FOR PUBLIC UTILITY COMMISSION USE ONLY

Effective: Upon Approval
Issued By: Jamey Wigley
Title: General Manager

CENTRAL TEXAS
TELEPHONE COOPERATIVE, INC.

SECTION 17
THIRD REVISED SHEET NO. 12
REPLACING SECOND REVISED SHEET NO. 12

General Exchange Tariff

LOCAL EXCHANGE ACCESS SERVICE TARIFFS

- IV. LIFELINE SERVICE (Continued)
 - B. Eligibility Requirements (Continued)
 - 4. Provision of Service (Continued)
 - (c) The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.
 - (d) The Cooperative has provided a confidentiality agreement to the LIDA specifying the use of confidential client information is solely for providing Lifeline Service.
 - C. Deposits
 - 1. The deposit requirements will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Restriction Service.
 - D. Lifeline Service Discounts
 - 1. Eligible consumers who subscribe to Lifeline Service will receive the following discounts:
 - (a) Federal Reduction in accordance with 47 C.F.R. Section 54.403 applied to the monthly Federal Subscriber Line Charge (SLC) and Residential Local Exchange Access Line Rate.
 - (b) Maximum State Reduction of \$3.50 applied to the monthly Residential Local Exchange Access Line Rate.

FOR PUBLIC UTILITY COMMISSION USE ONLY

Effective: April 2, 2012
Issued By: Jamey Wigley
Title: General Manager

PENDING
MGR: JL AA: pjf
Date Filed: 04/05/2012
Tariff Control#: 40225

CENTRAL TEXAS
TELEPHONE COOPERATIVE, INC.

SECTION 17
SECOND REVISED SHEET NO. 13
REPLACING FIRST REVISED SHEET NO. 13

General Exchange Tariff

LOCAL EXCHANGE ACCESS SERVICE TARIFFS

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E. Service Charges

1. Service charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
2. Service charges apply when:
 - (a) At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.
 - (b) A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangements, which preclude Lifeline Service eligibility.

FOR PUBLIC UTILITY COMMISSION USE ONLY

Effective: April 2, 2012
Issued By: Jamey Wigley
Title: General Manager

PENDING

MGR: JL AA: pjf
Date Filed: 04/05/2012
Tariff Control#: 40225

CENTRAL TEXAS
TELEPHONE COOPERATIVE, INC.

SECTION 17
FIRST REVISED SHEET NO. 14
REPLACING ORIGINAL SHEET NO. 14

General Exchange Tariff

LOCAL EXCHANGE ACCESS SERVICE TARIFFS

IV. LIFELINE SERVICE (Continued)

E. Service Charges (Continued)

2. Service Charges Apply When: (Continued)

(c) New residential applicants (those without existing local exchange access service) eligible for the Lifeline Program will be subject to applicable service charges.

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3. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges.

D
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F. Payments and Disconnection of Service

1. The Cooperative may not disconnect Lifeline Service for nonpayment of toll charges.

2. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Cooperative's customers.

FOR PUBLIC UTILITY COMMISSION

Effective: April 2, 2012
Issued By: Jamey Wigley
Title: General Manager

PENDING

MGR: JL AA: pjf
Date Filed: 04/05/2012
Tariff Control#: 40225

Response to Line3010
Central Texas Telephone Cooperative
Study Area 442052

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Central Texas Telephone Cooperative (“CTTC”) provides this certification that it is taking reasonable steps to provide upon reasonable request broadband 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 offerings in urban areas as determined in an annual survey as specified in Public Notice DA 16-362, and that requests for such service are met within a reasonable amount of time. Details for how CTTC is meeting its obligations for meeting its goals and required obligations are specified within the FCC Form 481 annual filing.

REDACTED FOR PUBLIC INSPECTION

LINE 3017– RUS Annual Report

REDACTED FOR PUBLIC INSPECTION