INLAND TELEPHONE COMPANY - SAC 472423 ID
ATTACHMENTS TO THE FCC FORM 481

LINE 510 - COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES

(472423 ID 510 SERVICE QUALITY AND CPNI CERTIFICATION.pdf)
(472423 ID 510 ITC CPNI PROCEDURES.pdf)

Service Quality Standards and Consumer Protection Rules Certification §54.313(a)(5)

Any recipient of high-cost support shall provide the following: Certification that it is complying with applicable service quality standards and consumer protection rules.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company")(SAC 472423), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

Inland has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission"), codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended. On this basis, the Company certifies to the Commission, pursuant to 47 C.F.R. § 64.2009(e), that the Company's operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009. Inland is also complying with the applicable service quality standards of the Commission and the Idaho Public Utilities Commission.

The Company further certifies that it publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2017 at Roslyn, Washington.

By: _____
James K. Brooks
Treasurer/Controller
Inland Telephone Company

LINE 510

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
MARCH 1, 2017

The following statement explains how the operating procedures of Inland Telephone Company ("Inland" or "Company") ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U (§§ 64.2001-64.2011) and is relevant to calendar year 2016. Except as otherwise indicated, the following applies with respect to the Commission's rules in effect both before and after the December 8, 2007 effective date of the Commission's April 2, 2007 Report and Order in CC Docket No. 96-115. *See* FCC 07-22 (rel. Apr. 2, 2007); Public Notice, DA 07-4915 (rel. Dec. 6, 2007). This statement covers calendar year 2016.

I. Use of customer proprietary network information without customer approval.

A. Inland may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Inland, without customer approval.

B. Inland may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the subscriber does not already subscribe from Inland, unless Inland has customer approval to do so, except as described in Section I.C.

(1) Inland may use, disclose or permit access to CPNI derived from their provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and information services, such as call answering, voice mail or messaging, voice storage and retrieval services, and fax storage and retrieval services.

(2) Inland may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto. The Company does not sell CPNI to any third-party for any purpose.

C. Inland may use, disclose, or permit access to CPNI, without customer approval, as follows:

(1) Inland may use, disclose, or permit access to CPNI, in its provision of inside wire installation, maintenance, and repair services.

(2) Inland may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory

assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

D. Inland may use, disclose, or permit access to CPNI to protect Inland's rights or property; to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Inland's services; and to render, provision, bill or collect for services.

Inland provides local exchange telephone service and access to long distance service providers in six exchanges in the states of Idaho and Washington. Inland's operating procedures comply with the above requirements and include, but are not limited to, the provisions described below. The Company does not engage in any outbound telemarketing. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Under Company policy, none of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

Moreover, the Company does not use any CPNI for any inbound marketing of services that are not within a category of service (i.e., local and interexchange) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted without prior customer approval with respect to the Company's affiliates. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, and pursuant to Commission-mandated carrier change procedures, the Company does not provide CPNI to any third-party for any purpose.

The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI without customer approval as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Sections 222(c) and (d) of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission.

Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than: pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or in accordance with the authentication and other requirement described at Section IV below and in the FCC's rules, as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as Social Security Number, driver's license number, mother's maiden name, user name or password, as appropriate or otherwise required).

II. Approval required for use of customer proprietary network information.

A. Inland may obtain customer approval through written, oral or electronic methods.

(1) Inland does not seek or obtain oral approval, and therefore does not bear the burden of demonstrating that such approval has been given in compliance with the FCC's rules.

(2) A customer's approval or disapproval obtained by Inland to use, disclose, or permit access to the customer's CPNI, the use of CPNI outside of the customer's total service relationship with Inland must remain in effect until the customer revokes or limits such approval or disapproval.

(3) Inland must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes.

(1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), Inland only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules and, by December 8, 2007, with the Commission's amended rules. Inland's process is described in Section II.A above.

(2) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, Inland may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the foregoing policies to ensure the FCC's rules are complied with.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

(1) Prior to any solicitation for customer approval, Inland must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

(2) Inland must maintain records of notification, whether oral, written or electronic, for at least one year.

B. Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit Inland to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and Inland has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, Inland may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

(6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

(7) Inland may state in the notification that the customer's approval to use CPNI may enhance Inland's ability to offer products and services tailored to the customer's needs. Inland also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) Inland may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from Inland is valid until the customer affirmatively revokes or limits such approval or denial.

(10) Inland's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

Inland must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The

contents of any such notification must comply with the requirements of paragraph C of this section.

(1) Inland must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Inland may, in its discretion, provide for a longer period. Inland must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and

(ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(2) Insofar as Inland is using the opt-out mechanism, it must provide a Notice to its customers every two years.

(3) If Inland uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) Inland must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;

(ii) Inland must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

(iii) Opt-out e-mail notices that are returned to Inland as undeliverable must be sent to the customer in another form before Inland may consider the customer to have received notice;

(iv) Inland must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and

(v) Inland must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Inland may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

Inland may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

F. Notice Requirements Specific to One-Time Use of CPNI.

(1) Inland may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether Inland uses opt-out or opt-in approval based on the nature of the contact.

(2) The contents of any such notification must comply with the requirements of paragraph C of this section, except that Inland may omit any of the following notice provisions if not relevant to the limited use for which Inland seeks CPNI:

(i) Inland need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;

(ii) Inland need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;

(iii) Inland need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Inland explains to customers that the scope of the approval Inland seeks is limited to one-time use; and

(iv) Inland may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Inland clearly communicates that the customer can deny access to his CPNI for the call.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the foregoing policies to ensure the FCC's rules are complied with.

IV. Safeguards required for use and disclosure of customer proprietary network information.

A. Inland must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Inland's policies and procedures are detailed in Section II above.

B. Effective December 8, 2007, Inland may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are complied with and (1) the customer provides Inland with a pre-established password, (2) Inland, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty (30) days, or (3) when Inland calls the telephone number of record to disclose the call detail information. Inland is permitted to create a back-up customer authentication method for lost or forgotten passwords. Inland is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from Inland personnel all of the call detail information necessary to

address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then Inland personnel are permitted to proceed with its routine customer care procedures.

C. Not later than June 8, 2008, Inland must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account through a password.

D. Effective December 8, 2007, Inland is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.

E. Business customers are exempt from the password requirements which became effective December 8, 2007, if: the customer is contractually bound to Inland, is serviced by a dedicated Inland account representative as the primary contact, and within the contract Inland is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.

F. Inland trains its personnel as to when they are and are not authorized to use CPNI, and Inland must have an express disciplinary process in place.

G. Inland must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Inland shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Inland shall retain the record for a minimum of one year.

H. Inland must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

I. Effective December 8, 2007, Inland must take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. Inland must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit.

Inland must take measures to protect CPNI stored in its internal databases from potential unauthorized access, and evaluate and increase its security measures should it discover an increase in attempts to gain access to unauthorized information.

J. Inland must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include Inland's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if Inland offers other methods by which consumers may opt-out.

K. Effective December 8, 2007, Inland has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.

(1) Inland must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.

(2) Inland is prohibited from notifying customers or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) Inland identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. Inland must notify the affected customer(s) after the applicable period.

(3) Inland must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

Inland's operating procedures comply with all of the above requirements, including those that became effective December 8, 2007. With respect to online authentication in particular, Inland implemented measures to ensure compliance by the applicable June 8, 2008 deadline. As previously discussed, the Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the relevant aforementioned policies to ensure the FCC's rules are complied with. Inland notes in particular that:

- ***Company personnel are trained as to when they are and are not authorized to use CPNI, and that an express process is in place such that violations of these procedures may result in disciplinary action, up to and including termination of employment.***

- ***Inland does not provide customers' with online access to their CPNI at this time.***

- ***With respect to business customers subject to Section IV.E above, Inland requires them to provide the names of all that are authorized to have access to the account and at what authorization level (e.g. to make service changes, request additional services,***

billing inquiries) and further requires that a 6 to 10-place alphanumeric password be established.

- ***Operating procedures have been implemented to comply with the remaining requirements described above and applicable to Inland's use, disclosure of and third party access to CPNI.***

V. Supplemental Information

Effective December 8, 2007, the FCC's rules require that the annual certification filed pursuant to 47 C.F.R. § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. Inland is not aware of any consumer complaints regarding the unauthorized release of CPNI and has not taken action against any data brokers.

As of January 3, 2017, telecommunications carriers no longer are subject to the specific recordkeeping and annual CPNI compliance certification requirements contained in Sections 64.2009(c) and (e) of the Commission's rules however, the Inland maintains these procedures.

LINE 610 - FUNCTIONALITY IN EMERGENCY SITUATIONS

(472423 ID 610 FINCTIONAL IN EMERGENCIES CERTIFICATION.pdf)

Ability to Remain Functional in Emergencies Certification
§54.313(a)(6)

ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company")(SAC 472423), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies that it maintained the ability to function in emergency situations under the standard found in [ID] Commission Order No. 29841 and in 47 C.F.R. §54.202(a)(2), as such standards relate to functionality of wireline carriers in emergency situations. The Company further certifies that it maintains back-up power to ensure functionality without an external power source in the forms of auxiliary generators and batteries in its central offices as well as adequate battery back-up in its subscriber carrier cabinets. The Company's switching capability is more than adequate to manage the traffic of its subscribers.

For calls within the exchange of Leon, depending upon where a cut is made, there exists redundant toll routing however, the other exchange has no redundant toll routing. In both exchanges, customers can continue to make calls within the exchange should the interexchange interconnected facilities get disconnected. The Company does not have ring technology at this time however; the Company is always looking for redundant routing alternatives.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2017 at Roslyn, Washington.

By: _____
James K. Brooks
Treasurer/Controller
Inland Telephone Company

LINE 920 - TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

(472423 ID 920 TRIBAL ENGAGEMENT STATEMENT.pdf)
(472423 ID 920 EAGLE RIVER-TRIBAL EXAMPLE.pdf)

TRIBAL ENGAGEMENT STATEMENT

Although the Lenore exchange service area of Inland Telephone Company, Study Area Code 472423, is within the conventional boundaries of the Nez Perce Tribe reservation, the exchange primarily consists of private property (non-tribal owned). The Company did not perform a needs assessment, deployment planning, feasibility, or sustainability planning with a focus on Tribal community anchor institutions since the Company does not serve the areas in which the Nez Perce have their tribal headquarters, administration, enterprises, cultural center, hatchery, or any anchor institutions.

As for subscribers, the Company would not know if a subscriber was a tribal member unless they were claiming Tribal Lifeline. Inland Telephone Company is an equal opportunity provider and does not ask or keep track of race, creed, color or sexual orientation when providing service; to keep track of this information may be considered profiling which the Company does not engage in.

The Company fully cooperates with the Nez Perce Tribe in matters involving easements, rights of way and any build that may require the possible disturbance of tribal ground; potential archeological study whether the ground is tribally owned or not.

Attached is a copy of correspondence from a contractor, Eagle River Development LLC, contracted by the Company to perform a study compliant to the National Environmental Policy Act for a proposed tower site. The study demonstrates that although the proposed tower site is not on tribal owned property, the Company seeks Section 106 concurrence from the Nez Perce Tribe as it is located within the traditional boundaries of the Nez Perce Reservation.

EAGLE RIVER
DEVELOPMENT LLC
GENERAL & ENVIRONMENTAL CONTRACTORS
P.O. Box 3474, Spokane, WA 99220
N. 420 Lake Rd. Spokane Valley, WA 99212
P: 509-535-3064 F: 509-535-2181
WSCL: EAGLERD990BS

Inland Telephone Company New 185' Lattice Antenna Tower: Lenore, ID

Mr. Bob Hillweg
Inland Telephone Company
P.O. Box 171
Roslyn, WA 98941

RE: Proposed New-Build 185' Lattice Antenna Tower Site: Lenore, ID: NEPA Checklist Summary Report Site Location: NW 1/4 Section 32, Township 37 North, Range 01 West B.M., Nez Perce County, ID.
Eagle River Development, LLC Project: 1511E

Dear Mr. Hillweg:

Eagle River Development, LLC at Inland Telephone Company request prepared a NEPA Checklist and Summary Report, Archaeological/Cultural Resource Field Survey, THPO/SHPO Archive Research, THPO Concurrence Letter and Tribal Notifications including FCC Form 620 submission package for the proposed 185' lattice antenna tower and property owned by Inland Telephone Company located approximately 4 miles southeast of Lenore, Idaho within the Nez Perce Indian Reservation in the NW ¼ of Section 32, Township 37 North, Range 01 West, B.M. Nez Perce County, Idaho.

The National Environmental Policy Act (NEPA) Checklist and Reviews (report attached) did not reveal Section 106 adverse effects for the project pertaining to direct and visual effects for the undertaking. Even though no direct or visual effects on cultural resources for the subject site and property the Nez Perce THPO (Keith Baird) has delayed Section 106 concurrence due to some perceived misunderstandings between the ownership of this site and ongoing difficulties regarding some of Inland Cellular LLC holdings in the area. All other items for the attached NEPA report did not reveal significant effects or impacts to the environment under the FCC regulations, *47 CFR 1.1307-1.1319*. Preliminary FCC TOWAIR Analysis determination results obtained from the FCC website indicated that the tower may not require registration, although overlying Section 106 considerations may make registration of the tower a prudent action. It is your firm's obligation to attain an FAA Determination Letter for the tower even though it appears to be more than 5 miles from an airport.

An Archaeological and Cultural Resource Field Survey and Report as well as archival research did not reveal any new cultural sites on the tower site or within a 0.5-1.0 mile radius. A THPO letter with results of our findings with FCC Form 620 and the Archaeological Report was emailed the THPO on 4/21/16. Other Tribal notifications and comments have either been covered or eliminated from comments through the National Programmatic Agreement Regulations.

It is the opinion of Eagle River Development, LLC that this property should receive concurrence to allow for construction pending any delays being promulgated by the Nez Perce THPO. We caution Inland Telephone Company from initiating any construction activities on the site until concurrence from the Nez Perce THPO is received and all other County/Local permits that may be required are received. We are submitting this report and invoice prior to such concurrence at the request of Mr. Bob Hillweg.

Respectfully,

John F. Wark, RPG
Principal Environmental Geologist
Attachments: Invoice, Email of Report, 2 hard copies of nepa checklist summary report & disc w/nepa report.

© Eagle River Development, LLC

LINE 1010 - VOICE SERVICE RATE COMPARABILITY COMPLIANCE

(472423 ID 1010 VOICE SERVICES COMPARABILITY CERTIFICATION.pdf)

Voice Services Rate Comparability Certification and Residential Lines §54.313(a)(10)

Any recipient of high-cost support shall provide the following: A certification that the pricing of the company's voice services is not more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau, Wireless Telecommunications Bureau, and Office of Engineering and Technology.

PUBLIC NOTICE DA 17-167 - ETCs that are ILEC recipients of high-cost support must report the number of residential service lines for which the sum of the rate and state fees are below $22.49 as of June 1, 2017. In addition, each ETC, including competitive ETCs, must certify that the pricing of its basic residential voice services is no more than $49.51.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 472423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(a)(10), that the Company's pricing of its voice services is no more than $49.51.

The Company further submits the following residential service lines and rates; excluding the Federal Subscriber Line Charge of $6.50, that are below $22.49:

Exchange	Rate Type	Count	Base Res. Rate	State SLC	State USF Fee	Mand. EAS Charge	Total Per Res.
LENORE (836)	Res-Measured	6	18.00	0	.12	0	18.12
LEON (224)	Res-Measured	2	18.00	0	.12	0	18.12

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2017 at Roslyn, Washington.

By: _____

James K. Brooks
Treasurer/Controller
Inland Telephone Company

LINE 1010

LINE 1030 - BROADBAND COMPARABILITY COMPLIANCE

(472423 ID 1030 BROADBAND SERVICES COMPARABILITY CERTIFICATION.pdf)

Broadband Services Rate Comparability Certification
§54.313(a)(12)

Any recipient of high-cost support shall provide the following: A certification that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark to be announced annually in a public notice issued by the Wireline Competition Bureau, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 472423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

The Company offers at least one broadband service plan that meets the relevant metrics in all of its exchanges; pricing benchmark for the minimum speed standard of 10 Mbps downstream and 1 Mbps upstream. The Company's rate for a 10 Mbps downstream and 1 Mbps upstream service is $75.00. On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(a)(12), its compliance.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2017 at Roslyn, Washington.

By: _____
James K. Brooks
Treasurer/Controller
Inland Telephone Company

LINE 1030

LINE 1210 - TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

(472423 ID 1210 INLAND LIFELINE APPLICATION.pdf)
(472423 ID 1210 FCC FORM 555.pdf)

LIFELINE ASSISTANCE

From Inland Telephone Company

Do you qualify for discounted monthly telephone service?

Lifeline Discounts

Inland Telephone Company (d/*b/a* Inland Networks) customers may be eligible to currently save $9.25 per month through the Federal Lifeline Program and, for Idaho residents, an additional $2.50 per month through the Idaho Telecommunications Service Assistance Program (ITSAP), administered through the Community Action Partnership Association of Idaho (CAPAI).

Qualifying for Federal Lifeline

Customers may qualify for Federal Lifeline assistance if they are currently participating in one or more of the following assistance programs:

- Medicaid
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's Free Lunch Program

Additionally, customers may qualify for Federal Lifeline if their total household income is at or below 135% of the Federal Poverty Guideline.

Customers who are also residents of federally recognized Tribal Lands may qualify for additional Federal Lifeline support of up to $25 per month and may qualify for Lifeline under the assistance programs listed above or if they currently participate in one or more of the following assistance programs:

- Bureau of Indian Affairs General Assistance
- Tribally Administered Temporary Assistance for Needy Families (TTANF)
- Head Start (must satisfy income qualifying standard)
- Food Distribution Program on Indian Reservations (FDPIR)

Signing-Up for Lifeline Service

If you believe that you may qualify for Federal assistance, you must complete an application that can be obtained from a Customer Service Representative at 1-800-462-4578.

For State assistance, Inland Telephone Company still asks that you complete an application however, qualifying for State assistance must be done through the applicable State agency; CAPAI for Idaho residents.

Additional Information

For additional information about the Federal Lifeline program, please visit www.usac.org/li .

Important Information

Lifeline assistance is a government assistance program that provides only eligible consumers with discounted service that is non-transferable and is available for ***only one discount per household***. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals living at the same address that share income and expenses. The Lifeline assistance is only available in areas where the company has Eligible Telecommunications Carrier status. The Federal Communications Commission has mandated that all recipients of Federal Lifeline certify their eligibility annually.

INLAND TELEPHONE COMPANY
103 S. 2ND Street
P.O. Box 171
Roslyn, WA 98941

(509) 649-2211; (800) 462-4578
Fax: (509) 649-2555
Email: custserv@inlandnet.com

CERTIFICATION BY CUSTOMER IN ORDER TO RECEIVE FEDERAL LIFELINE SUPPORT

Please respond completely. **Inaccurate or incomplete responses may cause your application to be rejected**. Information provided should be that of the **account holder**.

Customer Name: _____ **Telephone Number:** _____

Service Address: _____ **City:** _____ **State:** _____

Billing Address: _____ **City:** _____ **State:** _____

Last 4 Digits of Social Security Number: _____ **Date of Birth:** _____

If I qualify for Federal Lifeline Support, I would like the Lifeline Support to be applied to my (Please select one):

☐ Telephone Service ☐ Internet Service (Must suscribe to at least a 10/1 service level)

INCOME ELIGIBILITY (DOCUMENTATION REQUIRED)

☐ I certify that my household income is at or below 135% of the federal poverty guidelines and therefore I qualify for Lifeline Support under the federal income requirements and have provided proof of my qualifications.

PLEASE CHECK the corresponding box for the number of household members.

☐	1	$16,038	☐	5	$38,394
☐	2	$21,627	☐	6	$43,983
☐	3	$27,216	☐	7	$49,586
☐	4	$32,805	☐	8	$55,202
		For each additional household member add	☐	#	$5,616

# of Additional: _____

NOTE: THE ABOVE AMOUNTS ARE 2016 FEDERAL POVERTY LEVELS; SUBJECT TO CHANGE ANNUALLY.

FEDERAL PROGRAM ELIGIBILITY (DOCUMENTATION REQUIRED)

I certify that I qualify for Lifeline Support and am currently participating in one or more of the programs listed that I have checked below and am providing a copy of my benefit or program participation card or award letter. (**Please check all applicable boxes**)

☐ Supplemental Nutrition Assistance Program (SNAP)(f/k/a Food Stamps)
☐ Medicaid
☐ Federal Public Housing Assistance (FPHA)
☐ Veterans Pension and Survivors Benefit
☐ Supplemental Security Income (SSI)

TRIBAL LIFELINE ELIGIBILITY (DOCUMENTATION REQUIRED)

I certify that I qualify for tribal Lifeline Support, as I reside on land that meets the Bureau of Indian Affairs definition of "reservation" (any federally recognized Indian tribe's reservation, Pueblo, or Colony including former reservations in Oklahoma, Alaska Native regions, Hawaiian Home Lands and Indian Allotments) **AND** participate in one or more of the programs listed that I have checked below and am providing a copy of my benefit or program participation card or award letter. (**Please check all applicable boxes**)

☐ Supplemental Nutrition Assistance Program (SNAP)(f/k/a Food Stamps)
☐ Tribal Administered Temporary Assistance for Needy Families (TTANF)
☐ Federal Public Housing Assistance (FPHA)
☐ Bureau of Indian Affairs General Assistance
☐ Supplemental Security Income (SSI)
☐ Head Start (Income eligible)
☐ Medicaid
☐ Food Distribution Program on Indian Reservations (FDPIR)
☐ Veterans Pension and Survivors Benefit
☐ Income Eligibility (See above **Income Eligibility**)

Tribal Identification Number: _____

SUBSCRIBER CERTIFICATION

It is understood that by participating in the Lifeline program, the support that I receive is not actual payment to me but a discount on my monthly billed service. Participating in Lifeline does not protect me from collection procedures if I do not pay my telephone or Internet bill. I fully understand that this discount, as well as the criteria for participation in the Lifeline Program, may change and I may no longer qualify, or the amount of support may increase or decrease.

INLAND TELEPHONE COMPANY
103 S. 2ND Street
P.O. Box 171
Roslyn, WA 98941

(509) 649-2211; (800) 462-4578
Fax: (509) 649-2555
Email: custserv@inlandnet.com

As the Certifying Subscriber, I certify that, (i) the service is for me and not a member of the household; (ii) I am not listed as a dependent on someone else's tax return; and, (iii) the service address is my primary residence. I further certify that the service that I receive from Inland Telephone Company is my main service line and neither I nor anyone in my household receives Lifeline Support for any other telecommunications service. Further, I understand that Lifeline is a federal benefit program that provides a monthly discount on either home or mobile service and **ONLY ONE** Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline Support from multiple telecommunications providers. I understand that violation of the one-per-household requirement will result in de-enrollment from the program and possible fines and imprisonment. As the Certifying Subscriber claiming income eligibility, I certify that the documentation I have provided accurately represents: (i) my household income and the number of persons in my household; or, (ii) proof of participation in an eligible program.

I certify that I will notify Inland Telephone Company within 30 days,(i) if for any reason I should no longer participate in any of the eligible programs or qualify by income, and or (ii) if I move from the address provided on this form. If my address listed above is temporary, I certify that I will verify my address to Inland Telephone Company every 90 days. I understand that if I fail to respond to an attempt to verify my address within 30 days, my Lifeline support may be terminated. I understand that if I fail to give notice as required, I am subject to penalties, including de-enrollment, being barred from the program and fines and imprisonment.

I understand that Lifeline Support is not transferrable and that I may not transfer my service to any individual, including another eligible Lifeline Support recipient. I further understand that if my service goes unused for 60 days, my service will be suspended subject to a 30 day period in which I may use the service or contact Inland Telephone Company to confirm that I want to continue receiving the service.

Further, I fully understand that in order to continue to receive this support, I must annually, or more often, certify my eligibility and provide proof of eligibility. I understand that my failure to timely re-certify will result in de-enrollment and termination of my Lifeline benefits.

I fully understand that the Lifeline Program is administered by the Universal Service Administration Company (USAC) under the guidance and authority of the Federal Communications Commission (FCC)and that all of the information that I have supplied pertaining to my eligibility will be shared with USAC and the FCC and I give my consent to do so.

I certify that the information provided on this form is true and correct to the best of my knowledge under penalty of perjury and if I have provded any misleading statements in order to receive support, I will be liable for any support received, my service may be discontinued, it may result in de-enrollment and my being barred from the program and I would be subject to state and federal fines and imprisonment.

SIGNATURE OF APPLICANT _____ DATE _____

APPLICANT (PRINTED) _____

Inland Telephone Company will keep the information contained in this form confidential, except as required by federal or state law. ALL INFORMATION COMPLETED ON THIS FORM IS SUBJECT TO STATE AND FEDERAL PERJURY PENALTIES.

INLAND TELEPHONE COMPANY
103 S. 2ND Street
P.O. Box 171
Roslyn, WA 98941

(509) 649-2211; (800) 462-4578
Fax: (509) 649-2555
Email: custserv@inlandnet.com

LIFELINE HOUSEHOLD WORKSHEET

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). **Household expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income includes** salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else may currently receive a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

1) Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check NO if you do not have a spouse or partner)

☐ YES ☐ NO

> If you checked **YES**, you may not sign up for Lifeline because someone in your household already receives Lifeline. **Only ONE** Lifeline discount is allowed per household.

> If you checked **NO**, please answer question #2.

2) Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

A.	A parent	☐ YES	☐ NO
B.	An adult son or daughter	☐ YES	☐ NO
C.	Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc..)	☐ YES	☐ NO
D.	An adult roommate	☐ YES	☐ NO
E.	Other _____	☐ YES	☐ NO

> If you checked **NO** for each statement above, you do not need to answer the remaining questions. **Please initial line B**, below, and sign and date the worksheet.

> If you checked **YES**, please answer question #3.

3) Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?

☐ YES ☐ NO

> If you checked **NO**, then your address includes **more than one household**. **Please initial lines A and B below**, and sign and date the worksheet.

> If you checked **YES**, then your address includes **only one household**. You **may not** sign up for Lifeline because someone in your household already receives Lifeline.

CERTIFICATION

Please initial the certification below and sign and date this worksheet which must accompany your Lifeline application.

A. _____ *I certify that I live at an address occupied by multiple households.*

B. _____ *I understand that violation of the* ***one-per-household*** *requirement is against the Federal Communications Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States Government.*

SIGNATURE OF APPLICANT _____ DATE _____

APPLICANT (PRINTED) _____

INLAND TELEPHONE COMPANY
103 S. 2ND Street
P.O. Box 171
Roslyn, WA 98941

(509) 649-2211; (800) 462-4578
Fax: (509) 649-2555
Email: custserv@inlandnet.com

ACCEPTABLE DOCUMENTATION REQUIRED FOR LIFELINE INCOME ELIGIBILITY

When requesting Lifeline based on income eligibility (i.e., the consumer's household income is **at or below 135%** of the Federal Poverty Guidelines), the consumer must provide documentation of income eligibility at the time of enrollment. Any one of the following documents is acceptable to be used to verify income eligibility for Lifeline:

- **The prior year's Federal Tax Return; or**
- **The prior year's State Tax Return; or**
- **The prior year's Tribal Tax Return; or**
- **Three consecutive months' worth of income statements from an employer or paycheck stubs within the current calendar year; or**
- **Divorce Decree documenting income; or**
- **Child Support Document documenting income; or**
- **Social Security Statement of Benefits; or**
- **Veterans Administration Statement of Benefits; or**
- **An Unemployment/Worker's Compensation Statement of Benefits; or**
- **Federal or Tribal Notice Letter of Participation in General Assistance.**

If the consumer presents documentation of income that does not cover a full year, such as current pay stubs, the consumer must present three consecutive months' worth of the same types of document within the calendar year.

FCC Form 555
May 2016

OMB Approval
3060-0819

Annual Lifeline Eligible Telecommunications Carrier Certification Form
All carriers must complete all or portions of all sections
Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

472423	143002527
Study Area Code (SAC)	Service Provider Identification Number (SPIN)

*(An Eligible Telecommunications Carrier (ETC) must provide a certification form for **each SAC** through which it provides Lifeline service).*

2016	ID	Inland Telephone Company
Recertification Year	State	ETC Name
Inland Networks		Western Elite Incorporated Services
DBA, Marketing, or Other Branding Name *(If same as ETC name, list "N/A" Do not leave blank)*		Holding Company Name *(If same as ETC name, list "N/A" Do not leave blank)*

Does the reporting company have affiliated ETCs? Yes ☑ No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
522423	Inland Telephone Company

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: **Initial Certification** *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or

B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial _____

Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A – B – C – D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year *(February data month)*	**Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers**	**Number of subscribers claimed on the February FCC Form 497 that were initially enrolled in the current Form 555 calendar year** *(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)*	**Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC**	**Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year**
1	0	0	0	1

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	**Number of subscribers responding to ETC contact**	**Number of non-responding subscribers**	**Number of subscribers responding that they are no longer eligible** *(This should be a subset of Block G.)*	**Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt**
1	1	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	**Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC**
0	0

Note: *If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.*

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

AND/OR

B) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on:
USAC NLAD.

(List database or name of administrator here)

Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

OR

C) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

M = (F+K)	N = (J+L)	O = ((N ÷ M) * 100)
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC ***(This should equal the number reported in Block E)***	**Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility**	**Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response**
1	0	0

Section 4: ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements? Yes ☐ No ☑

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	
Total Subscribers	

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Signature of Officer

James K. Brooks, Treasurer
Printed Name and Title of Officer

jbrooks@inlandnet.com
Email Address of Officer

February 1, 2017
Date

James K. Brooks
Person Completing This Certification Form

(509) 649-2211
Contact Phone Number

LINE 3010B - CERTIFICATE OF PUBLIC INTEREST {47 CFR § 54.313(f)(1)(i)}

(472423 ID 3010B BROADBAND MILESTONE CERTIFICATION.pdf)

Broadband Milestone Certification
§54.313(f)(1)(i)

Rate-of-Return ETCs are required to provide certain certifications and other details related to their broadband obligations.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 472423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(f)(1)(i), that it has taken reasonable steps to provide upon reasonable request, broadband service at actual speeds of 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 reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

The Company currently offers a maximum speed of 10 Mbps downstream/1 Mbps upstream in its Leon and Lenore exchanges, however, the Company cannot achieve this speed to all subscribers within the Lenore exchange. The Company has taken further steps for achieving a standard of 25 Mbps downstream/3 Mbps upstream. It has established a Gigabit Ethernet connection at the central office to the Internet backbone and has purchased some of the equipment for the subscriber plant upgrade.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2017 at Roslyn, Washington.

By: _____
James K. Brooks
Treasurer/Controller
Inland Telephone Company

LINE 3010B

LINE 3017 - RUS ANNUAL REPORT AND ALL REQUIRED DOCUMENTATION

(472423 ID 3017 INLAND RUS OPERATING STATEMENT.pdf)

.ccording to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid ›MB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, earching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER NAME: Inland Telephone Company (Prepared with Audited Data)

NSTRUCTIONS-Submit report to RUS within 30 days after close of the period. 'or detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING: December, 2016

BORROWER DESIGNATION: WA0534

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII

(Check one of the following)

[X] All of the obligations under the RUS loan documents have been fulfilled in all material respects.

[ ] There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Gregory Maras — 3/31/2017 (DATE)

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
:URRENT ASSETS			**CURRENT LIABILITIES**		
1. Cash and Equivalents	282,161	391,052	25. Accounts Payable	250,669	260,605
2. Cash-RUS Construction Fund	344,772	707,373	26. Notes Payable	0	0
3. Affiliates:			27. Advance Billings and Payments	0	0
a. Telecom, Accounts Receivable	0	0	28. Customer Deposits	2,416	2,640
b. Other Accounts Receivable	0	0	29. Current Mat. L/T Debt	663,400	1,132,800
c. Notes Receivable	0	0	30. Current Mat. L/T Debt-Rur. Dev.	0	0
4. Non-Affiliates:			31. Current Mat.-Capital Leases	0	0
a. Telecom, Accounts Receivable	621,477	376,357	32. Income Taxes Accrued	0	20
b. Other Accounts Receivable	0	0	33. Other Taxes Accrued	86,445	83,701
c. Notes Receivable	0	0	34. Other Current Liabilities	504,041	519,318
5. Interest and Dividends Receivable	0	0	**35. Total Current Liabilities (25 thru 34)**	1,506,971	1,999,084
6. Material-Regulated	242,749	270,709	**LONG-TERM DEBT**		
7. Material-Nonregulated	0	0	36. Funded Debt-RUS Notes	112,070	51,428
8. Prepayments	77,094	88,993	37. Funded Debt-RTB Notes	22,721	51
9. Other Current Assets	0	0	38. Funded Debt-FFB Notes	8,947,295	14,380,555
0. Total Current Assets (1 Thru 9)	1,568,253	1,834,484	39. Funded Debt-Other	(3,535)	(3,715)
IONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan	0	0
1. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt	0	0
a. Rural Development	484,080	808,606	42. Reacquired Debt	0	0
b. Nonrural Development	0	0	43. Obligations Under Capital Lease	0	0
2. Other Investments			44. Adv. From Affiliated Companies	0	0
a. Rural Development	0	0	45. Other Long-Term Debt	0	0
b. Nonrural Development	217,985	236,241	**46. Total Long-Term Debt (36 thru 45)**	9,078,551	14,428,319
3. Nonregulated Investments	1,550,828	2,071,788	**OTHER LIAB. & DEF. CREDITS**		
4. Other Noncurrent Assets	250	250	47. Other Long-Term Liabilities	0	0
5. Deferred Charges	0	0	48. Other Deferred Credits	1,011,744	1,304,210
6. Jurisdictional Differences	0	0	49. Other Jurisdictional Differences	0	0
7. Total Noncurrent Assets (11 thru 16)	2,253,143	3,116,885	50. Total Other Liabilities and Deferred Credits (47 thru 49)	1,011,744	1,304,210
'LANT, PROPERTY, AND EQUIPMENT			**EQUITY**		
8. Telecom, Plant-in-Service	27,040,232	37,510,983	51. Cap. Stock Outstand. & Subscribed	93,150	93,150
9. Property Held for Future Use	629,899	312,104	52. Additional Paid-in-Capital	7,175	7,175
0. Plant Under Construction	5,115,939	380,098	53. Treasury Stock	0	0
1. Plant Adj., Nonop. Plant & Goodwill	0	0	54. Membership and Cap. Certificates	0	0
2. Less Accumulated Depreciation	18,905,314	18,990,699	55. Other Capital	0	0
3. Net Plant (18 thru 21 less 22)	13,880,756	19,212,486	56. Patronage Capital Credits	0	0
4. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	6,004,561	6,331,917
			58. Total Equity (51 thru 57)	6,104,886	6,432,242
	17,702,152	24,163,855	**59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)**	17,702,152	24,163,855

Total Equity = 26.62% % of Total Assets

USDA-RUS **OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS**	BORROWER DESIGNATION WA0534
INSTRUCTIONS- See RUS Bulletin 1744-2	PERIOD ENDING December, 2016

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues	684,380	706,702
2. Network Access Services Revenues	4,170,260	4,791,978
3. Long Distance Network Services Revenues	(449)	510
4. Carrier Billing and Collection Revenues	49,928	46,965
5. Miscellaneous Revenues	36,574	42,002
6. Uncollectible Revenues	157	2,437
7. Net Operating Revenues (1 thru 5 less 6)	4,940,536	5,585,720
8. Plant Specific Operations Expense	1,592,338	1,453,646
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	471,850	446,603
10. Depreciation Expense	1,294,047	1,312,366
11. Amortization Expense	182	182
12. Customer Operations Expense	539,664	561,806
13. Corporate Operations Expense	1,001,800	943,198
14. Total Operating Expenses (8 thru 13)	4,899,881	4,717,801
15. Operating Income or Margins (7 less 14)	40,655	867,919
16. Other Operating Income and Expenses	0	0
17. State and Local Taxes	142,942	159,343
18. Federal Income Taxes	(38,430)	200,367
19. Other Taxes		0
20. Total Operating Taxes (17+18+19)	104,512	359,710
21. Net Operating Income or Margins (15+16-20)	(63,857)	508,209
22. Interest on Funded Debt	214,726	288,365
23. Interest Expense - Capital Leases	0	0
24. Other Interest Expense	191	3,580
25. Allowance for Funds Used During Construction	67,703	109,525
26. Total Fixed Charges (22+23+24-25)	147,214	182,420
27. Nonoperating Net Income	11,931	9,067
28. Extraordinary Items	0	0
29. Jurisdictional Differences	0	0
30. Nonregulated Net Income	98,148	(11,540)
31. Total Net Income or Margins (21+27+28+29+30-26)	(100,992)	323,316
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year	6,105,869	6,004,561
34. Miscellaneous Credits Year-to-Date	0	4,040
35. Dividends Declared (Common)	0	0
36. Dividends Declared (Preferred)	0	0
37. Other Debits Year-to-Date	316	0
38. Transfers to Patronage Capital	0	
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	6,004,561	6,331,917
40. Patronage Capital Beginning-of-Year	0	0
41. Transfers to Patronage Capital	0	
42. Patronage Capital Credits Retired	0	0
43. Patronage Capital End-of-Year (40+41-42)	0	0
44. Annual Debt Service Payments	740,499	1,069,871
45. Cash Ratio [(14+20-10-11) / 7]	0.7510	0.6740
46. Operating Accrual Ratio [(14+20+26) / 7]	1.0427	0.9417
47. TIER [(31+26) / 26]	0.3140	2.7724
48. DSCR [(31+26+10+11) / 44]	1.8102	1.6995

USDA-RUS

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0534

PERIOD ENDED

December, 2016

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
EXCHANGE	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
DEWATTO	27.00	22.60	16	286	302	157.60	53.42
PRESCOTT	26.50	18.00	39	106	145	208.09	53.15
ROSLYN	24.00	18.00	194	1,161	1,355	219.73	96.11
UNIONTOWN	25.00	18.00	178	285	463	309.21	64.25
LEON	40.68	25.76	1	25	26	20.37	13.14
LENORE	40.68	25.75	18	217	235	178.34	12.00
MobileWireless					0		
Route Mileage Outside Exchange Area						18.07	0.00
Total			446	2,080	2,526	1,111.41	292.07
No. Exchanges	6						

USDA-RUS

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0534

PERIOD ENDED

December, 2016

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

4. BROADBAND SERVICE

			Details on Least Expensive Broadband Service					
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
DEWATTO	302	232	48	768	512	39.95	Package	DSL
PRESCOTT	145	64	18	768	512	39.95	Package	DSL
ROSLYN	1,355	1,075	387	6,000	1,500	49.95	Package	DSL
UNIONTOWN	463	235	169	6,000	1,500	49.95	Package	DSL
LEON	26	19	13	6,000	1,500	49.95	Package	DSL
LENORE	235	124	80	768	512	39.95	Package	DSL
Total	2,526	1,749						

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0534 PERIOD ENDING December, 2016
INSTRUCTIONS- See RUS Bulletin 1744-2	

PART D. SYSTEM DATA

1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile
15	30	463	5.46	2.27

PART E. TOLL DATA

1. Study Area ID Code(s)	2. Types of Toll Settlements (Check one)		
a. 472423	Interstate:	☐ Average Schedule	☒ Cost Basis
b. 522423	Intrastate:	☐ Average Schedule	☒ Cost Basis
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			

PART F. FUNDS INVESTED IN PLANT DURING YEAR

1. RUS, RTB, & FFB Loan Funds Expended	6,600,674
2. Other Long-Term Loan Funds Expended	
3. Funds Expended Under RUS Interim Approval	
4. Other Short-Term Loan Funds Expended	
5. General Funds Expended (Other than Interim)	684,813
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	7,285,487

PART G. INVESTMENTS IN AFFILIATED COMPANIES

INVESTMENTS	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
(a)	*(b)*	*(c)*	*(d)*	*(e)*	*(f)*
1. Investment in Affiliated Companies - Rural Development	324,526		808,606		808,606
2. Investment in Affiliated Companies - Nonrural Development					

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0534
INSTRUCTIONS – See help in the online application.	PERIOD ENDED December, 2016

	PART I – STATEMENT OF CASH FLOWS	
1.	**Beginning Cash (Cash and Equivalents plus RUS Construction Fund)**	626,933
	CASH FLOWS FROM OPERATING ACTIVITIES	
2.	**Net Income**	323,316
	Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3.	Add: Depreciation	1,312,366
4.	Add: Amortization	182
5.	Other (Explain) See Notes Section	308,249
	Changes in Operating Assets and Liabilities	
6.	Decrease/(Increase) in Accounts Receivable	245,120
7.	Decrease/(Increase) in Materials and Inventory	(27,960)
8.	Decrease/(Increase) in Prepayments and Deferred Charges	(11,899)
9.	Decrease/(Increase) in Other Current Assets	0
10.	Increase/(Decrease) in Accounts Payable	9,936
11.	Increase/(Decrease) in Advance Billings & Payments	0
12.	Increase/(Decrease) in Other Current Liabilities	12,553
13.	**Net Cash Provided/(Used) by Operations**	2,171,863
	CASH FLOWS FROM FINANCING ACTIVITIES	
14.	Decrease/(Increase) in Notes Receivable	0
15.	Increase/(Decrease) in Notes Payable	0
16.	Increase/(Decrease) in Customer Deposits	224
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	5,819,168
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	292,466
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	0
20.	Less: Payment of Dividends	0
21.	Less: Patronage Capital Credits Retired	0
22.	Other (Explain) See Notes Section	(292,690)
23.	**Net Cash Provided/(Used) by Financing Activities**	5,819,168
	CASH FLOWS FROM INVESTING ACTIVITIES	
24.	Net Capital Expenditures (Property, Plant & Equipment)	(5,417,115)
25.	Other Long-Term Investments	(863,742)
26.	Other Noncurrent Assets & Jurisdictional Differences	0
27.	Other (Explain) See Notes Section	(1,238,682)
28.	**Net Cash Provided/(Used) by Investing Activities**	(7,519,539)
29.	**Net Increase/(Decrease) in Cash**	471,492
30.	**Ending Cash**	1,098,425

INLAND TELEPHONE COMPANY

CASH FLOW RECONCILING EXPLANATIONS

RUS OPERATING REPORT 2016

Description	**Amount**
Line 5 Other	
Depreciation and amortization on nonregulated investments	125,453.00
Change in deposits	224.00
Cash surrender value of life insurance	(8,540.00)
Less plant in AP	(5,621.00)
Deferred FIT	200,347.00
Non-cash transfer of state income taxes	(20.00)
Non-cash stock dividend	(3,594.00)
Total Amount of Adjustment	308,249.00
Line 22 Other	
Operating deferred FIT on Investments	(2,081.00)
Non-cash transfer of deferred FIT	(90,038.00)
Change in deposits	(224.00)
Operating deferred FIT	(200,347.00)
Total Amount of Adjustment	(292,690.00)
Line 27 Other	
Retirements/Transfers in Net Plant	(1,226,709.00)
Operating cash flow in long-term investments	15,740.00
Deferred FIT on investments	2,081.00
Plant in AP	5,621.00

Non-cash transfer of deferred FIT	90,038.00
Operating depreciation on long-term investments	(125,453.00)
Total Amount of Adjustment	(1,238,682.00)