

**REDACTED – FOR PUBLIC INSPECTION**

**VIA ECFS**

June 27, 2016

Ms. Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 Office of the Secretary  
 445 12<sup>th</sup> 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, Moapa Valley Telephone Company (the Company), Study Area Code 552353 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 Company's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Company, 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

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Ms. Marlene Dortch

Page 2

treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Moapa Valley Telephone Company maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

**Five-Year Service Quality Improvement Plan Progress Report**

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Moapa Valley Telephone Company 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 Company maintains as confidential. Public availability of this information would have a substantial negative impact on the Company.

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 Company'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 Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to

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Ms. Marlene Dortch

Page 3

improve service quality, service coverage, and/or service capacity. It also contains a map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Company 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 Company'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 Company.

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

The Company 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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Ms. Marlene Dortch

Page 4

- (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 Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company'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). Moapa Valley Telephone Company 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.<sup>1</sup> The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Moapa Valley Telephone Company 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.

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

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<sup>1</sup> *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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Ms. Marlene Dortch

Page 5

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

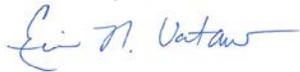
The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

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: John W. Lyon, President - Moapa Valley Telephone Company

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	552353
<015> Study Area Name	MOAPA VALLEY TEL CO.
<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

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b> Study Area Code	552353
<b>&lt;015&gt;</b> Study Area Name	MOAPA VALLEY TEL CO.
<b>&lt;020&gt;</b> Program Year	2017
<b>&lt;030&gt;</b> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<b>&lt;035&gt;</b> Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<b>&lt;039&gt;</b> 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? (yes / no)

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**<111>** If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? (yes / no)

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

**<112>** Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

552353NV112.pdf

Name of Attached Document

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

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

Yes
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	552353
<015> Study Area Name	MOAPA VALLEY TEL CO.
<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

<b>(400) Number of Complaints per 1,000 customers</b> Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	552353
<b>&lt;015&gt;</b>	Study Area Name	MOAPA VALLEY TEL CO.
<b>&lt;020&gt;</b>	Program Year	2017
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com
<b>&lt;400&gt;</b>	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
<b>&lt;410&gt;</b>	Complaints per 1000 customers for fixed voice	0 . 0
<b>&lt;420&gt;</b>	Complaints per 1000 customers for mobile voice	
<b>&lt;430&gt;</b>	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
<b>&lt;440&gt;</b>	Complaints per 1000 customers for fixed broadband	0 . 0
<b>&lt;450&gt;</b>	Complaints per 1000 customers for mobile broadband	

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

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

<010>	Study Area Code	552353
<015>	Study Area Name	MOAPA VALLEY TEL CO.
<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	552353NV510.pdf

**(600) Functionality in Emergency Situations  
Data Collection Form**

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FCC Form 481

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

July 2013

<010>	Study Area Code	552353
<015>	Study Area Name	MOAPA VALLEY TEL CO.
<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	552353NV610.pdf







**(900) Tribal Lands Reporting  
Data Collection Form**

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

<010> Study Area Code	552353
<015> Study Area Name	MOAPA VALLEY TEL CO.
<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

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

Moapa Band of Paiutes

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

<920> Tribal Government Engagement Obligation

552353NV920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes

<b>(1000) Voice and Broadband Service Rate Comparability Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	552353
<015>	Study Area Name	MOAPA VALLEY TEL CO.
<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 552353NV1010.pdf

\_\_\_\_\_  
Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 552353NV1030.pdf

\_\_\_\_\_  
Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

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

<010>	Study Area Code	552353
<015>	Study Area Name	MOAPA VALLEY TEL CO.
<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

<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).



<b>(2000) Price Cap Carrier Additional Documentation</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	July 2013

<b>&lt;010&gt;</b>	Study Area Code	552353
<b>&lt;015&gt;</b>	Study Area Name	MOAPA VALLEY TEL CO.
<b>&lt;020&gt;</b>	Program Year	2017
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	eric.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**

<b>&lt;2010&gt;</b> 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	<input style="width: 100%; height: 20px;" type="text"/>	
<b>&lt;2011&gt;</b> 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	<input style="width: 100%; height: 20px;" type="text"/>	
<b>&lt;2022&gt;</b> 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.	<input style="width: 100%; height: 20px;" type="text"/>	
<b>&lt;2023&gt;</b> 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.	<input style="width: 100%; height: 20px;" type="text"/>	
<b>&lt;2024A&gt;</b> Round 2 Recipient of Incremental Support?	<input style="width: 100%; height: 20px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<b>&lt;2024B&gt;</b> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<input style="width: 100%; height: 60px;" type="text"/>
<b>&lt;2025A&gt;</b> Round 1 or Round 2 Recipient of Incremental Support?	<input style="width: 100%; height: 20px;" type="text"/>	
<b>&lt;2025B&gt;</b> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	Name of Attached Document Listing Required Information	<input style="width: 100%; height: 60px;" type="text"/>
<b>&lt;2015&gt;</b> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100%; height: 20px;" type="text"/>

(2000) Price Cap Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

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

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

Name of Attached Document Listing Required Information

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)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010>	Study Area Code	552353
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<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  
Carrier certifies to 54.313(f)(1)(iii)

(3009)

(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)(ii)} No - No New Community Anchors

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

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

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

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

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

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

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

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

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

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

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

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

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

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

(3024) Underlying information subjected to an officer certification.

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

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

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

FCC Form 481

Data Collection Form

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

July 2013

<010>	Study Area Code	552353
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**Financial Data Summary**

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation  
Data Collection Form

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

<010>	Study Area Code	552353
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<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

**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 \_\_\_\_\_

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	552353
<b>&lt;015&gt;</b>	Study Area Name	MOAPA VALLEY TEL CO.
<b>&lt;020&gt;</b>	Program Year	2017
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<b>&lt;039&gt;</b>	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:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<b>&lt;010&gt;</b>	Study Area Code	552353
<b>&lt;015&gt;</b>	Study Area Name	MOAPA VALLEY TEL CO.
<b>&lt;020&gt;</b>	Program Year	2017
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<b>&lt;039&gt;</b>	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>MOAPA VALLEY TEL CO.</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:	Filing Due Date for this form: <u>07/01/2016</u>
<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.</small>	

**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>MOAPA VALLEY TEL CO.</u>
Name of Authorized Agent Firm:	<u>Moss Adams, LLP</u>
Signature of Authorized Agent or Employee of Agent:	Date: <u>06/28/2016</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:	Filing Due Date for this form: <u>07/01/2016</u>
<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.</small>	

## Attachments

REDACTED FOR PUBLIC INSPECTION

LINE 112 – Five Year Service Quality Improvement Progress Report

REDACTED FOR PUBLIC INSPECTION

Response Line 510  
Moapa Valley Telephone Company  
Study Area 552353

**Voice Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Moapa Valley Telephone Company (“Moapa”) is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. ILEC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. Moapa also conducts subscriber outreach regarding CPNI by placing CPNI rules and regulations in its published phonebook. In addition, Moapa 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.

Moapa also outlines its rates, terms, and conditions under which ILEC offers service in its Local Exchange Tariff. 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. ILEC keeps its tariffs available for public inspection at its business offices.

**Broadband Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Moapa is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. Moapa trains staff on applicable rules for broadband services issues on an annual basis. In addition, Moapa has placed its network practices and policies regarding FCC’s Net Neutrality Rules in its published phonebook.

Moapa also outlines its rates, terms, and conditions under which Moapa 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  
Moapa Valley Telephone Company  
Study Area 552353

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) MOAPA Moapa Valley Telephone Company (“Moapa”) meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Moapa central offices by use of a generator and batteries that provide it with 8 hours of emergency power. In addition, Moapa field electronics have 8 hours of back-up power. Moapa has sufficient generators to provide additional power to equipment should it sustain a prolonged emergency situation. Lastly, Moapa has deployed Fiber to the Home and it’s Optical Network Terminals at subscriber premises are equipped with batteries that provide 8 hours of emergency power. Moapa also has SONET & ERPS technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. Moapa has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. Moapa also has proper staff in place to repair any fiber cuts in a timely manner. Moapa has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. In addition, Moapa as deployed Emergency Stand Alone technology in its network to provide for call completion should a fiber cut occur at remote locations to help insure call completion. Moapa has developed and trained its staff on network preparedness plans in case of emergency situations. Moapa is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such 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) Moapa Valley Telephone Company (“Moapa”) meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to MOAPA central offices by use of a generator and batteries that provide it with 8 hours of emergency power that is also used to provide service to the broadband network. In addition, Moapa field electronics have 8 hours of back-up power by use of generators and batteries. Moapa also has SONET & ERPS technology deployed in its core fiber optic network that is self-healing and will automatically reroute broadband traffic should a fiber cut occur. Moapa has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. Moapa also has proper staff in place to repair any fiber cuts in a timely manner. Moapa has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. Moapa has developed and trained its staff on network preparedness plans in case of emergency situations.



<b>(710) Broadband Price Offerings Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt; Study Area Code</b>	552353
<b>&lt;015&gt; Study Area Name</b>	MOAPA VALLEY TEL CO.
<b>&lt;020&gt; Program Year</b>	2017
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Eric N. Votaw
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	2099556116 ext.
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	eric.votaw@mossadams.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	NV	Glendale	57.95	0.0	57.95	6.0	1.0	999999.0	Other, Unlimited
	NV	Glendale	67.95	0.0	67.95	10.0	1.0	999999.0	Other, Unlimited
	NV	Glendale	77.95	0.0	77.95	15.0	2.0	999999.0	Other, Unlimited
	NV	Glendale	87.95	0.0	87.95	15.0	5.0	999999.0	Other, Unlimited
	NV	Glendale	97.95	0.0	97.95	25.0	10.0	999999.0	Other, Unlimited
	NV	Glendale	97.95	0.0	97.95	30.0	5.0	999999.0	Other, Unlimited
	NV	Glendale	102.95	0.0	102.95	50.0	10.0	999999.0	Other, Unlimited
	NV	Glendale	107.95	0.0	107.95	50.0	25.0	999999.0	Other, Unlimited
	NV	Glendale	122.95	0.0	122.95	100.0	50.0	999999.0	Other, Unlimited
	NV	Lake Mead	57.95	0.0	57.95	6.0	1.0	999999.0	Other, Unlimited
	NV	Lake Mead	67.95	0.0	67.95	10.0	1.0	999999.0	Other, Unlimited
	NV	Lake Mead	77.95	0.0	77.95	15.0	2.0	999999.0	Other, Unlimited
	NV	Lake Mead	87.95	0.0	87.95	15.0	5.0	999999.0	Other, Unlimited
	NV	Lake Mead	97.95	0.0	97.95	25.0	10.0	999999.0	Other, Unlimited
	NV	Lake Mead	97.95	0.0	97.95	30.0	5.0	999999.0	Other, Unlimited
	NV	Lake Mead	102.95	0.0	102.95	50.0	10.0	999999.0	Other, Unlimited
	NV	Lake Mead	107.95	0.0	107.95	50.0	25.0	999999.0	Other, Unlimited
	NV	Lake Mead	122.95	0.0	122.95	100.0	50.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	57.95	0.0	57.95	6.0	1.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	67.95	0.0	67.95	10.0	1.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	77.95	0.0	77.95	15.0	2.0	999999.0	Other, Unlimited

<b>(710) Broadband Price Offerings Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	552353
<015> Study Area Name	MOAPA VALLEY TEL CO.
<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

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	NV	Lake Mead - 2 pt	87.95	0.0	87.95	15.0	5.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	97.95	0.0	97.95	25.0	10.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	97.95	0.0	97.95	30.0	5.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	102.95	0.0	102.95	50.0	10.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	107.95	0.0	107.95	50.0	25.0	999999.0	Other, Unlimited
	NV	Lake Mead - 2 pt	122.95	0.0	122.95	100.0	50.0	999999.0	Other, Unlimited
	NV	Logandale	57.95	0.0	57.95	6.0	1.0	999999.0	Other, Unlimited
	NV	Logandale	67.95	0.0	67.95	10.0	1.0	999999.0	Other, Unlimited
	NV	Logandale	77.95	0.0	77.95	15.0	2.0	999999.0	Other, Unlimited
	NV	Logandale	87.95	0.0	87.95	15.0	5.0	999999.0	Other, Unlimited
	NV	Logandale	97.95	0.0	97.95	25.0	10.0	999999.0	Other, Unlimited
	NV	Logandale	97.95	0.0	97.95	30.0	5.0	999999.0	Other, Unlimited
	NV	Logandale	102.95	0.0	102.95	50.0	10.0	999999.0	Other, Unlimited
	NV	Logandale	107.95	0.0	107.95	50.0	25.0	999999.0	Other, Unlimited
	NV	Logandale	122.95	0.0	122.95	100.0	50.0	999999.0	Other, Unlimited
	NV	Overton	57.95	0.0	57.95	6.0	1.0	999999.0	Other, Unlimited
	NV	Overton	67.95	0.0	67.95	10.0	1.0	999999.0	Other, Unlimited
	NV	Overton	77.95	0.0	77.95	15.0	2.0	999999.0	Other, Unlimited
	NV	Overton	87.95	0.0	87.95	15.0	5.0	999999.0	Other, Unlimited
	NV	Overton	97.95	0.0	97.95	25.0	10.0	999999.0	Other, Unlimited
	NV	Overton	97.95	0.0	97.95	30.0	5.0	999999.0	Other, Unlimited





Response Line 920  
Moapa Valley Telephone Company  
Study Area 552353

Moapa Valley Telephone Company, (“Moapa”) Moapa continues to have discussions with the Tribal government regarding the telecommunication needs of the tribe. In addition, Moapa is in compliance with all Tribal licensing, permitting, RoW and other regulatory requirements to operate within the jurisdiction of the Moapa Band of Paiutes Tribal lands.

Response to Line 1010  
MOAPA VALLEY TELEPHONE COMPANY  
Study Area 552353

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10 ) Moapa Valley Telephone Company (“Moapa”) 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. Moapa’s current total local end-user rate<sup>1</sup> of:

<u>Exchanges</u>	<u>Rate Explanation</u>
Glendale	\$12.10 (which includes a local fee of \$12.10, mandated state fees of 0.00 and mandatory extended area service charges of \$0.00)
Lake Mead	\$12.12 (which includes a local fee of \$12.10, mandated state fees of 0.02 and mandatory extended area service charges of \$0.00)
Lake Mead – 2pty	\$8.11 (which includes a local fee of \$8.10, mandated state fees of 0.01 and mandatory extended area service charges of \$0.00)
Logandale	\$12.12 (which includes a local fee of \$12.10, mandated state fees of 0.02 and mandatory extended area service charges of \$0.00)
Overton	\$12.12 (which includes a local fee of \$12.10, mandated state fees of 0.02 and mandatory extended area service charges of \$0.00)
Upper Muddy	\$12.12 (which includes a local fee of \$12.10, mandated state fees of 0.02 and mandatory extended area service charges of \$0.00)

None of the Moapa Valley exchanges are not above the standard deviation as specified in the USF/ICC Transformation Order<sup>2</sup>

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

<sup>2</sup> 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  
MOAPA VALLEY TELEPHONE COMPANY  
Study Area 552353

### Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (11) Moapa Valley Telephone Company charges a residential rate of \$67.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$75.20, which is the 2016 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.<sup>1</sup>

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<sup>1</sup> *Wireline Competition Bureau Announces Results of 2016 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 16-362 (rel. April 6, 2016).

www.mossadams.com

209-955-6100  
888-957-3266  
209-955-6199

September 30, 2010

**VIA FED EX**

Advice Letter No. 7

Ms. Breanne Breuer  
Public Utilities Commission of Nevada  
1150 E. William Street  
Carson City, Nevada 89701

Dear Breanne:

This filing revises the following tariff sheets for Moapa Valley Telephone Company's Tariff No. 2A:

<u>P.U.C.N. Sheet No.</u>	<u>Title of Sheet</u>	<u>Canceling P.U.C.N. No.</u>
1st Revised Sheet Nos. 63, 66	Schedule No. A-3, Lifeline Service	Original Sheet Nos. 63, 66
1st Revised Sheet No. 80	Schedule No. A-11 Link Up	Original Sheet No. 80

On May 25, 2010, Moapa Valley Telephone Company filed its initial state Lifeline reimbursement report with Solix. This filing reflects the Tariff changes to the Lifeline end user credits effective January 1, 2011 in Schedule No. A-3, Lifeline Service.

Also, this filing changes the Food Stamp description to Supplemental Nutrition Assistance Program along with some text changes.

This filing will not increase any rate or charge, cause the withdrawal of service, or conflict with other schedules.

The effective date will be determined by staff.

Ms. Breanne Breuer  
September 30, 2010  
Page 2

We have elected to do a paper filing after our conversation with Karen Taylor on September 22, 2010. Enclosed is the original of this filing and a check for \$10 to cover the filing fee. Also enclosed is the required Draft Notice in compliance with Nevada Administrative Code 702.162.

Please call me at 209.955.6103 if you have questions.

Sincerely,



Lorrie Bernstein  
For Moss Adams LLP

LB:cg

Enclosures

cc/enc: Mr. Brad Lyon (Via E-mail & hard copy)  
Mr. John Lyon (Via E-mail & hard copy)  
Mr. Larry Neil (Via E-mail & hard copy)  
Mr. Eric Witkoski, Consumer Advocate (Via E-mail)  
Ms. Lucille Hill (Via E-mail)  
Ms. Marlene Lang (Via E-mail)

**Tariff No. 2A**

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**SCHEDULE NO. A-3**

**LIFELINE SERVICE**

**A. Description**

Applicable to qualifying low-income, one-party residence customers of the Utility who meet the eligibility criteria established by the Federal Communications Commission's Rule 54.409(b).

**B. Conditions**

1. An applicant must meet all of the following criteria in order to be eligible for Lifeline Service:
  - a. The customer's total household gross income does not exceed 150% of the federally established poverty levels set forth for the number of persons in that customer's household as updated. The applicant must provide documentation of income, or that a member of the household receives, or is eligible to receive, benefits from a public program.
  - b. The customer must provide documentation which demonstrates the total household gross income of the applicant includes:
    - (1) Most recent federal or tribal tax return; or
    - (2) Three consecutive months of all income statements for applicant's household within the same calendar year. Such income statements include all forms of income pursuant to 47 C.F.R. 54.400(f).
  - c. Eligible Public Programs include one or more of the following programs:
    - (1) Medicaid;
    - (2) Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps; (T)
    - (3) Supplemental Security Income;
    - (4) Federal Public Housing Assistance;
    - (5) Low-Income Home Energy Assistance Program;
    - (6) Temporary Assistance to Needy Families; or
    - (7) National School Lunch Free Lunch Program.

---

Issued: October 1, 2010

Issued By:

Effective: January 1, 2011

John W. Lyon

Advice No.: 7

President



**Tariff No. 2A**

---

SCHEDULE NO. A-11

LINK UP

**B. Conditions – (Cont'd)**

**2. (Cont'd)**

c. Eligible Public Programs include one or more of the following programs:

- (1) Medicaid;
- (2) Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps; (T)
- (3) Supplemental Security Income;
- (4) Federal Public Housing Assistance;
- (5) Low-Income Home Energy Assistance Program;
- (6) Temporary Assistance to Needy Families; or
- (7) National School Lunch Free Lunch Program.

d. The customer must sign, under penalty of perjury, a document certifying the following before the customer can receive Lifeline Service:

- (1) The customer meets the criteria in B.2.a., b., and c., above.
- (2) That the customer will notify the Utility when they no longer participate in the program or programs.

e. The residence premises at which the residence service is requested is the applicant's principal place of residence.

f. There is only one telephone line serving the residence premises. The residence premises household (dwelling unit) shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic establishment.

3. Link Up will not be furnished on a Foreign Exchange Service basis.

4. Customers shall be allowed to receive the benefit under this schedule for a second or subsequent time only for a principal place of residence with an address different from the residence address at which the Link Up assistance was provided previously.

5. The qualifying customer is also entitled to Lifeline Service.

6. A customer's continued eligibility will be verified as stated in Schedule No. A-3, Sections B.8 and B.9.

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Issued: October 1, 2010

Issued By:

Effective: January 1, 2011

Lyon W. Lyon

Advice No.: 7

President

# Draft Notice Application for Applications, Petitions and Complaints

Page 1 of 2

The Commission requires a draft notice be included with all applications, petitions and complaints. See Nevada Administrative Code 703.162. Please include one copy of this form with your filing.

- I. Include a title that describes the relief requested, or proceeding scheduled pursuant to Nevada Administrative Code ("NAC") 703.160 (5)(a.)

Moapa Valley Telephone Company (Moapa Valley) seeks approval of Advice Letter 7 to establish the new Lifeline credits that will appear on the Lifeline end user bills effective January 1, 2011.

- II. Include the name of the applicant, complainant, petitioner, or the name of the agent for same pursuant to NAC 703.160 (5) (b). Moapa Valley Telephone Company.

- III. Include a paragraph with a brief description of the purpose of the filing or proceeding with an introductory statement in plain English understandable to a person of average knowledge and intelligence, that summarizes the relief requested or proceeding scheduled, **AND** its impact upon consumers, pursuant to NAC 704.160 (5)(c).

Moapa Valley Telephone Company revised the Lifeline Service Tariff to reflect the additional Lifeline credits that their Lifeline end user customers will see on their January 1, 2011 bills. Also the Food Stamp's programs name was updated to say Supplemental Nutrition Assistance Program (SNAP).

- IV. A declaration by the applicant, petitioner, or complainant whether a consumer session is required by Nevada Revised Statute ("NRS") 704.069 (1). NAC 703.162 (2)<sup>1</sup> No consumer session is required.

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<sup>1</sup> NRS 704.069 Commission required to conduct consumer session for certain rate cases; Commission required to conduct general consumer session annually in certain counties.

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110, inclusive, in which:

(a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and

(b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant's annual gross operating revenue, whichever is less.

2. In addition to the case-specific consumer sessions required by subsection 1, the Commission shall, during each calendar year, conduct at least one general consumer session in the county with the largest population in this state and at least one general consumer session in the county with the second largest population in this state. At each general consumer session, the Commission shall solicit comments from the public on issues concerning public

- V. If the draft notice pertains to a tariff filing, please include the tariff number and the section number(s) or schedule number(s) being revised.

Tariff No. 2A, Schedule No. A-3, 1<sup>st</sup> Revised Sheet Numbers 63 & 66 and Schedule No. A-11, Link Up, 1<sup>st</sup> Revised Sheet Number 80.

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utilities. Not later than 60 days after each general consumer session, the Commission shall submit the record from the general consumer session to the Legislative Commission.

Response to Line3010  
Moapa Valley Telephone Company  
Study Area 552353

#### Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Moapa Valley Telephone Company (“Moapa”) 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 Moapa is meeting its obligations for broadband goals and required obligations are specified within the FCC Form 481 annual filing.

REDACTED FOR PUBLIC INSPECTION

LINE 3026— Audited Financial Statements

REDACTED FOR PUBLIC INSPECTION