

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

June 27, 2016

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

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

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

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

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Washington County Rural (the Cooperative), Study Area Code 320834 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Cooperative's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments

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contain competitively sensitive data that Washington County Rural maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

Five-Year Service Quality Improvement Plan Progress Report

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

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

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

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

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

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

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

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

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deployment targets at the wire center level. This is closely guarded, privileged information that the Cooperative does not make publicly available.

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

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

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

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

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

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

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

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

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

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

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

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

Financial Annual Report

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

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

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

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

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

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

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

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

Please contact me if you have any questions.

Sincerely,



Eric Votaw, Senior Manager for
Moss Adams LLP

EV/ch

Enclosures

cc: Roland King, President - Washington County Rural

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

<010> Study Area Code	320834
<015> Study Area Name	WASHINGTON CTY RURAL
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Sara Morris
<035> Contact Telephone Number: Number of the person identified in data line <030>	8129675521 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	sara.morris@telemedia.coop
Form Type	54.313 and 54.422

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(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<110> Has your company received its ETC certification from the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
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) <input checked="" type="radio"/> <input type="radio"/>

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.

320834in112.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	320834
<015> Study Area Name	WASHINGTON CTY RURAL
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Sara Morris
<035> Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<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

(400) Number of Complaints per 1,000 customers
Data Collection Form

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

<010>	Study Area Code	320834	
<015>	Study Area Name	WASHINGTON CTY RURAL	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris	
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop	
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0	
<420>	Complaints per 1000 customers for mobile voice		
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0	
<450>	Complaints per 1000 customers for mobile broadband		

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

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

<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	320834in510.pdf

**(600) Functionality in Emergency Situations
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	320834
<015> Study Area Name	WASHINGTON CTY RURAL
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Sara Morris
<035> Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemidia.coop
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	320834in610.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	320834
<015> Study Area Name	WASHINGTON CTY RURAL
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Sara Morris
<035> Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<900> Does the filing entity offer tribal land services? (Y/N) No

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

- <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

(1000) Voice and Broadband Service Rate Comparability Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	320834IN1010.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	320834IN1030.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
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<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	320834in1210.pdf Name of Attached Document
---	---

<1220> Link to Public Website	HTTP http://www.telemedia.coop/lifeline/
-------------------------------	--

“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
|--|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
|---|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

(2000) Price Cap Carrier Additional Documentation	FCC Form 481
Data Collection Form	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

<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

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

<p><2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2024A> Round 2 Recipient of Incremental Support?</p>	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 100%; height: 50px;" type="text"/>
<p><2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.</p>	<p>Name of Attached Document Listing Required Information</p>	<input style="width: 100%; height: 50px;" type="text"/>
<p><2025A> Round 1 or Round 2 Recipient of Incremental Support?</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-</p>	<p>Name of Attached Document Listing Required Information</p>	<input style="width: 100%; height: 50px;" type="text"/>
<p><2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<input style="width: 100px; height: 20px;" type="text"/>	

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

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

FCC Form 481

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

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

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	320834
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<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

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.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

(3010A) Milestone Certification {47 CFR § 54.313(f)(1)(i)} Yes - Attach Certification

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(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

(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	320834
<015> Study Area Name	WASHINGTON CTY RURAL
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Sara Morris
<035> Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemidia.coop

Financial Data Summary

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

<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

4005 Rural Broadband Experiment

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

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

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

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

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

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

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

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

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

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

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

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

<010> Study Area Code	320834
<015> Study Area Name	WASHINGTON CTY RURAL
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Sara Morris
<035> Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	WASHINGTON CTY RURAL
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/24/2016
Printed name of Authorized Officer:	Roland King
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	8129673171 ext.
Study Area Code of Reporting Carrier:	320834 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
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.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
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.	

Attachments

LINE 112 – Five Year Service Quality Improvement Progress Report

REDACTED FOR PUBLIC INSPECTION

**(710) Broadband Price Offerings
Data Collection Form**

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

<010>	Study Area Code	320834
<015>	Study Area Name	WASHINGTON CTY RURAL
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Sara Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129675521 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sara.morris@telemedia.coop

<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}
	IN	Pekin IN	39.95	0.0	39.95	3.0	1.0	999999.0	Other, n/a
	IN	Pekin IN	44.95	0.0	44.95	6.0	1.0	999999.0	Other, n/a
	IN	Pekin IN	49.95	0.0	49.95	10.0	1.0	999999.0	Other, n/a
	IN	Pekin IN	59.95	0.0	59.95	20.0	1.0	999999.0	Other, n/a
	IN	Pekin IN	69.95	0.0	69.95	30.0	1.0	999999.0	Other, n/a
	IN	Pekin IN	79.95	0.0	79.95	50.0	25.0	999999.0	Other, n/a
	IN	Pekin IN	44.900000000000	0.0	44.9	3.0	3.0	999999.0	Other, n/a
	IN	Pekin IN	49.900000000000	0.0	49.9	6.0	3.0	999999.0	Other, n/a
	IN	Pekin IN	54.900000000000	0.0	54.9	10.0	3.0	999999.0	Other, n/a
	IN	Pekin IN	64.9	0.0	64.9	20.0	3.0	999999.0	Other, n/a
	IN	Pekin IN	74.9	0.0	74.9	30.0	3.0	999999.0	Other, n/a

320834in510.pdf

Service Quality Standards & Consumer Protection Rules Compliance

Please refer to the following documents regarding annual CPNI Certification with accompanying procedures as well as the documentation regarding the current Red Flag suspension status, including the 1/27/2011 Board of Directors Resolution that exempts Washington County Rural Telephone Cooperative, Inc. from compliance with the FACT Act Red Flag Identity Theft Prevention Program. The Board of Directors agreed to continue the indefinite suspension.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2015

1. Date filed: 02/19/2016
2. Name of company(s) covered by this certification: Washington County Rural Telephone Cooperative, Inc.
3. Form 499 Filer ID: 808455
4. Name of signatory: Roland King
5. Title of signatory: President
6. Certification:

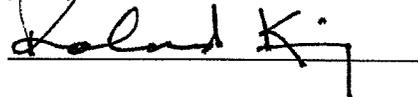
I, Roland King, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

Attachment: Accompanying Statement of Operating Procedures

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, Washington County Rural Telephone Cooperative, Inc. d/b/a Tele-Media Solutions, herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI manual has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by our Company's board
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
 - o Established an outbound marketing supervisory review process for the use of CPNI
 - o Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
 - o Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
 - o All customer during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
 - o Call detail is only released to customers during customer-initiated telephone contact if a password is provided. If the requesting customer does not provide a password, only the following FCC approved methods are permitted for the release of the requested call detail:
 - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
 - Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
 - Having customer come in to Company's office and provide a valid government issued photo ID
5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
 - o password
 - o customer response to a back-up means of authentication for lost or forgotten passwords
 - o online account
 - o address of record
6. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
 - o Customers are notified bi-annually of their rights for the use of their CPNI in marketing campaigns
 - o New customers are notified of the opt-out procedure as a part of the customer sign-up process
 - o Billing system displays customer's opting status
 - o Compliance officer retains CPNI notifications and opting records for at least two years
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
 - o Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
 - o Company maintains security of all CPNI, including but not limited to:
 - Documents containing CPNI are shredded
 - Computer terminals are locked when employee is not at the station

**RESOLUTION 01272011 OF THE BOARD OF DIRECTORS FOR
WASHINGTON COUNTY RURAL TELEPHONE COOPERATIVE, INC.**

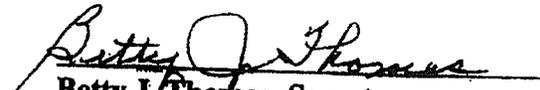
RESOLUTION: At a meeting of the Board of Directors of **Washington County Rural Telephone Cooperative, Inc.**, hereafter referred to as the Board, which was held on **January 27, 2011**, and the following resolution was unanimously passed:

BE IT RESOLVED, that the Red Flag Program Clarification Act of 2010 exempts **Washington County Rural Telephone Cooperative, Inc. d/b/a Tele-Media Solutions** from having to comply with the FACT Act Red Flag Identity Theft Prevention Program, hereafter referred to as the Program, which was created in response to the requirements of the Red Flag Rules established by the Department of the Treasury, Federal Reserve System, Federal Deposit Insurance Corporation, Department of the Treasury, National Credit Union Administration, and Federal Trade Commission, which implemented Section 114 of the Fair and Accurate Credit Transactions Act of 2003:

1. That the Red Flag Clarification Act amended the Fair Credit Reporting Act with respect to the applicability of identity theft guidelines to creditors.
2. That the Act narrowed the definition of a "creditor" as someone who uses credit reports, furnishes consumer information to credit reporting agencies or "advances funds...based on an obligation of the person to repay the funds or repayable from specific property pledges by or on behalf of the person..." and narrowed the scope of the Rule by exempting from the definition of "creditor" the following criterion, "does not include a creditorthat advances funds on behalf of a person for expenses incidental to a service provided by the creditor to that person."

BE IT FURTHER RESOLVED, that the Board will suspend indefinitely **Washington County Rural Telephone Cooperative, Inc. d/b/a Tele-Media Solutions'** FACT Act Red Flag Identity Theft Prevention Program and will review at least annually and comply as necessary to address changing identity theft risks.

IN WITNESS WHEREOF, I have affixed my name as Secretary of said **Washington County Rural Telephone Cooperative, Inc.**, this 27th day of **January 2011**.


Betty J. Thomas, Secretary

Functionality in Emergency Situations for Voice

Back-Up Power

The Company can ensure functionality without an external power source. All of our DLC's remote locations and central offices have an 8 hour battery backup system. We have a fixed generator at our central offices and portable generators for our remote DLCs. This applies to both voice and broadband services to our customers.

Rerouting of Traffic around Damaged Facilities

The Company is using a 10 Gig Ethernet ring throughout our company. We are also using an OC48 ring shared with adjoining companies. These provide diverse routing in case of a cable splice or other outage. The same local loop serves both the broadband and voice services for the customer.

Traffic Spikes

The company has adequate switching facilities to handle sporadic traffic spikes. It can take reasonable steps to reroute traffic or add capacity to manage traffic spikes throughout its network as emergency situations require. Broadband bandwidth is monitored on a regular basis. If usage peaks near the allotted bandwidth, we can add additional bandwidth as needed.

Functionality in Emergency Situations for Broadband

Back-Up Power

The Company can ensure functionality without an external power source. All of our DLC's remote locations and central offices have an 8 hour battery backup system. We have a fixed generator at our central offices and portable generators for our remote DLCs. This applies to both voice and broadband services to our customers.

Rerouting of Traffic around Damaged Facilities

The company is using a 10 Gig Ethernet ring throughout our company. We are also using an OC48 ring shared with adjoining companies. These provide diverse routing in case of a cable splice or other outage. The same local loop serves both the broadband and voice services for the customer.

Traffic Spikes

The company has adequate switching facilities to handle sporadic traffic spikes. It can take reasonable steps to reroute traffic or add capacity to manage traffic spikes throughout its network as emergency situations require. Broadband bandwidth is monitored on a regular basis. If usage peaks near the allotted bandwidth, we can add additional bandwidth as needed.

320834IN1010
Response to Line 1010
Washington City Rural 320834

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Washington City Rural 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 16, 2016. Washington Cnty Rural's current total local end-user rate¹ of \$21.70 is not above the standard deviation as specified in the USF/ICC Transformation Order.²

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

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

320834IN1030
Response to Line 1030
Washington Rural Telephone Company
Study Area 320834

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (1) Washington Cnty Rural charges a residential rate of \$49.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

¹ *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

Response to line 1210
 Washington Rural Telephone Company
 320834

Lifeline Terms and Conditions

Washington Rural Telephone Company (the "Company") offers Lifeline program-supported service to qualified low-income residential consumers for one telephone line per eligible household. The Lifeline program provides discounts to eligible low-income consumers to help them establish and maintain telephone service. Lifeline assistance lowers the cost of basic, monthly local telephone service. Eligible consumers can receive \$9.25 per month in discounts. In addition, the Federal Universal Service Charge is not assessed to consumers participating in Lifeline. Toll Blocking prevents the placement of all long distance calls for which a subscriber would be charged. Toll blocking is available to eligible consumers at no cost. Also, by choosing this option, consumers are usually not charged a deposit.

Lifeline Program Eligibility Information

Program Based Eligibility

Consumers are eligible for Lifeline if they, one of their dependents or their household participate in one of the following qualifying assistance programs:

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

Lifeline applicants must present documentation demonstrating eligibility either through participation in one of the qualifying federal assistance programs or through income-based means.

Acceptable documentation of program-based eligibility includes: current or prior year's statement of benefits from a qualifying state, federal or Tribal program; notice letter of participation in a qualifying state, federal or Tribal program; program participation documents; or another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.

Income Based Eligibility

In addition, consumers are eligible for Lifeline if their household income is at or below 135% of the federal poverty guidelines.

2015 Federal Poverty Guidelines – 135%

Household Size	48 Contiguous States and D.C.	Alaska	Hawaii
1	\$15,889	\$19,872	\$18,292
2	\$21,505	\$26,892	\$24,745
3	\$27,121	\$33,912	\$31,198
4	\$32,737	\$40,932	\$37,651
5	\$38,353	\$47,952	\$44,104
6	\$43,969	\$54,972	\$50,557
7	\$49,585	\$61,992	\$57,010
8	\$55,201	\$69,012	\$63,463
For each additional person, add	\$5,616	\$7,020	\$6,453

Response to line 1210
Washington Rural Telephone Company
320834

Acceptable documentation of income eligibility includes: prior year's state, federal or Tribal tax return; current income statement from an employer or paycheck stub; social security statement of benefits; Veterans Administration statement of benefits; retirement/pension statement of benefits; unemployment/workmen's compensation statement of benefits; federal or Tribal notice of letter participating in General Assistance; or a divorce decree or child support award or other official document containing income information.

Tribal Eligibility

A subscriber who lives on Tribal lands and is an eligible resident of Tribal lands is eligible for Tribal Lifeline service or Tribal Link Up if the subscriber, one or more of the subscriber's dependents, or the subscriber's household participates in any of the above-listed qualifying assistance programs or one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs General Assistance; Tribally Administered Temporary Assistance for Needy Families; Head Start (if income eligibility criteria are met); or the Food Distribution Program on Indian Reservations (FDPIR). Tribal subscribers may also qualify if the household income is at or below 135% of the Federal Poverty Guidelines.

Numbers of Minutes-of-Use Provided as Part of Lifeline Program Service

The Company's Voice Lifeline service includes unlimited local minutes-of-use within the toll-free calling area. The Company's Voice Lifeline Plan does not include any free minutes-of-use for toll. Toll is billed at the standard toll rate depending on which interexchange carrier the consumer subscribes to for toll service. As part of the Lifeline service, Toll blocking is available to eligible consumers at no cost.

Rates

Subscribers may receive the Lifeline credit on any type or grade of local service, including bundled services that are normally offered by the Company. Advertised rates do not include any applicable taxes or surcharges.

Recertification of Lifeline Eligibility

Lifeline recipients are required to recertify their eligibility annually. Failure to properly recertify a recipient's continued eligibility for the Lifeline program will result in termination of the Lifeline recipient's monthly Lifeline discount and de-enrollment from the Lifeline Program.

Additional Lifeline Program Information

The Lifeline program is limited to one benefit per household, consisting of either wireline or wireless service. A household is defined, for purposes of the Lifeline program, as an individual or group of individuals who live together at the same address and share income and expenses. Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

LIFELINE

A PHONE PROGRAM FOR LOW-INCOME CONSUMERS



TELE-MEDIA SOLUTIONS

Your Local Cooperative Community Association

About the Lifeline Program

Since 1985, the Lifeline program has provided a discount on phone service for qualifying low-income consumers to ensure that all Americans have the opportunities and security that phone service brings, including being able to connect to jobs, family and emergency services. In 2005, Lifeline discounts were made available to qualifying low-income consumers on pre-paid wireless service plans in addition to traditional landline service. Lifeline is part of the Universal Service Fund.

The Lifeline program is available to eligible low-income consumers in every state, territory, commonwealth, and on Tribal lands. Consumers must have proper proof of eligibility to enroll. Existing Lifeline subscribers must re-certify their eligibility every year by responding to their Lifeline Provider's attempts to re-certify eligibility. Subscribers who fail to re-certify their eligibility will be de-enrolled from the program and lose their Lifeline benefits.

For more information, visit www.lifelinesupport.org or call the FCC at 1-888-225-5322.

For Tele-Media customers, Lifeline provides a discount on basic monthly telephone service of \$9.25 per month.



TELE-MEDIA SOLUTIONS

105 E Railroad Street, Pekin, IN 47165
812-967-3171 • 877-967-3171
www.telemedia.coop

LIFELINE ELIGIBILITY AND APPLICATION PROCESS

Are You Eligible?

To participate in the Lifeline program, a consumer must either have an income that is at or below 135% of the federal poverty guidelines (see chart) or participate in one of the following assistance programs:

- Medicaid
- Supplemental Nutrition Assistance Program (Food Stamps or SNAP)
- Supplemental Security Income (SSI)
- Federal Public House Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance to Needy Families (TANF)
- National School Lunch Program's Free Lunch Program
- Bureau of Indian Affairs General Assistance
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Head Start (if income eligibility criteria are met)
- State assistance programs (if applicable)

A consumer may be eligible if his or her household income is at or below 135% of the federal poverty guidelines as indicated in the chart. These amounts may change and you are required to provide proof of all sources of income. The person applying for eligibility **must be** the same person listed on the telephone bill.



Lifeline Household Eligibility

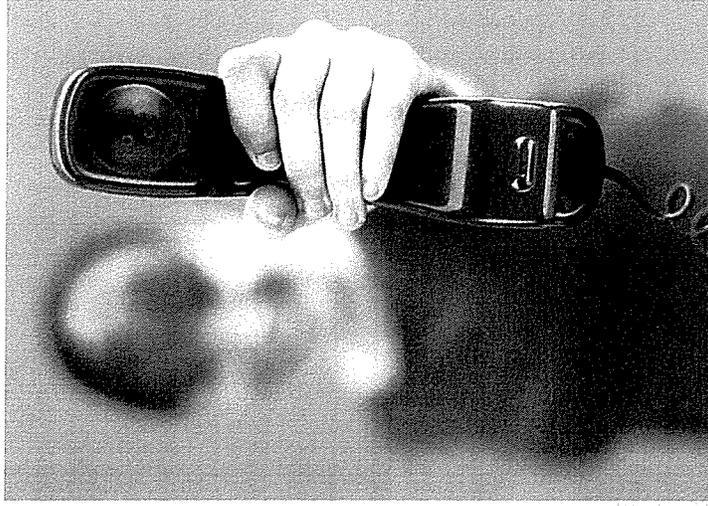
Federal rules prohibit eligible low-income consumers from receiving more than one Lifeline discount per household. An eligible consumer may receive a discount on either a wireline or wireless service, but not both.

A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live together at the same address as one economic unit. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of the household. A household may include related and unrelated persons. A household is not permitted to receive Lifeline benefits from multiple providers. Violation of the one-per-household limitation constitutes a violation of the FCC's rules and will result in de-enrollment from the program. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person.

A consumer whose household currently is receiving more than one Lifeline service must select a single Lifeline provider and contact the other provider to de-enroll from their program. Consumers violating this rule may also be subject to criminal and/or civil penalties.

Household Size	Household Income
1	\$16,038.00
2	\$21,627.00
3	\$27,216.00
4	\$32,805.00
For each additional person, add	\$5,616.00

320834m1210.pdf



How to Apply

Simply call toll free **1-866-290-1731** to verify eligibility and to request an application. Tele-Media Solutions also provides applications to customers upon request.

You must provide proof of program participation. This could include a copy of your benefit ID card, a copy of an eligibility letter from an authorized agency or prior year's statement of benefits. Do not send original documents.

Mail the application, telephone bill and documents to:

Lifeline Administrator
30 Lamidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Response to Line3010
Washington Rural Telephone Company
Study Area 320834

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Washington County RTC 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 Washington County RTC is meeting its obligations for meeting its goals and required obligations are specified within the FCC Form 481 annual filing.

LINE 3026– Audited Financial Statements

REDACTED FOR PUBLIC INSPECTION