FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

June 29, 2016

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

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – ETC Annual Reports and Certifications WC Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Totah Communications Inc. ("Totah"), Kansas, Study Area Code 412030, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Totah, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan information identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. 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 and14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources. The request for confidential treatment of the five-year plan information is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). Totah keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Totah is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.

REDACTED - FOR PUBLIC INSPECTION

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

Totah requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Totah offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA 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. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to 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 Nos. 10-90 and 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 five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 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 and associated progress reports contain information on the Company's future plans, number of customers served and other planning information that 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 Internet service 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 would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

REDACTED - FOR PUBLIC INSPECTION

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

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

(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 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 five year planning period information would provide valuable information to 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.

Please contact me if you have any questions.

Sincerely,

Tim Morrissey
President
314-605-9220
tmorrissey@fwainc.com

Enclosures

REDACTED - FOR PUBLIC INSPECTION

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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Peter Deibert
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	die_bert@totelcsi.com
	Form Type	54.313 and 54.422

(100) Service Quality Improvement Reporting
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no) ● ○
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) ● ○

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

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

412030KS112.pdf

Name of Attached Document

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

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

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

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<210> For the prior calendar year, were there any reportable voice service outages? No

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

(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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.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

(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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

(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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.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	412030KS510.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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	412030KS610.pdf

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**

-- See attached worksheet --

(710) Broadbrand Price Offerings
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	**Total Rate and Fees**	**Broadband Service - Download Speed (Mbps)**	**Broadband Service - Upload Speed (Mbps)**	**Usage Allowance (GB)**	**Usage Allowance Action Taken When Limit Reached {*select*}**
			-- See attached worksheet --					

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<810>	Reporting Carrier	Totah Communications, Inc
<811>	Holding Company	Totah Communications, Inc.
<812>	Operating Company	Totah Communications, Inc.

<813>

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

-- See attached worksheet --

(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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

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

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

		Select Yes or No or Not Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

(1000) Voice and Broadband Service Rate Comparability
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	412030KS1010.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	412030KS1030.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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).	

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
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<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
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<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website HTTP www.totelcsi.com/lifeline-link

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

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ✔

<1222> Details on the number of minutes provided as part of the plan, ✔

<1223> Additional charges for toll calls, and rates for each such plan. ✔

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

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

Incremental Connect America Phase I reporting

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

<2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support

<2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A> Round 2 Recipient of Incremental Support?

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

Name of Attached Document Listing Required Information

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

<2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-

Name of Attached Document Listing Required Information

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

(2000) Price Cap Carrier Additional Documentation (Continued)
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

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

<2016> Certification support used to build broadband

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

<2017A> Connect America Fund Phase II recipient?

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

Name of Attached Document Listing Required Information

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing Required Information

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

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

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

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

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

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

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
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<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

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

Progress Report on 5 Year Plan

(3009)	Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	412030KS3010b.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	◉ ○
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	◉ ○
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		✔
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		✔
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	412030KS3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	○ ○
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		☐
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		☐
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		☐
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		☐
(3023)	Underlying information subjected to a review by an independent certified public accountant		☐
(3024)	Underlying information subjected to an officer certification.		☐
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		☐
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

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

Data Collection Form

FCC Form 481

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

July 2013

<010>	Study Area Code	412030
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<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die bert@totelcsi.com

[redacted]

REDACTED - FOR PUBLIC INSPECTION

Name of Attached Document Listing Required Information

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

4005 Rural Broadband Experiment

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

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

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

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

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

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

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

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

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

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

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: TOTAH COMMUNICATIONS

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/28/2016

Printed name of Authorized Officer: Keith Watson

Title or position of Authorized Officer: Exec VP/Controller

Telephone number of Authorized Officer: 9185352208 ext.

Study Area Code of Reporting Carrier: 412030 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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.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

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

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**
KS	Tyro		FR	17.4	0.0	1.56	0.0	18.96
KS	Elgin		FR	17.4	0.0	1.56	0.0	18.96
KS	Liberty		FR	17.4	0.0	1.56	0.0	18.96
KS	Hewins		FR	17.4	0.0	1.56	0.0	18.96
KS	Elk City		FR	17.4	0.0	1.56	0.0	18.96
KS	Havana		FR	17.4	0.0	1.56	0.0	18.96

(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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<711>

<a1> State	<a2> Exchange (ILEC)	<b1> Residential Rate	<b2> State Regulated Fees	<c> Total Rates and Fees	<d1> Broadband Service - Download Speed (Mbps)	<d2> Broadband Service -Upload Speed (Mbps)	<d3> Usage Allowance (GB)	<d4> Usage Allowance Action Taken When Limit Reached {select}
KS	Tyro	29.5	0.0	29.5	1.0	0.768	999999.0	Other, NEVER REACHED
KS	Tyro	39.0	0.0	39.0	2.0	0.768	999999.0	Other, NEVER REACHED
KS	Tyro	48.0	0.0	48.0	3.0	0.768	999999.0	Other, NEVER REACHED
KS	Tyro	65.0	0.0	65.0	4.0	1.0	999999.0	Other, NEVER REACHED
KS	Elgin	29.5	0.0	29.5	1.0	0.768	999999.0	Other, NEVER REACHED
KS	Elgin	39.0	0.0	39.0	2.0	0.768	999999.0	Other, NEVER REACHED
KS	Elgin	48.0	0.0	48.0	3.0	0.768	999999.0	Other, NEVER REACHED
KS	Elgin	65.0	0.0	65.0	4.0	1.0	999999.0	Other, NEVER REACHED
KS	Liberty	29.5	0.0	29.5	1.0	0.768	999999.0	Other, NEVER REACHED
KS	Liberty	39.0	0.0	39.0	2.0	0.768	999999.0	Other, NEVER REACHED
KS	Liberty	48.0	0.0	48.0	3.0	0.768	999999.0	Other, NEVER REACHED
KS	Liberty	65.0	0.0	65.0	4.0	1.0	999999.0	Other, NEVER REACHED
KS	Hewins	29.5	0.0	29.5	1.0	0.768	999999.0	Other, NEVER REACHED
KS	Hewins	39.0	0.0	39.0	2.0	0.768	999999.0	Other, NEVER REACHED
KS	Hewins	48.0	0.0	48.0	3.0	0.768	999999.0	Other, NEVER REACHED
KS	Hewins	65.0	0.0	65.0	4.0	1.0	999999.0	Other, NEVER REACHED
KS	Elk City	29.5	0.0	29.5	1.0	0.768	999999.0	Other, NEVER REACHED
KS	Elk City	39.0	0.0	39.0	2.0	0.768	999999.0	Other, NEVER REACHED
KS	Elk City	48.0	0.0	48.0	3.0	0.768	999999.0	Other, NEVER REACHED
KS	Elk City	65.0	0.0	65.0	4.0	1.0	999999.0	Other, NEVER REACHED
KS	Havana	29.5	0.0	29.5	1.0	0.768	999999.0	Other, NEVER REACHED

(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	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
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<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
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<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}
KS	Havana	39.0	0.0	39.0	2.0	0.768	999999.0	Other, NEVER REACHED
KS	Havana	48.0	0.0	48.0	3.0	0.768	999999.0	Other, NEVER REACHED
KS	Havana	65.0	0.0	65.0	4.0	1.0	999999.0	Other, NEVER REACHED

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Peter Deibert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	die_bert@totelcsi.com

<810>	Reporting Carrier	Totah Communications, Inc
<811>	Holding Company	Totah Communications, Inc.
<812>	Operating Company	Totah Communications, Inc.

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
Totel Customer Services, Inc.		Totel CSI

TOTAH COMMUNICATIONS, INC.

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

(USAC DOCUMENT - 412030KS112.PDF)

[redacted]

REDACTED - FOR PUBLIC INSPECTION

[redacted]

REDACTED - FOR PUBLIC INSPECTION

[redacted]

REDACTED - FOR PUBLIC INSPECTION

[redacted]

GREATER THAN 4MB
BROADBAND CAPABILITY

REMOTE
LOCATION

REDACTED - FOR PUBLIC INSPECTION

FCC 481 2016 PROGRESS REPORT MAP

SCALE:	NOT TO SCALE	DATE:	06-2016

[redacted]

GREATER THAN 4MB
BROADBAND CAPABILITY

REMOTE
LOCATION

REDACTED - FOR PUBLIC INSPECTION

FCC 481 2016 PROGRESS REPORT MAP

SCALE: NOT TO SCALE | DATE: 06-2016

GREATER THAN 4MB
BROADBAND CAPABILITY

LOCATION

REDACTED FOR PUBLIC INSPECTION

FCC 481 2016 PROGRESS REPORT MAP

SCALE:	NOT TO SCALE	DATE:	06-2016

[redacted]

GREATER THAN 4MB
BROADBAND CAPABILITY

REMOTE
LOCATION

REDACTED - FOR PUBLIC INSPECTION

FCC 481 2016 PROGRESS REPORT MAP

SCALE: NOT TO SCALE | DATE: 06-2016

GREATER THAN 4MB
BROADBAND CAPABILITY

LOCATION

REDACTED FOR PUBLIC INSPECTION

FCC 481 2016 PROGRESS REPORT MAP

SCALE:	NOT TO SCALE	DATE:	06-2016

GREATER THAN 4MB
BROADBAND CAPABILITY

REDACTED FOR PUBLIC INSPECTION

REMOTE
LOCATION

FCC 481 2016 PROGRESS REPORT MAP

SCALE:	NOT TO SCALE	DATE:	06-2016

TOTAH COMMUNICATIONS, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 412030KS510.PDF)

TOTAH COMMUNICATIONS, INC.
QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES

1. Available Customer Service Representatives to Answer Phones

All calls received by Totah Communications, Inc. during business hours are generally answered by the third ring. When the assigned customer representatives are unable to answer calls by the third ring, calls roll to our out sourced customer service help desk center.

2. Provide After Hours Emergency Customer Service

Calls are generally answered within 60 seconds. Call logs are reviewed daily by personnel. Customer service representatives have been given a list of questions by Totah Communications, Inc. to ask to assist them in resolving any issues. Unresolved issues are reviewed the following work day. Issues requiring immediate attention are sent to the Totah Communications, Inc. service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After-hours customer service is also available through our out sourced answering service 24/7.

3. Provide a 24/7 Hour Internet Help Desk Service

All calls are generally answered within 60 seconds. Call logs are reviewed daily by personnel with Managers available to review and address any issues.

4. Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities

Customers are given two months of missed payments before their service is cut off for non-payment of bill. Notification of the payment due date and the cut-off date are prominently displayed on bills as well as of the opportunity to make payment arrangements to avoid being cut-off.

Customers in danger of losing service also receive an automated call from a customer service representative to remind them of the late payment. If a customer complains that notice was not given, they are directed to speak with a Manager who will work to resolve the matter and prevent it from occurring again. Account balance reports are printed monthly using the company's billing system.

5. Ensure That All New Service Installation Orders Are Fulfilled Promptly

All customers are contacted within 48 hours regarding scheduling the new service installation. If outside plant is already in place, we fill the order at the customers' earliest convenience; if outside plant is in not in place, fill the order as soon as the weather permits.

6. Minimize Customer Downtime for Services & Make Requested Changes Promptly

Contact customers regarding all service requests the same day, with a goal of resolving all issues within 48 hours. Any unresolved issues will be resolved contingent upon the technician/customer coordination of access to the premises. Changes requiring key strokes are many times made within the same day as requested.

7. Proactively Monitoring in Case of Major Service Outages

Generally, Service technicians are made aware of outages affecting customers within an hour. It is the goal of Totah Communications, Inc. to resolve major outages within four hours or less. If an outage cannot be resolved within four hours, technicians will begin utilizing all resources, both from within and from without. Technicians establish and accomplish yearly training goals to be better equipped for managing all services.

CUSTOMER PRIVACY

Company Confidential Information Policy

Totah Communications, Inc. has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information.

The policy states: *"You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."*

Company CPNI Policy

Totah Communications, Inc. has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that "failure to protect this information result in disciplinary action up to and including discharge for the responsible employee."

As a part of this policy, Totah Communications, Inc. has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

TOTAH COMMUNICATIONS, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 412030KS610.PDF)

Totah Communications, Inc.
Emergency Response Plan
(Restoration of Service)

CONTACT LIST

Name & Title	Office#
Mark M Gailey	918 535 2208
mmgailey@totelcsi.com	
President & General Manager	
Dusty Harper	918 535 2208
dusty@totelcsi.com	
Engineering Supervisor	
Keith Watson	918 535 2208
kewatson@totelcsi.com	
Executive VP & Controller	

Purpose

The primary purpose of this Emergency Response Plan (the "Plan") is to set forth general guidelines, policies and procedures to be taken in case of an emergency as defined below to enable Totah Communications, Inc. (the "Company") to secure expeditious restoral of service first to local emergency management agencies and then to Company customers in the event of such emergency.

Scope

This Plan, is compliant with the Kansas Corporation Commission (KCC) Rules, shall be followed to the extent possible in the event of an emergency which, for the purposes of this Plan, shall be defined as: (1) service interruptions of such magnitude that conditions affect the entire Company system or a major division thereof; or (2) a situation which, in the judgment of Company management, may cause a high degree of public interest or concern. The conditions which would require use of these procedures are collectively referred to herein as "emergency," "emergency conditions" or "emergency situation."

This Plan recognizes that each emergency will present challenges specific to the situation, but the same general recovery steps should be followed during each emergency. An Emergency Response Team will be established during each emergency to direct the recovery process.

Emergency Response Team

In the event of an emergency, an Emergency Response Team will be established. An Emergency Response Team Coordinator will be designated, and shall be the highest-ranking Company management employee available. Members of the Emergency Response Team will be selected by the Coordinator based upon an assessment of the critical skills and knowledge necessary as they relate to the emergency.

FUNCTIONS OF THE EMERGENCY RESPONSE TEAM

The functions of the Emergency Response Team shall include the following:

I. GENERAL FUNCTIONS

(A) Make an initial assessment of the extent of the service interruption;

(B) Determine if the service interruption can be restored by the use of in-house personnel only or whether outside resources will be required;

(C) Provide priority consideration to restoration of service, where feasible, to emergency services (911/E911 services, hospitals, law enforcement and fire-fighting entities);

(D) Make immediate assessments of the restoration of service;

(E) Make a conclusory assessment of the restoration of service.

II. SPECIFIC FUNCTIONS

(A) Communications

The Emergency Response Team Coordinator will, as soon as is practical and feasible, insure that contact is made with the KCC through the Consumer Services Division at (800) 662-0027 or (785) 271-3140. Such notification will, where possible consist of the following information and will be provided as soon as information is available:

(1) Initial Contact

a. Notify KCC of outage;

b. Notify KCC of cause of the outage;

c. Notify KCC of the area affected; and,

d. Notify KCC of the estimated time for repair.

(2) Intermediate Contact

a. Provide status reports as deemed necessary by the Emergency Response Team Coordinator or as requested by the KCC.

(3) Conclusory Contact

a. Final contact advising the KCC of restoral of service.

In addition to the communication responsibilities listed above, the Emergency Response Team Coordinator will insure that contact is made with all appropriate and necessary employees in the affected area and instruct them where to report for purposes of expediting restoration of service.

(B) Damage Assessment

The Emergency Response Team will have the duty of assessing the damage to all Company buildings and outside plant facilities. The Team will also be in charge of determining power outages. The Coordinator will be responsible for the coordination of restoration of power either commercially or with the use of stand-by generators, and also for the coordination of outside contractors which may be utilized by the Company if and when necessary for the restoration of service. The Coordinator will also maintain a list of the contact names and phone numbers where backup generators may be available.

(C) Priority of Restoration

The Emergency Response Team will be responsible for giving priority for restoration of service to the local emergency management agencies (i.e. Police, Fire, Hospital and 911 Center). The Emergency Response Team will restore access to toll service in the event of a toll outage. The Coordinator will also cooperate with emergency agencies for the clearing downed lines and poles from roadways. After service has been restored to all local emergency management agency locations, this team will begin the task of restoring service to all Company customers affected by the emergency.

III. COMPANY EMPLOYEES

The Company believes it is the responsibility of each employee that is a member of the Emergency Response Team to secure his/her family first and then report to the Company. Employees deemed critical to the restoration process will be directed to report to the location requiring their particular skills and expertise.

TOTAH COMMUNICATIONS, INC.

VOICE SERVICES RATE COMPARABILITY

(USAC DOCUMENT - 412030KS1010.PDF)

Voice Services Rate Comparability
Totah Communications, Inc. - Kansas

In compliance with the 54.313 Rules, Totah Communications, Inc. – Kansas must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2016 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the rate floor for voice services is $21.93 and the reasonable comparability benchmark for voice services is $41.07[1].

The rates shown on the Voice Pricing Form (0700) are below $41.07. Consequently, Totah Communications, Inc. – Kansas meets the above mentioned requirement.

[1] WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2016 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCS SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS; WC Docket #10-90, DA 16-362 Released April 5th, 2016

TOTAH COMMUNICATIONS, INC.

LIFELINE PLAN

(USAC DOCUMENT - 412030KS1210.PDF)

TOTAH COMMUNICATIONS, INC. - KANSAS
LIFELINE/LINKUP AMERICA ON TRIBAL LANDS PROGRAM
AUTHORIZATION AND CERTIFICATION FORM

You are required to complete and sign this certification form in order to enroll you in Totah Communications, Inc.'s (Totah) "Enhanced" Lifeline and/or "Expanded" LinkUp programs as approved by the Federal Communications Commission (FCC). This authorization is only for the purpose of verifying your participation in these programs and will not be used for any other purpose.

THE BENEFITS YOU RECEIVE UNDER THE ENHANCED LIFELINE/LINKUP PROGRAM WILL TERMINATE ON MAY 31, 2016, UNLESS YOU COMPLETE ANOTHER AUTHORIZATION AND CERTIFICATION FORM WITHIN THIRTY DAYS OF JUNE 1, 2016 (2016 LIFELINE PROGRAM) AND RETURN IT TO TOTAH COMMUNICATIONS, INC.

A. YOU MUST MEET PROGRAM PARTICIPATION REQUIREMENTS *OR* HOUSEHOLD INCOME REQUIREMENTS

1. I hereby certify that I participate in at least one of the following programs (**CHECK ALL THAT APPLY**) OR my household income is at or less than 150% of the federal poverty level:

_____ Supplemental Nutrition Assistance Program (SNAP a/k/a Food Stamps)
_____ Temporary Assistance for Needy Families (TANF)
_____ Supplemental Security Income (SSI)
_____ Medical Assistance (Medicaid)
_____ General Assistance
_____ Food Distribution Program
_____ Food Distribution Program on Indian Reservations ("FDPIR")
_____ Federal Public Housing
_____ Low Income Energy Assistance Program (LIEAP)
_____ Bureau of Indian Affairs General Assistance
_____ Temporary Assistance for Needy Families (TANF) Tribally-administered block grant programs
_____ Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision)
_____ National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals)
_____ Tribally Administered Free School Lunch Program

OR

_____ My household income is at or less than 150% of the federal poverty level. There are ___ individuals in my household. Customer must provide sufficient proof of income as set forth in 47 CFR §54.400(f). **You will need to fill out page 3 if qualifying by Federal Poverty Level.**

B. YOU MUST MEET THE "ONE PER HOUSEHOLD" REQUIREMENT

- **ONLY ONE PERSON IN A HOUSEHOLD CAN QUALIFY TO RECEIVE PROGRAM BENEFITS.**
- **A "HOUSEHOLD" IS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES.**
- **ONLY ONE RESIDENCE TELEPHONE SERVICE IN A HOUSEHOLD CAN RECEIVE PROGRAM SUPPORT.**
- **A HOUSEHOLD MAY NOT RECEIVE LIFELINE/LINKUP BENEFITS FROM MULTIPLE SERVICE PROVIDERS.**

_____ *My initials here certify that my household meets the one-per-household requirement. I understand that falsely certifying eligibility is a violation of the rules of the Federal Communications Commission and will result in my removal from the Lifeline/LinkUp Program and could result in criminal prosecution by the United States government.*

Do you live at an address at which there are multiple households (for example, a nursing home or group home)?

_____ Yes (If yes, you must complete a supplemental form to determine your eligibility.)
_____ No

C. YOU MUST ACKNOWLEDGE AND CERTIFY THE FOLLOWING STATEMENTS AND NOTIFICATION OBLIGATIONS (*You must **read and initial** all statements below to acknowledge and certify you understand your obligations.*)

_____ I certify that the telephone service location to which this certification applies is my primary/temporary (circle one) residential service address located at _____, and to the best of my knowledge this residential service address is located on former tribal land/reservation (as defined in 25 CFR § 20.1(v)).

_____ I also certify that if the address identified above is a temporary one, I will recertify my temporary residential address every 90 days.

_____ I also certify that if in the future, I no longer live at the address identified above, I will notify Totah Communications, Inc. within 30 days.

_____ I also certify that if in the future, I no longer participate in or qualify for at least one of the programs listed in item A.1 above or conditions change in any way, I will notify Totah Communications, Inc. within 30 days.

_____ I also certify that I will notify Totah Communications, Inc. within 30 days if I no longer live at the address identified above.

_____ I also certify that:

_____a. The telephone service which I am requesting receipt of Lifeline and/or LinkUp benefits for is listed in my name.
_____b. I am 18 years of older and am not claimed as a dependent on another person's tax return.
_____c. The above service address is my primary/temporary residence, not a second home or business.

_____d. My household will receive only one Lifeline/LinkUp service and, to the best of my knowledge, my household is not already receiving a Lifeline/LinkUp service.

D. YOU MUST ACKNOWLEDGE THE FOLLOWING STATEMENTS (*You must **read and initial** all statements below to acknowledge your understanding of the actions of Totah Communications, Inc., you hereby authorize.*)

_____ I authorize Totah Communications, Inc. or its duly appointed representative to access any records required to verify these statements in order to confirm my continued participation in the above program. I authorize representatives of the above programs to discuss with and/or provide copies to Totah Communications, Inc., if requested by the company, to verify my participation in the above program and my eligibility for "Enhanced" Lifeline or "Expanded" LinkUp benefits.

_____ I authorize Totah Communications, Inc. to transmit to the Administrator of the National Lifeline Accountability Database my full name, my full residential address, my date of birth, and the last four digits of my Social Security Number or Tribal Identification Number, the telephone number to be associated with Lifeline/LinkUp Program benefits, the date on which Lifeline/LinkUp service is begun, the date on which Lifeline/LinkUp Program benefits end, the amount of support sought by the Company and the means through which I qualify for Program benefits. I understand that transmission of this information is required to ensure the proper administration of the Lifeline/LinkUp Program. I also understand that if I refuse to have this information transmitted to the Administrator, I will be denied Program benefits.

D. CUSTOMER/APPLICANT INFORMATION

Applicant's Name _____
Applicant's Billing Address, if different than identified above _____
Home Phone Number (_____) _____ Work Phone Number(_____) _____
(Your contact number during weekdays between 8 a.m. and 5 p.m.)
Social Security Number (SSN) (last four digits) or Tribal identification number if you do not have a SSN: _____
Date of Birth _____

When returning Lifeline form and proof we will also need a copy of photo Id of person who qualifies.

I AFFIRM, UNDER PENALTY OF PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE AND THAT PROVIDING FALSE OR FRAUDULENT INFORMATION TO RECEIVE LIFELINE/LINKUP BENEFITS IS PUNISHABLE BY LAW.

_____ _____
Signature of benefit recipient Date

TOTAH COMMUNICATIONS, INC.

MILESTONE CERTIFICATION

(USAC DOCUMENT - 412030KS3010.PDF)

Progress Report on 5 Year Plan

Line 3010(a) - Milestone Certification

Totah Communications, Inc. - Kansas certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 4Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within a reasonable amount of time.

TOTAH COMMUNICATIONS, INC.

CONSOLIDATED FINANCIAL STATEMENTS

(USAC DOCUMENT - 412030KS3017.PDF)

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

USDA-RUS

FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS

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

BORROWER NAME: Totah Communications, Inc.

ADDRESS: Ochelata, Oklahoma

INSTRUCTIONS-Submit report to RUS within 15 days after close of the period.

PERIOD ENDING: December, 2015

BORROWER DESIGNATION: OK1111

CERTIFICATION

We hereby certify that:

1. the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief; and

2. we have fulfilled our obligations under the Loan Documents throughout the year in all material respects

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

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

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the notes section of this report.

Mark Gailey

04/21/2016

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE END OF PERIOD
CURRENT ASSETS		**CURRENT LIABILITIES**	
1. Cash and Equivalents	[redacted]	**16. Accounts Payable**	[redacted]
2. Cash-RUS Construction Fund	[redacted]	**17. Notes Payable**	[redacted]
3. Accounts Receivable	[redacted]	**18. Current Mat. L/T Debt - RLIS**	[redacted]
4. Notes Receivable	[redacted]	**19. Current Mat. UT Debt-Other**	[redacted]
5. Materials and Inventory	[redacted]	**20. Current Mat.-Capital Leases**	[redacted]
6. Other Current Assets	[redacted]	**21. Other Current Liabilities**	[redacted]
Total Current 7. Assets (1 thru 6)	[redacted]	**Total Current 22. Liabilities (16 thru 21)**	[redacted]
NONCURRENT ASSETS		**LONG-TERM DEBT**	
8. Investment in Affiliated Companies	[redacted]	23. Funded Debt-RUS Notes	[redacted]
9. Other Noncurrent Assets	[redacted]	24. Funded Debt-RTB Notes	[redacted]
PLANT, PROPERTY, AND		25. Funded Debt-FFB Notes	[redacted]
EQUIPMENT		26. Funded Debt-Other	[redacted]
10. Telecom. Plant-in-Service	[redacted]	**Total Long-Term**	
		27. Debt (23 thru 26)	[redacted]
11. Plant Under Construction	[redacted]	**OTHER LIAB. & DEF. CREDITS**	
12. Plant Adj., Nonop. Plant, & Goodwill	[redacted]	28. Other Long-Term Liabilities	[redacted]
13. Less Accumulated Depreciation	[redacted]	**EQUITY**	
Net Plant		29. Cap. Stock Outstand. & Subscribed	[redacted]
14. **(10 thru 12 less 13)**	[redacted]	30. Additional Paid-in-Capital	[redacted]
		31. Membership and Cap. Certificates	[redacted]
		32. Patronage Capital Credits	[redacted]
		33. Retained Earnings or Margins	[redacted]
		34. **Total Equity (29 thru 34)**	[redacted]
TOTAL ASSETS 15. (7+8+9+14)	[redacted]	**TOTAL LIABILITIES AND 35. EQUITY (22+27+28+34)**	[redacted]

Total Equity = [redacted] **% of Total Assets**

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USDA-RUS

FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS

BORROWER DESIGNATION: OK1111

PERIOD ENDING: December, 2015

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	YEAR-TO-DATE
1. Local Network Services Revenues	
a. Voice	[redacted]
b. Video	[redacted]
c. Internet	
i. Broadband	[redacted]
ii. Other	[redacted]
2. Network Access Services and Long Distance Revenues	[redacted]
3. Miscellaneous Revenues	[redacted]
4. Other Operating Income	[redacted]
5. Uncollectible Revenues	[redacted]
6. Net Operating Revenues (11 thru 4 less 5)	[redacted]
7. Plant Specific Operations Expense	[redacted]
8. Plant Nonspecific Operations Expense *(Excluding Depreciation* & Amortization)	[redacted]
9. Customer Operations Expense	[redacted]
10. Corporate Operations Expense	[redacted]
11. Other Operating Expenses	[redacted]
12. Total Operating Expenses (7 thru 11)	[redacted]
13. Operating Income or Margins (6 less 12)	[redacted]
14. Nonoperating/Nonregulated Net Income	[redacted]
15. EBIDTA (13 + 14)	[redacted]
16. Depreciation Expense	[redacted]
17. Amortization Expense	[redacted]
18. EBIT (15 - 16 - 17)	[redacted]
19. Interest on Funded Debt	[redacted]
20. Other Interest Expense	[redacted]
21. Taxes	
a. Property	[redacted]
b. Income	[redacted]
22. Total Net Income or Margins (18-19-20-21)	[redacted]
23 Dividends Declared (Common)	[redacted]
24 Dividends Paid	[redacted]
25 Transfers to Patronage Capital	[redacted]
26 Principal Payments on Long Term Debt and Capital Leases	[redacted]
27 TIER (19 + 20 + 22) / (19 + 20)	[redacted]

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USDA-RUS

FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS

BORROWER DESIGNATION

OK1111

PERIOD ENDING

December, 2015

PART C. SERVICES

		1. RATES		2. SUBSCRIBERS		
		Residential	Business	Residential	Business	Total
No.	**SERVICE OFFERINGS**	(a)	(b)	(a)	(b)	(c)
	Broadband Data Packages					
1	10M/10M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
2	6M/6M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
3	1M/1M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
4	5M/5M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
5	3M/3M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
6	2M/2M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
7	4M/4M	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	Nonbroadband Data Packages					
8						
9	56K	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
10						
	Voice Packages					
11	Local - KS	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
12	Local - OK	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
13	Local - OK	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

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USDA-RUS

FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS

BORROWER DESIGNATION

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PERIOD ENDING

December, 2015

PART C. COMMUNITIES

No.	Community	County	State	No.Broadband Data Customers	Broadband Application
1	Elgin city	Chautauqua	KS	[redacted]	
2	Other Area	Chautauqua	KS	[redacted]	
3	Elk City	Montgomery	KS	[redacted]	
4	Lenapah town	Nowata	OK	[redacted]	
5	Other Area	Washington	OK	[redacted]	
6	Liberty city	Montgomery	KS	[redacted]	
7	Ochelata town	Washington	OK	[redacted]	
8	Talala town	Rogers	OK	[redacted]	
9	Other Area	Osage	OK	[redacted]	
10	Burbank town	Osage	OK	[redacted]	
11	Tyro city	Montgomery	KS	[redacted]	
12	Wann town	Nowata	OK	[redacted]	
13	Havana city	Montgomery	KS	[redacted]	

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USDA-RUS

FINANCIAL AND STATISTICAL REPORT
FOR BROADBAND BORROWERS

BORROWER DESIGNATION: OK1111

PERIOD ENDING: December, 2015

PART D. STATEMENT OF CASH FLOWS

1. Beginning Cash	[redacted]
CASH FLOWS FROM OPERATING ACTIVITIES:	
2. Net Income	[redacted]
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3. Add: Depreciation	[redacted]
4. Add: Amortization	[redacted]
5. Other (Explain) Prior year income not on Dec 2014 and change in APBO and 2015 loss booked by auditors.	[redacted]
Changes in Operating Assets and Liabilities:	
6. Decrease/(Increase) in Accounts Receivable	([redacted]
7. Decrease/(Increase) in Materials and Inventory	([redacted]
8. Decrease/(Increase) in Other Current Assets	[redacted]
9. Increase/(Decrease) in Accounts Payable	[redacted]
10. Increase/(Decrease) in Other Current Liabilities	[redacted]
11. Net Cash Provided/(Used) by Operations	[redacted]
CASH FLOWS FROM FINANCING ACTIVITIES:	
12. Decrease/(Increase) in Notes Receivable	[redacted]
13. Increase/(Decrease) in Notes Payable	[redacted]
14. Plus:/(Less) Net Increase/(Decrease) in Long Term Debt (including current maturities)	([redacted]
15. Plus: Increase/(Less: Decrease) in Capital Stock, Paid-in Capital or Membership and Capital Certificates	([redacted]
16. Less: Payment of Dividends	[redacted]
17. Other (Explain) Changes in Capital Stock	[redacted]
18. Net Cash Provided/ (Used) by Financing Activities	([redacted]
CASH FLOWS FROM INVESTING ACTIVITIES:	
19. Net Capital Expenditures	([redacted]
20. Long-Term Investments	[redacted]
21. Other (Explain)	
22. Net Cash Provided (Used) by Investing Activities	([redacted]
23. Net Increase/ (Decrease) in Cash	[redacted]
24. Ending Cash	[redacted]

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USDA-RUS **FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS**	BORROWER DESIGNATION OK1111 PERIOD ENDING December, 2015

PART E. BIP PERFORMANCE MEASURES

	New Broadband Service	Improved Broadband Service
1. Number of households subscribing to	[redacted]	[redacted]
2. Number of businesses subscribing to	[redacted]	[redacted]
3. Number of educational providers receiving	[redacted]	
4. Number of libraries receiving	[redacted]	[redacted]
5. Number of health care providers receiving	[redacted]	
6. Number of public safety providers receiving		

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USDA-RUS **FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS**	BORROWER DESIGNATION OK1111 PERIOD ENDING December, 2015

Notes to Operating Report - Broadband

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