



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

July 1, 2016

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Oxford West Telephone Company
Study Area Code 100002**

Dear Ms. Dortch:

On behalf of Oxford West Telephone Company (“Company”), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company’s Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

July 1, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Oxford West Telephone Company
Study Area Code 100002
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Oxford West Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Five-Year Service Quality Improvement Plan (“Five-Year Plan”) Progress Report⁴ and must also report outages, both of which are contained in attachments to the 2016 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company’s outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481

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

July 2013

<010> Study Area Code	100002
<015> Study Area Name	OXFORD WEST TEL CO
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Dawna Hannan
<035> Contact Telephone Number: Number of the person identified in data line <030>	2073333455 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	dhannan@oxfordnetworks.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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

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

100002me112.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

**(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	100002
<015> Study Area Name	OXFORD WEST TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035> Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

100002me330.pdf

<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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.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	100002me510.pdf

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

REDACTED FOR PUBLIC INSPECTION

FCC Form 481

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

July 2013

<010> Study Area Code	100002
<015> Study Area Name	OXFORD WEST TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035> Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	100002me610.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	100002
<015> Study Area Name	OXFORD WEST TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035> Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

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

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

Passamaquoddy Tribe

<920> Tribal Government Engagement Obligation

100002me920.pdf

Name of Attached Document

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

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

Select Yes or No or Not Applicable
Yes
Yes

(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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

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

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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

<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
--	--

<010>	Study Area Code	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">100002me1210.pdf</div> Name of Attached Document
---	--

<1220> Link to Public Website HTTP

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

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

(2000) Price Cap Carrier Additional Documentation	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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.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	<input style="width: 100%;" type="text"/>	
<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	<input style="width: 100%;" type="text"/>	
<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.	<input style="width: 100%;" type="text"/>	
<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.	<input style="width: 100%;" type="text"/>	
<2024A> Round 2 Recipient of Incremental Support?	<input style="width: 100%;" type="text"/>	<input style="width: 100%; height: 40px;" type="text"/>
<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	<input style="width: 100%; height: 40px;" type="text"/>
<2025A> Round 1 or Round 2 Recipient of Incremental Support?	<input style="width: 100%;" type="text"/>	
<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	<input style="width: 100%; height: 40px;" type="text"/>
<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100%;" type="text"/>

(2000) Price Cap Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

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

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

July 2013

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

<2016> Certification support used to build broadband

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

<2017A> Connect America Fund Phase II recipient?

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

Name of Attached Document Listing Required Information

cap carrier used for capital expenditures in 2015.

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

Name of Attached Document Listing Required Information

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

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

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

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

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

<010>	Study Area Code	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.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.

(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

(3020) (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3021) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3022) 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

REDACTED FOR PUBLIC INSPECTION

(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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

Financial Data Summary

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

(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form

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

<010>	Study Area Code	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.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	100002
<015>	Study Area Name	OXFORD WEST TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035>	Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.com

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

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

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

<010> Study Area Code	100002
<015> Study Area Name	OXFORD WEST TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Dawna Hannan
<035> Contact Telephone Number - Number of person identified in data line <030>	2073333455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dhannan@oxfordnetworks.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) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	JSI
Name of Reporting Carrier:	OXFORD WEST TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 07/01/2016
Printed name of Authorized Officer:	Dawna Hannan
Title or position of Authorized Officer:	Vice President - Regulatory Affairs
Telephone number of Authorized Officer:	2073333455 ext.
Study Area Code of Reporting Carrier:	100002 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.	

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:	OXFORD WEST TEL CO
Name of Authorized Agent Firm:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 07/01/2016
Name of Authorized Agent Employee:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	100002 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.	

Attachments

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

REDACTED FOR PUBLIC INSPECTION

REF	CUSTOMER NAME	DESCRIPTION OF SERVICE REQUESTED	SERVICE REQUESTED (√ ALL APPLICABLE TO UNFULFILLED REQUEST)		BROADBAND	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
			BROADBAND	VOICE	SPEED REQUESTED	
1	Customer 1	DSL	X			This customer is well beyond 18,000 feet from the DSLAM in that area and located in a very sparsely populated area. We plan to review this request during the 2017 budget process.

Oxford West Telephone Company Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Oxford West Telephone Company (“Company”) hereby certifies that to the best of the knowledge of its officers responsible for said matters, it is complying with applicable service quality standards and consumer protection rules. The Company is subject to service quality standards as required by 35-A M.R.S.A. §7225, and to the Maine PUC’s general authority over service quality, which includes service quality standards adopted by the Maine PUC in Chapters 201 and 206 of its Rules. The Company is subject to consumer protection requirements, including, but are not limited to, the following: (1) filing a Provider of Last Resort Tariff pursuant to the requirements of the

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

Maine PUC which disclose rates, terms and conditions of service to customers; (2) adherence to Main PUC consumer protection and billing requirements governing telephone providers, including Chapters 206, 289, 290, 292, 294, 296 and 297; and (3) applicable federal and state requirements governing the protection of customers' privacy, including Truth-In-Billing, CPNI, and Red Flag Rules.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Oxford West Telephone Company Demonstration of Ability to Function in Emergency Situations

Oxford West Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹ The Company’s voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel. The Company complies with the FCC's backup power requirements, effective October 16, 2015.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”



OXFORD NETWORKS

www.oxfordnetworks.com

January 31, 2015

Governor Joseph Socabasin
Passamaquoddy Tribe
Indian Township Reservation
PO Box 301
Princeton, Maine 04468-0301

Dear Governor Socabasin,

Oxford West Telephone Company currently has tribal land belonging to the Passamaquoddy Tribe within our serving territory. The property is approximately 18.31 acres near Songo Pond in Albany Township. Oxford West Telephone Company currently provides telephone service to this location. We are able to provide high speed DSL service (5/1) to this location should the need arise.

The Federal Communications Commission (FCC) is requiring telephone companies such as Oxford West Telephone Company to meet with Tribal government leaders annually to discuss the following:

- Needs Assessment and Deployment Planning
- Feasibility and Sustainability Planning
- Marketing of Services in a Culturally Sensitive Manner
- Rights of Way Processes, and Use Permitting, Facilities Siting, Environmental and Cultural Preservation Review Processes
- Compliance with Tribal Business Licensing Requirement

We understand that both the Indian Township Reservation and the Pleasant Point Reservation have joint ownership of the above tribal land.

We would like to meet with both yourself and Governor Rueben Clayton Cleaves this month if possible. We are amenable to meeting with both of you together or separately whichever is most convenient for each of you. We will be sending a similar request to Governor Cleaves.

Please call me at your earliest convenience at 333-3455 to let me know of your availability to meet with senior management of Oxford West Telephone Company. After our initial meeting, we will be required to meet annually to continue discussions on the above issues. We very much look forward to meeting with you.

Sincerely,

Dawna K. Hannan
Vice President – Regulatory Affairs

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature <i>x Eddie Lozada</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
	B. Received by (Printed Name) <i>Eddie Lozada</i>	C. Date of Delivery
1. Article Addressed to: Governor Joseph Socabasin Passamaquoddy Tribe Indian Township Reservation PO Box 301 Princeton, ME 04468-0301	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™ <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Transfer from service label)	7004 1350 0000 1450 7988	
PS Form 3811, July 2013	Domestic Return Receipt	



OXFORD NETWORKS

www.oxfordnetworks.com

January 31, 2015

Governor Reuben Clayton Cleaves
Passamaquoddy Tribe
Pleasant Point Reservation
P.O. Box 343
Perry, ME 04667-0343

Dear Governor Cleaves,

Oxford West Telephone Company currently has tribal land belonging to the Passamaquoddy Tribe within our serving territory. The property is approximately 18.31 acres near Songo Pond in Albany Township. Oxford West Telephone Company currently provides telephone service to this location. We are able to provide high speed DSL service (5/1) to this location should the need arise.

The Federal Communications Commission (FCC) is requiring telephone companies such as Oxford West Telephone Company to meet with Tribal government leaders annually to discuss the following:

- Needs Assessment and Deployment Planning
- Feasibility and Sustainability Planning
- Marketing of Services in a Culturally Sensitive Manner
- Rights of Way Processes, and Use Permitting, Facilities Siting, Environmental and Cultural Preservation Review Processes
- Compliance with Tribal Business Licensing Requirement

While conducting research, we were advised that both the Pleasant Point Reservation and the Indian Township Reservation have joint ownership of the above tribal land.

We would like to meet with both yourself and Governor Socabasin this month if possible. We are amenable to meeting with both of you together or separately whichever is most convenient for each of you. We will be sending a similar request to Governor Socabasin.

Please call me at your earliest convenience at 333-3455 to let me know of your availability to meet with senior management of Oxford West Telephone Company. After our initial meeting, we will be required to meet annually to continue discussions on the above issues. We very much look forward to meeting with you.

Sincerely,

A handwritten signature in black ink that reads "Dawna K. Hannan". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dawna K. Hannan
Vice President – Regulatory Affairs

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Governor Reuben Clayton Cleaves
 Passamaquoddy Tribe
 Pleasant Point Reservation
 P. O. Box 343
 Perry, ME 04667-0343

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Reuben Cleaves* Agent

B. Received by (Printed Name) Addressed to
Reuben Cleaves

C. Date of Delivery
2/18/16

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Certified Mail® Priority Mail Express™
- Registered Return Receipt for Merchandise
- Insured Mail Collect on Delivery

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
 (Transfer from service label)

7004 1350 0000 1450 7971

PS Form 3811, July 2013

Domestic Return Receipt

Product	Description	Code	Monthly Cost	One Time Charges
Lifeline Telephone Service	<p>The Lifeline Service Program provides for a reduction equal to amounts as ordered by the Maine Public Utilities Commission. Monthly Lifeline subsidies will not exceed the cost of monthly access line rate(s) and the FCC end user subscriber line Charge.</p> <p>the reduction applies to the monthly rate for one residential basic exchange service line. The reduction in the monthly rate and other Lifeline benefits are provided to qualified residential customers under the FCC Lifeline Assistance program.</p>			
General Information	<p>~ This service is restricted to low income residential subscribers. To qualify for the Lifeline Service Program any member of a subscriber's household must be a recipient of benefits from one of the following programs: Medicaid; Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps; Supplemental Security Income (SSI); Federal Public Housing Assistance; Low-Income Home Energy Assistance Program (LIHEAP); National School Lunch Program's free lunch program; and Temporary Assistance for Needy Families (TANF). An applicant is also eligible if they have a household income at or below 135% of the Federal Poverty Guidelines.</p> <p>~ The company is prohibited against disconnection of Lifeline customers' local service for non-payment of optional and toll charges.</p> <p>~ The Company has the right to place mandatory toll restriction on Lifeline accounts who fail to make payment of toll charges within a reasonable period of time.</p> <p>~ Toll Restrictions service will be offered free of charge to Lifeline customers.</p> <p>~ The Company is prohibited from requiring a Lifeline customer to pay service deposits in order to initiate service even if the subscriber voluntarily elects to receive toll blocking.</p> <p>~ the Company must apply partial payments received from Lifeline customers first to local charges and then to toll charges.</p> <p>~ A credit of -\$9.00 applies to installing one residential access line for those customers who are eligible for the Lifeline Service Program. This credit also applies for restoration or reconnection of service, for reasons other than temporary suspension of service, at the same location no more than once per customer per year.</p>		\$9.25 Federal Credit \$3.50 State Credit	\$9.00 Installation Credit
Responsibility of the Subscriber	<p>Customers must be certified as eligible by the appropriate State of Maine agency or present satisfactory proof of eligibility to the Company for both the reduced monthly rate and the installation credit. Recertification of eligibility will occur at least once per year. The monthly credit will be removed from customer accounts who are no longer eligible.</p>			
Local Private Line Service	<p>Private Line Telephone Service is the provision of facilities, including channels and station equipment not switched through a central office, to enable a customer to communicate between specified locations. All facilities required for this service are furnished by the Telephone Company on a full-period service basis only.</p> <p>The service equipment and channels provided under this section are not furnished for the commercial transmission of communications between exchanges nor for the use on competition with any form of service rendered by the Telephone Company or its connecting companies.</p> <p>The rates specified herein are applicable where facilities are available and when standard transmission voice grade circuits can be obtained without the use of special equipment. If, for operating reasons, special equipment is required to render satisfactory service, such special equipment shall be charged for in addition to the applicable charges for standard equipment.</p>			
Local Channels (Dry Cable Pair)	Local Channels		\$10.80	
Local Transport Digital Line Service	Channels provided herein are for data transmission only		\$12.00	
Intra Exchange Dark Fiber	Priced on an Individual Case Basis (ICB)		ICB	
Off/On Premise Extension	<p>Off Premise and On Premise Extensions are not in accordance with the general plan of furnishing telephone service are provided only under special conditions when warranted by the circumstances involved and when suitable facilities are and continue to be available.</p> <p>Off premise and On Premise Extensions are furnished when the station telephone is outside the building in which the associated telephone is located. An extension is considered to be off-premise if it leaves the customer's property boundary (i.e. across the road), but within the same exchange.</p> <p>A special equipment charges as approved by the Public Utilities Commission under special contract will be applied for such equipment as may be required at any time for transmission and signaling where a customer requires an off premise station line in connection with access line telephone service.</p> <p>The type of circuit construction and its routing are at all times determined by the Telephone Company and ownership of such circuits shall remain vested in the Company.</p>			
Off Premise Extension	Lines serving Business or Residence where the extension termination is on premises other than the access line termination point, but within the same exchange area.		\$5.80 /per loop if same continuous loop \$18.10 / per loop if non-continuous loop	
On Premise Extension	Lines serving Business or Residence where the extension termination is on the same continuous property as the access line termination point but in a separate building		\$3.80 /per loop	

SERVICE CHARGES

3.1 General

- A. Service Charges apply to services or equipment ordered or connected into service at the Customer's request including initial connections, moves, and restoration of service. Certain items of equipment in this Tariff are listed with an Installation Charge. This Installation Charge is applied in addition to the appropriate Service Charges listed below.
- B. Service charges apply in addition to, but not in lieu of charges which may be incurred in installations of a temporary or speculative nature.
- C. Service charges are comprised of the following work functions, one or more of which is applicable based upon the service or equipment requested by a Customer.
 - 1. Initial Connection Charge - Applicable for work performed by the Telephone Company in connection with the Initial establishment of or restoration of provider of last resort retail service.
 - 2. Secondary Service Order Charge - Applicable for work performed by the Telephone Company in association with connections, moves or changes to an established provider of last resort retail service
 - 3. Telephone Number Change Charge - Applicable for work performed by the Telephone Company in connection with changing telephone numbers at the customer's request
 - 4. Network Interface/Drop Relocation Charge - Applicable for work performed by the Telephone Company for the relocation of the Network Interface device or aerial/buried drop.
 - 5. Additional Line Connection Charge - is applicable for work performed by the Telephone Company in connection with the installation of additional line(s) at the time of initial establishment of service. Applies when a customer is adding more than one access line at a time (Initial Connection Charge of \$38.00 applies for the first line).

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 8/1/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson
President & CEO

**Oxford West Telephone Company
 Provider of Last Resort Retail Service
 Schedule of Rates, Terms and Conditions**

3.2 Rates

		<u>Nonrecurring Charge</u>	
		<u>Business</u>	<u>Residence</u>
A.	Initial Connection Charge	\$38.00	\$38.00
B.	Secondary Service Order Charge	\$ 5.00	\$ 5.00
C.	Telephone Number Change Charge	\$15.00	\$15.00
D.	Network Interface/Drop Relocation Charge	\$20.00	\$20.00.
E.	Additional Line Connection Charge	\$20.00	\$20.00

3.3 Application of Service Charges

- A. The Initial Connection Charge is applicable for requests for:
 - 1. Initial connection of provider of last resort retail service
 - 2. Transfer of provider of last resort retail service involving a request for a final bill or, if a final bill is not requested, a refusal of the future Customer to accept full responsibility for the former Customer's account.

- B. The Secondary Service Order Charge is applicable for subsequent Customer requests for connections, moves or changes to an established provider of last resort retail service.

- C. The Initial Connection Charge and the secondary service order charge cannot be applied on the same order. When an order requires work for which both the Initial Connection Charge and secondary service order charge would otherwise be applied, only the Initial Connection Charge is applicable.

- D. Discontinuance of Service Charge An Initial Connection Charge will apply for restoration of service following disconnection for nonpayment.

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 2012/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson
 President & CEO

**Oxford West Telephone Company
Provider of Last Resort Retail Service
Schedule of Rates, Terms and Conditions**

**Section 3
Page 3
Original**

- E. In the case of equipment for which the initial Contract (termination agreement) period is more than one month at the same location, the Subscriber may arrange for the change of location on the same or to different Premises in the same Exchange area by one of the following methods:
1. By terminating the Contract for service at the old location, and signing a new application. In this case the Subscriber is required to pay the sum of any Termination Charges which may be applicable plus the Installation Charges which would apply in the case of a new installation.
 2. By paying the Cost of making the change in location including the Cost of removing all the equipment from the old locations and the Cost of installing the equipment at the new locations. In this case the Contract period is not affected.

3.4 Exceptions

- A. Service Charges do not apply for the following:
1. Visits to a Customer's Premises solely for the purpose of repair, maintenance or disconnection of Telephone Company provided service and equipment.
 2. Changes from Premium to Economy service or changes from any service other than Provider of Last Resort Retail Service to Provider of Last Resort Retail Service.
 3. Service reestablished after the destruction of the residential Customer's Premises by fire, flood, or other similar causes beyond the Customer's control, where the same amount of service is reestablished within a reasonable period of time at the same or different location. If, under the preceding conditions, service is installed at another location and then subsequently reestablished at the original location, Service Charges will apply for the subsequent installation.

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 8/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson

President & CEO

**Oxford West Telephone Company
Provider of Last Resort Retail Service
Schedule of Rates, Terms and Conditions**

**Section 3
Page 4
Original**

4. A change of telephone number when initiated by the Company.
5. Any work functions required not due to Customer's request.

B. To the extent the Commission requires application of a discount to installation charges for customers who have complied with the certification requirements and qualified for Lifeline service pursuant to Part 54 of the Rules of the Federal Communications Commission, Company shall apply such Commission ordered discounts to the installation charges associated with an initial connection of provider of last resort retail service.

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 8/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson

President & CEO

Residential Economy Service

4.1 Eligibility

- A. Residential service rates shall apply if the service is primarily for domestic purposes and the telephone number associated with the service is not included in any form of advertising for any business purpose.
- B. Business rates shall apply for any service that does not qualify for residential service rates as set forth in Section 4.1.A. Customers to whom business rates apply are not eligible to take Residential Economy Service.

4.2 Definitions

- A. Basic Service Calling Area – (BSCA) is the local (non-interexchange) calling area of the “home exchange” of a customer of Oxford West Telephone Company. The BSCA includes all exchanges that were in the BSCA prior to the amendments effective in December 2002 plus all exchanges that are contiguous to the home exchange that were not included prior to the December 2002 amendments. Within a BSCA, there may be Economy and Premium calling options with flat-rate and per-minute pricing as specified in the definitions of those options. For all options, the BSCA includes all of the exchanges that are included in the calling option with the largest flat-rate calling area.
- B. Home Exchange – is the Exchange of the Company where the Customer receives dial tone.
- C. Economy Calling Area is the Customer’s basic-service calling area that has a flat monthly rate for unlimited calling within the Customer’ Home Exchange and the list of Exchanges identified in connection with the particular Home Exchange in Section 4.4.A and a per-minute rate for calling to the list of Exchanges identified in connection with the Home exchange in Section 4.4.C of this Tariff.

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 2012/12**

Effective Date:

Docket No. 2012-397

Docket No.:



Craig S. Gunderson
President & CEO

Residential Economy Service (cont.)

- D. Provider of last resort service – is a flat-rate service with voice grade access to the public switched telephone network; local usage within the basic service calling areas of incumbent local exchange carriers as of January 1, 2012; dual-tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; toll limitation for qualifying low-income customers; and the capacity to maintain uninterrupted voice service during a power failure, either through the incorporation into the network or network interface devices of suitable battery backup or through electric current. For purposes of this Schedule, all terms included within the definition of provider of last resort service have the same meanings as set forth in 35-A MRSA § 7201.
- E. Residential Economy Service – is provider of last resort service offered to residential customers on a retail basis with the Economy Service Area as the Customer’s Basic Service Calling Area.

4.3 Regulations Concerning Residential Economy Service.

- A. Calls Outside the Economy Calling Area – Residential Economy Service customers may make local calls from their Home Exchange to the additional Exchanges included in Section 4.4.C at a per-minute rate. The per-minute rate for such calls is set forth in Section 4.4.D of this Tariff. Calls made from the Home Exchange to locations within the State of Maine, other than those listed in Section 4.4 are billed to the Customer at the applicable intrastate toll rates of the carrier used to provide Customer’s intrastate toll service.
- B. Municipal Calling Service – Customer shall receive toll free calling to any other customer of a Provider of Last Resort within the municipality in which Customer resides where practicable so long as Customer is utilizing an intralata toll provider for whom Company provides billing to the Customer. In the event Customer is charged by an intralata toll provider for whom Company provides billing to the Customer for a call to a Provider of Last Resort customer within the municipality in which Customer resides, Company shall remove any charges associated with any such municipal calling from the customer's bill when notified by the customer.
- C. Changes in Calling Areas – The Customer’s initial selection of either the Economy Calling Area Service offering or the Premium Calling Area Service offering is without charge. Subsequent changes by the Customer

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 2012/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson

President & CEO

Residential Economy Service (cont.)

are subject to the applicable Service Order Charge as identified in this Tariff. If only one Calling Area Service offering is available for an Exchange, the Customer will automatically be classified under the available service offering and no charge will apply.

- D. Rates – The applicable rates for the Company’s Residential Economy Service are listed in Sections 4.4.B and 4.4.D of this Tariff.
- E. Lifeline – Company complies with all provisions set forth in Part 54 of the Rules of the Federal Communications Commission and shall offer all applicable State and Federal discounts to customers who have been properly certified as qualifying for Lifeline service pursuant to Part 54 of the Rules of the Federal Communications Commission.

4.4 Calling Area Rates and List of Exchanges

- A. List of Exchanges Where Flat-Rated Calling Applies

Home Exchange	Unlimited Flat-Rated Calling to the Following Exchanges
Andover	Andover, Roxbury Pond
Bethel	Bethel, Locke Mills, West Bethel,
Bryant Pond	Bryant Pond, West Paris
Hebron	Hebron
Locke Mills	Locke Mills, Bethel, West Bethel
No. Norway	No. Norway, Norway
Roxbury Pond	N/A
Upton	Upton
West Bethel	Bethel, Locke Mills, West Bethel

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 2012/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson
 President & CEO

Residential Premium Service

5.1 Eligibility

- A. Residential service rates shall apply if the service is primarily for domestic purposes and the telephone number associated with the service is not included in any form of advertising for any business purpose.
- B. Business rates shall apply for any service that does not qualify for residential service rates as set forth in Section 5.1.A. Customers to whom business rates apply are not eligible to take Residential Premium Service.

5.2 Definitions

- A. Basic Service Calling Area – (BSCA) is the local (non-interexchange) calling area of the “home exchange” of a customer of Oxford West Telephone Company. The BSCA includes all exchanges that were in the BSCA prior to the amendments effective in December 2002 plus all exchanges that are contiguous to the home exchange that were not included prior to the December 2002 amendments. Within a BSCA, there may be Economy and Premium calling options with flat-rate and per-minute pricing as specified in the definitions of those options. For all options, the BSCA includes all of the exchanges that are included in the calling option with the largest flat-rate calling area.
- B. Home Exchange – is the Exchange of the Company where the Customer receives dial tone.
- C. Premium Calling Area is the Customer’s basic-service calling area that has a flat monthly rate for unlimited calling within the Customer’ Home Exchange and the list of Exchanges identified in connection with the particular Home Exchange in Section 5.4.A of this Tariff.
- D. Provider of last resort service – is a flat-rate service with voice grade access to the public switched telephone network; local usage within the basic service calling areas of incumbent local exchange carriers as of January 1, 2012; dual-tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; toll limitation for qualifying low-income customers; and the capacity to maintain uninterrupted voice service during power failure, either through the incorporation

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 2012/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson

President & CEO

Residential Premium Service (cont.)

into the network or network interface devices of suitable battery backup or through electric current. For purposes of this Schedule, all terms included within the definition of provider of last resort service have the same meanings as set forth in 35-A MRSA § 7201.

- E. Residential Premium Service – is provider of last resort service offered to residential customers on a retail basis with the Premium Service Area as the Customer’s Basic Service Calling Area.

5.3 Regulations Concerning Residential Premium Service.

- A. **Calls Outside the Premium Calling Area** – Calls made from the Home Exchange to locations within the State of Maine, other than those listed in Section 5.4 are billed to the Customer at the applicable intrastate toll rates of the carrier used to provide Customer’s intrastate toll service.
- B. **Municipal Calling Service** – Customer shall receive toll free calling to any other customer of a Provider of Last Resort within the municipality in which Customer resides where practicable so long as Customer is utilizing an intralata toll provider for whom Company provides billing to the Customer. In the event Customer is charged by an intralata toll provider for whom Company provides billing to the Customer for a call to a Provider of Last Resort customer within the municipality in which Customer resides, Company shall remove any charges associated with any such municipal calling from the customer's bill when notified by the customer.
- C. **Changes in Calling Areas** – The Customer’s initial selection of either the Economy Calling Area Service offering or the Premium Calling Area Service offering is without charge. Subsequent changes by the Customer are subject to the applicable Service Order Charge as identified in this Tariff. If only one Calling Area Service offering is available for an Exchange, the Customer will automatically be classified under the available service offering and no charge will apply.

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~ **Effective 8/1/12**

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson
 President & CEO

Residential Premium Service (cont.)

D. Rates – The applicable rates for the Company’s Residential Premium Service are listed in Section 5.4.B of this Tariff.

E. Lifeline – Company complies with all provisions set forth in Part 54 of the Rules of the Federal Communications Commission and shall offer all applicable State and Federal discounts to customers who have been properly certified as qualifying for Lifeline service pursuant to Part 54 of the Rules of the Federal Communications Commission.

5.4 Calling Area Rates and List of Exchanges

A. List of Exchanges Where Flat-Rated Calling Applies

Home Exchange	Unlimited Flat-Rated Calling to the Following Exchanges
Andover	Andover, Roxbury Pond, Rumford, Upton, Bethel
Bethel	Bethel, Locke Mills, West Bethel, Bryant Pond, Upton, Andover, No. Norway, Rumford, Harrison, North Lovell
Bryant Pond	Bryant Pond, West Paris, Bethel, Locke Mills, Sumner, Dixfield, Rumford
Hebron	Hebron, Lewiston, Turner, No. Turner, Buckfield, Mechanic Falls, Norway, Oxford
Locke Mills	Locke Mills, Bethel, West Bethel, Bryant Pond, No. Norway, West Paris, Rumford
No. Norway	No. Norway, Norway, Bethel, Locke Mills, West Paris, Harrison
Roxbury Pond	Roxbury Pond, Andover, Rumford
Upton	Upton, Andover, Bethel, West Bethel, Wilson’s Mills
West Bethel	West Bethel, Bethel, Locke Mills, Upton, North Lovell

Issued Date: July 31, 2012

Proposed Effective Date: ~~August 30, 2012~~

Effective Date: **Docket No. 2012-397**

Docket No.:



Craig S. Gunderson

President & CEO

Oxford West Telephone Company (SAC 1000002)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Oxford West Telephone Company hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual 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 comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
ETC Annual Reports and) WC Docket No. 14-58
Certifications)

**PETITION OF OXFORD TELEPHONE COMPANY AND OXFORD WEST
TELEPHONE COMPANY FOR LIMITED WAIVER OF SECTION 54.313(f)(2)(ii)**

Oxford Telephone Company and Oxford West Telephone Company (“Oxford and Oxford West” or the “Companies”) pursuant to Section 1.3 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules¹ request a limited waiver of the requirement specified in Section 54.313(f)(2)(ii).² This rule requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service (“RUS”) whose financial statements are audited in the ordinary course of business to file a copy of their audited financial statement with their ETC Annual Report (otherwise known as the “Form 481”).³

As demonstrated herein, “good cause” exists to allow the Companies a one-month limited waiver to submit the finalized version of their annual financial audit report after the July 1, 2016 deadline to submit their Form 481. Due to delays caused by the auditing process, which were unforeseen by the Companies, the audit reports will not be available by the July 1 deadline. Oxford and Oxford West had been informed all along by its auditor that the audits would be completed before July 1, and were only told on June 30 that there would be a delay. Oxford and

¹ 47 C.F.R. §1.3

² 47 C.F.R. § 54.313 (f)(2)(ii).

³ *Id.* Alternatively, the carrier may file “a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, accompanied by a copy of a management letter issued by the independent certified public accountant that performed the company's financial audit.” *Id.*

Oxford West will be submitting draft versions of the reports in their Form 481s and will populate the Lines 3027 – 3034 with the required financial data. Accordingly, the public interest would be served by allowing the Companies additional time to supplement their Form 481 with the finalized version of the audit reports.

I. Background

Oxford and Oxford West are privately held rate-of-return carriers that are not recipients of loans from RUS and have financial statements that are audited in the ordinary course of business. Each year, the Companies' external auditors, Macpage LLC ("Macpage") prepares an audit report for the Companies. Accordingly, in compliance with Section 54.313(f)(2)(ii), each year in their Form 481 filings, Oxford and Oxford West submits the audit reports prepared by Macpage.

II. Grant of this Waiver is Warranted

Generally, the Commission's rules may be waived for good cause shown.⁴ Furthermore, the Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.⁵ As demonstrated herein, grant of this petition is warranted.

Oxford and Oxford West and Macpage have been working diligently in preparing the audit reports for 2015. However, the finalized version of the reports will not be completed until after the July 1, 2015 deadline due to delays in completing the audits. The Companies have been in close communication with Macpage about the status of the audit and the July 1 deadline. During the weeks leading up to the July 1 deadline, the Companies contacted Macpage repeatedly seeking a status on the completion of the audit and reminding them that it needed to

⁴ 47 C.F.R. § 1.3.

⁵ *Northeast Cellular Telephone co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

be completed before July 1 to ensure compliance with FCC rules. Macpage assured the Companies that the audit would be completed on time. On June 30, Macpage informed Oxford and Oxford West that more time was needed for completing the audit.

Although the finalized version of the audit report will not be completed until after July 1, the Companies have been provided with draft versions of the report. Accordingly, the Companies will submit the draft versions in their FCC Form 481 filing. Further, the Companies will populate that data in Lines 3027 – 3034 of their respective Form 481s. Accordingly, waiver of Section 54.313(f)(2)(ii) is sought only to be able to supplement the Form 481s within one months after the filing deadline so that the finalized version of the audit report can replace the draft version. Such a limited waiver would further the public interest as strict compliance with this rule could result in the Companies having their high cost universal service support reduced on a pro-rata daily basis equivalent to the period of non-compliance,⁶ an extremely harsh penalty for rural rate-of-return carriers, particularly in this instance where the delayed audits were caused by an external entity.

Respectfully submitted,
Oxford Telephone Company and Oxford West
Telephone Company

By: /s/ Dawna Hannan

Dawna Hannan
Vice President – Regulatory Affairs & Human
Resources
491 Lisbon Street
Lewiston, Maine 04240-7418

July 1, 2016

⁶ See 47 C.F.R. § 54.313(j).

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY