Blackfoot
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866-541-5000 | Blackfoot.com

July 1, 2017

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

Re: Federal Communications Commission (FCC) Annual Reporting Requirements (FCC WC Docket No. 10-90)

Dear Ms. Dortch:

Attached please find : 1) Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co.'s (collectively referred to as "Blackfoot") 2017 FCC Form 481s, submitted pursuant to 47 C.F.R. §§ 54.313 and 54.422; and, 2) Blackfoot's request to withhold from public disclosure, pursuant to 47 C.F.R. § 0.459, its financial data submitted as part of its FCC Form 481 filing.

Please contact me if you have any questions regarding this filing

Sincerely,

Michelle Owens

Michelle Owens
Regulatory Specialist

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July 1, 2017

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

Re: CONDFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, -05-337, 03-109, GN DOCKET NO. 09-51, CC DOCKET NOS. 01-92, 96-45, WT DOCKET NO. 10-208 BEFORE THE FEDERAL COMMUNIATIONS COMMISSION

Dear Ms. Dortch:

As part of its FCC Form 481 filing, Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (referred to collectively as "Blackfoot") are submitting financial information. Blackfoot has three study areas: 482235, 483308, and 473333. Enclosed are three sets of the Blackfoot financial data—one for each of study area.

Pursuant to 47 C.F.R. §§ 0.457 and 0.459, Blackfoot respectfully requests that its financial information be withheld from public inspection.

The information for which protection is sought is being submitted pursuant to the above-captioned proceeding. As outlined below, Blackfoot is identifying the specific information for which confidential treatment is being sought, the degree to which the information is commercial or financial or contains trade secret information, an explanation to the degree to which the service is subject to competition, how public disclosure would cause competitive harm, identification of the measures Blackfoot has taken to prevent unauthorized disclosure, whether the information is available to the public, a justification for the period of time for which the material should not be available to public disclosure as well as other relevant information supporting Blackfoot's claim on confidentiality. *See* 47 C.F.R. § 0.459(b).

In the *Fifth Reconsideration Order,* the Commission permitted privately held rate of return carriers, such as Blackfoot, to seek confidential treatment of their financial information filed pursuant to Section 54.312(f)(2).[1] In addition, the financial data and five-year network build-out plan information constitute Blackfoot trade secrets and commercial or financial information under 5 U.S.C. § 552(b)(4).

[1] *Fifth Reconsideration Order,* 27 FCC Rcd 14,555-56, para. 17; *Connect America Fund et al.,* WC Docket No. 10-90 *et al.,* Protective Order, 27 FCC Rcd 14,231 (Wireline Comp. Bur. 2012).

The financial data contains Blackfoot's balance sheet, income statement, and cash flows. This financial data provides detailed information from which Blackfoot's debt-to-equity ratio, its leverage ratio and other key financial metrics can be derived. Blackfoot has worked hard to maintain a healthy financial structure, and has done so primarily through the expertise of its in-house finance staff. Put differently, the expertise of BTC's finance staff, including its CFO, which has been amassed over the last six decades, has created a text-book financial structure for rural telecom and broadband providers. The financial data is part and parcel to that outstanding financial structure.

In addition, the financial data reveals Blackfoot's economic health and viability in being able to efficiently operate a telecommunications and broadband network. The financial data portrays the necessary revenues, expenses, income, debt and cash flows necessary to operate as a successful rural ILEC. If revealed to a third party, that third party could utilize BTC's financial data to model its own financial structure to establish and operate a rural telecom and broadband company. In addition, the financial data could be used to expose potential economic vulnerabilities (and conversely strengths) of the overall enterprise. Competitors could potentially exploit these economic vulnerabilities through aggressive pricing or marketing of competing services, or other business strategies.

Public disclosure of Blackfoot's financial data would also have a detrimental competitive effect on Blackfoot. The financial data portrays Blackfoot's economic health and viability in being able to efficiently operate a telecommunications and broadband network. From the financial data, a third party could derive Blackfoot's debt-to-equity ratio, its leverage ratio, and other key financial metrics. This competitively sensitive information informs outside investment decisions, including Blackfoot's ability to service additional debt. If revealed to a third party, the financial data could be used to expose potential economic vulnerabilities of Blackfoot's ILEC operations in western Montana and southeastern Idaho. Competitors could potentially exploit these economic vulnerabilities through aggressive pricing or marketing of competing services. Blackfoot retains a competitive advantage by keeping the financial data secret and not available to the general public.

Thus, the financial data constitutes trade secret and commercial and other finance information and must be afforded the protection offered under 5 U.S.C. § 552(b)(4). Accordingly, Blackfoot respectfully requests that the information remain confidential for a minimum of five-years, the time reflected in the five-year build-out plan that is being submitted as part of the filing.

Enclosed are two copies of Blackfoot's financial data for each of its three study areas for which confidential treatment is being requested.

Please contact me if you have any questions related to this filing.

Sincerely,

Jason B. Williams
Chief Executive Officer

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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Michelle Owens
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	mowens@blackfoot.com
	Form Type	54.313 and 54.422

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

51

482235mt330 Broadband Unfulfilled Attempt Description.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	482215
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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	482235mt510Service Quality and Consumer Protection.pdf
<515>	Certify compliance with applicable minimum service standards	

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	482235mt610Functionality in Emergency.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

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

-- See attached worksheet

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<810>	Reporting Carrier	Blackfoot Telephone Cooperative, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Blackfoot Telephone Cooperative, Inc.

<813>

<a1> Affiliates	<a2> SAC	<a3> 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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

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

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

Confederated Salish and Kootenai Tribes

<920> Tribal Government Engagement Obligation

482235mt920Tribal Engagement.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 PDF, 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.	Yes
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	Yes
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	482235mt1010Voice Services Rate Comparability.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	482235mt1030Broadband Rate Comparability.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

482235mt1210Lifeline Terms and Conditions.pdf

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. ☑

(2005) 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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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

<2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.

<2022> Recipient certifies, representing year three 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 three - 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 three - 54.313(b)(2)(ii). Round 2 recipients only.

Name of Attached Document Listing Required Information

<2025A> Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).

Name of Attached Document Listing Required Information

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

(2005) 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

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?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<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)(1)(ii)(A)

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)(1)(ii)(C)

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure 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)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations (47 CFR § 54.313(f)(1)(i))		482235mt3010Public Interest Certification.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	Yes - Attach New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	482235mt3012bCommunity Anchor Institution.xlsm
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	(Yes/No) ◉ ○	
(3014)	If yes, does your company file the RUS annual report	(Yes/No) ○ ◉	
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	☐	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	☐	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) ◉ ○	
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	✓	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	✓	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	✓	
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	☐	
(3023)	Underlying information subjected to a review by an independent certified public accountant	☐	
(3024)	Underlying information subjected to an officer certification.	☐	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	☐	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	482235mt3026aAuditor Letter.pdf, 482235mt3026Financials.xlsm

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

Financial Data Summary

(3027) Revenue	23887488
(3028) Operating Expenses	18982174
(3029) Net Income	6450880
(3030) Telephone Plant In Service(TPIS)	120004714
(3031) Total Assets	105171733
(3032) Total Debt	29065024
(3033) Total Equity	64696968
(3034) Dividends	0

Name of Attached Document Listing Required Information

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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: BLACKFOOT TEL - BTC

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/30/2017

Printed name of Authorized Officer: Jason Williams

Title or position of Authorized Officer: Chief Executive Officer

Telephone number of Authorized Officer: 4065415454 ext.

Study Area Code of Reporting Carrier: 482235 Filing Due Date for this form: 07/03/2017

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

Unfulfilled Broadband Service Requests Resolution

Program Year 2018 - 2017 Submission of 2016

Ross Holt

Network Infrastructure Supervisor

Blackfoot

This document provides a high level description of the measures in place to resolve customer requests for broadband service that were unfulfilled in the prior calendar year.

Blackfoot Telephone Cooperative, Inc. (482235, 483308) and Fremont Telecom Co. dba Fremont Communications (472222) routinely replace digital loop carriers that are not capable of providing a minimum of 4 Mbps download and 1 Mbps upload to new loop carriers and provide Ethernet transport, where appropriate. Additionally, the companies deploy broadband accelerators in line that extend DSL or increase the speed to customers whose requests would otherwise be unfulfilled.

Service Quality Standards & Consumer Protection Rules Compliance

Program Year 2018 - 2017 Submission of 2016

Michelle Owens

Regulatory Specialist

Blackfoot

Blackfoot including Blackfoot Telephone Cooperative, Inc. (SAC 482235 and 483308) and Fremont Telcom Co. (SAC 472222) have a variety of service quality standards and consumer protection policies and procedures in place to comply with applicable federal and state rules. Following are high level descriptions of policies and procedures in place:

Service Quality and Consumer Protection

Consumer Protection:

- Blackfoot's general practice is to treat all information as if it were private regardless of the service offered. CPNI and Red Flag policies and procedures are adhered to, and annual training of all employees in relation to those obligations is provided.
- CALEA obligations and processes are strictly adhered to.
- Blackfoot sends out annual noticing to customers regarding Do-Not-Call and offers customers Robocall blocking options further assist in protecting their privacy.
- Blackfoot is SSAE No. 16 certified.
- Noticing of rate changes are provided to educate customers about changes appearing on their bills regardless of the jurisdiction or regulated nature of the service.

Service Quality:

- Annual call before you dig notices are provided to protect customers from preventable service outages.
- Annual reviews of backup power are undertaken ensure 911 service reliability. Blackfoot also conducts regular testing and maintenance of backup power and generators to ensure operability in the event of a disaster.
- Internal process are continuously reviewed for improvement with a focus on improving customer service and experience.
- Regular tests and maintenance are done for backup power to include generators. This is done to ensure continued functionality in the event of a power outage or disaster.

Functionality in Emergency Situations

Program Year 2018 - 2017 Submission of 2016

JB Ray

Field Services Manager

Blackfoot

This document provides a high level description of the measures in place to provide functionality in Emergency situations in the 482235, 483308 and 472222 study areas.

Central Offices in all 3 study areas (with the limited exceptions of the Drummond Alberton) are equipped with backup generators in the event of commercial AC power failures. Fuel supplies for these generators are adequate for 24-36 hours of operation and back up batteries located in each central office provide an additional 6-8 hours of backup power. In the event of a power outage affecting the Drummond or Alberton central offices, Blackfoot will deploy a portable generator to the site after 4 to 5 hours of now power.

All remote subscriber carrier locations are equipped with backup batteries that are capable of providing 8-12 hours of DC power in the event of a commercial AC power failure. We also maintain a pool of portable generators that are used to recharge these batteries if the AC power is not restored prior to the batteries being fully discharged.

Where practical, fiber optic cable routes that provide connectivity to a remote central office back to the host central office have diverse routes to insure uninterrupted operation in the event of a cable cut or failure. If diverse routes are not practical the remote central office is equipped with a “stand alone” function that insures uninterrupted local operation within the remoter central office service area.

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<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
ID	Powell		FR	18.0	0.0	0.12	0.0	18.12
ID	Powell		FR	22.5	0.0	0.12	0.0	22.62
ID	Powell		FR	25.0	0.0	0.12	0.0	25.12
ID	Powell		FR	26.0	0.0	0.12	0.0	26.12
MT	Alta		FR	18.0	0.0	0.0	0.0	18.0
MT	Alta		FR	22.5	0.0	0.0	0.0	22.5
MT	Alta		FR	25.0	0.0	0.0	0.0	25.0
MT	Alta		FR	26.0	0.0	0.0	0.0	26.0
MT	Alberton South		FR	18.0	0.0	0.0	0.0	18.0
MT	Alberton South		FR	22.5	0.0	0.0	0.0	22.5
MT	Alberton South		FR	25.0	0.0	0.0	0.0	25.0
MT	Alberton South		FR	26.0	0.0	0.0	0.0	26.0
MT	Arlee		FR	18.0	0.0	0.0	0.0	18.0
MT	Arlee		FR	22.5	0.0	0.0	0.0	22.5
MT	Arlee		FR	25.0	0.0	0.0	0.0	25.0
MT	Arlee		FR	26.0	0.0	0.0	0.0	26.0
MT	Avon		FR	18.0	0.0	0.0	0.0	18.0
MT	Avon		FR	22.5	0.0	0.0	0.0	22.5
MT	Avon		FR	25.0	0.0	0.0	0.0	25.0
MT	Avon		FR	26.0	0.0	0.0	0.0	26.0
MT	Charlo		FR	18.0	0.0	0.0	0.0	18.0

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<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
MT	Charlo		FR	22.5	0.0	0.0	0.0	22.5
MT	Charlo		FR	25.0	0.0	0.0	0.0	25.0
MT	Charlo		FR	26.0	0.0	0.0	0.0	26.0
MT	Clinton		FR	18.0	0.0	0.0	0.0	18.0
MT	Clinton		FR	22.5	0.0	0.0	0.0	22.5
MT	Clinton		FR	25.0	0.0	0.0	0.0	25.0
MT	Clinton		FR	26.0	0.0	0.0	0.0	26.0
MT	Condon		FR	18.0	0.0	0.0	0.0	18.0
MT	Condon		FR	22.5	0.0	0.0	0.0	22.5
MT	Condon		FR	25.0	0.0	0.0	0.0	25.0
MT	Condon		FR	26.0	0.0	0.0	0.0	26.0
MT	Dixon		FR	18.0	0.0	0.0	0.0	18.0
MT	Dixon		FR	22.5	0.0	0.0	0.0	22.5
MT	Dixon		FR	25.0	0.0	0.0	0.0	25.0
MT	Dixon		FR	26.0	0.0	0.0	0.0	26.0
MT	Ovando		FR	18.0	0.0	0.0	0.0	18.0
MT	Ovando		FR	22.5	0.0	0.0	0.0	22.5
MT	Ovando		FR	25.0	0.0	0.0	0.0	25.0
MT	Ovando		FR	26.0	0.0	0.0	0.0	26.0
MT	Potomac		FR	18.0	0.0	0.0	0.0	18.0
MT	Potomac		FR	22.5	0.0	0.0	0.0	22.5

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<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
MT	Potomac		FR	25.0	0.0	0.0	0.0	25.0
MT	Potomac		FR	26.0	0.0	0.0	0.0	26.0
MT	Seeley Lake		FR	18.0	0.0	0.0	0.0	18.0
MT	Seeley Lake		FR	22.5	0.0	0.0	0.0	22.5
MT	Seeley Lake		FR	25.0	0.0	0.0	0.0	25.0
MT	Seeley Lake		FR	26.0	0.0	0.0	0.0	26.0
MT	St Ignatius		FR	18.0	0.0	0.0	0.0	18.0
MT	St Ignatius		FR	22.5	0.0	0.0	0.0	22.5
MT	St Ignatius		FR	25.0	0.0	0.0	0.0	25.0
MT	St Ignatius		FR	26.0	0.0	0.0	0.0	26.0

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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}
MT	All	35.0	0.0	35.0	0.768	0.384	999999.0	Other, Unlimited
MT	All	38.0	0.0	38.0	1.5	1.0	999999.0	Other, Unlimited
MT	All	38.0	0.0	38.0	1.5	0.512	999999.0	Other, Unlimited
MT	All	40.0	0.0	40.0	4.0	2.0	999999.0	Other, Unlimited
MT	All	40.0	0.0	40.0	4.0	1.0	999999.0	Other, Unlimited
MT	All	40.0	0.0	40.0	4.0	0.51	999999.0	Other, Unlimited
MT	All	45.0	0.0	45.0	10.0	2.0	999999.0	Other, Unlimited
MT	All	45.0	0.0	45.0	10.0	1.0	999999.0	Other, Unlimited
MT	All	45.0	0.0	45.0	10.0	0.512	999999.0	Other, Unlimited
MT	All	50.0	0.0	50.0	15.0	2.0	999999.0	Other, Unlimited
MT	All	50.0	0.0	50.0	15.0	1.0	999999.0	Other, Unlimited
MT	All	50.0	0.0	50.0	15.0	0.512	999999.0	Other, Unlimited
MT	All	70.0	0.0	70.0	25.0	3.0	999999.0	Other, Unlimited
MT	All	70.0	0.0	70.0	25.0	2.0	999999.0	Other, Unlimited
MT	All	70.0	0.0	70.0	25.0	1.0	999999.0	Other, Unlimited
MT	All	70.0	0.0	70.0	25.0	0.512	999999.0	Other, Unlimited
MT	All	100.0	0.0	100.0	40.0	3.0	999999.0	Other, Unlimited
MT	All	100.0	0.0	100.0	40.0	2.0	999999.0	Other, Unlimited
MT	All	100.0	0.0	100.0	40.0	1.0	999999.0	Other, Unlimited
MT	All	100.0	0.0	100.0	40.0	0.512	999999.0	Other, Unlimited
MT	All	63.0	0.0	63.0	2.0	1.0	999999.0	Other, Unlimited

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
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<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.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}
MT	All	68.0	0.0	68.0	4.0	2.0	999999.0	Other, Unlimited
MT	All	70.0	0.0	70.0	6.0	2.0	999999.0	Other, Unlimited
MT	All	72.0	0.0	72.0	8.0	2.0	999999.0	Other, Unlimited
MT	All	75.0	0.0	75.0	10.0	2.0	999999.0	Other, Unlimited
MT	All	76.0	0.0	76.0	12.0	2.0	999999.0	Other, Unlimited
MT	All	77.0	0.0	77.0	14.0	2.0	999999.0	Other, Unlimited
MT	All	78.0	0.0	78.0	15.0	2.0	999999.0	Other, Unlimited
MT	All	65.0	0.0	65.0	4.0	1.0	999999.0	Other, Unlimited
MT	All	67.0	0.0	67.0	6.0	1.0	999999.0	Other, Unlimited
MT	All	69.0	0.0	69.0	8.0	1.0	999999.0	Other, Unlimited
MT	All	72.0	0.0	72.0	10.0	1.0	999999.0	Other, Unlimited
MT	All	73.0	0.0	73.0	12.0	1.0	999999.0	Other, Unlimited
MT	All	74.0	0.0	74.0	14.0	1.0	999999.0	Other, Unlimited
MT	All	75.0	0.0	75.0	15.0	1.0	999999.0	Other, Unlimited
MT	All	63.0	0.0	63.0	4.0	0.512	999999.0	Other, Unlimited
MT	All	65.0	0.0	65.0	6.0	0.512	999999.0	Other, Unlimited
MT	All	67.0	0.0	67.0	8.0	0.512	999999.0	Other, Unlimited
MT	All	70.0	0.0	70.0	10.0	0.512	999999.0	Other, Unlimited
MT	All	71.0	0.0	71.0	12.0	0.512	999999.0	Other, Unlimited
MT	All	72.0	0.0	72.0	14.0	0.512	999999.0	Other, Unlimited
MT	All	73.0	0.0	73.0	15.0	0.51	999999.0	Other, Unlimited

(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	482235
<015>	Study Area Name	BLACKFOOT TEL - BTC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Michelle Owens
<035>	Contact Telephone Number - Number of person identified in data line <030>	4065415131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mowens@blackfoot.com

<810>	Reporting Carrier	Blackfoot Telephone Cooperative, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Blackfoot Telephone Cooperative, Inc.

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Blackfoot Communications, Inc.		Blackfoot
Syringa Networks, LLC.		
Vision Net, Inc.		
Blackfoot Telephone Cooperative, Inc.	483308	Blackfoot
Fremont Telcom Co.	472222	Blackfoot
BTC Holdings, Inc.		

Tribal Engagement

Program Year 2018 - 2017 Submission of 2016

Judy Geer

Account Executive

Blackfoot Telephone Cooperative, Inc.

Blackfoot Telephone Cooperative, Inc. ("BTC") provides a broad range of services to the Confederated Salish Kootenai Tribe ("CSKT") on the Flathead Indian Reservation in northwestern Montana. In fact, the CSKT is one of BTC's largest customers.

Over the past year, BTC worked with CSKT on a number of projects/initiatives and we look forward to continuing our partnership. The following is a timeline of events with high level summaries of our engagement activities:

In April 2016, Blackfoot delivered the CSKT's Capital Credit Checks for patronage distributed to the CSKT as a member of Blackfoot Telephone Cooperative, Inc.

May 2016, Blackfoot worked with CSKT's Gaming Director of IT regarding phone solutions that could reduce their costs and planned facility construction to their Gray Wolf location.

In June and July 2016, Blackfoot provided quotes for services and further discussed solutions for a number of CSKT sites.

August 2016, Blackfoot worked with CSKT's IT program Manager on collocation pricing for their 2017 budget.

November 2016, CSKT and Blackfoot held a strategic business review meeting. During that meeting Blackfoot shared its strategic plans for future fiber build out starting in St. Ignatius and discussed commitment to expand to other tribal communities.

December 2016, Blackfoot and CSKT held year-end discussions regarding the successful 2016 year.

Blackfoot is in compliance with all tribal rights of way processes, land use permitting, facilities siting rules, environmental review processes, cultural preservation review and business licensing requirements

Voice Services Rate Comparability

Program Year 2018 - 2017 Submission of 2016

Michelle Owens

Regulatory Specialist

Blackfoot

For the Program year 2018, the average urban rate for local service is $22.49. Per FCC Public Notice DA 16-362 the reasonable comparability benchmark for voice services is $49.51. As indicated in line 700 worksheet none of the Blackfoot rates are above the reasonable comparable rate of $49.51.

Data Services Rate Comparability

Program Year 2018 - 2017 Submission of 2016

Michelle Owens

Regulatory Specialist

Blackfoot

Blackfoot Telephone Cooperative, Inc. (482235, 483308 and Fremont Telcom Co. dba Fremont Communications (472222) have several different voice, broadband and voice/broadband bundles at different prices. To ensure compliance with the FCC's rate comparability benchmark for broadband services, Blackfoot offers a distinct set of broadband service offerings that are priced at rates that are equal to or less than the FCC's service rate comparability benchmark. These prices are revised annually as the FCC adjusts the prices, if necessary, to ensure they remain equal to or less than the rate comparability benchmark.

Lifeline Terms and Conditions

Program Year 2018 - 2017 Submission of 2016

Michelle Owens

Regulatory Specialist

Blackfoot

For the Program year 2018, Lifeline consumers have the same voice and data options available to them as non-lifeline consumers. Rates can be reviewed in sections 700 and 710 of the 481 filing. The applicable terms and conditions are the same for any consumer regardless of low income determination. Local voice services are unlimited as are data services. Consumers wishing to purchase long distance services have a selection of service options to ensure the pricing meets their needs. Eligible lifeline consumers have a lifeline discount added to their account after eligibility has been determined. Additional information to include any applicable terms and conditions can be viewed by consumers at http://www.blackfoot.com/residential/ .

Broadband Reasonable Request

Program Year 2018 - 2017 Submission of 2016

Jason Williams

Chief Executive Officer

Blackfoot

Blackfoot certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas, and that such requests for such service are met with in a reasonable amount of time.

Template for Reporting Community Anchor Institutions (Lines 2018, 3012B, and 4003B)

Number	Name	Street Address	State	Zip
1	Swan Valley School District #33	6423 MT Highway 83	MT	59826
2	Salmon School District #73	40224 Salmon Prairie Rd	MT	59911
3	Dixon School District #9	425 B St	MT	59831
4	Potomac School District #11	29750 Potomac Rd	MT	59823

MOSS-ADAMS LLP
Certified Public Accountants | Business Consultants

REPORT OF INDEPENDENT AUDITORS

Board of Trustees
Blackfoot Telephone Cooperative, Inc.

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of Blackfoot Telephone Cooperative, Inc. (Cooperative) and its subsidiaries, which comprise the consolidated balance sheets as of December 31, 2016 and 2015, and the related consolidated statements of income, comprehensive income, members' equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate for the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

Praxity

REPORT OF INDEPENDENT AUDITORS
(continued)

Auditor's Responsibility (continued)
We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion
In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Blackfoot Telephone Cooperative, Inc. and its subsidiaries as of December 31, 2016 and 2015, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Moss Adams LLP

Spokane, Washington
February 18, 2017

FINANCIALS – REDACTED FOR PUBLIC INSPECTION