MOSSADAMS

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

July 3, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: **Cleveland County Telephone Company, Inc., SAC 401698**
Submission of FCC Form 481 Annual Report
WC Docket No. 14-58 – ETC Annual Reports and Certifications

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Cleveland County Telephone Company, Inc. ("the Company"), Study Area Code 401698, hereby files its FCC Form 481 – Carrier Annual Reporting Data Collection Form. *The version of the Company's FCC Form 481 submitted via the FCC's Electronic Comment Filing System (ECFS) is a redacted version of the filing that contains no confidential information.*

Section 3005 of FCC Form 481 requires privately-held rate-of-return carriers receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). The Company, by its authorized representative, hereby seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.[1] The *Protective Order* specifically covers the information required by 47 C.F.R. §54.313(f)(2).

T (972) 387-4300
F (972) 960-2810

8750 N. Central Expressway
Suite 300
Dallas, TX 75231

Assurance, tax, and consulting offered through Moss Adams LLP. Wealth management offered through Moss Adams Wealth Advisors LLC. Investment banking offered through Moss Adams Capital LLC.

[1] *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Protective Order, 31 FCC Rcd 2089 (2016).

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

Each page of the Company's financial annual report and the financial summary page on the FCC Form 481 bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

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

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

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

The FCC Form 481 has also been filed with the relevant state commissions and Tribal governments, as appropriate.

Please contact me if you have any questions.

Sincerely,

Dorothy Young
Authorized Representative for
Cleveland County Telephone Company, Inc.

DY/kr

cc: W. Jay Mitchell, Cleveland County Telephone Company, Inc.

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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Dianne Stanley
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	dstanley@kc.rr.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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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	401698
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<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<300> Unfulfilled service request (voice) 0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband) 0

<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	401698
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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	401698
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<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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	401698ar510.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

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<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	401698ar610.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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	12.84

<703>

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

-- See attached worksheet --

(710) Broadbrand Price Offerings
Data Collection Form

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<810>	Reporting Carrier	Cleveland County Telephone Co
<811>	Holding Company	ARK-O Holding
<812>	Operating Company	Cleveland County Telephone Co.

<813>

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

-- See attached worksheet --

(900) Tribal Lands Reporting
Data Collection Form

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

<010>	Study Area Code	401698
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<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

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

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached 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.	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

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

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

<010>	Study Area Code	401698
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	401698ar1010.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	401698ar1030.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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

401698ar1210.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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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	401698
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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.

Progress Report on 5 Year Plan

(3009) Carrier certifies to 54.313(f)(1)(iii) — Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment — Name of Attached Document Listing Required Information: 401698ar3010.pdf

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} — No - No New Community Anchors

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

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

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

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

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

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

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

(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: 401698ar3026.pdf

(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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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

[redacted]

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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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	401698
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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) MOSS ADAMS LLP **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: MOSS ADAMS LLP

Name of Reporting Carrier: CLEVELAND COUNTY TEL

Signature of Authorized Officer: CERTIFIED ONLINE Date: 07/03/2017

Printed name of Authorized Officer: Walter Mitchell

Title or position of Authorized Officer: President

Telephone number of Authorized Officer: 8703256244 ext.

Study Area Code of Reporting Carrier: 401698 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.

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: CLEVELAND COUNTY TEL

Name of Authorized Agent Firm: MOSS ADAMS LLP

Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 07/03/2017

Name of Authorized Agent Employee: Dorothy Young

Title or position of Authorized Agent or Employee of Agent Telecommunications Consulting Manager

Telephone number of Authorized Agent or Employee of Agent: 5126527726 ext.

Study Area Code of Reporting Carrier: 401698 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

(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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703256244 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	12.84

<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**
AR	ALL		FR	12.84	0.0	0.77	0.0	13.61

(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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703256244 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.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}
AR	ALL	55.95	0.0	55.95	10.0	1.0	999999	Other, No limit on usage allowance
AR	ALL	65.95	0.0	65.95	15.0	1.0	999999	Other, No limit on usage allowance
AR	ALL	75.95	0.0	75.95	20.0	1.0	999999	Other, No limit on usage allowance
AR	ALL	104.95	0.0	104.95	10.0	10.0	999999	Other, No limit on usage allowance

(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	401698
<015>	Study Area Name	CLEVELAND COUNTY TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703256244 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

<810>	Reporting Carrier	Cleveland County Telephone Co
<811>	Holding Company	ARK-O Holding
<812>	Operating Company	Cleveland County Telephone Co.

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
Decatur Telephone Company	401699	
Wyandotte Telephone Company	432034	

LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Cleveland County Telephone Company, Inc. ("the Company") complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Company operates are outlined in its member services tariff, which is approved by the Arkansas Public Service Commission ("Arkansas PSC"). The tariff contains provisions regarding the Company's customer service and protection practices.

Service quality standards for voice service are established by the Arkansas PSC. The Company consistently meets or exceeds those standards and provides reports to the Arkansas PSC, in accordance with the Arkansas PSC's rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a "best effort" service and are dependent upon a number of variables, many of which are outside the control of the Company. The Company also complies with the FCC's Open Internet rules, 47 C.F.R. §§8.3-8.11. These rules prohibit blocking, throttling, and paid prioritization, and also require the Company to publicly disclose information regarding its network management practices, performance, and the commercial terms of its broadband services.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the following consumer best practices: (1) the Company discloses its rates and terms of service to customers; (2) the Company provides specific disclosures in its advertising; (3) the Company separately identifies carrier charges from taxes on its billing statements; (4) the Company provides ready access to customer service; (5) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011).

LINE 610 - FUNCTIONALITY IN EMERGENCY SITUATIONS

Cleveland County Telephone Company, Inc. ("the Company") is able to function in emergency situations for both voice and broadband service. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored. Portable generators are stored at strategic locations to be deployed as needed. The network is capable of managing traffic spikes resulting from emergency situations.

The Company is able to reroute traffic around damaged facilities. Although the Company's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's 2017 reasonable comparability benchmark for voice services is $49.51, which includes the federal subscriber line charge ("SLC").[1]

In all of the exchanges served by Cleveland County Telephone Company, Inc. ("the Company"), as of January 1, 2017, the single-line residential local rate was $12.84. When the federal SLC ($6.50) is included, the total rate was $19.34. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of $49.51.

[1] *Wireline Competition Bureau Announces Results of 2017 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for ETCs Subject to Broadband Public Interest Obligations*, Public Notice, WC Docket No. 10-90, 32 FCC Rcd 1358 (2017).

LINE 1030 – BROADBAND SERVICES RATE COMPARABILITY

As of January 1, 2017, Cleveland County Telephone Company, Inc. was charging a residential rate of $55.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than $77.98, which is the 2017 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.[1]

[1] *Wireline Competition Bureau Announces Results of 2017 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for ETCs Subject to Broadband Public Interest Obligations*, Public Notice, WC Docket No. 10-90, 32 FCC Rcd 1358 (2017).

LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

Residential customers of Cleveland County Telephone Company, Inc. ("the Company") who qualify for the Lifeline Program receive a federal discount of $9.25 on local voice telephony service.

Throughout the Company's service area, the Lifeline single-line residential rate, including the federal subscriber line charge ("SLC"), is $10.09 ($19.34 standard rate - $9.25 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within their local calling area.

Toll charges for calls outside of the local calling area are determined by the long distance carrier of the customer's choosing. Customers may elect to subscribe to toll blocking at no charge.

The Company does not disconnect the service of Lifeline subscribers for the non-payment of toll charges. However, the Company reserves the right to implement toll blocking, at no charge, if the customer incurs a significant balance of unpaid toll bills.

Lifeline Program reductions do not apply to additional services such as custom calling features. Lifeline customers may subscribe to these services, where available, at the same rates offered to other customers.

Lifeline customers may subscribe to any bundled service package available to the public that includes residential voice telephony service and will receive the applicable discount from the regular price of the package.

The Company provides additional information regarding the Lifeline Program at http://sgo.cravenproductions.com/services/phone/lifeline/.

LINE 3010 – CERTIFICATION OF PUBLIC INTEREST OBLIGATIONS

Cleveland Counnty Telephone Company, Inc. (“the Company”) hereby certifies that the Company has taken 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 were met within a reasonable amount of time.

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Draft for discussion purposes only

ARK-O HOLDING COMPANY AND SUBSIDIARIES

Contents

Consolidated Financial Statements

Consolidated Balance Sheet as of December 31, 2016-Unaudited

Consolidated Statement of Income for the year ended December 31, 2016-Unaudited

Consolidated Statement of Cash Flows for the year ended December 31, 2016-Unaudited

Consolidating Balance Sheet as of December 31, 2016-Unaudited

Consolidating Statement of Income for the year ended December 31, 2016-Unaudited

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ARK-O HOLDING COMPANY AND SUBSIDIARIES

Consolidated Balance Sheet-Unaudited
December 31, 2016

Draft for discussion purposes only

Assets

Current assets:	
Cash and cash equivalents	$ [redacted]
Telecommunications accounts receivable	[redacted]
Interexchange carriers accounts receivable	[redacted]
Other accounts receivable	[redacted]
Materials and supplies	[redacted]
Prepaid expenses	[redacted]
Total current assets	[redacted]
Noncurrent assets:	
Loan costs, net of accumulated amortization	[redacted]
Deferred charges	[redacted]
Investment in CoBank stock	[redacted]
Goodwill	[redacted]
Total noncurrent assets	[redacted]
Property, plant and equipment:	
Telecommunications plant under construction	[redacted]
Telecommunications plant in service	[redacted]
Nonregulated property and equipment	[redacted]
Less depreciation reserve	[redacted]
Net property, plant and equipment	[redacted]
Total assets	$ [redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements

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Liabilities and Stockholders' Equity

Current liabilities:	
Current maturities of long-term debt	$ [redacted]
Accounts payable	[redacted]
Accounts payable - related party	[redacted]
Accrued salaries and wages	[redacted]
Accrued property and other taxes	[redacted]
Other accrued liabilities	[redacted]
Accrued interest	[redacted]
Advanced billings and payments	[redacted]
Total current liabilities	[redacted]
Long-term debt, less current maturities	[redacted]
Total liabilities	[redacted]
Stockholders' equity:	
Common stock, no par value, 100,000 shares authorized, issued and outstanding	[redacted]
Retained earnings	[redacted]
Total stockholders' equity	[redacted]
Total liabilities and stockholders' equity	$ [redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements

REDACTED - FOR PUBLIC INSPECTION

ARK-O HOLDING COMPANY AND SUBSIDIARIES

Consolidated Statement of Income-Unaudited
Year Ended December 31, 2016

Draft for discussion purposes only

Operating revenues:	
Local network service revenue	$ [redacted]
Network access service revenue	[redacted]
Miscellaneous revenue	[redacted]
Total operating revenues	[redacted]
Operating expenses:	
Plant specific	[redacted]
Plant non-specific:	
Network and other	[redacted]
Depreciation and amortization	[redacted]
Customer operations	[redacted]
Corporate operations	[redacted]
Total operating expenses	[redacted]
Net operating (loss)	[redacted]
Operating taxes:	
Other operating taxes	[redacted]
Total operating taxes	[redacted]
Net (loss) from operations	[redacted]
Nonoperating income (expense):	
Long distance revenues	[redacted]
DSL and non regulated revenues	[redacted]
Nonregulated operating expenses	[redacted]
Nonoperating income	[redacted]
Income available for fixed charges	[redacted]
Interest expense:	
Interest on long-term debt	[redacted]
Amortization of loan cost	[redacted]
Total fixed charges	[redacted]
Net income	$ [redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements

REDACTED - FOR PUBLIC INSPECTION

ARK-O HOLDING COMPANY AND SUBSIDIARIES

Consolidated Statement of Cash Flows-Unaudited
Year Ended December 31, 2016

Draft for discussion purposes only

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Net income	$ [redacted]
Adjustments to reconcile net income to net cash provided by operating activities:	
Depreciation and amortization	[redacted]
Decrease in accounts receivable	[redacted]
(Increase) in prepaid expenses	[redacted]
Increase in accounts payable	[redacted]
(Decrease) in accrued expenses	[redacted]
Net cash provided by operating activities	[redacted]
Cash flows from investing activities:	
Extension and replacement of property, plant and equipment	[redacted]
Proceeds from sale of land	[redacted]
Net cash used in investing activities	[redacted]
Cash flows from financing activities:	
Advances from affiliates, net	[redacted]
Net cash provided by financing activities	[redacted]
Net increase in cash and cash equivalents	[redacted]
Cash and cash equivalents at beginning of year	[redacted]
Cash and cash equivalents at end of year	$ [redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements

Draft for discussion purposes only

ARK-O HOLDING COMPANY AND SUBSIDIARIES

Consolidating Balance Sheet - Unaudited
December 31, 2016

REDACTED - FOR PUBLIC INSPECTION

	ARK-O Holding Company	Decatur Telephone Company	Cleveland County Telephone Company	Wyandotte Telephone Company	Eliminations	Consolidated Balances
Assets						
Current assets:						
Cash and cash equivalents	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Telecommunications accounts receivable	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Interexchange carriers accounts receivable	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Other accounts receivable	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Materials and supplies	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Prepaid expenses	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total current assets	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Noncurrent assets:						
Investment in affiliates	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Loan costs, net of accumulated amortization	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Deferred charges	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Investment in CoBank stock	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Goodwill	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total noncurrent assets	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Property, plant and equipment:						
Telecommunications plant under construction	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Telecommunications plant in service	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Nonregulated property and equipment	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Less depreciation reserve	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Net property, plant and equipment	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total assets	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements

Draft for discussion purposes only

ARK-O HOLDING COMPANY AND SUBSIDIARIES

Consolidating Balance Sheet - Unaudited
December 31, 2016

REDACTED - FOR PUBLIC INSPECTION

	ARK-O Holding Company	Decatur Telephone Company	Cleveland County Telephone Company	Wyandotte Telephone Company	Eliminations	Consolidated Balances
Liabilities and Stockholders' Equity						
Current liabilities:						
Current maturities of long-term debt	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Accounts payable	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Accounts payable - related party	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Accrued salaries and wages	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Accrued property and other taxes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Other accrued liabilities	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Accrued interest	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Advanced billings and payments	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total current liabilities	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Long-term debt, less current maturities	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total liabilities	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Stockholders' equity:						
Common stock	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Additional paid in capital	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Retained earnings (deficit)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total stockholders' equity	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total liabilities and stockholders' equity	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements

Draft for discussion purposes only

ARK-O HOLDING COMPANY AND SUBSIDIARIES

Consolidating Statement of Income - Unaudited
For the Year Ended December 31, 2016

REDACTED - FOR PUBLIC INSPECTION

	ARK-O Holding Company	Decatur Telephone Company	Cleveland County Telephone Company	Wyandotte Telephone Company	Eliminations	Consolidated Balances
Operating revenues:						
Local network service revenue	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Network access service revenue	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Miscellaneous revenue	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total operating revenues	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Operating expenses:						
Plant specific	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Plant non-specific:						
Network and other	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Depreciation and amortization	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Customer operations	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Corporate operations	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total operating expenses	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Net operating (loss) income	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Operating taxes:						
Federal and state income tax expense	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Other operating taxes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total operating taxes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Net (loss) income from operations	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Nonoperating income (expense):						
Long distance revenues	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
DSL and non regulated revenues	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Nonregulated operating expenses	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Equity in earnings of affiliates	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Federal and state income tax (expense)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Nonoperating income	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Income (loss) available for fixed charges	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Interest expense:						
Interest on long-term debt	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Amortization of loan cost	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total fixed charges	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Net income (loss)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

The accompanying consolidated financial statements omit substantially all disclosures required by generally accepted accounting principles and the consolidated statement of retained earnings and no assurance is provided on these financial statements