



Christopher T. Ulmer  
Senior Vice President

July 10, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90; 2018 FCC Form 481

Dear Ms. Dortch:

ICORE Consulting, on behalf of Killduff Telephone Company ("the Company") hereby submits to the Commission a copy of the Company's completed Form 481<sup>1</sup>. Certain portions of the Form 481 filing include information that is confidential in nature. Specifically, the section entitled "Rate of Return Carrier Additional Information"<sup>2</sup> should be accorded confidential treatment. Attached please find a statement of the reasons for withholding the redacted materials from public inspection pursuant to 47 CFR § 0.459.

Thank you for your attention to this matter. Should you or any member of the Commission Staff have any questions or comments, please do not hesitate to contact us at your convenience.

Sincerely,



Senior Vice President

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<sup>1</sup> This filing is required to comply with 47 CFR §§ 54.313 and 54.422(c).

<sup>2</sup> The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. <http://www.usac.org/hc/tools/forms.aspx>. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form filled out employs the 3005 or 3000 designation.

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**CONFIDENTIALITY REQUEST AND STATEMENT OF JUSTIFICATION  
IN COMPLIANCE WITH 47 C.F.R. §0459(b)**

Killduff Telephone Company ("Company") is a small, privately held rural local exchange company based in Iowa. The Company requests confidential treatment of certain information being provided to the Commission in its 2018 FCC Form 481. The information is competitively sensitive and its disclosure would have a negative competitive consequence upon the Company were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 CFR §0.459.

Regulation	Statement of support and compliance with Confidentiality requests
47 CFR §0.459(a)(2)	ICORE Consulting, on behalf of the Company has e-filed, through ECFS, the redacted version and sent via USPS Express Mail the confidential hard copy version (original and one copy) of its 2018 FCC Form 481.
47 CFR §0.459(b)(1)	The Company requests that the documentation required in the section entitled "Rate of Return Carrier Additional Information <sup>3</sup> , which consists of the Company's financial reports, income statement, balance sheet and cash flow statement, be accorded confidential treatment. The confidential information has been redacted from the public version with black shading.
47 CFR §0.459(b)(2)	The circumstances giving rise to the submission of this confidential information is set forth in 47 CFR § 54.313 and 47 CFR § 54.422.
47 CFR §0.459(b)(3) and §0.459(b)(4)	The information for which confidentiality is sought is financial in nature, including balance sheet, income statement, and statement of cash flows.
47 CFR §0.459(b)(5)	There is robust competition in the telecommunications market today, including wireless, VoIP providers, and cable television providers to name a few. Financial data such as the amount of cash on hand, amount of debt, and revenue by source are all examples of information that competitors would not receive in the normal course of business.
47 CFR §0.459(b)(6)	The financial information is disclosed only within the Company, and furthermore is only provided (1) members of senior management, or (2) those employees who require this information to perform their jobs.
47 CFR §0.459(b)(7)	The Company has not previously released this information to third parties without the execution of a non-disclosure agreement.
47 CFR §0.459(b)(8)	The Company requests that the information be held by the Commission as confidential indefinitely.

<sup>3</sup> The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. <http://www.usac.org/hc/tools/forms.aspx>. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form filed out employs the 3005 or 3000 designation.

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

FCC Form 481

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

July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name: Person USAC should contact with questions about this data	Christopher Ulmer
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	culmer@icorellc.com
	Form Type	54.313 and 54.422

REDACTED - FOR PUBLIC INSPECTION

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

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@corellc.com

For the prior calendar year, were there any reportable voice service outages?

[illegible]

<010> Study Area Code

351407

<015> Study Area Name

KILLDOFF TEL. CO.

<020> Program Year

2019

<030> Contact Name - Person USAC should contact regarding this data

Christopher Ulmer

<035> Contact Telephone Number - Number of person identified in data line  
<030>

6109283903 ext.

<039> Contact Email Address - Email Address of person identified in data line  
<030>

culmer@icorellc.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.

<410> Complaints per 1000 customers for fixed voice

<420> Complaints per 1000 customers for mobile voice

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

**FCC Form 481**  
**OMB Control No. 3060-**  
**July 2018**

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com
<515>	Certify compliance with applicable minimum service standards	

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

FCC Form 481  
OMB Control No. 3060-091  
July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDOFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	351407IA610.pdf

REDACTED - FOR PUBLIC INSPECTION



(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLBUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

No

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

<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)(5) includes:

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

Select Yes or No or Not Applicable

<b>(1000) Voice and Broadband Service Rate Comparability Data Collection Form</b>		<b>FCC Form 481</b>	
		<b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b>	
		<b>July 2018</b>	

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDOFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Umer
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<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

Yes

Voice services rate comparability certification

&lt;1000&gt;

351407IA1010.pdf

Attach detailed description for voice services rate comparability compliance

&lt;1010&gt;

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

Broadband comparability certification

&lt;1020&gt;

Name of Attached Document

Attach detailed description for broadband comparability compliance

&lt;1030&gt;

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	610283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

&lt;1100&gt; Certify whether terrestrial backhaul options exist (Y/N)

Yes

&lt;1130&gt; 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).

&lt;1140&gt; Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

Not Applicable

**(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 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

351407TA1210.pdf

**<1210> Terms & Conditions of Voice Telephony Lifeline Plans**

Name of Attached Document

**<1220> Link to Public Website**

HTTP

www.killdufftel.com

"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 2019

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDOUFF TEL. CO.
<020>	Program Year	2019
<020>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<030>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of frozen 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(c)(d),(e). The information reported on this form and in the documents attached below is accurate.

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

**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 2017.

<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)

<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)

Name of Attached Document Listing  
 Required Information

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

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

CAF BLS Reporting

- (3008A) Please indicate whether new locations were deployed during the prior calendar year. (Yes/No)
- (3008B) Please enter the number of new locations deployed in the prior calendar year associated with each of the following speed tiers.
- (3008B1) Number of newly built locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.
- (3008B2) Number of newly built locations with access to broadband speeds of 25/3 Mbps or higher.
- (3008C) Please provide the percentage of deployment across the entire study area.

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers n financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this fo attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	351407IA3010x
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
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)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(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)	<input type="radio"/> <input checked="" type="radio"/>
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		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by		<input type="checkbox"/>

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

Data Collection Form

FCC Form 481

OMB Control No. 3060-0966/OMB Control No. 3060-0819

July 2018

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDOFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

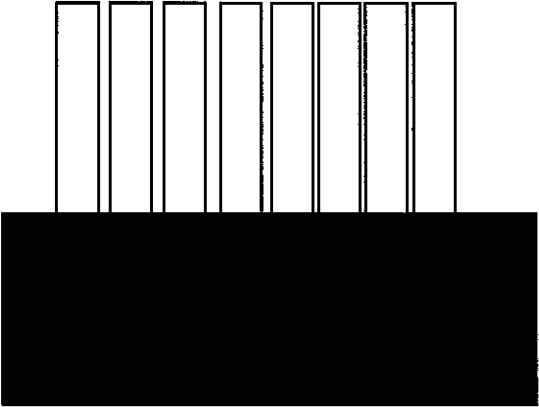
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



REDACTED - FOR PUBLIC INSPECTION



<010>	Study Area Code	351407
<015>	Study Area Name	KILLDOFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide list of newly served community anchor institutions.

#### 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 response to Line 4001.

**4001.** Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates of 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

<010>	Study Area Code	351407
<015>	Study Area Name	KILLDOUFF TEL. CO.
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

## 5005 Alaska Plan

(5010) Do you participate in the Alaska plan? (Yes/No)

(5011)	Please indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas previously served exclusively by performance-limiting satellite backhaul.	(Yes/No)
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(5012)	<p>If the filing carrier identified in its approved performance plans that it relies exclusively on satellite backhaul for a certain portion of the population in its service area, indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas that were previously served exclusively by satellite backhaul.</p>	(Yes/No)
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[illegible]

<b>Certification - Reporting Carrier Data Collection Form</b>	<b>FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018</b>
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<010> Study Area Code	351407
<015> Study Area Name	KILLDUFF TEL. CO.
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035> Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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.	

<b>Certification - Agent / Carrier</b>	<b>FCC Form 481</b>
<b>Data Collection Form</b>	<b>OMB Control No. 3060-0985/OMB Control No. 3060-0819</b>
	<b>July 2018</b>

<010> Study Area Code	351407
<015> Study Area Name	KILLDUFF TEL. CO.
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035> Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>ICORE Consulting, LLC</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	ICORE Consulting, LLC
Name of Reporting Carrier:	KILLDUFF TEL. CO.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 07/09/2018
Printed name of Authorized Officer:	Christopher Ulmer
Title or position of Authorized Officer:	General Manager
Telephone number of Authorized Officer:	6109283903 ext.
Study Area Code of Reporting Carrier:	351407 Filing Due Date for this form: 07/16/2018
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:	KILLDUFF TEL. CO.
Name of Authorized Agent Firm:	ICORE Consulting, LLC
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 07/09/2018
Name of Authorized Agent Employee:	Christopher T. Ulmer
Title or position of Authorized Agent or Employee of Agent	Sr. VP
Telephone number of Authorized Agent or Employee of Agent:	6109283903 ext.
Study Area Code of Reporting Carrier:	351407 Filing Due Date for this form: 07/16/2018
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**

Company	Killduff Telephone Company
Study Area Code	351407
Supplemental Data For:	Line 610 – Description of Functionality in Emergency Situations

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As an initial point, the Company had no service outages during 2017 which met the FCC's threshold for reporting into the Network Outage Reporting System ("NORS").

The Company engages in preventative maintenance programs which help ensure network reliability in all conditions. This includes regular checks on generators, battery back-up, HVAC infrastructure at central office switches, and tree trimming/removal when trees have the potential to take down telephone lines during events of high wind or heavy snow. Access to critical infrastructure (like central office switches) is limited to essential personnel. Spare equipment is maintained in inventory.

Like most local exchange carriers, the Company's network consists of electronic switching equipment and a network of fiber optics and copper facilities. From a switching standpoint, the Company has one primary switch and smaller switches which are fed by the primary switch. These smaller switches are often referred to as intraexchange remote switches or concentrators. The largest threat to switches is the loss of power. To address this, the Company ensures adequate battery back-up is maintained. For emergency situations which extend beyond the useful life of the battery back-up, the Company uses generators to power the switches. These generators are portable which ensures they can be relocated to any switching center based on the specific needs of each switch. In addition, the Company's office will serve as a Command and Control center. This center is included as a primary location to which continuous power is required.

In cases of emergency, the Company's management has contact information for all employees. Depending upon the scope of the emergency, the Company may call-in as many employees as necessary to provide continual telecommunications service. The Company has access to local and regional construction companies which can be called in to supplement the work force if necessary. When poles are down from emergencies, the Company works with other utilities attached to the same poles to expedite the repair or replacement of the infrastructure.

In summation, the Company takes preventative measures to plan for emergency situations and also takes steps to mitigate the risk or duration of such events.

Killduff Telephone Company

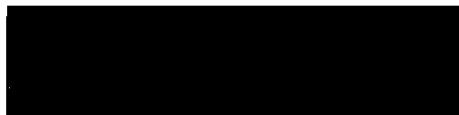
305 7<sup>th</sup> Avenue

Sully, Iowa 50251

June 25, 2018

I, Christopher Ulmer, hereby certify that Killduff Telephone Company pricing of voice services are no more than two standard deviations above the applicable national average urban rate for voice service as specified in the most recent public notice issued by the Wireline Commission bureau.

Respectfully,



Christopher T. Ulmer

General Manager

### SERVICE CHARGES

## B. LIFELINE ASSISTANCE

1. The Federal Lifeline Assistance Program is a plan which assists qualified low-income applicants with reductions in their monthly local exchange service rate. The assistance applies for a single telephone line at the applicant's principal place of residence. Qualified applicants shall have their monthly local exchange service rate reduced by the federal support amount defined in 47 CFR 54.403.
2. Eligibility Requirements  
To be eligible for assistance, an applicant must provide documentation showing the applicant (1) meets income-based criterion currently defined as at or below 135 percent of the Federal Poverty Guidelines, OR (2) participates in at least one of the following programs as defined by 47 CFR 54.409:
  - a. Medicaid (e.g. Title XIX/Medical, state supplemental assistance)
  - b. Supplemental Nutrition Assistance Program (SNAP)
  - c. Supplemental Security Income (SSI)
  - d. Federal public housing assistance
  - e. Low-Income Home Energy Assistance Program (LHEAP)
  - f. Temporary Assistance for Needy Families Program (TANF)
  - g. National School Lunch Program

The Lifeline customer is responsible for notifying the Company if the customer ceases to participate in any of the public assistance programs listed above.

A Lifeline customer may only receive assistance from one wireline or one wireless telephone provider per household.

3. **Application for Assistance**  
An applicant shall request telephone assistance through completion of a certification form provided by the Company as governed by 47 CFR 54.410.
4. **Rates**
  - a. The Lifeline customer will receive a monthly credit toward their local exchange service rate. The total monthly credit identified in 47 CFR 54.403 shall be used to reduce the Lifeline customer's rate.
  - b. Toll blocking shall be included with this service offering without charge. No service deposit would be required if applicant voluntarily elects toll blocking with the initiation of Lifeline Service.

ISSUED: April 30, 2012 EFFECTIVE: June 1, 2012  
Date Date

BY: Don Long President Sully, Iowa 50251  
Name Title Address



Killduff Telephone Company

TELEPHONE TARIFF

PART VII

Revised

Sheet No. 71

Filed with Board

Cancels \_\_\_\_\_

Sheet No. \_\_\_\_\_

ACCESS SERVICES CONCURRENCE

A. CONCURRENCE IN RATES AND CHARGES OF NATIONAL EXCHANGE CARRIER ASSOCIATION TARIFF F.C.C. NO. 3, 4, AND 5 AS FILED BY THE IOWA TELECOMMUNICATIONS ASSOCIATION ACCESS SERVICE TARIFF NO. 1

1. Killduff Telephone Company concurs in the Effective Access Tariffs as filed by the Iowa Telecommunications Association in the State of Iowa.

ISSUED: April 20, 2006 EFFECTIVE: May 20, 2006  
Date Date

BY: Don Long President Sully, IA 50251  
Name Title Address

Company	Killduff Telephone Company
Study Area Code	351407
Supplemental Data For:	Line 3010A – Certification of Public Interest Obligations

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To be in compliance with the Milestone Certification of providing upon a reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream:

- The Company certifies that it has taken reasonable steps to provide upon a reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream with latency suitable for real time applications, including Voice over Internet Protocol.
- The Company provides usage capacity that is reasonably comparable to comparable offerings in urban areas.
- The Company certifies that requests for such service are met within a reasonable amount of time.

<010> Study Area Code  
<015> Study Area Name  
<020> Program Year  
<030> Contact Name - Person USAC should contact regarding this data.  
<035> Contact Telephone Number - Number of person identified in data line <030>  
<039> Contact Telephone Email Address - Email Address of person identified in data line <030>

☐ Files as reviewed single company  
☐ Filed as reviewed consolidated company  
☐ Filed as subsidiary of reviewed consolidated company

<010> [REDACTED]  
<015> [REDACTED]  
<020> [REDACTED]  
<030> [REDACTED]  
<035> [REDACTED]  
<039> [REDACTED]

☐ Filed as audited single company  
☐ Filed as audited consolidated company  
☐ Filed as subsidiary of audited consolidated company

**CERTIFICATION**

We hereby certify that the information furnished on this form is true and correct. We are aware that this form and the information furnished hereon are being submitted to the Federal Communications Commission for its review and approval for release to the public.

*[Signature]*  
Date

**PART A. BALANCE SHEET**

		BALANCE PRIOR YEAR	BALANCE END OF PERIOD
ASSETS			
<b>CURRENT ASSETS</b>			
1. Cash and Equivalents			
2. Cash-RUS Construction Fund			
3. Affiliates:			
a. Telecom. Accounts Receivable			
b. Other Accounts Receivable			
c. Notes Receivable			
4. Non-Affiliates:			
a. Telecom. Accounts Receivable			
b. Other Accounts Receivable			
c. Notes Receivable			
5. Interest and Dividends Receivable			
6. Material-Regulated			
7. Material-Nonregulated			
8. Prepayments			
9. Other Current Assets			
10. Total Current Assets (1 Thru 9)			
<b>NONCURRENT ASSETS</b>			
11. Investment in Affiliated Companies			
a. Rural Development			
b. Nonrural Development			
12. Other Investments			
a. Rural Development			
b. Nonrural Development			
13. Nonregulated Investments			
14. Other Noncurrent Assets			
15. Deferred Charges			
16. Jurisdictional Differences			
17. Total Noncurrent Assets (11 thru 16)			
<b>PLANT, PROPERTY, AND EQUIPMENT</b>			
18. Telecom. Plant-in-Service			
19. Property Held for Future Use			
20. Plant Under Construction			
21. Plant Adj., Nonop. Plant & Goodwill			
22. Less Accumulated Depreciation			
23. Net Plant (18 thru 21 less 22)			
24. TOTAL ASSETS (10+17+23)			
<b>LIABILITIES AND STOCKHOLDERS' EQUITY</b>			
<b>CURRENT LIABILITIES</b>			
25. Accounts Payable			
26. Notes Payable			
27. Advance Billings and Payments			
28. Customer Deposits			
29. Current Mat. L/T Debt			
30. Current Mat. L/T Debt-Rur. Dev.			
31. Current Mat.-Capital Leases			
32. Income Taxes Accrued			
33. Other Taxes Accrued			
34. Other Current Liabilities			
35. Total Current Liabilities (25 thru 34)			
<b>LONG-TERM DEBT</b>			
36. Funded Debt-RUS Notes			
37. Funded Debt-RTB Notes			
38. Funded Debt-FFB Notes			
39. Funded Debt-Other			
40. Funded Debt-Rural Develop. Loan			
41. Premium (Discount) on L/T Debt			
42. Recquired Debt			
43. Obligations Under Capital Lease			
44. Adv. From Affiliated Companies			
45. Other Long-Term Debt			
46. Total Long-Term Debt (36 thru 45)			
<b>OTHER LIAB. &amp; DEF. CREDITS</b>			
47. Other Long-Term Liabilities			
48. Other Deferred Credits			
49. Other Jurisdictional Differences			
50. Total Other Liabilities and Deferred Credits (47 thru 49)			
<b>EQUITY</b>			
51. Cap. Stock Outstanding & Subscribed			
52. Additional Paid-in-Capital			
53. Treasury Stock			
54. Membership and Cap. Certificates			
55. Other Capital			
56. Patronage Capital Credits			
57. Retained Earnings or Margins			
58. Total Equity (51 thru 57)			
59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)			

## (305b) Operating Report for Privately-Held Rate of Return Carriers

## Balance Sheet - Data Collection Form

Page 2 of 3

FCC Form 481

OMB Control No. 3060-0986

July 2013

<010> Study Area Code 351407  
 <015> Study Area Name Kilduff Telephone Company  
 <020> Program Year 2019  
 <030> Contact Name - Person USAC should contact regarding this data Matthew Mumma  
 <035> Contact Telephone Number - Number of person identified in data line <030> 610-928-3913  
 <039> Contact Telephone Email Address - Email Address of person identified in data line <030> mmumma@icorellc.com

## PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or margins (21+27+28+29+30-26)		

REDACTED - FOR PUBLIC INSPECTION

32.	Total Taxes Based on Income	
33.	Retained Earnings or Margins Beginning-of-Year	
34.	Miscellaneous Credits Year-to-Date	
35.	Dividends Declared (Common)	
36.	Dividends Declared (Preferred)	
37.	Other Debits Year-to-Date	
38.	Transfers to Patronage Capital	
39.	Retained Earnings or Margins end-of-Period [(31+33+34)-(35+36+37+38)]	
40.	Patronage Capital Beginning-of-Year	
41.	Transfers to Patronage Capital	
42.	Patronage Capital Credits Retired	
43.	Patronage Capital End-of-Year (40+41-42)	
44.	Annual Debt Service Payments	
45.	Cash Ratio [(14+20-10-11)/7]	
46.	Operating Accrual Ratio [(14+20+26)/7]	
47.	TIER [(31+26)/26]	
48.	DSCR [(31+26+10+11)/44]	

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PART C. STATEMENTS OF CASH FLOWS

CASH FLOWS FROM OPERATING ACTIVITIES	
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
2. Net Income	Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities
3. Add: Depreciation	
4. Add: Amortization	
5. Other (Explain)	
Changes in Operating Assets and Liabilities	
6. Decrease/(Increase) in Accounts Receivable	
7. Decrease/(Increase) in Materials and Inventory	
8. Decrease/(Increase) in Prepayments and Deferred Charges	
9. Decrease/(Increase) in Other Current Assets	
10. Increase/(Decrease) in Accounts Payable	
11. Increase/(Decrease) in Advance Billings & Payments	
12. Increase/(Decrease) in Other Current Liabilities	
13. Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	
15. Increase/(Decrease) in Notes Payable	
16. Increase/(Decrease) in Customer Deposits	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20. Less: Payment of Dividends	
21. Less: Patronage Capital Credits Retired	
22. Other (Explain)	
23. Net Cash Provided/(Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	
25. Other Long-Term Investments	
26. Other Noncurrent Assets & Jurisdictional Differences	
27. Other (Explain)	
28. Net Cash Provided/(Used) by Investing Activities	
29. Net Increase/(Decrease) in Cash	
30. Ending Cash	