



September 8, 2017

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

**Re: Joint Petition of Cheyenne River Sioux Tribe Telephone Authority and CenturyLink QC's for Waiver of the Definition of "Study Area" Contained in Part 36, Appendix Glossary of the Commission's Rules**

Dear Ms. Dortch,

On behalf of Cheyenne River Sioux Tribe Telephone Authority, I am submitting the attached First Amendment to the above referenced petition.

Thank you. Please let us know if you have any questions.

Sincerely,

Lori Sherwood  
Director of Broadband Development

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

In the Matter of	)	
	)	
Joint Petition of	)	
Cheyenne River Sioux Tribe Telephone Authority and	)	CC Docket No. 96-45
CenturyLink QC's for Waiver of the Definition of "Study	)	
Area" Contained in Part 36, Appendix-Glossary of the	)	
Commission's Rules	)	

**FIRST AMENDMENT TO PETITION FOR STUDY AREA WAIVER**

This Amendment seeks to provide clarification regarding how the Cheyenne River Sioux Tribe Telephone Authority (CRSTTA) estimates the cost to build out to all of the impacted locations as well as how the impact on USF is calculated.

CenturyLink was not providing any services to any of the locations impacted by the boundary line change. Further, no CenturyLink network assets are being transferred to CRSTTA. Four of the locations, all residential, now within Century Link's service area have requested FTTP service from CRSTTA.

CRSTTA estimates that it will cost \$22,000 to build out to 5 loops that include four households. This is correcting an inadvertent mischaracterization in the initial filing that stated there were four customers and three locations. The four households include one customer having two lines (main and fax) and three customers that are located very close to one another.

Originally it was anticipated that there would not be any additional impact to USF support. However, upon further examination, CRSTTA is presenting a modified calculation showing that CRSTTA would receive approximately \$350 annually in total in USF support for the additional customers. To calculate the USF Support impact of approximately \$350, the 2016 USF calculation was used as a base and compared to the new USF calculation which added plant costs of approximately \$22,000, depreciation expense of approximately \$1,900 and 5 working loops to the initial 2016 USF base inputs.

If approved, the 5 loops would be assessed ARC charges. CRSTTA's current ARC charges for a residential line is \$2.35 and for a farm and ranch residential line is \$1.60. CRSTTA would approximately receive a range of \$96 to \$141 of ARC revenues annually dependent on the type of service requested and if ARC rates remain constant. Annually ARC revenues are reported and trued-up with the CAF-ICC data request. The CAF-ICC support will be reduced by the additional ARC revenues billed and collected.

CRSTTA had no plant investment costs associated with the four households in the 2011 cost study base year that was utilized for the initial CAF-ICC original amount, and there will be no change to the existing frozen revenue requirement as a result of the additional 5 loops.

**Respectfully Submitted,**

DATE: September 8, 2017

**Cheyenne River Sioux Tribe Telephone Authority**

A handwritten signature in cursive script, appearing to read "Mona Thompson", is written over a horizontal line.

Mona Thompson  
General Manager  
C.R.S.T. Telephone Authority  
100 Main Street  
P.O. Box 810  
Eagle Butte, SD 57625