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

REDACTED – FOR PUBLIC INSPECTION

June 16, 2015

Via Hand Delivery

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

Re: WC Docket No. 14-58
2015 ETC Annual Report of Star Telephone Membership Corp.
Study Area Code 230502

Dear Ms. Dortch:

On behalf of Star Telephone Membership Corp. ("Star"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.[1] Star seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.[2] The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).[3]

Please direct any questions regarding the filing to the undersigned.

Sincerely,

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

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

[1] 47 C.F.R. §§ 54.313, 54.422.
[2] *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).
[3] 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

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REDACTED – FOR PUBLIC INSPECTION

June 16, 2015

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

Re: WC Docket No. 14-58
2015 ETC Annual Report of Star Telephone Membership Corp.
Study Area Code 230502
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Star Telephone Membership Corp. ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,[1] withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).[2]

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").[3]

2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.[4]

3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

[1] 47 C.F.R. §§ 0.457, 0.459.
[2] 47 C.F.R. § 0.459(b)(1) through (9).
[3] 47 C.F.R. §§ 54.313, 54.422.
[4] 47 C.F.R. §§ 54.313(a)(1).

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

   In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."[5] The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

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

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought.

230502

STAR MEMBERSHIP CORP

2016

Donna Bullard

9105647862 ext.

dcbullard@stmc.net

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
	✓	
	✓	✓
✓	✓	
0		
0	✓	
0.0	✓	✓
0.0		
0.0	✓	
0.0		
	✓	✓
230502nc510.pdf	✓	✓
230502nc610.pdf	✓	✓
	✓	✓
	✓	
	✓	✓
Certification	✓	
	✓	
		✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

	✓	
	✓	

(100) Service Quality Improvement Reporting
Data Collection Form

	230502
	STAR MEMBERSHIP CORP
	2016
	Donna Bullard
	9105647862 ext.
	dcbullard@stmc.net
	○ ◉
	○ ○

230502nc112.pdf

How much (USF) was used to improve service quality and how support was used to improve service quality	
How much (USF) was used to improve service coverage and how support was used to improve service coverage	
How much (USF) was used to improve service capacity and how support was used to improve service capacity	

GENERAL EXCHANGE TARIFF

Star Telephone
Membership Corporation
North Carolina

Section: 3
Fifth Revised Page 2
Effective: April 4, 1990

3. BASIC FLAT RATE EXCHANGE SERVICE (cont.)

3.2 Local Exchange Service Rate Components (cont.)

3.2.3 (cont.)

(f) Both fully rated "main" services associated with bridged service.

(g) Toll terminals, toll stations and inward WATS access lines terminated in telephone instruments, PBX, Centrex, key systems, etc.

(h) Lines service interconnected arrangement which are terminated in telephone sets, PBX, key systems, etc.

(i) Outward WATS terminated in telephone sets, PBX, Centrex, key

GENERAL EXCHANGE TARIFF

Star Telephone
Membership Corporation
North Carolina

Section: 3
Ninth Revised Page 3
Effective: July 1, 2014

3. BASIC FLAT RATE EXCHANGE SERVICE (cont.)

3.4 Monthly Exchange Rates (cont.)

3.4.1 Local Exchange Rate (cont.) (C)

Exchange: Abbottsburg, Coharie, Cypress Creek, Harrells, Herring, Kelly, Lisbon, Six Runs, South River & White Oak

Individual Residence: $17
Individual Business (Non-key): $22

(C) – Change

(C)

Star Telephone Membership Corporation Attachment - Line 1210

GENERAL EXCHANGE TARIFF

Star Telephone
Membership Corporation
North Carolina

Section: 3
Third Revised Page: 3A
Effective: December 4, 2007

3. BASIC FLAT RATE EXCHANGE SERVICE

3.4 MONTHLY EXCHANGE RATES

3.4.1 MONTHLY EXCHANGE RATES (Cont'd.)

GENERAL EXCHANGE TARIFF

Star Telephone
Membership Corporation
North Carolina

Section: 3
First Revised Page 3B
Effective: January 20, 1998

3. BASIC FLAT RATE EXCHANGE SERVICE

3.4 MONTHLY EXCHANGE RATES

3.4.2 INTERSTATE SUBSCRIBER LINE CHARGE WAIVER AND MATCHING PROGRAM

a. GENERAL

(1) The Interstate Subscriber Line Charge, mandated by the Federal Communications Commission (FCC), is a monthly fee applicable to residential and single-line business customers.

(2) The Interstate Subscriber Line Charge Waiver and Matching Program, adopted by the North Carolina Utilities Commission in Docket No. P-100, Sub 80, provides for a credit equal to 100% of the Interstate Subscriber Line Charge plus an equivalent state provided subsidy. The total credit is the sum of the Federal and State credits. This credit is applied to the monthly bills for current qualified residential recipients of Supplemental Security Income, Food Stamps, or a current participant in Work First or Temporary Assistance for Needy Families who reside in the Star Telephone Membership Corporation's service area. (C)

b. APPLICATIONS AND REGULATIONS

(1) Certification Form

A standard application will be available only from the agency involved and not the telephone cooperative.

(2) Processing Forms

The cooperative will accumulate all application forms and apply the credit on the subscriber's monthly bill. An explanation of the credit will appear on each telephone bill.

C – This information has been changed.

GENERAL EXCHANGE TARIFF

Star Telephone
Membership Corporation.

Section: 3
First Revised Page: 3C

[redacted]

C – This information has been changed.
M – Material shown on this page was previously shown on original Page 3E, Section 3.

GENERAL EXCHANGE TARIFF

Star Telephone
Membership Corporatioin
North Carolina

Section: 3A
Third Revised Sheet: 1
Effective: FEB 22 1985

APPLICATION OF RATES FOR BUSINESS AND RESIDENCE SERVICE

A. GENERAL

Determination as to whether subscribers' service (as distinguished

GENERAL EXCHANGE TARIFF

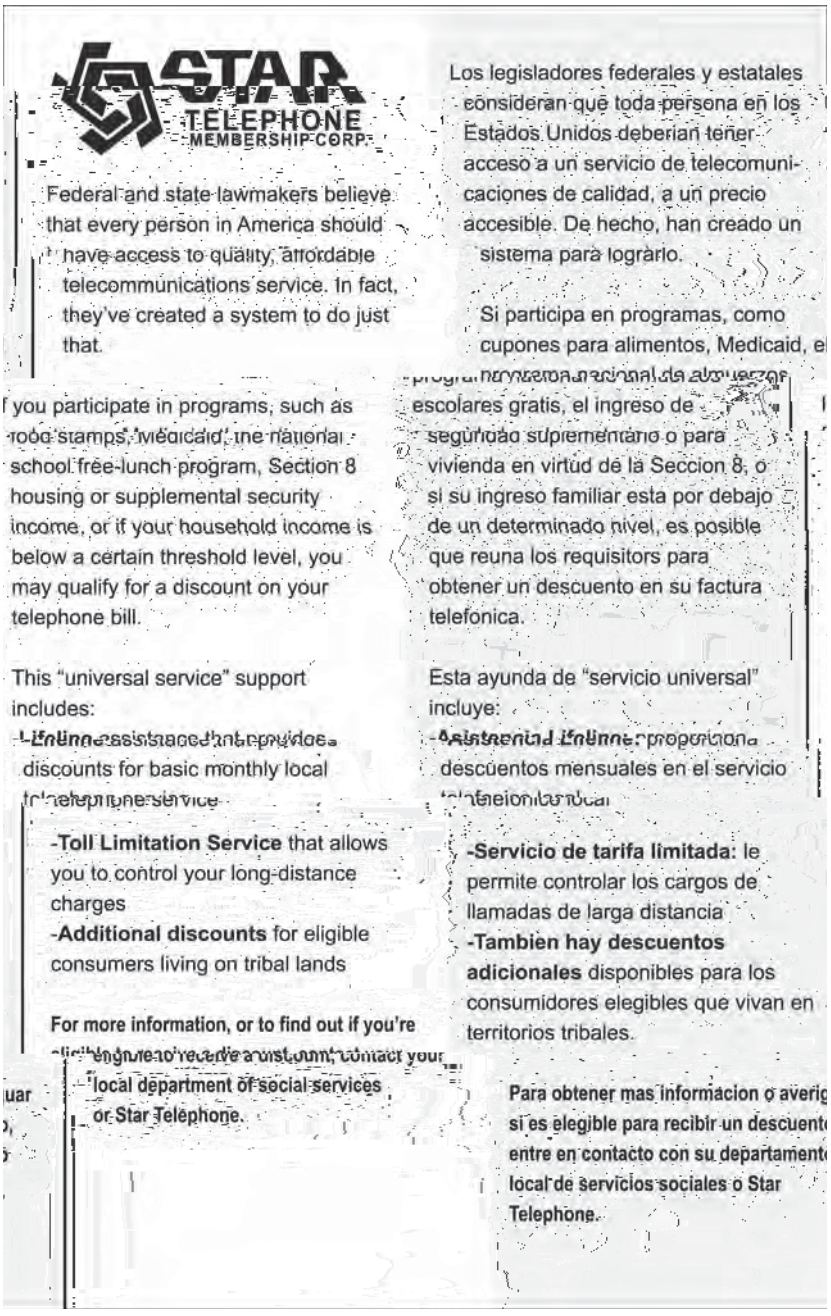
Star Telephone
Membership Corporation
North Carolina

Section: 3A
Third Revised Sheet: 2
Effective:

FEB 22 1985

APPLICATION OF RATES FOR BUSINESS AND RESIDENCE SERVICE

[redacted]



STAR TELEPHONE MEMBERSHIP CORP.

Federal and state lawmakers believe that every person in America should have access to quality, affordable telecommunications service. In fact, they've created a system to do just that.

Los legisladores federales y estatales consideran que toda persona en los Estados Unidos deberian tener acceso a un servicio de telecomunicaciones de calidad, a un precio accesible. De hecho, han creado un sistema para lograrlo.

If you participate in programs, such as food stamps, Medicaid, the national school free-lunch program, Section 8 housing or supplemental security income, or if your household income is below a certain threshold level, you may qualify for a discount on your telephone bill.

Si participa en programas, como cupones para alimentos, Medicaid, el programa nacional de almuerzos escolares gratis, el ingreso de seguridad suplementario o para vivienda en virtud de la Seccion 8, o si su ingreso familiar esta por debajo de un determinado nivel, es posible que reuna los requisitors para obtener un descuento en su factura telefonica.

This "universal service" support includes:

-**Lifeline assistance** that provides discounts for basic monthly local telephone service

-**Toll Limitation Service** that allows you to control your long-distance charges

-**Additional discounts** for eligible consumers living on tribal lands

Esta ayunda de "servicio universal" incluye:

-**Asistencia Lifeline:** proporciona descuentos mensuales en el servicio telefonico local

-**Servicio de tarifa limitada:** le permite controlar los cargos de llamadas de larga distancia

-**Tambien hay descuentos adicionales** disponibles para los consumidores elegibles que vivan en territorios tribales.

For more information, or to find out if you're eligible to receive assistance, contact your local department of social services or Star Telephone.

Para obtener mas informacion o averig si es elegible para recibir un descuent entre en contacto con su departament local de servicios sociales o Star Telephone.

Star Telephone Membership Corporation (SAC 230502)

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

Star Telephone Membership Corporation hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at 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 as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Star Telephone Membership Corp (SAC 230502)

Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service

USF/ICC Transformation Order requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Star Telephone Membership Corp hereby provides the FCC with a list of community anchor institutions to which it newly began providing access to broadband service in calendar year 2014.[1]

See attached list.

[1] The FCC has defined community anchor institutions in Section 54.5 schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities.

Number	Name	Address
1	WILSON CHAPEL MISS BAP CHURCH	4867 NEW HOPE CHURCH RD, TURKEY, NC 28393
2	HARRELLS VOL FIRE DEPT	915 WARD RD, HARRELLS, NC 28444
3	MT OLIVE MISSIO BAPT CHUR	5548 SILVER SPOON RD, WHITEVILLE, NC 28472
4	BLADEN'S BLOOMIN' AGRI INDUSTRIAL INC	340 AVIATION PARKWAY, ELIZABETHTOWN, NC 28337
5	CHARISMA LIFE CENTER	7254 MINNIE-HALL RD, ROSEBORO, NC 28382
6	LOWER BLADEN CO COMMUNITY CITIZENS GROUP	153 LIGHTWOOD KNOT RD, KELLY, NC 28448
7	UPPER ROOM PRAYER HOUSE	7035 DOE HILL RD, AUTRYVILLE, NC 28318
8	HICKORY GROVE BAPTIST CHURCH	6414 CENTER RD, BLADENBORO, NC 28320
9	MT OLIVE HEADSTART CENTER	5465 SILVER SPOON RD, WHITEVILLE, NC 28472
10	WHITE'S CREEK BAPTIST CHURCH	6062 MERCER MILL BROWN MARSH RD, CLARKTON, NC 28433
11	TOMAHAWK FIRST BAPTIST	8340 TOMAHAWK HWY, HARRELLS, NC 28444
12	SMITH CHAPEL AMEZ METHOD	7485 OLD MINTZ HWY, GARLAND, NC 28441
13	ZARA BETTERMENT CORP	2104 S ELWELL FERRY RD, COUNCIL, NC 28434
14	WINDSOR UNITED METH CHURCH	12863 NC 242 HWY N, ELIZABETHTOWN, NC 28337
15	JEHOVAH'S WITNESSES	1088 BRITT RD, CLARKTON, NC 28433
16	CENTERVILLE BAPTIST CHURCH	18577 NC 53 HWY E, KELLY, NC 28448

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY