

<010> Study Area Code	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Nick Schneider
<035> Contact Telephone Number: Number of the person identified in data line <030>	5036332111 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	nick@stpaultel.com

ANNUAL REPORTING FOR ALL CARRIERS	54,313 Completion Required	54,422 Completion Required
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			(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<200> Outage Reporting (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<210> <input checked="" type="checkbox"/> ← check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<310> Detail on Attempts (voice)	<input type="text" value=""/> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<330> Detail on Attempts (broadband)	<input type="text" value=""/> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<510> <input type="text" value="532396OR510.pdf"/> (attached descriptive document)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<610> <input type="text" value="532396OR610.pdf"/> (attached descriptive document)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<1000> Voice Services Rate Comparability Certification	<input type="text" value="Yes"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<1010> <input type="text" value=""/> (attach descriptive document)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

532396OR112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	Yes
<114> Report how much universal service (USF) support was received	Yes
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

**(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	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<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 document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) 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

**(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	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<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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<010> Study Area Code	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaulte1.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	532396OR1210.pdf
	Name of Attached Document

<1220> Link to Public Website	HTTP www.oregon.gov/puc
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"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, | <input checked="" type="checkbox"/> |
|--|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
|---|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

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

July 2013

<010>	Study Area Code	
<015>	Study Area Name	532396
<020>	Program Year	ST PAUL COOP ASSN
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	NICK SCHNEIDER
<039>	Contact Email Address - Email Address of person identified in data line <030>	3036332111 ext. nick@stpaultel.com

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

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {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)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation FCC Form 481
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 532396
 <015> Study Area Name ST PAUL COOP ASSN
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Nick Schneider
 <035> Contact Telephone Number - Number of person identified in data line <030> 5036332111 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> nick@stpaultel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring 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.

(3010) Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))
 Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))
 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) Yes No

Please check these boxes to confirm that the attached document(s), 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) for 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) 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
 (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
 (3021) Management letter and 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) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information
 Name of Attached Document Listing Required Information

(3000) 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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<010> Study Area Code	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

Financial Data Summary

(3027) Revenue	766455
(3028) Operating Expenses	656398
(3029) Net Income	195730
(3030) Telephone Plant In Service(TPIS)	1572300
(3031) Total Assets	2743996
(3032) Total Debt	0
(3033) Total Equity	2743996
(3034) Dividends	0

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	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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:	ST PAUL COOP ASSN
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/16/2015
Printed name of Authorized Officer:	Nick Schneider
Title or position of Authorized Officer:	Sec/Treas
Telephone number of Authorized Officer:	5036332111 ext.
Study Area Code of Reporting Carrier:	532396 Filing Due Date for this form: 07/01/2015
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
---	--

<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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) _____ 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:	
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.	

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:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
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.	

Attachments

St Paul Cooperative Telephone Association
("St. Paul")
2015

PROGRESS REPORT ON SERVICE QUALITY IMPROVEMENT PLAN

This document is an integral part of the Company's 2015 Annual Report, as attached to Form 481. It is in compliance with §54.313(a)(1) adopted in the FCC's USF/ICC Transformation Order (11-161) and incorporates all further clarifications identified in subsequent Reconsideration Orders, as applicable, that were in effect at the time the Annual Report was due by Rule to the requisite regulatory authorities.

St. Paul Telco advises that the environment in which the Company operates is dynamic, not static. As a result, certain network targets identified in its initial 5 Year Network Improvement Plan, filed in 2014, may be modified in response to regulatory decisions that have been subsequently adopted, and as their implication upon the Company's financial viability in providing the required services and service level quality became known.

Modifications to the network plan may also have been taken due to changes in market conditions, technology, vendor-driven support, weather, or emergency related contingencies.

Targets not met or changed since the initial 5 Year Plan filing are identified and reasons provided for those changes.

UNIVERSAL SERVICE SUPPORT RECEIVED IN 2015

Per the Universal Service Administrative Company (USAC), as available for the period up to this filing, St. Paul Telco received a total of \$80,875.00(as of 6/16/15) in USF support funds. The breakdown of the funding to the point of filing is:

- \$2,345.00 High Cost Loop Support
- \$39,285.00 Connect America Fund-Intercarrier Compensation Support
- \$39,245.00 Interstate Common Line Support

Universal Service Support funds are used to: 1) maintain, upgrade, and improve the Company's network and, 2) cover operating expenses and debt commitments as necessary to permit it to offer a high level of service for both voice and broadband within the authorized serving area.

USF support will continue to be included in the Company's current revenue accounts and forward-looking projections. Revenues, in the aggregate, are used for both capital expenditures as well as to cover operating expenses and fixed costs incurred to obtain capital from lenders. The Company does not segregate USF separately for purposes of capital and operating expenditures; USF is expended in the same proportion as all other revenues.

The proportionate share of USF expenditures in 2015 to date for CAPEX is estimated to be \$40,437.50 (50%) ; for OPEX \$40,437.50 (50%).

In the accompanying 2015 project detail, expenditures for network improvements sometimes involve service quality, coverage and capacity as an integrated improvement project and are not mutually exclusive from one another. In terms of cost, projects involving multiple qualifiers are of equal dollar equivalence. Where a project involves a single qualifier, it is so noted.

PROGRESS REPORT

2015 Blanchet West Project

St Paul Telephone used operating cash flow to deploy FttH for the Blanchet West Project. This project is about 95% completed and will be done in the third quarter of this year.

The Blanchet West project cost is estimated at \$56,420.00. The project involves placement of about 1 mile of fiber to service 40 subscribers. When completed the 40 subscribers will have broadband speeds up to 20MB download and 10MB upload. This project is scheduled for completion in the third quarter of 2015. St Paul Telephone expects an increase in broadband subscribership as the result of this project based on past experience of copper connected customers who were upgraded to FttH. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

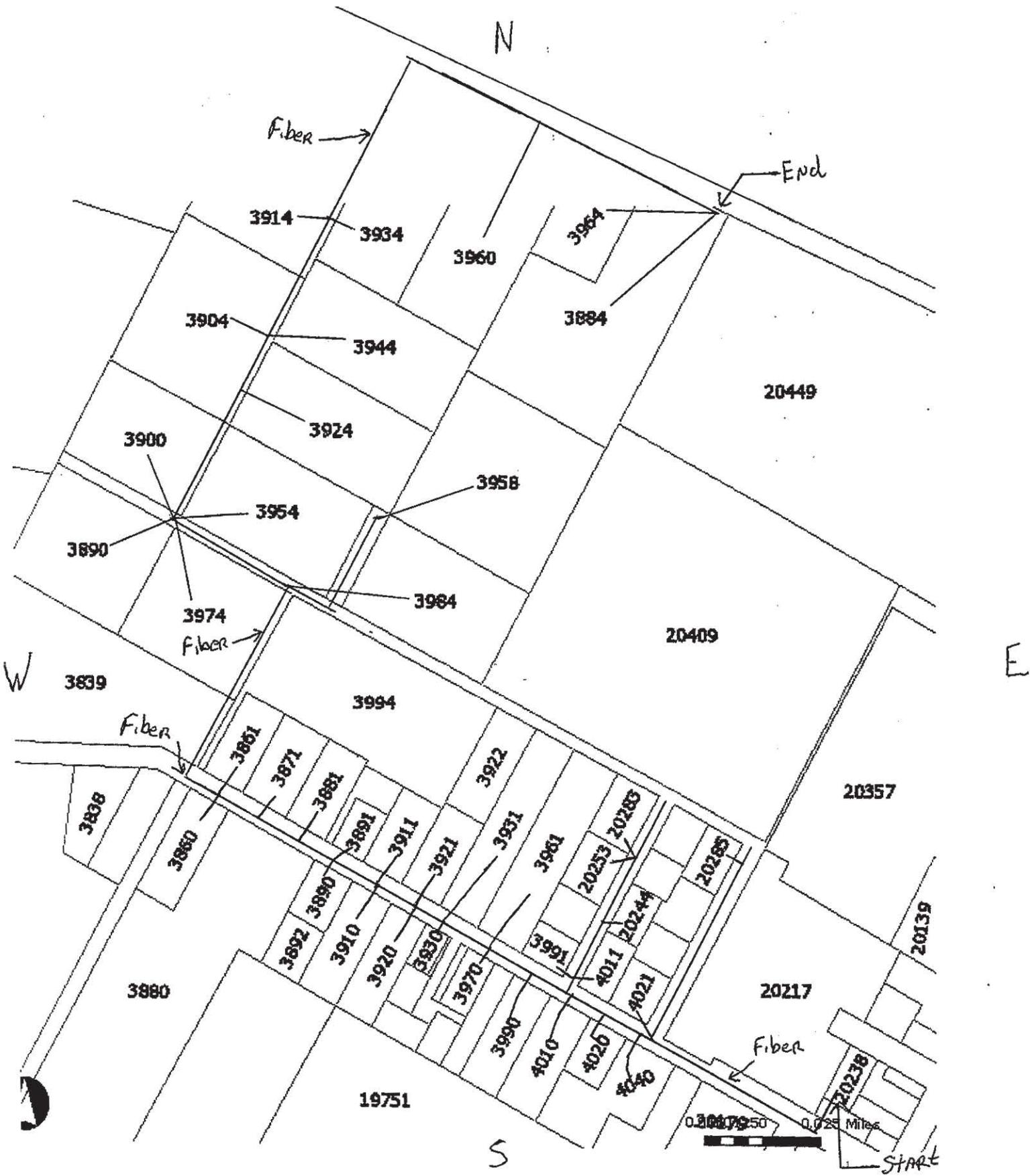
This project provides Service Quality, Coverage and Capacity upgrades.

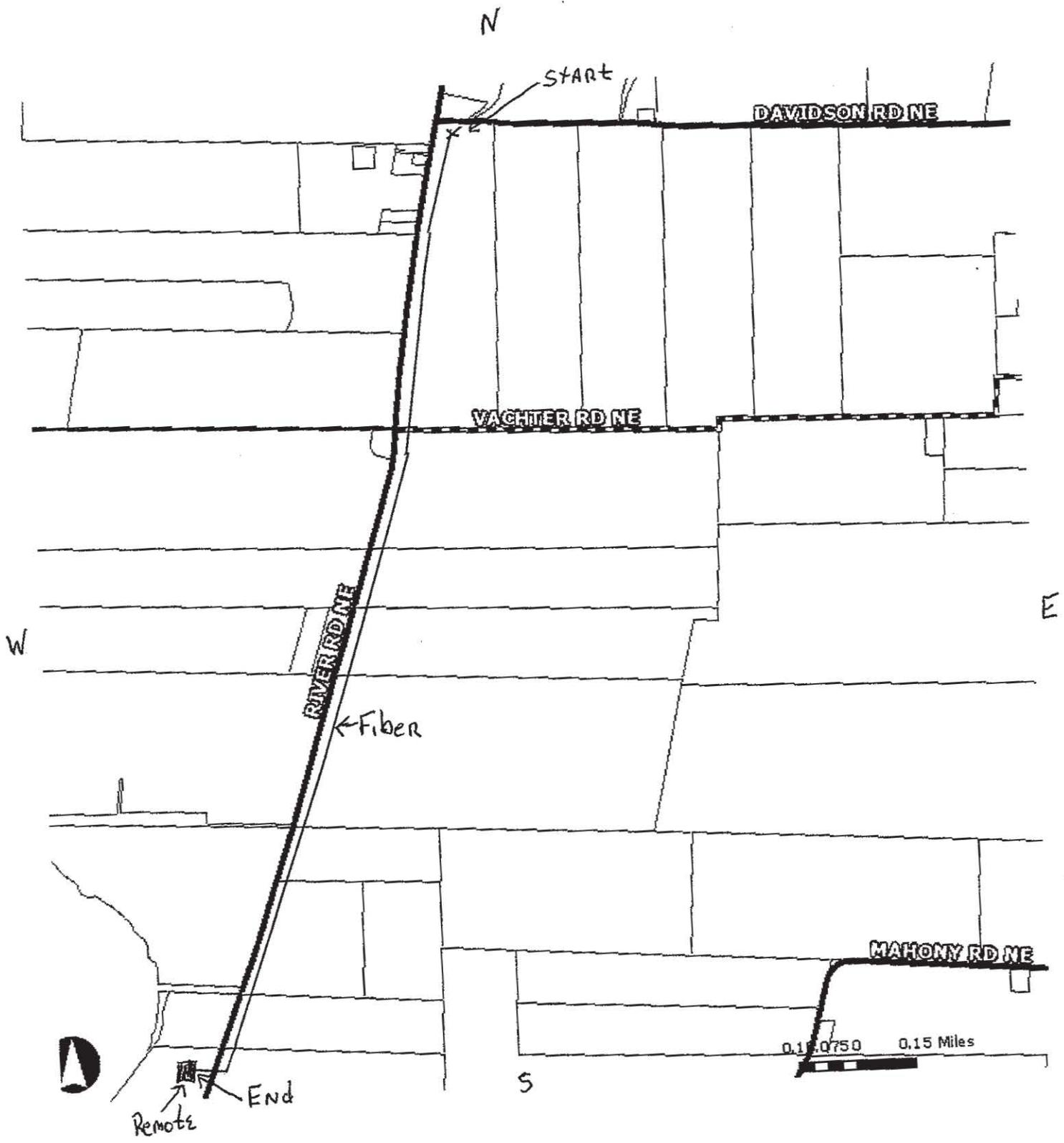
2016 South End Project

St Paul Telephone used operating cash flow to replace copper cable with fiber to feed the Subscriber Remote Terminal. This project was scheduled of 2016 but do to the increase amount of usage in bandwidth it was decided to complete this project this year.

The South End project cost is estimated at \$105,220.00. The project involves placement of about 2.1 miles of fiber to feed a Subscriber Remote Terminal. That remote is currently being fed by copper cable. The remote is serving about 30 customers. This will increase the amount of broadband capacity that the customers now have available to them. The project is scheduled for completion in the fourth quarter of 2016. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

This project provides Service Quality, Coverage and Capacity upgrades





St Paul Telephone
South End Project

532396



June 16, 2015

532396OR3010

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: WC Docket No. 14-58, 2015 Annual Report, Form 481 for High-Coast
Recipient 54.313(f)(1) "Milestone Certification"

Dear Ms Dortch:

In compliance with the filing requirements associated with, and
attached to Form 481, we wish to advise the Commission that St Paul
Cooperative Telephone Association:

Has taken reasonable steps to provide upon reasonable request
broadband service at actual speeds of 4 Mbps downstream/1
Mbps upstream:

Provides latency suitable for real-time applications including VoIP
and usage capacity which is reasonably comparable to those in
urban areas and;

That reasonable requests for service are met within a reasonable
timeframe.

If there are questions, I may be contacted at 503-633-2111.

Sincerely,

Nick Schneider
Manager

532396OR3012

ANCHOR INSTITUTIONS WITHIN ST. PAUL TELEPHONE TERRITORY

Number	Name	Address
1	St Paul Fire Dept.	4233 Church Ave
2	St Paul Elementary School	20449 Main St
3	St Paul High School	20449 Main St
4	St Paul Parochial School	20327 Christie St
5	St Paul Catholic Church	20217 Christie St

No anchor institutions requested a change in broadband service in 2014. All anchor institutions have access to speeds greater than 4/1.

ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION**Statements of Operations**

December 31, 2014 and 2013

	<u>2014</u>	<u>2013</u>
Operating Revenues:		
Local network	\$ 110,894	\$ 112,764
Network access	542,442	566,048
Long distance	40,330	43,149
Miscellaneous	<u>72,789</u>	<u>41,526</u>
Total Operating Revenues	<u>766,455</u>	<u>763,487</u>
Operating Expenses:		
Plant specific operations	124,027	142,537
Plant nonspecific operations	24,060	17,514
Depreciation	154,178	138,382
Long distance	29,120	31,907
Customer operations	115,123	113,440
Corporate operations	191,375	225,819
Operating taxes	<u>18,515</u>	<u>18,192</u>
Total Operating Expenses	<u>656,398</u>	<u>687,791</u>
Operating Margin	<u>110,057</u>	<u>75,696</u>
Other Income:		
Investment and other income	48,936	32,395
Nonregulated activity, net	25,146	3,426
Ticketing services, net	<u>11,591</u>	<u>39,081</u>
Total Other Income	<u>85,673</u>	<u>74,902</u>
Net Margin	<u>\$ 195,730</u>	<u>\$ 150,598</u>

ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION**Balance Sheets**

December 31, 2014 and 2013

ASSETS	<u>2014</u>	<u>2013</u>
Current Assets:		
Cash and cash equivalents	\$ 392,654	\$ 391,959
Marketable securities	661,480	651,261
Accounts receivable, net of allowance for doubtful accounts of zero	74,899	75,150
Prepaid expenses	<u>21,016</u>	<u>22,787</u>
Total Current Assets	<u>1,150,049</u>	<u>1,141,157</u>
Other Investments	<u>21,647</u>	<u>21,647</u>
Property, Plant, and Equipment:		
In service	3,264,032	3,004,316
Construction in process	<u>106,602</u>	<u>81,791</u>
	3,370,634	3,086,107
Less accumulated depreciation	<u>1,798,334</u>	<u>1,644,157</u>
Property, Plant, and Equipment, net	<u>1,572,300</u>	<u>1,441,950</u>
	<u>\$ 2,743,996</u>	<u>\$ 2,604,754</u>
LIABILITIES AND MEMBERS' EQUITY		
Current Liabilities:		
Accounts payable	\$ 18,303	\$ 22,877
Accrued expenses	9,605	9,457
Customer deposits	<u>2,800</u>	<u>2,500</u>
Total Current Liabilities	<u>30,708</u>	<u>34,834</u>
Unclaimed Patronage Capital Distributions Payable	<u>18,424</u>	<u>18,612</u>
Members' Equity:		
Memberships - fully paid	111,000	114,000
Memberships - partly paid	12,255	10,396
Other equity	662,087	570,560
Accumulated other comprehensive income	35,404	13,664
Patronage capital	<u>1,874,118</u>	<u>1,842,688</u>
Total Members' Equity	<u>2,694,864</u>	<u>2,551,308</u>
	<u>\$ 2,743,996</u>	<u>\$ 2,604,754</u>

ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION**Statements of Cash Flows**

December 31, 2014 and 2013

	<u>2014</u>	<u>2013</u>
Cash Flows from Operating Activities:		
Net margin	\$ 195,730	\$ 150,598
Adjustments to reconcile net margin to net cash provided by operating activities:		
Depreciation	154,178	138,382
Depreciation on nonregulated equipment	11,338	3,400
Changes in assets and liabilities:		
Accounts receivable	251	15,002
Prepaid expenses	1,771	(2,522)
Accounts payable	(4,574)	6,483
Accrued expenses	148	1,881
Customer deposits	300	600
Net Cash Provided by Operating Activities	<u>359,142</u>	<u>313,824</u>
Cash Flows from Investing Activities:		
Purchases of plant and equipment	(286,416)	(137,057)
Purchases of nonregulated equipment	(9,450)	(37,203)
Proceeds from sales and maturities of marketable securities	725,956	61,599
Purchases of marketable securities	(714,435)	(52,682)
Net Cash Used by Investing Activities	<u>(284,345)</u>	<u>(165,343)</u>
Cash Flows from Financing Activities:		
Decrease in memberships	(1,141)	(1,846)
Retirement of patronage capital	(72,961)	(80,561)
Net Cash Used by Financing Activities	<u>(74,102)</u>	<u>(82,407)</u>
Net Increase in Cash and Cash Equivalents	695	66,074
Cash and Cash Equivalents, beginning	<u>391,959</u>	<u>325,885</u>
Cash and Cash Equivalents, ending	\$ <u>392,654</u>	\$ <u>391,959</u>

See accompanying notes to financial statements.



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CPAs AND BUSINESS CONSULTANTS

Accountants • CPAs • CFOs

INDEPENDENT AUDITORS' REPORT

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The Board of Directors
St. Paul Cooperative Telephone Association
St. Paul, Oregon

We have audited the accompanying financial statements of St. Paul Cooperative Telephone Association, which comprise the balance sheets as of December 31, 2014 and 2013, and the related statements of operations, comprehensive income, changes in members' equity, and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

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

Auditors' Responsibility

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

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

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of St. Paul Cooperative Telephone Association, as of December 31, 2014 and 2013, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

AKT LLP

Salem, Oregon
February 12, 2015

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Consumer Protection

St. Paul Cooperative Telephone Association complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employee's handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

Service Quality Standards

Voice

St. Paul Cooperative Telephone Association complies with the service standards of the State of Oregon as promulgated in the Oregon Administrative Rules 860-034-0390, Retail Telecommunications Service Standards for Small Telecommunications Utilities.

Broadband

St. Paul Cooperative Telephone Association complies with the service standards as established by NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.

St Paul Cooperative Telephone Association

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54.313 (a)(6) Ability to Remain functional in emergency Situations

Back-up Power

St. Paul Cooperative Telephone Association has the following back-up power capabilities:

Switches – stand alone and/or host

Switch A 30kw Generator, propane fuel, 250 gallon fuel tank also 15 hour of battery back-up.

Remote Central Offices

No Remote Offices

Subscriber carrier)DLC, AFC, OPM, etc)

Calix 1 10 Hours of battery back-up also have portable generator.

Calix 2 Same as above.

Calix 3 Same as above.

Calix 4 Same as above.

Network Interface Devices (NIDs)

St. Paul Cooperative Telephone Association has 313 customers with metallic (copper) connections to the Central Office and their NIDs are powered from the Central Office.

St Paul Cooperative Telephone Association has 44 customers with non-metallic (fiber optic) connections to the Central Office. These customers' NIDs are battery powered in case of emergency. The batteries are rated to last 8 hours.

Ability to reroute traffic around damaged facilities:

St Paul Cooperative Telephone Association is investigating the installation of redundant facilities for interexchange carrier traffic.

Capability to manage traffic spikes resulting from emergency situations

St. Paul Cooperative Telephone Association has 357 customers, switching capacity of 1000 simultaneous calls, and transport capacity for 96 simultaneous calls. St Paul Cooperative Telephone Association takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

LIFELINE FOR ST PAUL COOPERATIVE TELEPHONE ASSOCIATION CUSTOMERS

Lifeline, also known as Oregon Telephone Assistance Program (OTAP), is a government program that offers qualified people a discount on their monthly local telephone bill. You will save up to \$12.75 for your basic monthly bill. You're eligible for Lifeline if you participate in any of the following programs; Food Stamps, Low Income Home Energy Assistance Program (LIHEAP), Supplemental Security Income (SSI), Welfare Medical ID Card, Oregon Health Plan. And are at or below 135% of the federal poverty level guidelines based on annual income and number of household.

Being a Lifeline customer does not protect you from being disconnected if you fail to pay your telephone bill.

To receive an application for Lifeline Service you may contact the Residential Service Protection Fund (RSPF) Programs at 1-800-848-4442 or 503-373-7171 in Salem; TTY users can call 1-800-648-3458; or write to:

Oregon Public Utility Commission RSPF
550 Capitol St NE, Suite 215
Salem, Or. 97301-2551.

Lifeline y para los consumidores de la Cooperativa de la Asociacion de Telefonos.

Lifeline, tambien conocida como el Programa de Asistencia Telefonica de Oregon (OTAP), es un programa del gobierno que ofrece a personas calificadas un descuento en su cuenta mensual telefonica. Usted ahorrara hasta \$12.75 para su cuenta basica mensual. Usted es elegible para Lifeline, si usted participa en cualquier de los siguientes programas; Estampillas de Comida, Programa de Asistencia con la Electricidad para personas de bajos recursos (LIHEAP), Beneficios de Desabilidad para Persona Incapacitada (SSI), Tarjeta de Seguro Medico, El Plan de Salud de Oregon y si esta en el nivel o mas bajo del 135% del nivel de pobreza federal basado en la guia anual de recursos o en el numero de miembros de familia.

Ser miembro de **Lifeline** no le protegera de estar desconectado de servicio si usted no paga su cuenta mensual.

Para recibir una solicitud para **Lifeline** favor de ponerse en contacto con Residential Service Protection Fund (RSPF) al 1-800-848-4442 o 503-373-7171 en Salem; Consumidores Sordos pueden llamar al 1-800-648-3458; o escribir a:

Oregon Public Utility Commission RSPF
550 Capitol St. NE, Suite 215
Salem, Or. 97301-2551

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Lifeline subscribers receive the same residential service as a regular subscriber, but at a reduced monthly recurring rate. Thus, lifeline subscribers have an unlimited number of local calling minutes. As for toll, lifeline subscribers, similar to every St. Paul Cooperative Telephone Association subscriber, are free to choose their own toll usage plans through IXCs that serve St. Paul Cooperative Telephone Association.