Your business is our business.

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 17, 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 Grand Telephone Company, Inc.
Study Area Code 431994

Dear Ms. Dortch:

On behalf of Grand Telephone Company, Inc. ("Grand"), 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] Grand 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 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 17, 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 Grand Telephone Company, Inc.
Study Area Code 431994
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Grand Telephone Company, Inc. ("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.

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[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. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.

8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.

9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

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

FCC Form 481 - Carrier Annual Reporting Data Collection Form

REDACTED FOR PUBLIC INSPECTION

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Jason Anderson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jsanderson@grand.net

ANNUAL REPORTING FOR ALL CARRIERS

			54.313 Completion Required	54.422 Completion Required
			(check box when complete)	
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	✓	
<200>	Outage Reporting (voice)	(complete attached worksheet)	✓	✓
<210>	✓ <-- check box if no outages to report		✓	
<300>	Unfulfilled Service Requests (voice)	0		
<310>	Detail on Attempts (voice)	(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)	0	✓	
<330>	Detail on Attempts (broadband)	(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed	0.0	✓	✓
<420>	Mobile	0.0		
<430>	Number of Complaints per 1,000 customers (broadband)		✓	
<440>	Fixed	0.0		
<450>	Mobile	0.0		
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	✓	✓
<510>	431994ok510.pdf	(attached descriptive document)	✓	✓
<600>	Functionality in Emergency Situations	(check to indicate certification)	✓	✓
<610>	431994ok610.pdf	(attached descriptive document)	✓	✓
<700>	Company Price Offerings (voice)	(complete attached worksheet)	✓	
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	✓	
<800>	Operating Companies and Affiliates	(complete attached worksheet)	✓	✓
<900>	Tribal Land Offerings (Y/N)? ● ○	(if yes, complete attached worksheet)	✓	
<1000>	Voice Services Rate Comparability Certification	Yes	✓	
<1010>		(attach descriptive document)		
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) ● ○	(if not, check to indicate certification)		
<1110>		(complete attached worksheet)		
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)		✓

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)		
<2005>		(complete attached worksheet)		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)	✓	
<3005>		(complete attached worksheet)	✓	

(100) Service Quality Improvement Reporting Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

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

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.

431994ok112.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

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 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

<703>

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

-- See attached worksheet --

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	**Total Rate and Fees**	**Broadband Service - Download Speed (Mbps)**	**Broadband Service - Upload Speed (Mbps)**	**Usage Allowance (GB)**	**Usage Allowance Action Taken When Limit Reached {*select*}**

-- See attached worksheet --

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<810>	Reporting Carrier	Grand Telephone Company, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Grand Telephone Company, Inc.

<813>

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

-- See attached worksheet --

(900) Tribal Lands Reporting Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

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

Cherokee Nation

<920> Tribal Government Engagement Obligation

431994ok920.pdf

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:

		Select Yes or No or Not Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Yes
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	Yes
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

(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	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

431994ok1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ✓

<1222> Details on the number of minutes provided as part of the plan, ✓

<1223> Additional charges for toll calls, and rates for each such plan. ✓

(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	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

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

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

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

July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

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)}

431994ok3010.pdf

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)}

431994ok3012.pdf

Name of Attached Document Listing Required Information

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

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

Please check these boxes to confirm that the attached 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

431994ok3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited? (Yes/No) ○ ○

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(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

REDACTED FOR PUBLIC INSPECTION

(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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

Financial Data Summary

(3027) Revenue	[redacted]
(3028) Operating Expenses	[redacted]
(3029) Net Income	[redacted]
(3030) Telephone Plant In Service(TPIS)	[redacted]
(3031) Total Assets	[redacted]
(3032) Total Debt	[redacted]
(3033) Total Equity	[redacted]
(3034) Dividends	[redacted]

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier:

Signature of Authorized Officer: Date

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier: Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

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) Dee Dee Longenecker **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: Dee Dee Longenecker

Name of Reporting Carrier: GRAND TEL CO INC

Signature of Authorized Officer: CERTIFIED ONLINE Date: 06/16/2015

Printed name of Authorized Officer: Jason Anderson

Title or position of Authorized Officer: Co-Manager / 2nd Vice President

Telephone number of Authorized Officer: 9182534231 ext.

Study Area Code of Reporting Carrier: 431994 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.

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: GRAND TEL CO INC

Name of Authorized Agent or Employee of Agent: Dee Dee Longenecker

Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/16/2015

Printed name of Authorized Agent or Employee of Agent: Dee Dee Longenecker

Title or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs

Telephone number of Authorized Agent or Employee of Agent: 5123380473 ext.235

Study Area Code of Reporting Carrier: 431994 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.

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

Grand Telephone Company, Inc.

Study Area Code 431994

Response to Line 510 - Service Quality Standards and Consumer Protection Rules Compliance – Voice and Broadband Service

In establishing this certification in its *2005 ETC Order*,[1] the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."[2] The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.[3] In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."[4]

Grand Telephone Company, Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing rules 47 C.F.R. § 64.2401, as required in the OCC

---

[1] *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

[2] *Id.* at para. 28.

[3] *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

[4] *Id.* at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Grand Telephone Company, Inc.

Study Area Code 431994

Response to Line 610 - Ability to Function in Emergency Situations for Voice and Broadband

Grand Telephone Company, Inc. ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).[1] The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

[1] Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**
OK	All		FR	16.0	0.05	0.35	0.0	16.4

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<711>

<a1> State	<a2> Exchange (ILEC)	<b1> Residential Rate	<b2> State Regulated Fees	<c> Total Rates and Fees	<d1> Broadband Service - Download Speed (Mbps)	<d2> Broadband Service -Upload Speed (Mbps)	<d3> Usage Allowance (GB)	<d4> Usage Allowance Action Taken When Limit Reached {select}
OK	All	79.95	0.0	79.95	9.0	1.0	0.0	Other, No usage allowance, V-Data, 1 year term
OK	All	106.95	0.0	106.95	9.0	1.0	0.0	Other, No usage allowance, data only, 1 year term
OK	All	71.95	0.0	71.95	9.0	1.0	0.0	Other, No usage allowance, V-Data, 3 year term
OK	All	96.25	0.0	96.25	9.0	1.0	0.0	Other, No usage allowance, data only, 3 year term
OK	All	59.95	0.0	59.95	6.0	1.0	0.0	Other, No usage allowance, V-Data, 1 year term
OK	All	86.95	0.0	86.95	6.0	1.0	0.0	Other, No usage allowance, data only, 1 year term
OK	All	53.95	0.0	53.95	6.0	1.0	0.0	Other, No usage allowance, V-Data, 3 year term
OK	All	78.25	0.0	78.25	6.0	1.0	0.0	Other, No usage allowance, data only, 3 year term

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<810>	Reporting Carrier	Grand Telephone Company, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Grand Telephone Company, Inc.

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
OMNI III Cable T.V., Inc.		Grand Lake Telecommunications

Grand Telephone Company, Inc.

Study Area Code 431994

Response to Lines 920 – Tribal Lands Reporting

Grand Telephone Company, Inc. ("Company") serves the Cherokee Nation located in northeastern Oklahoma. The Company's outreach efforts per the requirements of 47 C.F.R. §54.313(a)(9), are outlined in the attached correspondence documents.

Jason S. Anderson, CPA

From: Jason S. Anderson, CPA <jsanderson@grand.net>
Sent: Monday, December 15, 2014 2:05 PM
To: Louie Slagle (lou-slagle@cherokee.org)
Cc: Tim Etris (tdetris@grand.net)
Subject: Introductions

I'm not sure if you knew or not, but Rex Brixey retired as GM of Grand Telephone Company, Inc. last year. Tim Etris and I took over upon his retirement as the Co-Managers and would like to take this moment to introduce ourselves to you.

We also wanted to reach out and see if there is any way Grand Telephone can be of assistance to the Cherokee Nation in this coming year.

As you are the contact Grand usually deals with during the Cherokee National Holiday, we understand if you would rather refer us to someone else who may deal more directly with the needs that Grand Telephone can provide to Cherokee Nation.

Thank you for your time, and please do not hesitate to contact us any time you have questions and/or needs that Grand Telephone can help with.

Sincerely,

Jason

==========
Jason S. Anderson, CPA
Co-Manager
Grand Telephone Company, Inc.
OMNI III Cable T.V., Inc.
GTC, Inc.
P.O. Box 308
Jay, OK 74346
(918) 253-4231 / (918) 253-8024 fax
==========

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Jason S. Anderson, CPA

From: Cara Cowan Watts <caracowanwatts@gmail.com>
Sent: Friday, December 26, 2014 10:46 AM
To: Tim Etris; Jason S. Anderson, CPA
Subject: Fwd: Introductions

Cara Cowan Watts
caracowan.com

Find me on Facebook, LinkedIn, Twitter, Google+, Pinterest and Instagram!

---------- Forwarded message ----------
From: **Cara Cowan Watts** <caracowanwatts@gmail.com>
Date: Fri, Dec 26, 2014 at 10:45 AM
Subject: Re: Introductions
To: "Jon B. James" <jon-james@cherokee.org>

Osda! :D I am unsure who to connect them to or what is overall needed. Will you reach out to them and help guide them?

Wado! Happy New Year!

Cara Cowan Watts
caracowan.com

Find me on Facebook, LinkedIn, Twitter, Google+, Pinterest and Instagram!

On Fri, Dec 26, 2014 at 10:31 AM, Jon B. James <jon-james@cherokee.org> wrote:
Thanks Cara. We do a lot of business with Grand Telephone and have been for over 10 years. They have been very helpful and gracious...

Jon B. James
CIO/Executive Director
Cherokee Nation
P. O. Box 948
Tahlequah, OK 74464

-------- Original message --------

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From: Cara Cowan Watts <caracowanwatts@gmail.com>
Date:12/26/2014 7:46 AM (GMT-06:00)
To: "Jason S. Anderson, CPA" <jsanderson@grand.net>, "Chuck Hoskin Jr." <chuck-hoskin@cherokee.org>, Bill Baker <Bill-Baker@cherokee.org>, "Jon B. James" <jon-james@cherokee.org>
Cc: Tim Etris <tdetris@grand.net>, Harley Buzzard <harley-buzzard@cherokee.org>, "Curtis G. Snell" <curtis-snell@cherokee.org>, Canaan Duncan <canaan-duncan@cherokee.org>
Subject: Re: Introductions

Jason and Tim, I am happy to assist!

I have added Chief Baker, Secretary of State Chuck Hoskin, Jon James Director of IT for Cherokee Nation (I believe this title is correct.) and the two Delaware County Councilmembers so they are both aware of the dialogue and may assist.

Please email me if you need anything. There is a lot of opportunity in telecom for both business and consumers or community.

WADO for helping grow Delaware County and thus the Cherokee Nation!

Sincerely,

Cara Cowan Watts
caracowan.com<http://caracowan.com>

Find me on Facebook, LinkedIn, Twitter, Google+, Pinterest and Instagram!

On Wed, Dec 17, 2014 at 3:04 PM, Jason S. Anderson, CPA
<jsanderson@grand.net<mailto:jsanderson@grand.net>> wrote:
It was very nice meeting you at the Boys & Girls Ground Breaking Ceremony…and as I mentioned…we are wanting to reach out and see if there was any way Grand Telephone could be of assistance to the Cherokee Nation in the coming year.

Rex Brixey, who retired as GM here at Grand last year, had previously started correspondence with Secretary of State Charles Head before his sudden accident. Tim Etris and I took over as Co-Managers upon Rex's retirement and would like to take this time to re-introduce ourselves to you.

Given your background in telecom…meeting you was very fortunate in my opinion…and hopefully we can find some time in the near future to discuss some plans to help the Cherokee Nation businesses in the area…as well as the qualifying members in the area…find ways to not only save some money but possibly obtain even better service.

We'd also like to look to the future and see if there's anything Cherokee Nation might see as a need that we may be able to provide.

We completely understand if you would rather refer us to someone else who may more directly be involved in this type of business relationship, knowing as a member of the tribal council your time may be limited.

We look forward to discussing any issues, please do not hesitate to contact us any time you have questions and/or needs that Grand Telephone can help with.

Sincerely,

Jason Anderson

==========

Jason S. Anderson, CPA
Co-Manager
Grand Telephone Company, Inc.
OMNI III Cable T.V., Inc.
GTC, Inc.
P.O. Box 308
Jay, OK 74346
(918) 253-4231<tel:%28918%29%20253-4231> / (918) 253-8024<tel:%28918%29%20253-8024> fax
==========

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Sherri Stephens

From: Tim Etris <tdetris@grand.net>
Sent: Wednesday, January 29, 2014 3:49 PM
To: stephens@grand.net
Subject: FW: RE: Cherokee Nation Utility Easement (Sam Hider Clinic, Jay, Oklahoma)

From: Joel Bean [mailto:Joel-Bean@cherokee.org]
Sent: Wednesday, January 29, 2014 3:23 PM
To: 'Tim Etris'
Subject: RE: RE: Cherokee Nation Utility Easement (Sam Hider Clinic, Jay, Oklahoma)

You got it, it will be in the mail today.

From: Tim Etris [mailto:tdetris@grand.net]
Sent: Wednesday, January 29, 2014 2:51 PM
To: 'Sherri Stephens'
Cc: Joel Bean
Subject: RE: RE: Cherokee Nation Utility Easement (Sam Hider Clinic, Jay, Oklahoma)

Joel
Thanks for getting the easement back to us so quickly. Please send a hard copy to Grand Telephone so Sherri can file it at the courthouse.
Thanks again

==========
Tim Etris
Co-Manager, Vice-President/Plant Superintendent
Grand Telephone Company, Inc.
OMNI III Cable T.V., Inc.
GTC, Inc.
226 S 4TH ST
PO Box 308
Jay, OK 74346
(918) 253-4231 office
(918) 253-8024 fax
==========

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From: Sherri Stephens [mailto:stephens@grand.net]
Sent: Wednesday, January 29, 2014 1:01 PM
To: Tim Etris
Subject: Fwd: RE: Cherokee Nation Utility Easement (Sam Hider Clinic, Jay, Oklahoma)

-------- Original Message --------
Subject:RE: Cherokee Nation Utility Easement (Sam Hider Clinic, Jay, Oklahoma)
Date: Wed, 29 Jan 2014 09:51:50 -0600
From: Joel Bean <Joel-Bean@cherokee.org>
To:'Sherri Stephens' <stephens@grand.net>

Attached is a scanned copy of the signed easement, if you need the original let me know and I will mail it to you.

Joel

From: Sherri Stephens [mailto:stephens@grand.net]
Sent: Friday, January 24, 2014 1:48 PM
To: Joel Bean
Cc: Tim Etris
Subject: Cherokee Nation Utility Easement (Sam Hider Clinic, Jay, Oklahoma)

Mr. Bean,

As per your telephone conversation with Mr. Tim Etris, Co-Manager, Grand Telephone Company, Inc., please find attached a copy of the above mentioned Utility Easement between Cherokee Nation and Grand Telephone Company, Inc. Please have utility easement signed before a notary public and return one original copy by mail to be filed at the Delaware County Clerk's office. If you would like a copy of the filed copy, please let me know.

The legal description that was given to our office is also attached. You can see that it was filed at the Delaware County Clerk's office in Book 2018, Page 792. When typing this easement I thought there might be a problem with part of the description. I called to verify this and there was a problem with the line "THENCE SN00° 05'42" W". I have it marked with "*". There should not be a " S (South)". I did not have a copy of the warranty deed, but verified this with Michelle Baker at the County Clerk's office today, January 24, 2014, by telephone. I took it out of the utility easement that I typed between Cherokee Nation and Grand Telephone Company, Inc.

Please verify this with your legal description and if you would please send me a copy of your legal description to go with my copy of the utility easement I would appreciate it.

If there are any questions, please contact Mr. Tim Etris at 918.253.4231, or e-mail tdetris@grand.net.

I will be out of the office until Monday, February 3.

Thank you,

Sherri L Stephens, Executive Asst
Grand Telephone Company, Inc.
P O Box 308
Jay OK 74346-0308
918.253.4231

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Grand Telephone Company, Inc.

Study Area Code: 431994

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Grand Telephone's tariff(s) on file with the Oklahoma Corporation Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:[(1)(2)]

Exchange Name	R-1 Rate	Res. EAS Charge
Disney	$ 16.00	$ -
Jay	$ 16.00	$ -

[(1)] Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Oklahoma Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

[(2)] Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

LOCAL EXCHANGE SERVICE

I. LIFELINE SERVICE

C. Eligibility Requirements for Lifeline Service in Non-Tribal Areas (Continued)

a. The applicant or customer must meet the requirements for eligibility for either Medicaid/SoonerCare, Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), federal public housing, Low-Income Energy Assistance Program, Supplemental Security Income, Temporary Assistance for Needy Families ("TANF"), National School Lunch Program ("NSL"), Food Distribution Program on Indian Reservations ("FDPIR") or 135% of the Federal Poverty Guidelines. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or

b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or

c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.

d. For federal income tax purposes, the applicant is not a dependent unless over sixty years of age.

2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.

3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.

4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.

5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

D. Lifeline Credits in Non-Tribal Areas

	Monthly Credit
Federal Lifeline Credit:	$9.25

Public Utility Division
20140092
Tariff Sheets Approved
er 165:55-5-10(c)

LOCAL EXCHANGE SERVICE

I. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued)

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.

5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.

6.. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

F. Lifeline Credits on Tribal Lands

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits has Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), Aid to Families with Dependent Children (AFDC), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR") or Oklahoma Sales Tax Relief Act (68 O.S.§5011, et seq.), then the Customer should receive credits as follows:

	Monthly Credit[1]
Federal Lifeline Credit:	$9.25
Additional Federal Credit to Residential Access Line necessary to reduce customer's bill to $1.00	(See footnote (2) below)

(1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, less $1.00. In no instance will a subscriber's monthly local exchange rate be less than $1.00 after the application of the Lifeline Credits.
(2) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed $24.00, as specified by the FCC in CC Docket No. 96-45.

Public Utility Division
201400092
Tariff Sheets Approved
Order 165:55-5-10(c)

LOCAL EXCHANGE SERVICE

I. LIFELINE SERVICE

C. Eligibility Requirements for Lifeline Service in Non-Tribal Areas (Continued)

a. The applicant or customer must meet the requirements for eligibility for either Medicaid/SoonerCare, Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), federal public housing, Low-Income Energy Assistance Program, Supplemental Security Income, Temporary Assistance for Needy Families ("TANF"), National School Lunch Program ("NSL"), Food Distribution Program on Indian Reservations ("FDPIR") or 135% of the Federal Poverty Guidelines. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or

b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or

c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.

d. For federal income tax purposes, the applicant is not a dependent unless over sixty years of age.

2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.

3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.

4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.

5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

D. Lifeline Credits in Non-Tribal Areas

	Monthly Credit
Federal Lifeline Credit:	$9.25

Public Utility Division
20140092
Tariff Sheets Approved
Per 165:55-5-10(c)

LOCAL EXCHANGE SERVICE

I. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued)

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.

5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.

6.. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

F. Lifeline Credits on Tribal Lands

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits has Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), Aid to Families with Dependent Children (AFDC), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR") or Oklahoma Sales Tax Relief Act (68 O.S.§5011, et seq.), then the Customer should receive credits as follows:

	Monthly Credit[1]
Federal Lifeline Credit:	$9.25
Additional Federal Credit to Residential Access Line necessary to reduce customer's bill to $1.00	(See footnote (2) below)

(1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, less $1.00. In no instance will a subscriber's monthly local exchange rate be less than $1.00 after the application of the Lifeline Credits.
(2) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed $28.00, as specified by the FCC in CC Docket No. 96-45.

Public Utility Division
20140092
Tariff Sheets Approved
Under 165:55-5-10(c)

Grand Telephone Company, Inc.

Study Area Code 431994

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

Grand Telephone Company, Inc. 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 and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

Grand Telephone Company (SAC 431994)

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

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions[1] to which the ETC newly began providing broadband service. Grand Telephone Company did not newly begin providing any community anchor institutions with access to broadband service in calendar year 2014.

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

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY