

<010> Study Area Code 140058

<015> Study Area Name LUDLOW TEL CO

<020> Program Year 2016

<030> Contact Name: Person USAC should contact with questions about this data Bruce Schiefelbein

<035> Contact Telephone Number: 6086645455 ext. Number of the person identified in data line <030>

<039> Contact Email Address: Email of the person identified in data line <030> bruce.schiefelbein@tdstelecom.com

ANNUAL REPORTING FOR ALL CARRIERS

	54.313 Completion Required	54.422 Completion Required
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		54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)		<input type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input type="checkbox"/>	<input type="checkbox"/>
<410> Fixed		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 140058vt510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 140058vt610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input 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 type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input 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	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6085645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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.

140058vt112.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	140058
<015> Study Area Name	LUDLOW TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@dstelecom.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	140058
<015>	Study Area Name	LUDELOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext 2
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@rdstelacom.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

140058vt1210.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 <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No.: 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	14058
<015> Study Area Name	LUDLOW TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiereibein
<035> Contact Telephone Number - Number of person identified in data line <030>	808884555 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiereibein@tdsterecom.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)iii}

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

Data Collection Form

FCC Form 481

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

July 2013

<010>	Study Area Code	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdatelecom.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)]

140058vt3010.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)]

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)] (Yes/No) 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

REDACTED - AVAILABLE FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

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

July 2013

<010>	Study Area Code	140058
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<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@dsrelec.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3009-0050/OMB Control No. 5050-0319 July 2013
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<010>	Study Area Code	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdatelecom.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:	LUDLOW TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/11/2015
Printed name of Authorized Officer:	Kevin Hess
Title or position of Authorized Officer:	Executive Vice President
Telephone number of Authorized Officer:	6086644160 ext.
Study Area Code of Reporting Carrier:	140058 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
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<010> Study Area Code	140058
<015> Study Area Name	LUDLOW TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@statelecom.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

Ludlow Telephone Company dba TDS Telecom

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

As an Incumbent Local Exchange Carrier (ILEC) and Eligible Telecommunications Carrier (ETC), Ludlow has been providing ubiquitous, high-quality voice telecommunications services in its study area for many years. To accomplish and maintain this service level, Ludlow has made significant historical investment to deploy, operate, and maintain an integrated, highly-reliable network. In addition to its own capital spending, Ludlow draws from the federal Universal Service Fund (USF). Universal service support has been (and continues to be) critical in enabling Ludlow's services in its rural markets to be reasonably comparable in quality and price to services in more urban markets, as Congress mandated in the Telecommunications Act. Ludlow draws USF support because the cost of providing voice and data services in its rural study area are substantially higher than those in urban areas, and thus all of the costs cannot be recovered solely from Ludlow's customers while maintaining reasonably comparable prices. Ludlow has made investments to bring high speed data services to its customers when the level of customer revenues and universal service support has made it financially viable to do so.

For Ludlow, federal high cost support is used to help offset ongoing network costs, but the monies received cover only a portion of the cost of updating and operating the network. In 2014, Ludlow received \$485,600 in USF support while incurring [REDACTED] in operating expenses and investing [REDACTED] in new plant. The attached Schedule A contains a list of specific network improvement projects that were completed in 2014 at the wire center level. Where these projects related to specific DSAs within the wire center, it is so indicated and can be cross-referenced to the exchange map attached as Exhibit 1. As evidenced by these support and expenditure numbers provided for the current reporting year, the universal service support that Ludlow receives covers only a fraction of its cost to provide service. Continued receipt of USF support is vital to helping Ludlow maintain reasonably comparable rates for local exchange service; and to incrementally upgrade its telecommunications facilities and equipment to help meet evolving service requirements and maintain high quality service.

Because USF funding support is modest compared to Ludlow's ongoing network operating expense, the spending of USF support money is primarily focused on repair, maintenance and incremental upgrades to maintain existing service levels rather than further expansion of broadband services deeper into the



Ludlow Telephone Company dba TDS Telecom

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

network. Given the current level of customer revenues, the level of universal support, and the technology available today, the additional costs associated with expanding broadband services to unserved portions of the study area, or increasing speeds to already served portions of the study area, far exceed Ludlow's financial ability to make such investments.

The telecommunications industry continues to change rapidly and significantly as a result of the unprecedented pace of technological advances, increasing customer needs and ongoing regulatory reforms. The level of uncertainty brought about by these factors make long-range network planning a difficult task. By necessity, significant capital investment in network upgrades is cyclical. Capital expenditures in one year are typically followed by a number of years of maintenance of the network to allow time for recovery and return on the investment before the next upgrade is undertaken.

Rapid and significant changes in technology are expected to continue to occur in the telecommunications industry over the next five years. Ludlow believes that its existing network architecture will enable it to incorporate many of these technological changes efficiently, but expects that such changes will also shorten product lifecycles and drive an increase in the rate of obsolescence experienced with existing network equipment. However, having the capability to evolve and being able to afford the cost to evolve, are both necessary to support the capital expenditure.

In an attempt to deliver products similar to those available in more urban areas, telecom companies, like Ludlow are under growing pressure to provide access to services and applications that are driving enormous growth in customer demand for bandwidth. Absent predictable and sufficient universal service support for broadband services, Ludlow will be unable to meet this growing demand.

In addition, Ludlow also faces significant regulatory uncertainty at this time. The FCC's Transformation Order and subsequent orders on reconsideration have put universal service revenue in a state of flux. Forecasting universal service revenues and developing long-range, detailed network plans that depend on those revenues has become all but impossible. While the FCC Transformation Order adopted a



Ludlow Telephone Company dba TDS Telecom

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

number of comprehensive reforms to the universal service and intercarrier compensation mechanisms, it also left open the long term framework for universal service. Presently there are multiple plans in front of the FCC proposing new and different frameworks. While some plans provide for continued support under a rate of return (ROR) regime, others propose an optional plan to move in the direction of support based on a model which predicts the costs of a forward looking fiber to the home network. The details of these plans radically differ from one another, and the FCC has given little indication of which of these plans it will move towards. It is also possible that universal service reform for ROR companies will not be resolved in the near term, and that the current mechanisms will continue to struggle along. Given this backdrop, predicting next year's federal universal service amounts, let alone those for the next five years, is tenuous at best.

The most conservative approach would be to utilize status quo whereby we forecast based on past revenues. Yet even this approach is uncertain at best. For example, even under the "status quo" assumption, the FCC is considering (1) represeting the authorized interstate rate-of-return, possibly to a level lower than the current 11.25%; (2) eliminating high cost support in areas where there is an unsubsidized competitor offering service to less than 100% of customers; (3) limiting the recovery of Interstate Common Line Support (ICLS); and (4) lowering originating switched access rates similar to terminating rates. Having all these unknowns on the planning horizon (most, if not all of which could have a negative impact on Ludlow's level of support) make it near impossible to predict to what extent Ludlow can rely on universal service support at historic levels for continued aid in supporting its network. Any future rulemaking that results from these proposals could have significant impacts on the future network plans of Ludlow.

Given all of the uncertainty surrounding the industry, and the need for Ludlow to allocate scarce resources, invest prudently, and operate efficiently, long range predictive forecasting at any level of granularity is difficult and subject to revision as new information becomes known. Also, the speculative nature of planning in this type of environment hinders Ludlow's ability to effectively develop long-term network build out plans based on projected future USF support.



Ludlow Telephone Company dba TDS Telecom

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

The attached Schedule B summarizes Ludlow's USF received in 2014 and projected expenditures for 2015 – 2019. The projected 5-year period is based upon historical spending data, which, given the many unknown factors, may have limited value in predicting future network needs and may vary widely from actual spending incurred in the forecasted years, and thus should be treated with that in mind.

The content, timing, and specific geographic locations of projects that will be undertaken in the next five years, is unknown at this time. The selection of future projects will be based on the evaluation of many factors, including current consumer demand, limited capital resources and estimated amounts of universal service support. These and other external factors are not within Ludlow's control and are subject to change. Such changes may affect the assumptions and calculations regarding the optimal improvements to network facilities required to provide high-quality advanced services to Ludlow's customers.

With full recognition of the difficulty in predicting exact locations, specific projects or levels of expenditures, Ludlow commits to utilize available universal service support to help maintain and improve network quality, and if feasible, deploy advanced technologies and new services, expand coverage and improve broadband speeds for its customers.

Ludlow Telephone Company dba TDS Telecom

Schedule A

State: VERMONT

Study Area: 140058

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

2014 Capital Expenditures

Exchange	DSA	DSA Population	Description	Expenditure
LUDLOW	25700	1,303		
	25700	1,303		
	25700	1,303		
	25700	1,303		
	25700	1,303		
	25700	1,303		
	25700	1,303		
	25700	1,303		
	Various	#N/A		
PROCTORSVILLE	25600	739		
	25600	739		
	25600	739		
	Various	#N/A		
ALL EXCHANGES	All Exchanges	#N/A		

Ludlow Telephone Company (SAC 140058)

Line 100 - Service Quality Improvement Reporting

Rule 54.202(a)(1) and 54.313(a)(1)

USF Received in 2014

High Cost Loop Support	\$	-
ICLS Support	\$	310,830
Safety Net Additive	\$	-
Safety Value Additive		
CAF	\$	174,732
TOTAL	\$	485,562

Five-Year Plan

	2015	2016	2017	2018	2019
Operating Expenses	\$				
Capital Expenditures	\$				

LUDLOW TEL. CO., VT Broadband Status



DLC LOCATION | DSA

- Existing
- Proposed | Future
- Broadband Enabled
- No DSL

OTHER FEATURES

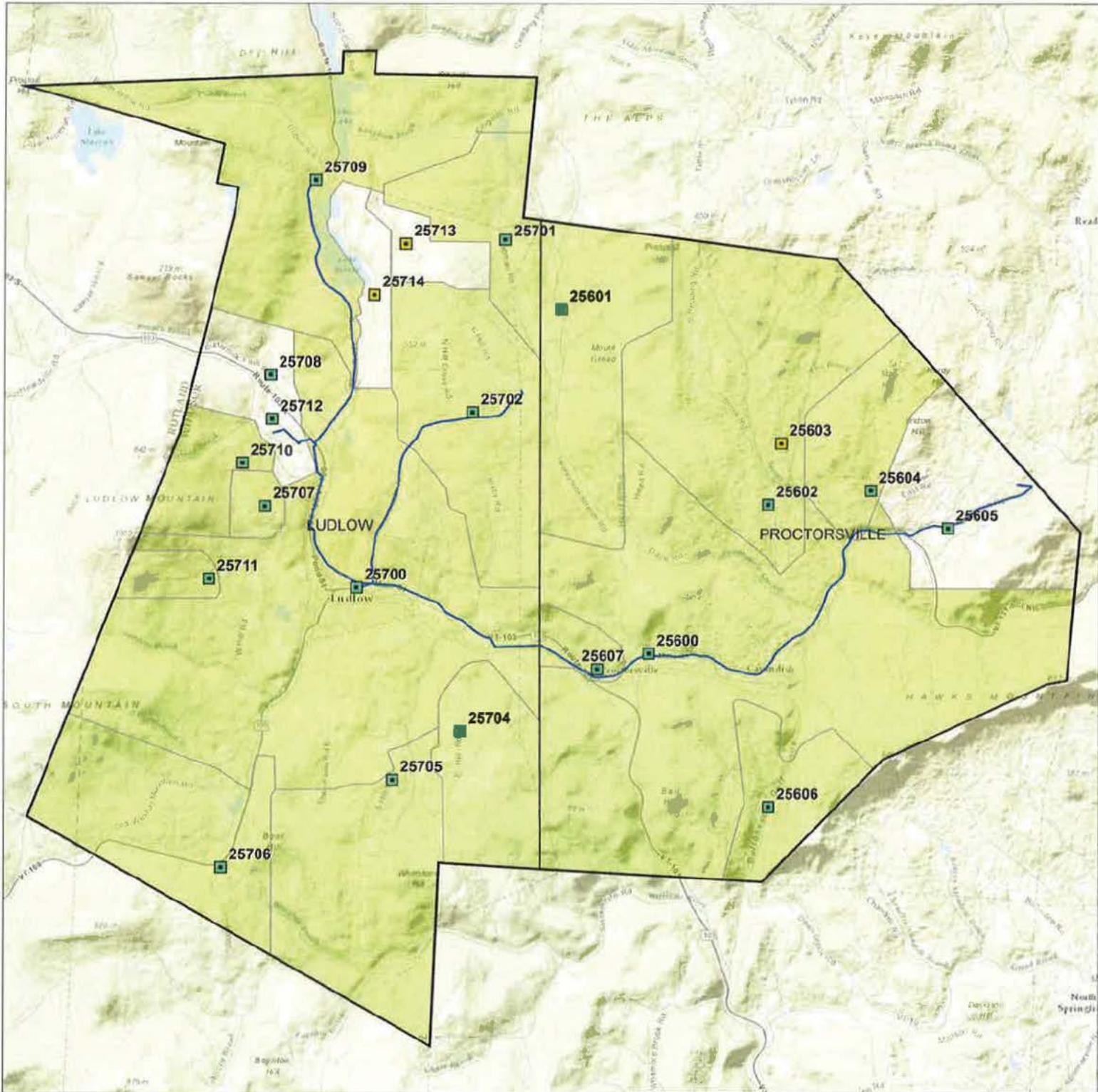
- Exchange Boundary
- Existing TDS Fiber



Scale = Miles



TDS Telecom Network Services | OSP Records | Date: 5/4/2015



Line 330 – Detail on Attempts (broadband)

Rule 54.313(a)(3)

Ludlow Telephone Company has implemented service availability tracking tools and employee training capabilities to respond to direct customer requests for broadband services.

Upon receipt of a new broadband service request, Ludlow Telephone Company's service advisors follow these steps for provisioning the service:

- 1) The Ludlow Telephone Company service advisor uses a customized service addressability software tool to determine if broadband service is available to the requested service address. If it is determined that service is offered to the address, an installation order will be initiated and scheduled immediately.
- 2) If the information in the service addressability tool indicates that extension of broadband service to the service address might be possible, a field service technician is dispatched to the customer premise to perform additional diagnostic testing. Such testing will determine whether there are any reasonable adjustments to the network or customer facilities which can be made to enable the provision of service. If tests confirm that broadband service can be offered at the service address, an order is initiated and service is provisioned.
- 3) In situations where Ludlow Telephone Company's terrestrial broadband service is not available to a requesting customer, Ludlow Telephone Company has partnered with Dish Network to offer dishNET satellite broadband service to customers. Ludlow Telephone Company's service advisors are trained to discuss and assist the customer in ordering dishNET broadband service.

As the Commission acknowledged¹, some of the service areas served by rate of return Carriers like Ludlow Telephone Company, have characteristics that make it highly cost prohibitive to extend broadband service using terrestrial wireline technology. Except as may be noted in Ludlow Telephone Company's 5-year plan attached to this filing, any further build-out of terrestrial broadband service to additional locations within its study area will be dependent upon the cost of the technology to be deployed and the capital infrastructure funding level available.

¹ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 13-332, released March 3, 2013 at paras 10-11.

Line 510 – Description of Compliance with Service Quality Standards and Consumer Protection

Rule 54.313(a)(5)

TDS Telecommunications Corporation's ILEC companies follow applicable federal and state service quality and consumer protection rules. They comply with quality of service requirements including monitoring and reporting service quality metrics where required. TDS Telecom has implemented numerous consumer protection measures to protect customer information. For example, TDS implemented Customer Proprietary Network Information (CPNI) policies and procedures that are consistent with the FCC's regulations. Employees are required to complete CPNI training and in addition, employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication. Annually, all employees are required to review TDS' Business Code of Conduct which includes information and requirements on protecting sensitive customer information from improper use and disclosure. TDS data privacy and security policies are reinforced through periodic training required of all employees. Additional consumer protection measures include TDS' use of a third-party verifier to prevent unauthorized presubscribed interexchange carrier (PIC) changes ("Slamming") and the elimination of billing and collection arrangements that could have potentially allowed unauthorized third-party charges to be added to customer's bills ("Cramming").

Line 610 – Description of Functionality in Emergency Situations**Rule 54.313(a)(6)**

Company is able to remain functional in an emergency situation through the use of back-up power to ensure functionality without an external power source. The Company's standard for battery backup is 8 hours in offices with no generator and 4 hours in offices with a generator. This is ensured during semi-annual routine maintenance which includes battery inspection, cleaning, documentation of float voltage and cell temperature, as well as equalization or replacement if necessary. In addition, permanent generators are present at significant wire centers to maintain power in the event a commercial power failure extends beyond battery backup capabilities. Also, portable generators are available for deployment to remote wire centers without permanent generators. The Company's network is engineered to provide maximum capacity in order to handle excess traffic in the event of traffic spikes resulting from emergency situations. Company facilities are remotely monitored and managed by a centralized Network Operations Center which is staffed 24 x 7, 365 days a year. Technicians are able to remotely access and respond to alarm conditions. By design, transport redundancy is built into the telephony and data network on many levels and in the event of a hardware or circuit failure or traffic spike, the networks are able to self-correct in many cases or, at many locations, technicians are able to manually switch network elements to standby facilities both locally and remotely.

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Data Collection Form**

FCC Form 481

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

July 2013

<010>	Study Area Code	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Telephone and Data Systems, Inc.		TDS
	TDS Telecommunications Corporation		TDS Telecom
	Amelia Telephone Corporation	190217	TDS Telecom
	Arcadia Telephone Company	300585	TDS Telecom
	Arizona Telephone Company	452171	TDS Telecom
	Arvig Telephone Company	361350	TDS Telecom
	Northwest Minnesota Special Access LLC		TDS Telecom
	Asotin Telephone Company, OR	532404	TDS Telecom
	Asotin Telephone Company, WA	522404	TDS Telecom
	Badger Telecom, LLC	330844	TDS Telecom
	Barnardsville Telephone Company	230469	TDS Telecom
	Black Earth Telephone Company, LLC	330849	TDS Telecom
	Blue Ridge Telephone Company	220346	TDS Telecom
	Bonduel Telephone Company, LLC	330851	TDS Telecom
	Bridge Water Telephone Company	361362	TDS Telecom
	Burlington, Brighton & Wheatland Telephone Company, LLC	330856	TDS Telecom
	Butler Telephone Company, Inc.	250284	TDS Telecom
	Calhoun City Telephone Company, Inc.	280448	TDS Telecom
	Camden Telephone Company, Inc.	320744	TDS Telecom
	Camden Telephone & Telegraph Company, Inc.	220351	TDS Telecom
	Central State Telephone Company, LLC	330859	TDS Telecom
	Chatham Telephone Company	310685	TDS Telecom
	Cleveland County Telephone Company, Inc.	401698	TDS Telecom

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Cobbosseecontee Telephone Company	100005	TDS Telecom
	Communications Corporation of Indiana	320776	TDS Telecom
	Communication Corporation of Michigan	310672	TDS Telecom
	Communications Corporation of Southern Indiana	320809	TDS Telecom
	Concord Telephone Exchange, Inc.	290559	TDS Telecom
	Continental Telephone Company	300607	TDS Telecom
	Contoocook Valley Telephone Company	123321	TDS Telecom
	Decatur Telephone Company	401699	TDS Telecom
	Delta County Tele-Comm, Inc.	462184	TDS Telecom
	Deposit Telephone Company, Inc.	150089	TDS Telecom
	Dickeyville Telephone, LLC	330875	TDS Telecom
	Eastcoast Telecom of Wisconsin, LLC	330914	TDS Telecom
	Edwards Telephone Company, Inc.	150092	TDS Telecom
	The Farmers Telephone Company, LLC	330880	TDS Telecom
	Grantland Telecom, LLC	330930	TDS Telecom
	Hampden Telephone Company	100010	TDS Telecom
	Happy Valley Telephone Company	542321	TDS Telecom
	Hartland & St Albans Telephone Company	100011	TDS Telecom
	Hollis Telephone Company, Inc.	123321	TDS Telecom
	The Home Telephone Company of Pittsboro, Inc.	320777	TDS Telecom
	Home Telephone Company, Inc. (IN)	320778	TDS Telecom
	Hornitos Telephone Company	542322	TDS Telecom
	Humphreys County Telephone Company	290566	TDS Telecom

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Island Telephone Company (MI)	310677	TDS Telecom
	The Island Telephone Company, Inc. (ME)	100007	TDS Telecom
	Kearsarge Telephone Company	120045	TDS Telecom
	Mid-State Telephone Company, KMP	361433	TDS Telecom
	Leslie County Telephone Company	260411	TDS Telecom
	Lewisport Telephone Company	260412	TDS Telecom
	Lewis River Telephone Company, Inc.	522427	TDS Telecom
	Little Miami communications Corporation	300513	TDS Telecom
	Ludlow Telephone Company	140058	TDS Telecom
	Mahanoy & Mahantango Telephone Company	170183	TDS Telecom
	M.C.T. Communications, Inc.	123321	TDS Telecom
	McClellanville Telephone Company, Inc.	240533	TDS Telecom
	McDaniel Telephone Company	522430	TDS Telecom
	The Merchants and Farmers Telephone Company	320788	TDS Telecom
	Merrimack County Telephone Company	120047	TDS Telecom
	Mid-Plains Telephone, LLC	330881	TDS Telecom
	Mid-State Telephone Company	361433	TDS Telecom
	Midway Telephone Company, LLC	330909	TDS Telecom
	Midway Telephone Company, LLC		
	Mosinee Telephone Company, LLC	330915	TDS Telecom
	Mt. Vernon Telephone Company, LLC	330917	TDS Telecom
	Myrtle Telephone Company, Inc.	287449	TDS Telecom
	Nelson-Ball Ground Telephone Company	220375	TDS Telecom

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	New Castle Telephone Company	193029	TDS Telecom
	New York Access Billing LLC		TDS Telecom
	Northfield Telephone Company	140061	TDS Telecom
	Norway Telephone Company, Inc.	240535	TDS Telecom
	Oakman Telephone Company, Inc.	250311	TDS Telecom
	Oakwood Telephone Company	300645	TDS Telecom
	Oklahoma Communications Systems, Inc.	431984	TDS Telecom
	Mid-America Telephone, Inc.	432010	TDS Telecom
	Oriskany Falls Telephone Corporation	150114	TDS Telecom
	Peoples Telephone Company, Inc.	250314	TDS Telecom
	Perkinsville Telephone Company, Inc.	140062	TDS Telecom
	Port Byron Telephone Company	150118	TDS Telecom
	Potlatch Telephone Company	472230	TDS Telecom
	Quincy Telephone Company, FL	210338	TDS Telecom
	Quincy Telephone Company, GA	220338	TDS Telecom
	Riverside Telecom, LLC	330943	TDS Telecom
	S&W Telephone Company, Inc.	320816	TDS Telecom
	Salem Telephone Company	260417	TDS Telecom
	Saluda Mountain Telephone Company	230498	TDS Telecom
	Scandinavia Telephone Company, LLC	330945	TDS Telecom
	Service Telephone Company	230500	TDS Telecom
	Shiawassee Telephone Company	310726	TDS Telecom
	Somerset Telephone Company	100024	TDS Telecom

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<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Southeast Mississippi Telephone Company, Inc.	283301	TDS Telecom
	Southeast Telephone Co. of Wisconsin, LLC	330952	TDS Telecom
	Milwaukee SMSA Tower Holding LLC		TDS Telecom
	Milwaukee SMSA LP		TDS Telecom
	Southwestern Telephone Company	452174	TDS Telecom
	The State Long Distance Telephone Company, LLC	330955	TDS Telecom
	Stockbridge & Sherwood Telephone Company, LLC	330954	TDS Telecom
	Strasburg Telephone Company	462207	TDS Telecom
	St. Stephen Telephone Company	240544	TDS Telecom
	Sugar Valley Telephone Company	170206	TDS Telecom
	TDS Communication Solutions, Inc.		TDS Telecom
	TDS Long Distance Corporation		TDS Telecom
	TDS METROCOM, LLC		TDS Telecom
	TDS Telecom Service Corporation		TDS Telecom
	Tellico Telephone Company, Inc.	290578	TDS Telecom
	Tennessee Telephone Company	290575	TDS Telecom
	Tenney Telephone Company, LLC	330958	TDS Telecom
	The Vanlue Telephone Company	300662	TDS Telecom
	Tipton Telephone Company, Inc.	320829	TDS Telecom
	Township Telephone Company, Inc.	150129	TDS Telecom
	Tri-County Telephone Company, Inc.	320830	TDS Telecom
	Tri-County Communications Corporation		TDS Telecom
	Union Telephone Company	120049	TDS Telecom

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	UTELCO, LLC	330963	TDS Telecom
	Vernon Telephone Company, Inc.	150133	TDS Telecom
	Virginia Telephone Company	190253	TDS Telecom
	Warren Telephone Company	100031	TDS Telecom
	Waunakee Telephone Company, LLC	330968	TDS Telecom
	The West Penobscot Telephone & Telegraph Company	100034	TDS Telecom
	West Point Telephone Company, Incorporated	320837	TDS Telecom
	Williston Telephone Company	240551	TDS Telecom
	Wilton Telephone Company, Inc.	120050	TDS Telecom
	Winsted Telephone Company	361507	TDS Telecom
	Winterhaven Telephone Company	542323	TDS Telecom
	Wolverine Telephone Company	310738	TDS Telecom
	Wyandotte Telephone Company	432034	TDS Telecom
	United States Cellular Corporation		
	Barat Wireless, Inc.		
	Carroll PCS, Inc.		
	CellVest Inc.		
	Eastern North Carolina Cellular Joint Venture		
	USCOC of Wilmington, LLC		
	Wilmington Cellular Partnership		
	Wilmington Cellular Telephone Company	239006	United States Cellular Corporation
	USCOC of Jacksonville, LLC		
	Jacksonville Cellular Partnership		

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<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Jacksonville Cellular Telephone Company	239006	United States Cellular Corporation
	Hardy Cellular Telephone Company	209005	U.S. Cellular (Hardy Cellular Telephone Co.)
	Humphreys County Cellular, Inc.		
	Iowa RSA #3, Inc.		
	Iowa RSA #12, Inc.		
	Farmers Cellular Telephone Company, Inc.	359016	United States Cellular
	Farmers Mutual Cellular Telephone Company, Inc.		
	Iowa RSA No. 12 Limited Partnership	359016	United States Cellular
	Jefferson Cellular Telephone Company, Inc.		
	McDaniel Cellular Telephone Company	529001	United States Cellular Corporation
	USCC Distribution Co., LLC		
	USCC Financial L.L.C.		
	USCC Services, LLC		
	USCC Purchase, LLC		
	USCC Real Estate Corporation		
	USCC Wireless Investment, Inc.		
	Advantage Spectrum, L.P.		
	Aquinas Wireless, L.P.		
	Barat Wireless, LP		
	Carroll Wireless, LP		
	King St Wireless, LP		
	USCOC of Rochester, Inc.		
	USCOC of Oregon RSA #5, Inc.	539002	United States Cellular Corporation

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	USCOC of Washington-4, Inc.	529001	United States Cellular Corporation
	Vermont RSA No. 2-B2, Inc.		
	United States Cellular Investment Company, LLC		
	Central Cellular Telephones LTD		
	Madison SMSA Tower Holding LLC		
	Iowa RSA #9, Inc.		
	Iowa RSA No.9 Limited Partnership	359016	United States Cellular
	Minnesota Invoo of RSA #7, Inc.		
	Redding MSA Limited Partnership		
	Texas Invco of RSA #6, Inc.		
	Community Cellular Telephone Company		
	Texas TSA 6 Tower Holdings, LP		
	Texas RSA 6 Limited Partnership		
	USCCI Corporation		
	USCIC of Fresno		
	Fresno MSA Limited Partnership		
	United States Cellular Investment Corporation of Los Angeles		
	Los Angeles SMSA Limited Partnership		
	USCIC of North Carolina RSA #1, Inc.		
	North Carolina RSA 1 Partnership		
	United States Cellular Investment Company of Oklahoma City, Inc.		
	Oklahoma City SMSA Tower Holding LLC		
	Oklahoma City SMSA Limited Partnership		

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
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	Venus Cellular Telephone Company, Inc.		
	Pennsylvania RSA 1 Limited Partnership		
	Pennsylvania RSA No. 6 (I) Limited Partnership		
	Pennsylvania RSA No. 6 (II) Limited Partnership		
	United States Cellular Operating Company, LLC	339007	United States Cellular Corporation
	California Rural Service Area #1, Inc.		
	Champlain Cellular, Inc.		
	Crown Point Cellular, Inc.		
	Indiana RSA #5, Inc.		
	Indiana RSA No. 4 Limited Partnership		
	Indiana RSA No. 5 Limited Partnership		
	Kenosha Cellular Telephone, L.P.	339007	United States Cellular Corporation
	Madison Cellular Telephone Company	339007	United States Cellular Corporation
	Maine RSA #1, Inc.	109002	United States Cellular Corporation
	Maine RSA #4, Inc.	109002	United States Cellular Corporation
	NH #1 Rural Cellular, Inc.	129002	United States Cellular Corporation
	Oregon RSA #2, Inc. (OR)	529002	United States Cellular Corporation
	Oregon RSA #2, Inc. (WA)	529001	United States Cellular Corporation
	PCS Wisconsin, LLC	339007	United States Cellular Corporation
	Racine Cellular Telephone Company	339007	United States Cellular Corporation
	Township Cellular Telephone, Inc.		
	St. Lawrence Seaway RSA Cellular Partnership		
	United States Cellular Operating Company Of Bangor		

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Bangor Cellular Telephone, L.P.	109002	United States Cellular Corporation
	United States Cellular Operating Company of Cedar Rapids		
	Cedar Rapids Cellular Telephone, L.P.	359016	United States Cellular
	United States Cellular Operating Company of Chicago, LLC	349007	United States Cellular Corporation
	USCOC of Chicago Real Estate Holdings, LLC		
	VB Midwest 1, LLC		
	United States Cellular Operating Company of Dubuque		
	Dubuque Cellular Telephone, L.P.	359016	United States Cellular
	United States Cellular Operating Company of Knoxville	299010	United States Cellular Telephone Co. (Greater Knoxville) LP
	Tennessee RSA No. 3 Limited Partnership	299010	United States Cellular Telephone Co. (Greater Knoxville) LP
	United States Cellular Telephone Company (Greater Knoxville), LP	299010	United States Cellular Telephone Co. (Greater Knoxville) LP
	Texahoma Cellular Limited Partnership		
	Newport Cellular, Inc.		
	United States Cellular Operating Company of Medford	539002	United States Cellular Corporation
	United States Cellular Operating Company of Yakima		
	Yakima MSA Limited Partnership	529001	United States Cellular Corporation
	USCOC of Central Illinois, LLC	349007	United States Cellular Corporation
	VB Midwest 3, LLC		
	USCOC of Greater Iowa, LLC (IA)	359016	United States Cellular
	USCOC of Greater Iowa, LLC (IL)	349007	United States Cellular Corporation
	USCOC of Greater Iowa, LLC (NE)	379019	USCOC of Nebraska/Kansas LLC DBA U.S. Cellular
	USCOC of Greater Iowa, LLC (DE)		
	USCOC of Greater Missouri, LLC (IL)	349007	United States Cellular Corporation

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<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	USCOC of Greater Missouri, LLC (MO)	429007	United States Cellular Corporation
	VB Midwest 2, LLC		
	USCOC of Greater North Carolina, LLC	239006	United States Cellular Corporation
	USCOC of Cumberland, LLC		
	MSN Communications, Inc.		
	USCOC of Greater Oklahoma, LLC	439004	United States Cellular Corporation
	USCOC of Greater Oklahoma, LLC	439035	United States Cellular Corp ? CL
	USCOC of Jack/Wil, Inc.		
	USCOC of LaCrosse, LLC	339007	United States Cellular Corporation
	USCOC Nebraska/Kansas, Inc.		
	USCOC Nebraska/Kansas, LLC (KS)	419012	USCOC of Nebraska/Kansas LLC
	USCOC Nebraska/Kansas, LLC (NE)	379019	USCOC of Nebraska/Kansas LLC DBA U.S. Cellular
	Kansas #15 Limited Partnership		
	USCOC of Pennsylvania RSA No. 10-B2, Inc.		
	Allentown SMSA Limited Partnership		
	USCOC of Richland, Inc.	529001	United States Cellular Corporation
	USCOC of South Carolina RSA #4, Inc.		
	USCOC of Texahoma, Inc.		
	Texahoma Cellular LP	439004	United States Cellular Corporation
	Texahoma Cellular LP	439035	United States Cellular Corp ? CL
	USCOC of Virginia RSA #3, Inc.	199004	United States Cellular Corporation
	Washington RSA #5, Inc.		
	Western Sub-RSA Limited Partnership	529001	United States Cellular Corporation

REDACTED - AVAILABLE 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	140058
<015>	Study Area Name	LUDLOW TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com
<810>	Reporting Carrier	LUDLOW TELEPHONE COMPANY
<811>	Holding Company	Telephone and Data Systems, Inc.
<812>	Operating Company	LUDLOW TELEPHONE COMPANY

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Westelcom Cellular, Inc.		
	New York RSA 2 Cellular Partnership Affiliate Fund		
	Airadigm Communications, Inc.		
	CommVest, Inc.		
	GTE Mobilnet of Indiana LP		
	MGW Communications, Inc.		
	National Telephone & Telegraph Company		
	Nelson-Ball Ground Cellular Telephone & Services, Inc.		
	New Paris Telephone, Inc.		
	Suttle-Straus, Inc.		
	Graphic Arts Alliance LLC		
	TDSI Corporation		
	OneNeck IT Solutions LLC		
	OneNeck IT Services Corporation		
	OneNeck UK Limited		
	Team Technologies LLC		
	TEAM Des Moines Partners, LLC		
	TEAM Madison Partners, L.L.C.		
	VISI Incorporated		
	Vital Support Systems, LLC		
	Volcano Communications Company	542343	
	TDS Broadband, LLC		

-Terms and Conditions of Voice Telephony Lifeline Service –
54.422(a)(2)

Lifeline Service Overview

1. A Lifeline customer may subscribe to any local service offering available to all residential customers. Such local service offerings include:
 - Basic local exchange telephone flat rate service (R1) which entitles the customer to an unlimited number of telephone calls within the exchange and local calling area (including EAS points) without additional charges. Toll charges do not apply.
 - A local measured service (if offered by the Company). The service is priced lower than R1 service but either a per minute or per message rate also applies. The measured service plan may include an allowance of minutes/messages.
 - An expanded local calling service which is priced higher than R1 service but includes a larger local calling service area without incurring toll charges.
 - Any bundle service that includes residential basic local exchange service.
2. For a list of local exchange services and rates, refer to the Company's Local Exchange tariff posted on its website at <http://www.tdstelecom.com/CustomerService/TariffSearch.aspx> and/or contact the Company at 1-888-CALL TDS (1-888-225-5837). (Note, not all bundles are tariffed)
3. Any of the local service offerings listed above is for a minimum one month period and entitles the customer to telephone calls within the exchange and local calling area (including EAS points). Toll charges do not apply to such calls.
4. Telephone Service including Lifeline service also includes –
 - Touch Tone
 - Access to 911 emergency service along with other N11 services
 - Access to operator services
 - Access to directory assistance
 - Access to toll calling via long distance carrier
 - Toll restriction service at no charge for Lifeline customers
5. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
6. Applicable taxes levied by state, county and local taxing authorities are added to local service rates.

-Terms and Conditions of Voice Telephony Lifeline Service –
54.422(a)(2)

STAR Packages

STAR Packages are optional service bundles. Each package permits a customer to receive services and features for a flat monthly rate, for each STAR Package subscriber line provided. The STAR Package options include the following services:

- 1) 3 STAR Package
Includes: Residential One-Party Line, Caller ID Deluxe, Call Waiting/Cancel Call Waiting, Call Forwarding, and Preferred Call Forwarding (not flat rate service at some companies)

The 3 STAR Package can be upgraded to include Anonymous Call Rejection, Three-Way Calling, Priority Ringing, Special Call Acceptance, and Personal Voicemail. The charge for this upgrade is set forth under "Residence" below (not flat rate service at some companies).

- 2) 4 STAR Package
Includes: Residential One-Party Line, Caller ID Deluxe, Call Waiting/Cancel Call Waiting, Call Forwarding, Preferred Call Forwarding, Anonymous Call Rejection, and 300 Minutes of LATA-Wide and/or Long Distance calling

The 4 STAR Package can be upgraded to include Three-Way Calling, Priority Ringing, Special Call Acceptance and Personal Voicemail. The charge for this upgrade is set forth under "Residence" below.

- 3) 5 STAR Package
Includes: Residential One-Party Line, Caller ID Deluxe, Call Waiting/Cancel Call Waiting, Call Forwarding, 3-Way Calling, Anonymous Call Rejection, Priority Ringing, Special Call Acceptance, Preferred Call Forwarding, Personal Voice Mail, and Unlimited LATA-Wide and/or Long Distance calling

Conditions and Limitations

- a. Rules, regulations, and limitations as specified elsewhere in the Company's tariffs for each individual service will apply as part of this Package.
- b. STAR Package customers may terminate their Package at any time upon notice to the Company.
- c. Unless terminated by the STAR Package customer or the Company, a customer will remain enrolled in the Package, as amended from time-to-time, with any applicable changes in rate, for as long as the Plan continues to be offered by the Company.
- d. New Customers that subscribe to one of the STAR Packages will receive a waiver of all installation charges.

**-Terms and Conditions of Voice Telephony Lifeline Service –
54.422(a)(2)**

Service Charges will not apply when the STAR Package replaces existing Local Exchange Service or if the customer requests a change from the STAR Package back to Local Exchange Service.

- e. A Package Change Fee will apply when a customer downgrades from the 4 STAR or 5 STAR Package to the 3 STAR or 4 STAR Package. Customers may upgrade to a higher STAR Package without incurring a charge.
- f. The Star Package may not be combined with any other optional toll calling plan service, except for those specified in this offering.
- g. Customers who fail to pay the entire Package rate per month will have all STAR Package optional features removed. The customer will then be converted to the tariffed Basic Local service rate. Service Charges will not apply for converting services back to tariff rates. Such customers will not be permitted to re-enroll in this any of the Packages until such time as all associated unpaid balances are satisfactorily paid in full.

Residence

1)	3 STAR Package, per line	\$19.99 to \$29.99
2)	4 STAR Package, per line	\$29.99 to \$39.99
3)	5 STAR Package, per line	\$39.99 to \$49.99
a.	Package Upgrade (features added to existing package)	\$5.00
b.	Package Change Fee	\$7.50

SECURITY LINE SERVICE

1. General

Security Line Service is a bundle for residential customers who have their main telecommunications service with a wireless provider but require a basic access line for back-up and high speed data.

The bundle includes a Residential One-Party Line and up to 1 Mbps high speed data. (Could be an LMS line at companies that provide LMS)

2. Terms and Conditions

- a. Security Line Service will be provisioned where facilities are available.
- b. Rules, regulations, and limitations as specified elsewhere in the Company's tariffs will apply to this bundle.
- c. No other optional services or features are allowed with this bundle, except Toll Restriction, Toll Restriction PIN Override, Non-Published Numbers, and Non-Listed Numbers. These four services will be allowed at the rate listed

-Terms and Conditions of Voice Telephony Lifeline Service –
54.422(a)(2)

elsewhere in the tariff. As stated in the Lifeline Service Overview, charges for toll restriction do not apply to Lifeline Customers.

- d. Customers must subscribe to this service for 1 year. Cancellation of the bundle prior to the one year timeframe will cause an early termination fee of \$99 to apply.
 - e. Customers must subscribe to TDS Long Distance Corporation as their long distance provider.
 - f. Any toll calls will be billed at TDS Long Distance toll rates.
 - g. Service Connection Charges will not apply.
 - h. Optional Call plans are not available with this bundle.
 - i. Seasonal Service is not available with this bundle.
3. Rates and Charges

Monthly Rate

Bundle Base Rate

\$36.95 to 47.20¹

¹ Other data speeds may be available for an additional charge.



525 Junction Rd
Madison, WI 53717
www.tdsfale.com

June 15, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: CC Docket No. 10-90
Certification of Reasonable Steps Taken to Provide 4 x 1 Broadband Service

Dear Ms. Dortch:

As part of the FCC's annual reporting requirements for ETC re-certification, Rule 54.313(f)(1)(i) requires carriers to certify that upon receiving a customer's reasonable request for broadband service with speeds of 4 mbps download and 1 mbps upload, the carrier took reasonable steps to provide service at those speeds.

TDS Telecommunications Corporation (TDS Telecom) owns and operates the telephone companies listed on the attachment. Each provides broadband service. Collectively through these companies, TDS Telecom offers broadband service to 94% of its ILEC customers. Most of these customers receive speeds of 5 mbps or faster.

TDS Telecom has recently completed a major initiative to extend its broadband coverage to much of its rural serving area. This effort utilized grant funding available through the American Recovery and Reinvestment Act and was administered by the Rural Utility Services (RUS). \$100 million in grant funding was received while TDS Telecom invested an additional \$25 million of its own capital. At the conclusion of this initiative, broadband service was made available to an additional 32,000 customers who were previously unserved.

At this time, and with today's available technology, TDS Telecom has extended its broadband footprint as far as is economically feasible. The 6% of customers that remain unserved live in our most rural and remote service areas. The cost to bring broadband to them, or to increase speeds to 4 x 1 for those who currently have service at slower speeds, would far exceed the revenue received. We continue to closely monitor emerging technologies and look for affordable ways to serve these customers, but for the time being, it is unreasonable and would not be a prudent use of company capital.

As Executive Vice President of TDS Telecommunications Corporation and an officer authorized to give this certification, I hereby certify that TDS Telecom collectively and through each of its subsidiaries listed on the attachment, has taken reasonable steps to provide 4 x 1 broadband service upon receipt of a reasonable request from a customer.

Sincerely,

A handwritten signature in cursive script that reads "Kevin G. Hess".

Kevin G. Hess
TDS Telecommunications Corporation

Attachment 1

State	Study Area Name	SAC
AL	Butler Telephone Company	250284
AL	Oakman Telephone Company, Inc.	250311
AL	Peoples Telephone Company, Inc.	250314
AR	Cleveland County Telephone Company, Inc.	401698
AR	Decatur Telephone Company	401699
AZ	Arizona Telephone Company	452171
AZ	Southwestern Telephone Company	452174
CA	Happy Valley Telephone Company	542321
CA	Hornitos Telephone Company	542322
CA	Winterhaven Telephone Company	542323
CO	Delta County Tele-Comm, Inc.	462184
CO	Strasburg Telephone Company	462207
FL	Quincy Telephone Company, FL	210338
GA	Blue Ridge Telephone Company	220346
GA	Camden Telephone & Telegraph Company, Inc.	220351
GA	Nelson-Ball Ground Telephone Company	220375
GA	Quincy Telephone Company, GA	220338
ID	Potlatch Telephone Company	472230
IN	Camden Telephone Company, Inc.	320744
IN	Communications Corporation of Indiana	320776
IN	Communications Corporation of Southern Indiana	320809
IN	Home Telephone Company, Inc. (IN)	320778
IN	S&W Telephone Company, Inc.	320816
IN	The Home Telephone Company of Pittsboro, Inc.	320777
IN	The Merchants and Farmers Telephone Company	320788
IN	Tipton Telephone Company, Inc.	320829
IN	Tri-County Telephone Company, Inc.	320830
IN	West Point Telephone Company, Incorporated	320837
KY	Leslie County Telephone Company	260411
KY	Lewisport Telephone Company	260412
KY	Salem Telephone Company	260417
ME	Cobbosseecontee Telephone Company	100005
ME	Hampden Telephone Company	100010
ME	Hartland & St Albans Telephone Company	100011
ME	Somerset Telephone Company	100024
ME	The Island Telephone Company, Inc. (ME)	100007
ME	The West Penobscot Telephone & Telegraph Company	100034
ME	Warren Telephone Company	100031
MI	Chatham Telephone Company	310685
MI	Communication Corporation of Michigan	310672

State	Study Area Name	SAC
MI	Island Telephone Company (MI)	310677
MI	Shiawassee Telephone Company	310726
MI	Wolverine Telephone Company	310738
MN	Arvig Telephone Company	361350
MN	Bridge Water Telephone Company	361362
MN	Mid-State Telephone Company	361433
MN	Mid-State Telephone Company, KMP	361413
MN	Winsted Telephone Company	361507
MS	Calhoun City Telephone Company, Inc.	280448
MS	Myrtle Telephone Company, Inc.	287449
MS	Southeast Mississippi Telephone Company, Inc.	283301
NC	Barnardsville Telephone Company	230469
NC	Saluda Mountain Telephone Company	230498
NC	Service Telephone Company	230500
NH	Contoocook Valley Telephone Company	123321
NH	Hollis Telephone Company, Inc.	123321
NH	Kearsarge Telephone Company	120045
NH	Merrimack County Telephone Company	120047
NH	Union Telephone Company	120049
NH	Wilton Telephone Company, Inc.	120050
NY	Deposit Telephone Company, Inc.	150089
NY	Edwards Telephone Company, Inc.	150092
NY	Oriskany Falls Telephone Corporation	150114
NY	Port Byron Telephone Company	150118
NY	Township Telephone Company, Inc.	150129
NY	Vernon Telephone Company, Inc.	150133
OH	Arcadia Telephone Company	300585
OH	Continental Telephone Company	300607
OH	Little Miami communications Corporation	300613
OH	Oakwood Telephone Company	300645
OH	The Vanlue Telephone Company	300662
OK	Mid-America Telephone, Inc.	432010
OK	Oklahoma Communications Systems, Inc.	431984
OK	Wyandotte Telephone Company	432034
OR	Asotin Telephone Company, OR	532404
PA	Mahanoy & Mahantango Telephone Company	170183
PA	Sugar Valley Telephone Company	170206

State	Study Area Name	SAC
SC	McClellanville Telephone Company, Inc.	240533
SC	Norway Telephone Company, Inc.	240535
SC	St. Stephen Telephone Company	240544
SC	Williston Telephone Company	240551
TN	Concord Telephone Exchange, Inc.	290559
TN	Humphreys County Telephone Company	290566
TN	Tellico Telephone Company, Inc.	290578
TN	Tennessee Telephone Company	290575
VA	Amelia Telephone Corporation	190217
VA	New Castle Telephone Company	193029
VA	Virginia Telephone Company	190253
VT	Ludlow Telephone Company	140058
VT	Northfield Telephone Company	140061
VT	Perkinsville Telephone Company, Inc.	140062
WA	Asotin Telephone Company, WA	522404
WA	Lewis River Telephone Company, Inc.	522427
WA	McDaniel Telephone Company	522430
WI	Badger Telecom, LLC	330844
WI	Black Earth Telephone Company, LLC	330849
WI	Bonduel Telephone Company, LLC	330851
WI	Burlington, Brighton & Wheatland Telephone Company, LLC	330856
WI	Central State Telephone Company, LLC	330859
WI	Dickeyville Telephone, LLC	330875
WI	Eastcoast Telecom of Wisconsin, LLC	330914
WI	Grantland Telecom, LLC	330930
WI	Mid-Plains Telephone, LLC	330881
WI	Midway Telephone Company, LLC	330909
WI	Mosinee Telephone Company, LLC	330915
WI	Mt. Vernon Telephone Company, LLC	330917
WI	Riverside Telecom, LLC	330943
WI	Scandinavia Telephone Company, LLC	330945
WI	Southeast Telephone Co. of Wisconsin, LLC	330952
WI	Stockbridge & Sherwood Telephone Company, LLC	330954
WI	Tenney Telephone Company, LLC	330958
WI	The Farmers Telephone Company, LLC	330880
WI	The State Long Distance Telephone Company, LLC	330955
WI	UTELCO, LLC	330963
WI	Waunakee Telephone Company, LLC	330968