

**REDACTED- FOR PUBLIC INSPECTION**

June 26, 2015

**VIA OVERNIGHT DELIVERY**

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

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 14-58, 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Ms. Dortch:

Pinnacles Telephone Company, a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted financial data, in compliance with 47 C.F.R. §§ 54.313 and 54.422

As specified in the Protective Order issued on November 16, 2012 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,



Eric N. Votaw, Senior Manager for  
Moss Adams LLP

Enclosures

cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division  
Pinnacles Telephone Company

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

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

<010> Study Area Code	542346
<015> Study Area Name	PINNACLES TEL CO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Eric N. Votaw
<035> Contact Telephone Number: Number of the person identified in data line <030>	2099556116 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	eric.votaw@mossadams.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313</b>	<b>54.422</b>
	<b>Completion Required</b>	<b>Completion Required</b>

			(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)				
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">542346CA510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">542346CA610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	<input type="text" value="Yes"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 2px;">542346CA1010.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<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 checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting  
Data Collection Form**

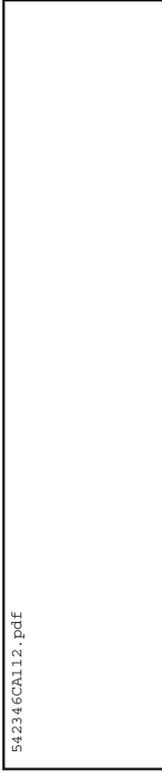
FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 542346  
 <015> Study Area Name PINNACLES TEL CO  
 <020> Program Year 2016  
 <030> Contact Name - Person USAC should contact regarding this data Eric N. Votaw  
 <035> Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mossadams.com

<110> Has your company received its ETC certification from the FCC?  (yes / no)   
 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.



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 542346  
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 <030> Contact Name - Person USAC should contact regarding this data Eric N. Votaw  
 <035> Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mosadams.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:

Select Yes or No or Not Applicable

- <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.

**(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	542346
<015>	Study Area Name	PINNACLES TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Yotaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.yotaw@mossadams.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

<010>	Study Area Code	542346
<015>	Study Area Name	PINNACLES TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

542346CA1210.pdf
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Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<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.



**(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

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 <030> Contact Name - Person USAC should contact regarding this data Eric N. Votaw  
 <035> Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mosadams.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) <b>Progress Report on 5 Year Plan</b> Milestone Certification (47 CFR § 54.313(f)(1)(ii))	542346CA3010.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.		Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))		Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))			<input type="checkbox"/>
(3014) If yes, does your company file the RUS annual report			<input type="checkbox"/>
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)			<input type="checkbox"/>
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows			<input type="checkbox"/>
(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	<input type="checkbox"/>
(3018) If the response is no on line 3014, is your company audited?			<input type="checkbox"/>
(3019) 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 Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications			<input type="checkbox"/>
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows			<input type="checkbox"/>
(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: 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,			<input checked="" type="checkbox"/>
(3023) Underlying information subjected to a review by an independent certified public accountant			<input checked="" type="checkbox"/>
(3024) Underlying information subjected to an officer certification.			<input checked="" type="checkbox"/>
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	542346CA3026.pdf	Name of Attached Document Listing Required Information	<input checked="" type="checkbox"/>
(3026) Attach the worksheet listing required information			

LINE 3000 RATE OF RETURN DATA

REDACTED FOR PUBLIC INSPECTION

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<030> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	542346
<015>	Study Area Name	PINNACLES TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
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<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.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	
<p>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.</p>	
Name of Authorized Agent:	
Name of Reporting Carrier: PINNACLES TEL CO	
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: 542346	Filing Due Date for this form: 07/01/2015
<small>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.</small>	

**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	
<p>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.</p>	
Name of Reporting Carrier: PINNACLES TEL CO	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date: 06/26/2015
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: 542346	Filing Due Date for this form: 07/01/2015
<small>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.</small>	

## Attachments

LINE 100 INITIAL FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

REDACTED FOR PUBLIC INSPECTION

Response Line 510  
Pinnacles Telephone Company  
Study Area 542346

### **Voice Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Pinnacles Telephone Company (“Pinnacles”) is in compliance with appropriate FCC Service Quality Standards, Consumer Protection Rules, as well as California Service Quality benchmarks as defined in G.O. 133-C. Pinnacles provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. Pinnacles also conducts subscriber CPNI outreach by periodically placing CPNI explanation messages into subscriber’s bills and also has signage in its business office regarding CPNI rules and regulations. Pinnacles trains staff on Red Flag issues on an annual basis to help prevent identify theft. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules. Lastly, Pinnacles provides reports and raw data to the California PUC on a quarterly basis, is in compliance with G.O.133-C and has not had to file any corrective action reports.

Pinnacles also outlines its rates, terms, and conditions under which Pinnacles offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. ILEC keeps its tariffs available for public inspection at its business offices.

### **Broadband Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Pinnacles is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. Pinnacles trains staff on Red Flag and CPNI issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

Pinnacles also outlines its rates, terms, and conditions under which Pinnacles offers Broadband service in NECA Tariff #5 to Internet Service Providers (“ISP”). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA’s website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610  
Pinnacles Telephone Company  
Study Area 542346

#### Functionality in Emergency Situations:

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Pinnacles Telephone Co. ("Pinnacles") meets the requirements to remain functional in emergency situations and has the following capabilities for both Broadband and Voice Networks:

#### **Voice Network**

Emergency power is provided by a bank of batteries which is capable of sustaining Central Office operations for more than 8 hours. A standby generator, fueled from a 500 gallon propane tank, is also available and will continue to sustain CO operations as long as fuel lasts. Remote terminals, which provide service to subscribers who are not near the CO, house battery banks which have been designed to last at least 8 hours without PG&E power. In the event of an outage lasting longer than 8 hours, Pinnacles deploys mobile generators to recharge battery banks as required.

Pinnacles' subscribers are served from remote terminals (or the CO), all of which are interconnected in multiple SONET fiber rings. Redundancy has been incorporated into the SONET ring technology - the entire system will continue to operate in the event of any single-point fiber failure in either fiber ring. In the event of simultaneous fiber failures, Pinnacles maintains a stock of all tools and supplies needed to affect fiber repairs and restore service.

Diverse fiber routes connect Pinnacles' service area to its meet point with AT&T for transport to their tandem switch: fibers along one route can be destroyed but service will remain unaffected as traffic will be re-routed onto the remaining, functional route.

Lastly, Pinnacles Telephone Co. has capabilities for managing traffic spikes resulting from emergency situations by use of distributed T1 circuits.

#### **Broadband Network**

Emergency power is provided by a bank of batteries which is capable of sustaining Central Office operations for more than 8 hours. A standby generator, fueled from a 500 gallon propane tank, is also available and will continue to sustain CO operations as long as fuel lasts. Remote terminals, which provide service to subscribers who are not near the CO, house battery banks which have been designed to last at least 8 hours without PG&E power. In the event of an outage lasting longer than 8 hours, Pinnacles deploys mobile generators to recharge battery banks as required.

Pinnacles' subscribers are served from remote terminals (or the CO), all of which are interconnected in multiple SONET fiber rings. Redundancy has been incorporated into the SONET ring technology - the entire system will continue to operate in the event of any single-point fiber failure in either fiber ring. In the event of simultaneous fiber failures, Pinnacles maintains a stock of all tools and supplies needed to affect fiber repairs and restore service.

Diverse fiber routes connect Pinnacles' service area to its meet point with AT&T for transport to their tandem switch: fibers along one route can be destroyed but service will remain unaffected as traffic will be re-routed onto the remaining, functional route.

Lastly, Pinnacles Telephone Co. has capabilities for managing traffic spikes resulting from emergency situations by use of distributed T1 circuits.





Response to Line 1010  
Pinnacles Telephone Company  
Study Area 542346

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10 ) Pinnacles Telephone Company (“Pinnacles”) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$47.48 as specified in Public Notice DA 15-470 issued on April 16, 2015. Pinnacles’ current total local end-user rate<sup>1</sup> of \$21.09 (which includes a local fee of \$20.25, mandated state fees of \$0.84 and mandatory extended area service charges of \$0) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

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<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE

APPLICABILITY

Applicable to eligible residence customers for Universal LifeLine Telephone Service (ULTS) a.k.a. California LifeLine Program or LifeLine furnished pursuant to the Moore Universal Telephone Service Act and in accordance with General Order 153. The Utility as listed throughout this Schedule is identified as the California LifeLine Service Provider in GO 153.

TERRITORY

Within the exchange areas, as said areas are defined on maps filed as part of the tariff schedules.

RATES AND CHARGES

	<u>Rate per Month</u>	
(1) Flat Rate Exchange Service:		
(1) Flat Rate Exchange Service:		
a. Individual access line		
1. Local Flat Rate Service	\$20.25	
2. End User Common Line (EUCL) Charge	6.50	(N)
3. Federal Lifeline Credit	9.25	(C)(T)
4. California Specific Support Credit	<u>11.39</u>	(I)
5. California LifeLine Flat Rate Service	\$6.11	(T)
		<u>Service Charge</u>
(2) Service Connection Charges: (See Special Conditions 5)		
a. Each New Service Order for Initial Install:		
1. New Service Order Charge	\$20.25	
2. Central Office Connection Work Charge	<u>27.00</u>	
	47.25	
3. Federal Link Up Credit	0.00	
4. California LifeLine Credit	<u>37.25</u>	
5. California LifeLine Service Connection Charge	\$10.00	

(Continued)

(To be inserted by the utility)  
 Advice Letter No. 250

*Issued by*

(To be inserted by Cal. P.U.C.)

Decision No. \_\_\_\_\_

Steven R. Bryan

Date Filed June 18, 2012

NAME

Effective June 18, 2012

President

TITLE

Resolution No. \_\_\_\_\_

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
 (Continued)

RATES AND CHARGES\* - (Continued)

	<u>Service Charge</u>	
(2) Service Connection Charges: - (Continued) (See Special Conditions 5)		
b. Each Subsequent New Service Order:		(N)
1. New Service Order Charge	\$20.25	
2. Central Office Connection Work Charge	<u>27.00</u>	
	47.25	
3. California LifeLine Credit	<u>37.25</u>	
4. California LifeLine Service Connection Charge	\$10.00	
c. Each Non-Payment Reconnect Charge:		
1. Restoral Charge	\$33.75	
2. California LifeLine Credit	<u>23.75</u>	
3. California LifeLine Service Connection Charge	\$10.00	(N)
d. Each change to convert to ULTS:		(T)
1. Change Charge	\$10.00	(N)
2. California LifeLine Credit	<u>0.00</u>	
3. California LifeLine Service Conversion Charge	\$10.00	(N)

\* The difference between the rates and charges in this Schedule and the regular tariffed rates and charges is recovered from the California ULTS Fund, federal Lifeline program, and/or federal Link Up program.

(Continued)

(To be inserted by the utility)  
**Advice Letter No.** 247

**Issued by**  
Steven R. Bryan  
NAME  
President  
TITLE

(To be inserted by Cal. P.U.C.)  
**Date Filed** November 1, 2011  
**Effective** December 1, 2011  
**Resolution No.** T-17321

**Decision No.** \_\_\_\_\_

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

RATES AND CHARGES - (Continued)

Service Charge

- (2) Service Connection Charges: - (Continued)  
(See Special Conditions 5)

(D)

(D)

(Continued)

(To be inserted by the utility)

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Steven R. Bryan

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President

TITLE

Resolution No. \_\_\_\_\_

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
 (Continued)

RATES AND CHARGES - (Continued)

	<u>Rate or Charge</u>	
(3) End User Common Line (EUCL) Charge (covered in federal lifeline credit)	No Charge	(T) (N)
(4) Toll Blocking (Also called toll restriction. See Schedule No. A-22)	No Charge	
(5) Surcharges	No Charge	

ULTS Rates (1) and (2) are exempt from California High Cost Fund A (CHCF-A) surcharge, California High Cost Fund B (CHCF-B) surcharge, California Advanced Services Fund (CASF) surcharge, California Teleconnect Fund (CTF) surcharge, California Relay Service Communications Device Fund (DDTP) surcharge, the California LifeLine (ULTS) surcharge, and the CPUC User Fee.

- (6) Deposits (see Special Conditions 7)
- a. A deposit is not required to establish or reestablish credit for basic service for ULTS customers.
  - b. A deposit may be required to maintain basic service if the Utility discovers the customer no longer qualifies for ULTS.
  - c. A deposit may be required for non-basic service(s).
  - d. If it is determined that false information has been provided, correct information plus a deposit for non-basic service(s) will be required.

(D)  
(D)

(Continued)

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Steven R. Bryan

**Effective** June 18, 2012

NAME

President

**Resolution No.** \_\_\_\_\_

TITLE

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS

1. Eligibility Criteria for Obtaining and Retaining ULTS:

a. Universal LifeLine Telephone Service (ULTS) is available to all residential customers who meet the following eligibility requirements:

- (1) The residence at which the service is requested is the subscriber's principal place of residence. An applicant for ULTS may report only one address in this state as his/her principal place of residence. (T)  
(N)  
(N)

The residence premises household (dwelling unit) shall consist of that portion of an individual house or building or one flat or apartment occupied entirely by a single family or individuals functioning as one domestic establishment.

The room or portion of a dwelling unit occupied exclusively by an individual not sharing equally as a member of the domestic establishment may be considered a separate residence for the application of ULTS. (T)  
(T)

- (2) The subscriber and the members of the subscriber's household collectively have one, and only one, ULTS line, except as provided for elsewhere in this schedule. (T)

- (3) Residential customers may qualify for ULTS by meeting either the Income-Based Criteria or the Program-Based Criteria.

- (4) Income-Based Criteria:

Income-based criterion allows an applicant to enroll in ULTS if members of the applicant's household collectively earn no more than the mandated annual income limits. Total household income is defined in Rules 1. (T)  
(T)

For the current Household Income Limitations, please refer to the Pacific Bell Telephone Company's (d.b.a. AT&T California) Schedule Cal. P.U.C. No. A5, Universal LifeLine Telephone Service for the Income-Based Criterion.

Customers must also provide proof of their total household income. Acceptable income documents are: (T)

- (a) Prior year's state, federal, or tribal tax return,
- (b) Current income statement for an employee or paycheck stub for three consecutive month's worth of the same type of statements within the last 12 months, (T)  
(T)

(Continued)

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Steven R. Bryan

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NAME

President

TITLE

Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS (Continued)

1. Eligibility Criteria for Obtaining and Retaining ULTS: (Cont'd)

a. Universal Lifeline Telephone Service (ULTS) is available to all residential customers who meet the following eligibility requirements: (Cont'd)

(4) Income-Based Criteria: (Cont'd)

Customers must also provide proof of their total household income. Acceptable income documents are: (Cont'd) (T)

- (c) Statement of benefits from Social Security, Veterans Administration, retirement/pension, unemployment compensation, and/or workmen's compensation,
- (d) A divorce decree,
- (e) Child support document,
- (f) Other official documents.

Borrowed money shall not be considered as income when determining eligibility for the ULTS program. Funds transferred from one account to another, such as from savings account to a checking account, shall not be considered as income when determining eligibility for the ULTS program, even if such funds are used for living expenses.

(5) No customer who is claimed as a dependent on another person's income tax return shall be eligible for ULTS. (T)

(Continued)

(To be inserted by the utility)

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(To be inserted by Cal. P.U.C.)

Advice Letter No. 247

Steven R. Bryan

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Decision No. \_\_\_\_\_

NAME

Effective December 1, 2011

President

TITLE

Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS - (Continued)

1. Eligibility Criteria for Obtaining and Retaining ULTS: - (Cont'd)

a. Universal Lifeline Telephone Service (ULTS) is available to all residential customers who meet the following eligibility requirements: (Cont'd)

(6) Program-Based Criteria:

Program-based criterion allows an applicant to enroll in ULTS based on participation by the applicant or a member of the applicant's household in a means-tested programs approved by the Commission. Approved means-test programs are: (T)  
(T)

- (a) Medicaid or Medi-Cal,
- (b) Supplemental Security Income (SSI),
- (c) CalFresh Program formerly called Food Stamps, (T)
- (d) Healthy Families Category A,
- (e) Tribal TANF,
- (f) Women, Infant and Children Program (WIC),
- (g) Low Income Home Energy Assistance Program (LIHEAP),
- (h) Federal Public Housing Assistance or Section 8,
- (i) Temporary Assistance for Needy Families (TANF), also known in California as:  
California Work Opportunity and Responsibility to Kids (CalWorks)  
Stanislaus Work Opportunity and Responsibility to Kids (StanWorks)  
Welfare-to-Work (WTW) (T)  
Greater Avenues for Independence (GAIN)
- (j) National School Lunch Program (NSLP), (T)
- (k) Bureau of Indian Affairs General Assistance,
- (l) Head Start Income Eligible (Tribal Only).

(7) For self-employed members, the "income from self-employment" shown on IRS Form 1040, Schedule C, line 29 shall be used to determine eligibility for ULTS. (T)

(8) A subscriber shall be eligible to receive two ULTS lines if: (i) the subscriber meets all ULTS eligibility criteria set forth above; (ii) a member of the subscriber's household is a disabled member and has immediate and continuous access within the household to a TTY; and (iii) the TTY is issued by DDTP or a medical certificate indicating the household member's need for a TTY is submitted. (T)  
(T)

(9) All ULTS rules and regulations that apply to the one ULTS line shall apply equally to the second ULTS line provided to a subscriber. (T)

(Continued)

(To be inserted by the utility)

*Issued by*

(To be inserted by Cal. P.U.C.)

Advice Letter No. 247

Steven R. Bryan

Date Filed November 1, 2011

Decision No. \_\_\_\_\_

NAME

President

Effective December 1, 2011

TITLE

Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS - (Continued)

1. Eligibility Criteria for Obtaining and Retaining ULTS: - (Cont'd)

a. Universal LifeLine Telephone Service (ULTS) is available to all residential customers who meet the following eligibility requirements: (Cont'd)

- (10) Customers that verbally certify they meet the ULTS income limits and have proof of income or participate in an approved public program will receive an Application Form in the mail from the California LifeLine Administrator for completion and submission prior to being enrolled in the ULTS program. (T)  
(T)
- (11) The completed Application Form and supporting documents, if any, must be received by the California LifeLine Administrator on or before the deadline date specified in the Application Form. (T)  
|  
(T)
- (12) Enrollment Process:
- (a) The Utility shall send a confirmation notice to all California LifeLine applicants informing them of the arrival of Application Forms from the California LifeLine Administrator and the requirement to return the completed forms with all required documentation. The notice shall also inform them that failure to return all the required documentation by the deadline date will result in denial of LifeLine service. (T)  
|  
(T)
- (b) Customers will incur regular tariff rates and charges until the approval of their California LifeLine Application Form process is completed. (T)  
(T)
- (c) Customers will be converted to LifeLine service upon the Utility receiving confirmation of the customer's eligibility from the California LifeLine Administrator. (T)  
(T)
- (d) Customers will receive a credit on their bill for the LifeLine discounts retroactive to their application date which will appear on their next bill. The customer may request a refund check for a net credit if the amount is over \$10.00. (T)
- (13) The Utility shall not knowingly enroll an applicant into the ULTS program who does not meet the ULTS eligibility criteria and the Utility shall not knowingly allow a subscriber to remain in the ULTS program who does not meet the ULTS eligibility criteria. (T)  
(T)
- (14) The Utility shall not link the availability of discounted phone service under the ULTS program with the sale of non-ULTS services.

(Continued)

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President

TITLE

Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS - (Continued)

1. Eligibility Criteria for Obtaining and Retaining ULTS: - (Cont'd)

a. Universal LifeLine Telephone Service (ULTS) is available to all residential customers who meet the following eligibility requirements: (Cont'd)

(15) The Utility must inform the applicant that he or she may opt to receive the instructions for the Application Form in Braille (English Only) or the instructions and the Application Form in large print.

(16) A subscriber changing his/her Utility shall not be required to undergo the Application Process, provided that the subscriber initiates California LifeLine service with his/her new Utility within 30 days of disconnecting California LifeLine service with the previous Utility and the subscriber maintains eligibility in all other respects. If a subscriber changes his or her principal place of residence, while maintaining eligibility in all other respects, the subscriber shall not be required to go through the Application Process again.

(17) Pursuant to 47 C.F.R. §54.410(d) and 47 C.F.R. §54.410(f), Universal Lifeline Telephone Service (California LifeLine) Program applicants and participants must provide their date of birth and the last four digits of their social security number, or Tribal identification number, as part of the eligibility requirements for receiving the California LifeLine or enhanced Lifeline discounts.

(N)  
|  
(N)

2. Universal LifeLine Telephone Service (ULTS) is available to eligible customers subscribing to flat rate individual access line service.

3. ULTS includes all the service elements defined in Rule No. 1 for Basic Service.

(Continued)

(To be inserted by the utility)

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Steven R. Bryan

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Decision No. \_\_\_\_\_

NAME

Effective December 12, 2012

President

TITLE

Resolution No. \_\_\_\_\_

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS - (Continued)

5. Discounted Nonrecurring Charges:

a. Initial Installation

- (1) The Universal LifeLine Telephone Service (ULTS) connection charge is applicable to each eligible household residing at the same principal place of residence. (T)
- (2) The ULTS connection charge may be applicable any time a subscriber (i) establishes ULTS, (ii) re-establishes ULTS at the same residence at which ULTS was previously provided (even when the customer was disconnected for nonpayment), (iii) establishes ULTS at a new residence, or (iv) switches ULTS from one utility to another. (T)
- (3) Utilities may not impose a "central office charge" in addition to the ULTS connection charge when installing or activating California LifeLine. (T)
- (4) Installation of a second and subsequent telephone service connections shall be subject to the Utility's regular tariffed rates for these connections, except that subscribers with a disabled household member may qualify for ULTS connection charges on two residential telephone connections. (T)  
(T)

b. Change Charges

The ULTS conversion charge is applicable each time a ULTS subscriber requests a change in the class (business or residential to ULTS), type (this means measured to flat rate service or vice versa, which is not applicable in our territory), or grade of service (this means going from one to two party service or vice versa, which is not applicable in our territory), including requests to change from Foreign Exchange Service. There is no limit on the number of times a ULTS subscriber may pay the ULTS conversion charge to change the class, type, or grade of service. This discounted charge excludes adding services not covered under the ULTS program. No conversion charge is assessed if a LifeLine applicant fails to qualify or if a LifeLine subscriber is removed from the LifeLine program (either voluntarily or involuntarily). (T)  
(T)  
(T)

(Continued)

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Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS - (Continued)

6. Eligible subscribers of this service may have up to twelve months to pay the Utility for the reduced service connection charges without interest. The Utility may charge a late-payment fee when Universal LifeLine Telephone Service (ULTS) subscribers fail to timely remit some or all of the ULTS connection charge under a deferred-payment schedule. (T)
7. Deposits for establishment of service from applicants for new service, as outlined in Cal. P.U.C. Rule No. 7, will not be required of eligible ULTS recipients. The Utility may require a ULTS customer to pay any overdue ULTS rates and charges, or make payment arrangements, before ULTS is reinstated at the same address or at a new address. The Utility may apply toll restriction to a ULTS customer's line when toll charges are not paid and optional services may be discontinued.
8. ULTS shall be subject to the conditions set forth in Cal. P.U.C. Rule No. 11, Discontinuance and Restoration of Service. Unless the customer directs otherwise; a partial payment will be applied towards the local service non-recurring and recurring charges, and federal taxes associated with this service. (T)

(Continued)

(To be inserted by the utility)

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Steven R. Bryan

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Decision No. \_\_\_\_\_

NAME  
President

Effective December 1, 2011

TITLE

Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS - (Continued)

9. Applicants who wish to re-establish ULTS service after removal from the program will be treated as a new applicant, subject to the Application Process and G.O. 153 rules, and a Service Conversion Charge as shown in Rates (2) above (once the applicant has successfully re-established ULTS service). The ULTS discount will be effective on the Application Date and will not be applied retroactively to the prior enrollment period. (T)
10. The California LifeLine Administrator will qualify new ULTS customers and verify the continued eligibility of existing ULTS customers. (T)

(Continued)

(To be inserted by the utility)

*Issued by*

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Advice Letter No. 247

Steven R. Bryan

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President

Effective December 1, 2011

TITLE

Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS – (Continued)

11. Subscribers to Universal Lifeline Telephone Service (ULTS) must notify the Utility of a change in any condition which occurs that would cause the household to no longer qualify for the service or a second ULTS line. Upon receipt of notification, the Utility will change the service to regular tariffed rates for the service furnished. Service connection charges will not apply to the change in service. The three-month limitation to back bill, as set forth in Rule No. 9, is not applicable to this service. (T)
12. Each ULTS customer is subject to the annual renewal process. (T)
13. The Utility will annually mail a notification of availability of ULTS to all its residential customers. (T)
14. In addition to the rates and conditions specified herein, all rules, regulations, charges, and rates in conjunction with the services furnished elsewhere in the tariffs are also applicable to the service provided under this schedule.
15. Optional services and equipment are not included in ULTS rates, but will be provided to ULTS customers at applicable tariffed rates and charges. Non-ULTS lines will be available to ULTS customers at the applicable regular tariffed rates and charges.
16. ULTS rates shall be applied to each monthly statement for the months this service is furnished and shall apply only for the duration of this service.
17. Definitions covered under the California LifeLine Program and words used throughout this Schedule are defined in GO153. (N)  
(N)

(Continued)

(To be inserted by the utility)

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Resolution No. T-17321

Schedule No. A-17

UNIVERSAL LIFELINE TELEPHONE SERVICE  
(Continued)

SPECIAL CONDITIONS – (Continued)

(D)

(D)

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Advice Letter No. 107

Rex Bryan

Date Filed December 20, 1994

Decision No. 94-09-065

NAME  
President

Effective January 1, 1995

TITLE

Resolution No. \_\_\_\_\_

Response to Line 3010  
Pinnacles Telephone Company  
Study Area 542346

#### Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Pinnacles Telephone Company (“Pinnacles”) provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time. Details for how Pinnacles is meeting its obligations for broadband goals and required obligations are specified within the FCC Form 481 annual filing.

LINE 3005 RATE OF RETURN DATA

REDACTED FOR PUBLIC INSPECTION