REDACTED - FOR PUBLIC INSPECTION

June 29, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 14-58, 47 CFR § 54.313 Annual Reporting Requirements for High-Cost Recipients (Form 481)

Dear Ms. Dortch:

Attached please find Bijou Telephone Cooperative Association's (Company) (SAC 462181) high-cost support recipient annual report pursuant to 47 CFR § 54.313 (Form 481).

The Company is filing certain financial information, reported pursuant to 47 CFR §54.313(f)(2), as confidential under the June 17, 2015 Protective Order (DA 15-712). Pursuant to that Order, each page of this filing has been marked "REDACTED - FOR PUBLIC INSPECTION." The non-redacted version of this information has been marked "CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58, GN DOCKET NO. 09-51, CC DOCKET NOS. 01-92, 96-45,WT DOCKET NO. 10-208 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." As such, the Company requests that the non-redacted version of its submission be withheld from public inspection.

The Company is also requesting confidential treatment of certain information being filed pursuant to 47 CFR 54.313(a)(1) (five year service quality improvement plan progress report) under 47 CFR § 0.457 and 0.459. The redacted version of this filing has been marked "REDACTED - FOR PUBLIC INSPECTION." The non-redacted version has been marked "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION."

Pursuant to 47 CFR § 0.459, the Company offers the following in support of its request for confidential treatment of certain information.

- *Identification of the specific information for which confidential treatment is sought*: The Company seeks confidential treatment of the five year service quality improvement plan progress report required per 47 CFR § 54.313(a)(1),

- *Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission*: The Company is providing the five year service quality improvement plan progress report as part of its annual high-cost support recipient report per 47 CFR § 54.313.

- *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged*: The Company considers the information to be highly sensitive in that it contains statements about the Company's future investment plans, and discusses specific equipment and strategies the Company will utilize to provide services.

- *Explanation of the degree to which the information concerns a service that is subject to competition*: The Company provides voice and broadband services that are in competition with various landline and wireless providers; thus, the investment data disclosed is related to services subject to competition to a high degree.

- *Identification of any measures taken by the submitting party to prevent unauthorized disclosure:* The Company makes the data being provided available only to employees, consultants, and attorneys on a limited, need-to-know basis.

- *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties*: The information is not publicly available.

- *Justification of the period during which the submitting party asserts that material should not be available for public disclosure*: The Company requests that the data provided be treated as confidential indefinitely. Due to the sensitive nature of the data, it would not be appropriate for public disclosure at any time in the foreseeable future.

- *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidential treatment should be granted*: None.

Accordingly, The Company requests confidential treatment of the five year service quality improvement plan progress report pursuant to section 0.457 and 0.459 of the Commission's rules.

The redacted version of this Form 481 submission will be filed via the Commission's Electronic Comment Filing System (ECFS) in the above-captioned docket.

If you have any questions about this filing, please contact the undersigned.

Sincerely,

Rob D. Strait
Principal
719-531-6342

Attachment

cc: Charles Tyler
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W., Room 5-A452
Washington, DC 20554

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	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Brian Creveling
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	creveling@netecin.net

ANNUAL REPORTING FOR ALL CARRIERS

(check box when complete)

Line	Item	Entry	Instruction	54.313 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting		(complete attached worksheet)	✓	
<200>	Outage Reporting (voice)		(complete attached worksheet)	✓	✓
<210>		✓ <-- check box if no outages to report		✓	
<300>	Unfulfilled Service Requests (voice)	0			
<310>	Detail on Attempts (voice)		(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)	0		✓	
<330>	Detail on Attempts (broadband)		(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)				
<410>	Fixed	0.0		✓	✓
<420>	Mobile	0.0			
<430>	Number of Complaints per 1,000 customers (broadband)			✓	
<440>	Fixed	0.0			
<450>	Mobile	0.0			
<500>	Service Quality Standards & Consumer Protection Rules Compliance		(check to indicate certification)	✓	✓
<510>		462181CO510.pdf	(attached descriptive document)	✓	✓
<600>	Functionality in Emergency Situations		(check to indicate certification)	✓	✓
<610>		462181CO610.pdf	(attached descriptive document)	✓	✓
<700>	Company Price Offerings (voice)		(complete attached worksheet)	✓	
<710>	Company Price Offerings (broadband)		(complete attached worksheet)	✓	
<800>	Operating Companies and Affiliates		(complete attached worksheet)	✓	✓
<900>	Tribal Land Offerings (Y/N)?		(if yes, complete attached worksheet)	✓	
<1000>	Voice Services Rate Comparability Certification	Yes		✓	
<1010>			(attach descriptive document)		
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)		(if not, check to indicate certification)	✓	
<1110>			(complete attached worksheet)		
<1200>	Terms and Condition for Lifeline Customers		(complete attached worksheet)		✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

Line	Instruction	54.313	54.422
<2000>	(check to indicate certification)		
<2005>	(complete attached worksheet)		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

Line	Instruction	54.313	54.422
<3000>	(check to indicate certification)	✓	
<3005>	(complete attached worksheet)	✓	

(100) Service Quality Improvement Reporting
Data Collection Form

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
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<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

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

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

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

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

462181CO112.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

(200) Service Outage Reporting (Voice)
Data Collection Form

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<220>

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

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

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

<010>	Study Area Code	462181
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

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

<703>

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

-- See attached worksheet --

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<711>

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

-- See attached worksheet --

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<810>	Reporting Carrier	Bijou Telephone Co-Op Association, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Bijou Telephone Co-Op Association, Inc.

<813>

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

-- See attached worksheet --

(900) Tribal Lands Reporting
Data Collection Form

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<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	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

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

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

462181CO1210.pdf

Name of Attached Document

<1220> Link to Public Website HTTP

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

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

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

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

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}

<2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}

<2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

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

<2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}

<2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}

<2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}

<2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017> 3rd year Broadband Service Certification

<2018> 5th year Broadband Service Certification

<2019> Interim Progress Certification

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

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(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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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification {47 CFR § 54.313(f)(1)(i)}

462181CO3010.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)}

462181CO3012.pdf
Name of Attached Document Listing Required Information

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

462181CO3026.pdf
Name of Attached Document Listing Required Information

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

Data Collection Form

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

Financial Data Summary

(3027) Revenue	1753428
(3028) Operating Expenses	1858146
(3029) Net Income	297019
(3030) Telephone Plant In Service(TPIS)	9115966
(3031) Total Assets	7333723
(3032) Total Debt	35591
(3033) Total Equity	4813112
(3034) Dividends	110621

Name of Attached Document Listing Required Information

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

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

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

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

Name of Reporting Carrier: BIJOU TEL COOP ASSOC

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/26/2015

Printed name of Authorized Officer: Brian Creveling

Title or position of Authorized Officer: General Manager

Telephone number of Authorized Officer: 3038225400 ext.

Study Area Code of Reporting Carrier: 462181 Filing Due Date for this form: 07/01/2015

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

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

<010>	Study Area Code	462181
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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier

I certify that (Name of Agent)____ 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:

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Attachments

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

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

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

<703>

<a1> State	<a2> Exchange (ILEC)	<a3> SAC (CETC)	<b1> Rate Type	<b2> Residential Local Service Rate	<b3> State Subscriber Line Charge	<b4> State Universal Service Fee	<b5> Mandatory Extended Area Service Charge	<c> Total per line Rates and Fees
CO	Byers-822		FR	16.0	0.0	0.42	0.0	16.42
CO	Deer Trail-769		FR	16.0	0.0	0.42	0.0	16.42

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<711>

<a1> State	<a2> Exchange (ILEC)	<b1> Residential Rate	<b2> State Regulated Fees	<c> Total Rates and Fees	<d1> Broadband Service - Download Speed (Mbps)	<d2> Broadband Service -Upload Speed (Mbps)	<d3> Usage Allowance (GB)	<d4> Usage Allowance Action Taken When Limit Reached {select}
CO	Byers-822	29.95	0.0	29.95	1.5	0.384	999999.0	Other, There are no usage limits
CO	Byers-822	44.95	0.0	44.95	3.0	0.512	999999.0	Other, There are no usage limits
CO	Byers-822	59.95	0.0	59.95	6.0	0.768	999999.0	Other, There are no usage limits
CO	Byers-822	75.0	0.0	75.0	10.0	1.0	999999.0	Other, There are no usage limits
CO	Byers-822	110.0	0.0	110.0	18.0	2.0	999999.0	Other, There are no usage limits
CO	Deer Trail-769	29.95	0.0	29.95	1.5	0.384	999999.0	Other, There are no usage limits
CO	Deer Trail-769	44.95	0.0	44.95	3.0	0.512	999999.0	Other, There are no usage limits
CO	Deer Trail-769	59.95	0.0	59.95	6.0	0.768	999999.0	Other, There are no usage limits
CO	Deer Trail-769	75.0	0.0	75.0	10.0	1.0	999999.0	Other, There are no usage limits
CO	Deer Trail-769	110.0	0.0	110.0	18.0	2.0	999999.0	Other, There are no usage limits

(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	462181
<015>	Study Area Name	BIJOU TEL COOP ASSOC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Brian Creveling
<035>	Contact Telephone Number - Number of person identified in data line <030>	3038225400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creveling@netecin.net

<810>	Reporting Carrier	Bijou Telephone Co-Op Association, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Bijou Telephone Co-Op Association, Inc.

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
EASTERN COLORADO INDEPENDENT NETWORKS, LLC		ECIN

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Five Year Service Quality Improvement Plan Progress Report
For the 2015 Reporting Year
Per 47 CFR § 54.313(a)(1)

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Cooperative, Inc. (SAC _462181_)
Statement Regarding Compliance with Service Quality Standards and Consumer Protection Rules
47 CFR § 54.313(a)(5)
Form 481, Line 510

Bijou Telephone Cooperative, Inc. (Bijou) is an incumbent local exchange carrier operating in the state of Colorado, and is an eligible telecommunications carrier (ETC) designated by the Colorado Public Utilities Commission (COPUC). As such, Bijou is subject to the regulatory authority of the COPUC and operates under the relevant rules and laws of the state of Colorado.

Bijou is subject to the service quality standards and consumer protection standards adopted by the COPUC and that are applicable to ILECs in the state of Colorado. These standards are contained in the Code of Colorado Regulations 4 CCR 723-2. Consumer protection standards are also contained in Bijou's local tariff that is on file with the COPUC.

Apart from effective internal procedures and operations, Bijou ensures compliance with all applicable service quality and consumer protection rules through COPUC enforcement, which entails the operation of an effective customer complaint process. Bijou is required to respond to customer complaints and other service quality-related inquiries from the COPUC in a reasonable time frame. Bijou consistently meets or exceeds all COPUC-adopted standards, and reports to this effect via all required COPUC processes.

Finally, Bijou has established internal procedures to ensure compliance with the Federal Communications Commission's Customer Proprietary Network Information (CPNI) rules that include, but are not limited to, periodic employee training and maintenance of written company CPNI procedures. Bijou certifies its compliance with the Commission's CPNI rules by making annual filings as required in 47 CFR § 64.2009(e).

Bijou Telephone Cooperative, Inc. (SAC _462181_)
Statement Regarding the Ability to Function in Emergency Situations
47 CFR § 54.313(a)(6)
Form 481, Line 610

Bijou Telephone Cooperative, Inc. (Bijou) is an incumbent local exchange carrier operating in the state of Colorado, and is an eligible telecommunications carrier (ETC) designated by the Colorado Public Utilities Commission (COPUC). As such, Bijou is subject to the regulatory authority of the COPUC and operates under the relevant rules and laws of the state of Colorado.

Bijou has batteries and portable generators capable of providing the required level of backup power, and that can be deployed as necessary to Bijou's switching and remote sites. Bijou's network is capable of rerouting traffic around damaged facilities, although this ability is not absolute and may be limited in certain circumstances. However, Bijou follows all industry standard practices in ensuring its network remains functional during different types of emergency situations.

(A) Process for Assignment of 8-1-1 Abbreviated Dialing Code. The assignment of the 8-1-1 abbreviated dialing code will be considered by the Commission upon: 1) the Commission's own motion; or 2) the Petition of an entity.

(B) Petition for Consideration of the Assignment of 8-1-1. An entity filing a Petition to request consideration of the assignment of the 8-1-1 abbreviated dialing code to provide a means for excavators and the general public to notify facility operators in advance of their intent to engage in excavation activities must present clear and convincing evidence that a public benefit exists. The Commission will evaluate the Petition based upon this evidence.

(C) Contents of the Petition. The Petition shall contain the following information and documentation:

(i) Background of the Petitioner, including composition of any governing board or agency;

(ii) Demonstration of public need;

(iii) Historic volume of calls seeking notification to facility operators in advance of their intent to engage in excavation activities;

(iv) Proposed affected geographic area;

(v) Proposed cost recovery solution, including funding mechanisms;

(vi) Proposed plan for community outreach and notification; and

(vii) Other pertinent factors that the Commission deems relevant.

(II) If two of more entities petition the Commission to provide a means for excavators and the general public to notify facility operators in advance of their intent to engage in excavation activities using 8-1-1 in the same or overlapping geographic areas, the Commission shall use the criteria in subparagraph (C) to establish one assignee.

(III) When a Petition is granted by the Commission under subparagraph (C), any telecommunications provider that provides service in the geographic area outlined in the Petition, shall complete the following tasks:

(A) If an affected telecommunications service provider is using 8-1-1 for purposes other than access to notification to facility operators in advance of their intent to engage in excavation activities, that provider shall discontinue use for that non-compliant purpose.

(B) If the affected telecommunications service provider plans to seek recovery of internal costs associated with 8-1-1 call completion, the affected provider shall perform all analyses required to quantify the cost to its individual company for the necessary translations and/or facilities work.

(C) The affected telecommunications service provider shall estimate the time required to perform the necessary translation and/or facilities work to allow 8-1-1 call completion from its subscribers as requested in the Petition.

(IV) Within 30 days of the granting of a Petition, the affected telecommunications service providers shall file with the Commission, the information requested in subparagraphs (B) and (C).

(V) All telecommunications service providers serving customers in the affected area will complete the requirements of subparagraph IV to allow for 8-1-1 call completion no later than April 13, 2007, unless a waiver is sought and granted.

(k) Rules relating to the provisioning of the 9-1-1 abbreviated dialing code for emergency services:

(I) See rules 2130 through 2159.

(l) Neither an entity granted the use of a N-1-1 abbreviated dialing code nor a provider may charge end users a fee on a per-call or per-use basis for using the N-1-1 system without the consent of the Commission.

(I) Sale or transfer of N-1-1 codes through private transactions is not allowed.

2742. – 2799. [Reserved].

PROGRAMS

<u>Low-Income Telephone Assistance Program</u>

Basis, Purpose, and Statutory Authority

The basis and purpose of these rules is to implement the Low-Income Telephone Assistance Program (LITAP) so that low-income individuals receive assistance adequate to ensure access to residential basic local exchange telecommunications service and to prescribe the procedures for the administration of the LITAP Fund.

The statutory authority for the promulgation of these rules is found at §§ 40-2-108, 40-3.4-106, and 40-15-502(3)(a), C.R.S. These rules are consistent with 47 U.S.C. § 254 and 47 C.F.R., Part 54 (October 2002).

2800. Applicability.

(a) Rules 2800 through 2805 are applicable to all providers of basic local exchange telecommunications service.

(b) Rules 2800 through 2819 are applicable to LECs who are Eligible Telecommunications Carriers (ETCs) and who are certified to do business in and to offer basic local exchange service within the state of Colorado.

2801. Definitions.

The following definitions apply only in the context of rules 2800 through 2819:

(a) "Eligible subscriber" means an individual who is qualified to receive low-income telephone assistance pursuant to § 40-3.5-105, C.R.S.

(b) "Low Income Telephone Assistance Program (LITAP) service" means a retail residential local service offering that:

(I) Allows eligible subscribers to pay reduced charges by applying the support amount described in § 40-3.4-104, C.R.S.; and

(II) Is available to eligible subscribers as determined by the Colorado Department of Human Services.

2802. Incorporation by Reference.

References in rules 2800 through 2819 to Part 54 are references to rules issued by the FCC and have been incorporated by reference, as identified in rule 2008.

2803. Plan Implementation.

Prior to implementing a program plan, each provider to which these rules apply shall file with the Commission the information specified in paragraph 2804(b), along with an advice letter and tariff pages adding the LITAP service.

(a) The tariff shall include a description of the LITAP service offered to eligible subscribers and the associated monthly rate. Such tariff shall provide a 25 percent discount, or the end user common line charge, whichever is greater, for a single residential basic local exchange line in the principal residence of an eligible subscriber. In addition, eligible subscribers who are billed by the provider and who pay mileage or zone charges associated with the line are eligible for a 25 percent discount for these charges.

(b) LITAP service rates shall be further reduced by any amount that the basic local exchange provider receives from any federal program providing for a reduction in such intrastate rate.

(c) In no event shall the discount for LITAP service be less than the end user common line charge imposed by the FCC.

2804. Fund Administration.

The Commission shall determine, and by appropriate order, impose a uniform charge on each business and residential access line in a uniform amount for participating telecommunications providers. Such charges can be adjusted on or before July 1 of each year. To assist the Commission in calculating that uniform charge, the following information shall be provided to the Commission:

(a) The Department of Human Services shall forward to the Commission by April 1 of each calendar year its estimate of its administrative expenses incurred under § 40-3.4-101, C.R.S., et seq., and its estimate of the number of eligible subscribers for the coming fiscal year.

(b) Each provider of basic local exchange telecommunications services shall, in its annual report to the Commission, state its estimate for the coming year of the number of eligible subscribers who will receive low-income telephone assistance, the number of business and residential subscribers subject to the uniform charge, and its administration cost of the program as well as the historic monthly amounts of collections generated by the uniform charge, the monthly amounts of revenue forgone due to the discount of the program, its monthly administration expenses, and amounts reimbursed from or remitted to the Low-Income Telephone Assistance Fund as managed by the State Treasurer. Providers of basic local exchange telecommunications services having more than 500,000 access lines shall report program administrative fees based on actual costs. Providers of basic local exchange telecommunications services having less than 500,000 access lines shall report a Commission-approved administrative fee based on an average cost to administer the program as shown in the provider's industry-standard cost documentation or actual cost to administer the program as demonstrated through the provider's accounting documentation.

(c) The State Treasurer shall forward to the Commission by April 1 of each calendar year, an accounting of the transactions occurring in the Low-Income Telephone Assistance Fund.

(d) The Commission by April 1, of each calendar year shall estimate its administrative expenses incurred under § 40-3.4-101, C.R.S., et seq.

(e) The Commission, within 30 days of receipt of each report and after examining same, shall calculate the uniform charge based upon the undisputed amounts. Disputes concerning the amounts due for reimbursements from the fund shall be resolved through the Commission's administrative hearing process.

(f) The Commission, shall by order, specify the amount of reimbursement due to each LEC if the foregone revenues plus any reasonable administrative expenses exceed the total amount of the uniform charge collected by the LEC.

2805. Uniform Charge.

(a) The uniform charges imposed pursuant to § 40-3.4-108(1), C.R.S., shall be billed to each access line of each provider of basic local exchange telecommunications services.

(b) The uniform charge shall not be imposed on any state or local governmental body or on eligible subscribers.

(c) A provider of basic local exchange telecommunications service may collect the uniform charge by a specific line item on subscribers' bills if provided for in its tariff. Alternatively, the uniform charge may be included in each subscriber's bill as part of the subscriber's basic exchange service rate and the provider's tariff shall indicate, through a footnote or other explanatory text, that the basic exchange service rate contains the uniform charge. In addition, if the basic exchange service rate includes the uniform charge, a market informational note shall be added to the bill once a year informing customers that "The base rate includes a Commission-approved monthly charge for the Low-Income Telephone Assistance Program".

(d) Upon collecting the uniform charge, each provider may retain, from the total charges collected, an amount sufficient to reimburse such provider for its provision of low-income telephone assistance.

(I) If the total collected is in excess of the amount sufficient to reimburse the provider, the provider shall by the 30th day following the end of each quarter (January 30, April 30, July 30, and October 30) remit the excess to the Commission. To assist providers, the Commission may provide net contributors a form at least 30 days prior to the above due dates in order to accurately calculate the amounts to be remitted to the Commission. The Commission shall deposit such amount with the State Treasurer, who shall credit the same to the Low-Income Telephone Assistance Fund.

(II) If the total collected is insufficient to reimburse the provider, the provider shall request reimbursement from the fund by providing the required information of paragraph 2804(b) in its annual report to the Commission. The Commission, after examining the information provided, shall calculate the amount due for reimbursements from the fund, and request reimbursement from the State Treasurer, who shall remit that amount and shall debit the same amount from the Low-Income Telephone Assistance Fund.

(e) The Department of Human Services shall file with the Commission a report detailing its costs in administering the low-income telephone assistance program in accordance with § 40-3.4-101, C.R.S., et seq. The Commission shall request reimbursement of the approved expenses of the Department of Human Services from the State Treasurer, who shall remit that amount and shall debit the same from the Low-Income Telephone Assistance Fund.

2806. Prohibition of Disconnection.

(a) Providers shall not disconnect LITAP service subscribers for non-payment of toll charges.

(b) The Commission may grant a variance of paragraph (a) of this rule if the LEC can demonstrate all of the following:

(I) It would incur substantial and unjustifiable costs in complying with this requirement;

(II) It offers toll limitation to its qualifying low-income customers without charge; and

(III) Telephone subscriptions among low-income customers in the carrier's service area are greater than or equal to the national subscription rate for low-income customers. For purposes of this subparagraph, a "low-income customer" is one with an income below the poverty level as defined by the Department of Human Services for a family of four residing in the state.

2807. Offering of Toll Limitation.

(a) All ETCs shall offer toll limitation to all qualifying low-income customers at the time such customers subscribe to LITAP service. If the customer elects to receive toll limitation, that service shall become part of the customer's LITAP service.

(b) LITAP support for providing toll limitation shall be provided from the federal lifeline program.

2808. Service Deposit.

Providers shall not collect a service deposit in order to initiate LITAP service, if the qualifying low-income customer voluntarily elects toll limitation from the carrier, where available. If toll limitation is unavailable, the carrier may charge a service deposit.

2809. Federal Reporting Requirements.

Each ETC shall file information with the administrator of the federal Lifeline program demonstrating that the carrier's LITAP plan meets the criteria set forth in 47 C.F.R., Part 54, Subpart E, and stating the number of qualifying low-income customers and the amount of state assistance.

2810. – 2819. [Reserved]

Telecommunications Relay Services for Disabled Telephone Users

Basis, Purpose, and Statutory Authority

The basis and purpose of these rules is to implement Article 17 of Title 40, C.R.S., Telecommunications Relay Services (TRS) for Disabled Users compliant with the federal Americans with Disabilities Act of 1990 and which are consistent with the Commission's quality of service rules; require relay-communicated messages to be delivered promptly, accurately, privately, and confidentially; specify the types of calls that are included as telecommunications relay services; and implement a cost recovery mechanism.

The statutory authority for the promulgation of these rules is found at §§ 40-3.4-106; 40-15-502(3)(a); 40-17-103(2) and (3); and 40-2-108, C.R.S.

2820. Applicability.

Rules 2820 through 2839 are applicable to all providers of basic local exchange telecommunications services, certificated to do business in the state.

2821. Definitions [Reserved].

2822. Incorporation by Reference.

References in rules 2820 through 2839 to Part 64 are references to rules issued by the FCC and have been incorporated by reference, as identified in rule 2008.

2823. Conformity with the Federal Americans with Disabilities Act of 1990.

(a) Adoption of federal regulations. For the purpose of providing telecommunications relay services in Colorado, the Commission adopts the FCC's rules and regulations establishing mandatory minimum operational and technical standards, found at 47 C.F.R. §§ 64.601 and 64.604 (a) and (b). These rules require that telecommunication relay service providers relay communicated messages promptly and accurately, maintain the privacy of persons who receive

Bijou Telephone Co-Op Association, Inc. (SAC ___462181___)
Milestone Certification
47 CFR 54.313(f)(1)(i)
Form 481, Line 3010

Bijou Telephone Co-Op Association, Inc. hereby certifies pursuant to 47 CFR 54.313(f)(1)(i) that it is taking all reasonable steps to provide, upon reasonable request, broadband service at actual speeds of at least 4 mbps downstream and 1 mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service are met within a reasonable time frame.

Bijou Telephone Co-Op Association, Inc. (SAC ___462181___)
Community Anchor
47 CFR 54.313 (f)(1)(ii)
Form 481, Line 3012

The Company did not begin providing broadband service to any community anchor institutions during 2014. The Company had previously provided broadband service meeting the Commission's public interest obligation standards to all community anchor institutions in its study area and, to the company's knowledge, no new community anchor institutions began operating in the Company's study area during 2014.

INDEPENDENT ACCOUNTANT'S COMPILATION REPORT

To the Board of Directors
The Bijou Telephone Co-op Association, Inc.
Byers, Colorado

We have compiled the accompanying balance sheets of The Bijou Telephone Co-op Association, Inc. (a Colorado corporation) as of December 31, 2014 and 2013, and the related statements of income and retained earnings or margins for the years ended December 31, 2014 and 2013, and cash flows for the year ended December 31, 2014, included in the accompanying prescribed form. We have not audited or reviewed the financial statements included in the accompanying prescribed form and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with the form prescribed by the Federal Communications Commission (FCC).

Management is responsible for the preparation and fair presentation of the financial statements included in the form prescribed by the FCC and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

The financial statements included in the accompanying prescribed form are presented in accordance with the requirements of the FCC, and are not intended to be a presentation in accordance with accounting principles generally accepted in the United States of America.

This report is intended solely for the information and use of the FCC, Universal Service Administrative Company and the Colorado Public Utilities Commission and is not intended to be and should not be used by anyone other than these specified parties.

Kiesling Associates LLP

Colorado Springs, CO

June 12, 2015

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Financial Data

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Financial Data

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

Bijou Telephone Co-Op Association, Inc. (SAC 462181)
Financial Data

REDACTED IN ITS ENTIRETY FOR PUBLIC INSPECTION

To the Board of Directors
The Bijou Telephone Co-op Association, Inc. and Subsidiaries
Byers, Colorado

We have audited the consolidated financial statements of The Bijou Telephone Co-op Association, Inc. and subsidiaries, as of and for the year ended December 31, 2014, and have issued our report thereon dated April 13, 2015. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, as well as certain information related to the planned scope and timing of our audit. We have communicated such information to you in our engagement letter dated October 7, 2014. Professional standards also require that we communicate to you the following information related to our audit.

Significant Audit Findings

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies.

The significant accounting policies of the Company are described in footnotes to the consolidated financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year ended December 31, 2014. We noted no transactions entered into by the Company during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the consolidated financial statements in the proper period.

Accounting estimates are an integral part of the consolidated financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the consolidated financial statements and because of the possibility that future events affecting them may differ significantly from those expected.

The only sensitive accounting estimates included in the consolidated financial statements for the year ended December 31, 2014, relate to the estimates for depreciation. As part of our audit, we compared the Company's depreciation rates to average rates used within the telecommunications industry. We have also discussed with management the Company's long-range plant replacement plans and have determined the current depreciation rates to be consistent with those plans.

The disclosures in the financial statements are neutral, consistent and clear.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Management has determined that their effects are immaterial, both individually and in the aggregate, to the consolidated financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, a disagreement with management is a financial accounting, reporting or auditing matter, whether or not resolved to our satisfaction, that could be significant to the consolidated financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated April 13, 2015.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Company's consolidated financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Company's auditor. However, these communications occurred in the normal course of our professional relationship and to our knowledge our responses were not a condition to our retention.

This letter is intended solely for the information and use of the board of directors, management of the Company, the Federal Communications Commission (FCC), Universal Service Administrative Company (USAC), and the relevant state and local regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties.

Kiesling Associates LLP

Colorado Springs, Colorado
April 13, 2015