



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

July 01, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Hopi Telecommunications, Inc.
Study Area Code 450815**

Dear Ms. Dortch:

On behalf of Hopi Telecommunications, Inc. (“Hopi”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Hopi seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

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

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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July 01, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Hopi Telecommunications, Inc.
Study Area Code 450815
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Hopi Telecommunications, Inc. (“Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

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

Please contact the undersigned with any questions regarding this request.

Sincerely,



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

<010> Study Area Code	450815
<015> Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Carroll Onsaе
<035> Contact Telephone Number: Number of the person identified in data line <030>	9285228428 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	consae@hopitelecom.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

(check box when complete)

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" 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"/>
<320> Unfulfilled Service Requests (broadband)	3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	450815az330.pdf <div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 450815az510.pdf (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 450815az610.pdf (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input checked="" type="radio"/> <input type="radio"/> (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)		<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

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

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input 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

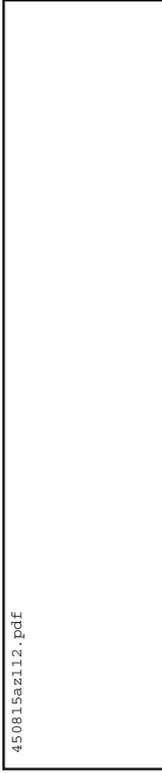
FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code 450815
 <015> Study Area Name HOPI TELECOMMUNICATIONS COMPANY
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Carroll Onsaie
 <035> Contact Telephone Number - Number of person identified in data line <030> 9285228428 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> onsaie@hopitelecom.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 450815
 <015> Study Area Name HOPI TELECOMMUNICATIONS COMPANY
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Carroll Onsaie
 <035> Contact Telephone Number - Number of person identified in data line <030> 9285228428 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> consae@hopitelecom.com

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

<920> Tribal Government Engagement Obligation
 450815az920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each of 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
Yes

- <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	450815
<015>	Study Area Name	HOPi TELECOMMUNICATIONS COMPANY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsay
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.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	450815
<015>	Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaie
<035>	Contact Telephone Number - Number of person identified in data line <030>	928528428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.com



Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

<http://www.hopitelecom.com/services-lifeline.php>

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



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



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



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

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

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

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

<010> Study Area Code 450815

<015> Study Area Name HOPI TELECOMMUNICATIONS COMPANY

<020> Program Year 2016

<030> Contact Name - Person USAC should contact regarding this data CARROLL ONBAE

<035> Contact Telephone Number - Number of person identified in data line <030> 9288228428 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> conbae@hopitelecom.com

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

Incremental Connect America Phase I reporting

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

Name of Attached Document(s) Listing Required Information

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

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

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

- <2016> Certification Support Used to Build Broadband

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

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

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

Name of Attached Document(s) Listing Required Information

- <2021> Interim Progress Community Anchor Institutions

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

<010> Study Area Code 450815
<015> Study Area Name HOPI TELECOMMUNICATIONS COMPANY
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data Carroll Onsaie
<035> Contact Telephone Number - Number of person identified in data line <030> 9285228428 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> conaie@hopi.telecom.com

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

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

(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))
450815az3010.pdf
Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

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
450815az3017.pdf
Name of Attached Document Listing Required Information (Yes/No)

(3018) If the response is no on line 3014, is your company audited?
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

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:
(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,
(3023) Underlying information subjected to a review by an independent certified public accountant
(3024) Underlying information subjected to an officer certification.
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

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

<010>	Study Area Code	450915
<015>	Study Area Name	HOP1 TELECOMMUNICATIONS COMPANY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onise
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	conaae@hopi.telcom.com

Financial Data Summary

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

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	450815
<015>	Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaе
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.com

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	450815
<015>	Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaе
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.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) <u>JSI</u> 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: <u>JSI</u>	
Name of Reporting Carrier: <u>HOPI TELECOMMUNICATIONS COMPANY</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/30/2015</u>
Printed name of Authorized Officer: <u>Carroll Onsaе</u>	
Title or position of Authorized Officer: <u>President & General Manager</u>	
Telephone number of Authorized Officer: <u>9285228428 ext.</u>	
Study Area Code of Reporting Carrier: <u>450815</u>	Filing Due Date for this form: <u>07/01/2015</u>
<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: <u>HOPI TELECOMMUNICATIONS COMPANY</u>	
Name of Authorized Agent or Employee of Agent: <u>JSI</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>06/30/2015</u>
Printed name of Authorized Agent or Employee of Agent: <u>Cassndra Heyne</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>3014597590 ext.</u>	
Study Area Code of Reporting Carrier: <u>450815</u>	Filing Due Date for this form: <u>07/01/2015</u>
<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

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

Hopi Telecommunications, Inc. 450815

Line 330 – Unfulfilled Requests for Broadband

1. CUSTOMER # 1 requested service 1/8/14 south of the Keams Canyon Post Office. The service request is still on hold because the customer was never authorized to move to that location.
2. CUSTOMER # 2 requested service 5/5/14 and did not release the service order authorizing HTI to play a new drop/cable until 6/15/15.
3. CUSTOMER # 3 requested a DS3 service that HTI could not fulfill due to lack of facilities.

Certification for Hopi Telecommunications, Inc.

Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

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

Hopi Telecommunications, Inc. (“HTI” or the “Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. As a company owned by the Hopi Tribe, HTI operates under terms and conditions that afford its customers, most of whom are members of the Tribe, with the consumer protections and service quality standards that will be in their best interest. HTI has developed a Local Exchange Tariff modeled after the tariff of CenturyTel from whom it purchased the three local exchanges for which it was designated an ETC. The rules and

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

² *Id.* at para. 28.

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

⁴ *Id.* at n. 72.

regulations in this tariff are based upon Arizona Corporation Commission (“ACC”) rules. Although HTI is not under the jurisdiction of the ACC, the consumer protection standards in the HTI tariff are the same as those required by the ACC for telecommunications carriers that are under state jurisdiction. These initial provisions may be modified from time to time with the approval of, or at the request of the Hopi Tribal Council. Other obligations include, but are not limited to, truth-in-billing requirements and CPNI, Red Flag Rules and other applicable federal requirements governing the protection of customers’ privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Certification for Hopi Telecommunications, Inc.

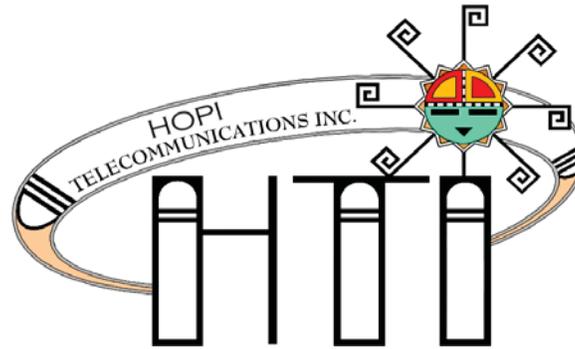
Demonstration of Ability to Function in Emergency Situations

Hopi Telecommunications, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.201(a)(2).¹ The Company’s voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to propane.

¹ Section 54.201(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

Hopi Telecommunications, Inc.
Annual Report
For the year ending 2014



*Owned by the Hopi Tribe,
your Telephone Company*

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Objectives of this report

1. Report to Council on HTI's corporate affairs and business during the previous calendar year.
2. Provide a projection of the business activities HTI expects to undertake in the current calendar year 2015.
3. Report and submit an audited financial statement for fiscal year 2014.

HOPI TELECOMMUNICATIONS, INC.

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AGENDA

- HTI History & Purposes
- 2014 Activities
- 2015 Scheduled Activities
- 2014 Audited Financial Statement
- 2015 Budget

HOPI TELECOMMUNICATIONS, INC.

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HTI History

- Hopi Tribal Council by Resolution H-043-2004 approved the business plan and established HTI
- Hopi Tribal Council reaffirmed the purpose of HTI by Resolution H-004-2010
- HTI Board of Directors consist of the following:
 - Board Chairman – James Underwood
 - Board Vice Chairman – Donald Massey
 - Board Secretary - Wilfred Moore
 - Board Member - Mickey McKandles
 - Board Member – Wilbur Maho
- Hopi Tribal Council provided an equity contribution of _____ to HTI

HOPI TELECOMMUNICATIONS, INC.

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HTI Purposes

- To construct, operate, and maintain telecommunications as a secure and profitable business of the Hopi Tribe.
- To develop, improve, and manage the telecommunications infrastructure on the Hopi Reservation and the lands of the Hopi Tribe.
- To improve, promote, and develop businesses and economic opportunities for the Hopi Tribe and its members on or near the Hopi Reservation and the lands of the Hopi Tribe.
- To provide employment opportunities for the Hopi Tribe and its members on or near the Hopi Reservation and the lands of the Hopi Tribe.
 - HTI has 14 employees and 10 are Hopi Tribal members.

HOPI TELECOMMUNICATIONS, INC. 5

2014 Activities

- Continued to extend DSL, telephone and satellite internet services to new customers.
- Continued to maintain and upgrade the copper/fiber optic cable outside plant network.

HOPI TELECOMMUNICATIONS, INC. 6

2014 Activities (Con't)

- Continued to maintain and upgrade central office operations, broadband loop carrier equipment, electronics, softswitch, radios, mapping, etc.

HOPI TELECOMMUNICATIONS, INC. 7

2014 Activities (Con't)

- Continued to develop HTI Operations:
 - HTI currently has [redacted] Access Lines.
 - HTI currently has [redacted] DSL customers.
 - HTI currently has [redacted] Lifeline customers.
 - HTI currently has [redacted] WildBlue Internet customers.

HOPI TELECOMMUNICATIONS, INC. 8

2014 Activities (Con't)

- Continued to map and digitize HTI's telecommunications infrastructure data.
- Continued efforts to obtain ROW to build fiber optic cable network to the Tribal Headquarters and the Hopi Ranger Station.

HOPI TELECOMMUNICATIONS, INC. 9

2014 Activities (Con't)

- Completed the FCC 's Broad Band Pilot Project, to gather data to evaluate a potential Broadband Lifeline Program.
- Hopi Towers – completed the structural analysis of the Spider Mound and Hotevilla towers.
- Hopi Towers - Entered into Facilities Use Agreements with entities/tenants using the tower facilities.

HOPI TELECOMMUNICATIONS, INC. 10

2015 Scheduled Activities

- Extend DSL, telephone and satellite internet services to new customers.
- Maintain and upgrade the copper/fiber optic cable outside plant network.
- Maintain and upgrade central office operations, broadband loop carrier equipment, electronics, softswitch, radios, mapping, etc.

HOPI TELECOMMUNICATIONS, INC. 11

2015 Scheduled Activities (Con't)

- Continue efforts to extend fiber optic cable to Tribal Headquarters and the Hopi Ranger Station.
- Install Broadband Loop Carrier equipment to service the Ranger Station and surrounding residential areas.
- Successful project completion is contingent upon HTI obtaining ROWs.

HOPI TELECOMMUNICATIONS, INC. 12

2015 Scheduled Activities (Con't)

- Build fiber optic backhaul to the Hotevilla Tower.
- Research and install fixed wireless technology to provide voice and data services to Hotevilla Village and surrounding areas.

HOPI TELECOMMUNICATIONS, INC. 13

2015 Scheduled Activities (Con't)

- Build and test "Fiber to the Premise" service at select locations.
- Ethernet Overlay – to enhance broadband services.
- Building improvements – to the Polacca and Kykotsmovi Central Offices.

HOPI TELECOMMUNICATIONS, INC. 14

2015 Scheduled Activities (Con't)

- Hopi Towers – Maintain and operate tower facilities and maximize tower usage.
- Research, design and implement a wireless telecommunications service.

HOPI TELECOMMUNICATIONS, INC. 15

2015 Scheduled Activities (Con't)

- Continue to complete the American Recovery and Reinvestment Act grant/loan award project, the award in the amount of \$3.6 mil.

HOPI TELECOMMUNICATIONS, INC. 16

ARRA Purposes

- To build out infrastructure and acquire necessary equipment to establish the first fiber-optic telecommunications connection between HTI and the world.
- To provide basic telephone and broadband services to currently unserved population areas in and round the communities of Spider Mound and Jeddito.

HOPI TELECOMMUNICATIONS, INC. 17

ARRA Goals

- Build 61 miles of fiber-optics cable between the community of Jeddito and Holbrook.
- Create reliable and high speed broadband connectivity to all HTI's subscribers.

HOPI TELECOMMUNICATIONS, INC. 18

ARRA Goals (Con't)

- Provide voice and data services to subscribers at Jeddito and Spider Mound utilizing wireless point-to-multipoint WiMAX access equipment.
- Implement an Ethernet Network to provide services to anchor institutions, i.e., tribal government, schools, health care, etc.

HOPI TELECOMMUNICATIONS, INC. 19

ARRA Goals (Con't)

- Effectively replace the current microwave telecommunications transport system as the primary connection to the world.

HOPI TELECOMMUNICATIONS, INC. 20

HTI 2015 Capital Expenditure Budget

- Central Office & Electronic Equipment @ [REDACTED]
- Building Improvements @ [REDACTED]
- Outside Plant Construction @ [REDACTED]
- Other related (environmental assessments, engineering and support costs) @ [REDACTED]
- Vehicles, Work & Office Equipment @ [REDACTED]
- Complete the ARRA project ([REDACTED] total award)

HOPI TELECOMMUNICATIONS, INC. 21

2014 Audited Financial Statements

A consolidated financial audit for FY 2014 is complete, performed by an independent audit firm Bolinger, Segars, Gilbert & Moss, L.L.P., Certified Public Accountants, for Hopi Telecommunications, Incorporated and Subsidiary (Little Star Communications, Inc.) [REDACTED]

HOPI TELECOMMUNICATIONS, INC. 22

Regulatory Authorities

HTI is regulated by:

- [REDACTED]
- Federal Communications Commission (FCC)
- National Exchange Carrier Association (NECA)
- Universal Service Administrative Company (USAC)
- Rural Development Utility Program (RDUP) – (Contractual loan agreement) [REDACTED]

HOPI TELECOMMUNICATIONS, INC.

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Regulatory Mandates

- Under a FCC Order, HTI raised its telephone base rate to \$16.00.

HOPI TELECOMMUNICATIONS, INC.

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HTI Community Involvement

- HTI contributed over \$8,857 to various organizations for the benefit of Hopi Tribal members, Organizations and Entities include:

<p>Shungopavi Youth Program Hopi Guidance Center Hopi Tribal Housing Authority Hopi Code Talkers Recognition Day Committee Dean James Memorial Run Committee Native Americans for Community Action Hopi-Tewa Women's Coalition to End Abuse Flagstaff High School Orchestra Kykotsmovi Village Administration Keams Canyon Elementary School PTO Natwani Coalition Hopi Health Care Center – Employee Association Hopi Rattlers FUSD Indian Education Program</p>	<p>Hopi Head Start Program Hopi Youth Soccer Office of Special Needs Jeddito Senior Center Miss Hopi Committee Shungopavi Village Annual Clan Run Hopi Tribe Economic Development Corporation Hopi Cancer Assistance Fund Hopi Veterans Services Our Nation for Youth – Water is Life Mesa 2 Mesa Run Hopi Head Start Program Hopi Breast & Cervical Cancer Early Detection Program Hopi Resource Enforcement Services</p>
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HOPI TELECOMMUNICATIONS, INC.

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THANK YOU

For more information on HTI's service offerings you may call

Keams Canyon Office: (928) 738-HOPI (4674)
 Flagstaff Office: (928) 522-8428

HOPI TELECOMMUNICATIONS, INC.

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Hopi Telecommunications, Inc. (450815)

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

Hopi Telecommunications, Inc. hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service 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 as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Hopi Telecommunications, Inc. (450815)

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

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Hopi Telecommunications, Inc. did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY