



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

June 26, 2015

Via Hand Delivery

Received / Filed

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

JUN 26 2015

Federal Communications Commission
Office of the Secretary

Re: **WC Docket No. 14-58**
2015 ETC Annual Report of PBT Telecom, Inc.
Study Area Code 240539

Dear Ms. Dortch:

On behalf of PBT Telecom, Inc. ("PBT"), 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 PBT 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)

No. of Copies rec'd 0+3
List ABCDE

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).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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: jsit@jsitel.com

June 26, 2015

Accepted / Filed

JUN 26 2015

Federal Communications Commission
Office of the Secretary

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 PBT Telecom, Inc.
Study Area Code 240539
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client PBT Telecom, 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).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

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.
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

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).

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 240539
 <015> Study Area Name PET TELECOM, INC.
 <020> Program Year 2016
 <030> Contact Name: Person USAC should contact with questions about this data Ben Spearman
 <035> Contact Telephone Number: Number of the person identified in data line <030> 8038943121 ext.
 <039> Contact Email Address: Email of the person identified in data line <030> ben.spearman@comporium.com

Accepted / Filed

JUN 20 2015

Federal Communications Commission
 Office of the Secretary

ANNUAL REPORTING FOR ALL CARRIERS

		54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	[Redacted] (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	[Redacted] (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> [Redacted] (attach 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> [Redacted] (attach descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> [Redacted] (attach descriptive document)		<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" 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)
 <2005> (complete attached worksheet)

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

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

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

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

<010> Study Area Code 240539
 <015> Study Area Name PBT TELECOM, INC.
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Ben Spearman
 <035> Contact Telephone Number - Number of person identified in data line <030> 8038943121 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> ben.spearman@comporium.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
 <111> 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.

240539ec112.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
 <114> Report how much universal service (USF) support was received
 <115> How much (USF) was used to improve service quality and how support was used to improve service quality
 <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
 <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
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	240539
<015>	Study Area Name	PBT TELECOM, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035>	Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.com

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1100) No Terrestrial Backhaul Reporting Data Collection Form FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	240539
<015> Study Area Name	PBT TELECOM, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035> Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.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 483 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	240539
<015>	Study Area Name	PBT TELECOM, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035>	Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.comporium.com/29707/residential-home-phone-local-telephone-lifeline-link-up-programs/>

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

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 483 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	
<015> Study Area Name	240539
<020> Program Year	PBT TELECOM, INC.
<030> Contact Name - Person USAC should contact regarding this data	2016
<035> Contact Telephone Number - Number of person identified in data line <030>	Ben Spearman
<039> Contact Email Address - Email Address of person identified in data line <030>	8058343121 ext.
	ben.spearman@comprium.com

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

Incremental Connect America Phase I reporting

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

Name of Attached Document(s) Listing Required Information

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

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

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

- <2016> Certification Support Used to Build Broadband

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

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation (Continued)
Data Collection Form

FCC Form 483
OMB Control No. 3160-0060/OMB Control No. 5060-0610
May 2013

<010> Study Area Code	240539
<015> Study Area Name	PBT TELECOM, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035> Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.com

Financial Data Summary

(3027) Revenue

[Redacted]

(3028) Operating Expenses

[Redacted]

(3029) Net Income

[Redacted]

(3030) Telephone Plant In Service(TPIS)

[Redacted]

(3031) Total Assets

[Redacted]

(3032) Total Debt

[Redacted]

(3033) Total Equity

[Redacted]

(3034) Dividends

[Redacted]

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0586/OMB Control No. 3080-0519 July 2015
---	--

<010>	Study Area Code	240539
<015>	Study Area Name	PBT TELECOM, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035>	Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.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. 3060-0082/OMB Control No. 3060-0619 May 2013
<010> Study Area Code	240539	
<015> Study Area Name	PBT TELECOM, INC.	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Ben Spearman	
<035> Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.com	

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Ben Spearman</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.	
Name of Authorized Agent:	Ben Spearman
Name of Reporting Carrier:	PBT TELECOM, INC.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2015
Printed name of Authorized Officer:	Glenn Martin
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	8032105528 ext.
Study Area Code of Reporting Carrier:	240539 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	PBT TELECOM, INC.
Name of Authorized Agent or Employee of Agent:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2015
Printed name of Authorized Agent or Employee of Agent:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	240539 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.	

REDACTED FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

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

ATTACHMENT REDACTED IN ENTIRETY

PBT Telecom, Inc.'s Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules for Voice and Broadband

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

PBT Telecom, Inc. (“PBT”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. PBT is subject to consumer protection obligations under South Carolina state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Public Service Commission of South Carolina which discloses rates, and terms and conditions of service to customers (Article 6, Subarticle 2, Section 103-612, Paragraph 2.1 of the South Carolina Code of Regulations); (2) adherence to state consumer protection requirements governing telephone providers which require Service Standards (Article 6, Subarticle 6, Section 103-663 of the South Carolina Code of Regulations; Customer Billing (Article 6, Subarticle 3, Section 103-622 of the

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.

South Carolina Code of Regulations; and Customer Complaints (Article 6, Subarticle 3, Section 103-628 of the South Carolina Code of Regulations); (3) truth-in-billing requirements (Article 6, Subarticle 3, Section 103-622.1 of the South Carolina Code of Regulations); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

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. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**PBT Telecom Inc.'s Demonstration of Ability to Function in Emergency Situations for
Voice and Broadband**

PBT Telecom, Inc. ("PBT") hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and Article 6, Subarticle 4, Section 103-646 of the South Carolina Code of Regulations. PBT's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Article 6, Subarticle 4, Section 103-646 of the South Carolina Code of Regulations. PBT can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow PBT 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. PBT 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. Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

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

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

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

<010> Study Area Code	240539
<015> Study Area Name	PBT TELCOM, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035> Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)	
SC	Wagener	58.95	0.0	58.95	5.0	0.512	999999.0	Other, No usage allowance	
SC	Wagener	48.45	0.0	48.45	7.0	0.512	999999.0	Other, No usage allowance	
SC	Wagener	58.95	0.0	58.95	9.0	0.768	999999.0	Other, No Usage allowance	
SC	Wagener	74.95	0.0	74.95	11.0	1.0	999999.0	Other, No usage allowance	
SC	Wagener	36.95	0.0	36.95	5.0	3.0	999999.0	Other, No usage allowance	
SC	Wagener	46.95	0.0	46.95	10.0	3.0	999999.0	Other, No usage allowance	
SC	Wagener	49.95	0.0	49.95	30.0	15.0	999999.0	Other, No usage allowance	
SC	Wagener	59.95	0.0	59.95	60.0	20.0	999999.0	Other, No usage allowance	
SC	Wagener	74.95	0.0	74.95	100.0	30.0	999999.0	Other, No usage allowance	
SC	Swansea	58.95	0.0	58.95	5.0	0.512	999999.0	Other, No usage allowance	
SC	Swansea	48.45	0.0	48.45	7.0	0.512	999999.0	Other, No usage allowance	
SC	Swansea	58.95	0.0	58.95	9.0	0.768	999999.0	Other, No Usage allowance	
SC	Swansea	74.95	0.0	74.95	11.0	1.0	999999.0	Other, No usage allowance	
SC	Swansea	36.95	0.0	36.95	5.0	3.0	999999.0	Other, No usage allowance	
SC	Swansea	46.95	0.0	46.95	10.0	3.0	999999.0	Other, No usage allowance	
SC	Swansea	49.95	0.0	49.95	30.0	15.0	999999.0	Other, No usage allowance	
SC	Swansea	59.95	0.0	59.95	60.0	20.0	999999.0	Other, No usage allowance	
SC	Swansea	74.95	0.0	74.95	100.0	30.0	999999.0	Other, No usage allowance	
SC	Pond Branch	58.95	0.0	58.95	5.0	0.512	999999.0	Other, No usage allowance	
SC	Pond Branch	48.45	0.0	48.45	7.0	0.512	999999.0	Other, No usage allowance	
SC	Pond Branch	58.95	0.0	58.95	9.0	0.768	999999.0	Other, No Usage allowance	

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

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

<010> Study Area Code	240539
<015> Study Area Name	PBT TELECOM, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Ben Spearman
<035> Contact Telephone Number - Number of person identified in data line <030>	8038943121 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ben.spearman@comporium.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service Download Speed (Mbps)	Broadband Service Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)	
SC	Pond Branch	74.95	0.0	74.95	11.0	1.0	999999.0	Other, No usage allowance	
SC	Pond Branch	36.95	0.0	36.95	5.0	3.0	999999.0	Other, No usage allowance	
SC	Pond Branch	46.95	0.0	46.95	10.0	3.0	999999.0	Other, No usage allowance	
SC	Pond Branch	49.95	0.0	49.95	30.0	15.0	999999.0	Other, No usage allowance	
SC	Pond Branch	59.95	0.0	59.95	60.0	20.0	999999.0	Other, No usage allowance	
SC	Pond Branch	74.95	0.0	74.95	100.0	30.0	999999.0	Other, No usage allowance	
SC	Gilbert	58.95	0.0	58.95	5.0	0.512	999999.0	Other, No usage allowance	
SC	Gilbert	48.45	0.0	48.45	7.0	0.512	999999.0	Other, No usage allowance	
SC	Gilbert	58.95	0.0	58.95	9.0	0.768	999999.0	Other, No Usage allowance	
SC	Gilbert	74.95	0.0	74.95	11.0	1.0	999999.0	Other, No usage allowance	
SC	Gilbert	36.95	0.0	36.95	5.0	3.0	999999.0	Other, No usage allowance	
SC	Gilbert	46.95	0.0	46.95	10.0	3.0	999999.0	Other, No usage allowance	
SC	Gilbert	49.95	0.0	49.95	30.0	15.0	999999.0	Other, No usage allowance	
SC	Gilbert	59.95	0.0	59.95	60.0	20.0	999999.0	Other, No usage allowance	
SC	Gilbert	74.95	0.0	74.95	100.0	30.0	999999.0	Other, No usage allowance	
SC	Pelion	58.95	0.0	58.95	5.0	0.512	999999.0	Other, No usage allowance	
SC	Pelion	48.45	0.0	48.45	7.0	0.512	999999.0	Other, No usage allowance	
SC	Pelion	58.95	0.0	58.95	9.0	0.768	999999.0	Other, No Usage allowance	
SC	Pelion	74.95	0.0	74.95	11.0	1.0	999999.0	Other, No usage allowance	
SC	Pelion	36.95	0.0	36.95	5.0	3.0	999999.0	Other, No usage allowance	
SC	Pelion	46.95	0.0	46.95	10.0	3.0	999999.0	Other, No usage allowance	

PBT Telecom, Inc. (SAC 240539)

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

PBT Telecom, Inc. hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, 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.

PBT Telecom, Inc. (240539)

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. PBT Telecom, Inc. hereby provides the FCC with a list of community anchor institutions to which it newly began providing broadband service since July, 2014.¹

Name	Address
Ridge Spring Monetta Middle School	10 J P Kneece Dr, Monetta, SC 29105
Deerfield Elementary School	638 Longs Pond Rd, Lexington, SC 29073

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



Your business
is our business.

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

June 22, 2015

VIA ECFS

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

Attention: Wireline Competition Bureau

**Re: Petition for Limited Waiver of § 54.313(f)(2)(ii)
Comporium Companies
ETC Annual Reports and Certifications, WC Docket No. 14-58**

Dear Ms. Dortch:

On behalf of Comporium, Inc. fka Rock Hill Telephone Company, Lancaster Telephone Company, Fort Mill Telephone Company, Citizens Telephone Company and PBT Telecom, Inc. (collectively, the "Comporium Companies"), JSI respectfully submits the above-referenced Petition for Limited Waiver. The Comporium Companies seek a limited waiver of Federal Communications Commission rules Section 54.313(f)(2)(ii) which requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service to file a copy of their audited financial statement with their ETC Annual Report.

Please direct inquiries regarding this Petition for Limited Waiver to the undersigned consultant for the Comporium Companies.

Sincerely,

John Kuykendall
Vice President

Enclosure

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
ETC Annual Reports and) WC Docket No. 14-58
Certifications)

**PETITION OF THE COMPORIUM COMPANIES FOR LIMITED WAIVER OF
SECTION 54.313(f)(2)(ii)**

Comporium, Inc. fka Rock Hill Telephone Company, Lancaster Telephone Company, Fort Mill Telephone Company, Citizens Telephone Company and PBT Telecom, Inc. (collectively the “Comporium Companies” or the “Companies”) pursuant to Section 1.3 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules¹ request a limited waiver of the requirement specified in Section 54.313(f)(2)(ii).² This rule requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service (“RUS”) whose financial statements are audited in the ordinary course of business to file a copy of their audited financial statement with their ETC Annual Report (otherwise known as the “Form 481”).³

As demonstrated herein, “good cause” exists to allow the Comporium Companies a two-month limited waiver to submit the finalized version of their annual consolidated financial audit report after the July 1, 2015 deadline to submit their Form 481. Due to delays caused by obtaining necessary financial information from an entity in which one of the Comporium

¹ 47 C.F.R. §1.3

² 47 C.F.R. § 54.313 (f)(2)(ii).

³ *Id.* Alternatively, the carrier may file “a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, accompanied by a copy of a management letter issued by the independent certified public accountant that performed the company’s financial audit.” *Id.*

Companies has a joint investment, the final audited version of the Companies' consolidated audit report will not be available by the July 1 deadline. However, the Comporium Companies will be submitting a draft version of the report in their Form 481s and will populate the Lines 3027 – 3034 with the required financial data. Accordingly, the public interest would be served by allowing the Companies additional time to supplement their Form 481s with the finalized version of the consolidated audit report.

I. Background

The Comporium Companies are privately held rate-of-return carriers that are not recipients of loans from RUS and have financial statements that are audited in the ordinary course of business. Each year, the Companies' external auditors, KPMG, LLP ("KPMG"), prepare a consolidated audit report for the Comporium Companies. In its *Fifth Order on Reconsideration*, the FCC clarified that companies that have study areas that are under common ownership or control and prepare a consolidated audit report "may file financial reports on a consolidated basis" in their FCC Form 481s.⁴ Accordingly, in compliance with Section 54.313(f)(2)(ii), each year in their Form 481 filings, each of the Comporium Companies submit the consolidated audit report prepared by KPMG.

II. Grant of this Waiver is Warranted

Generally, the Commission's rules may be waived for good cause shown.⁵ Furthermore, the Commission may exercise its discretion to waive a rule where the particular facts make strict

⁴ *Connect America Fund et al*, WC Docket No. 10-90 *et al.*, Fifth Order on Reconsideration, 27 FCC 14549, 14554, para. 14 (2012) ("*Fifth Order on Reconsideration*").

⁵ 47 C.F.R. § 1.3.

compliance inconsistent with the public interest.⁶ As demonstrated herein, grant of this petition is warranted.

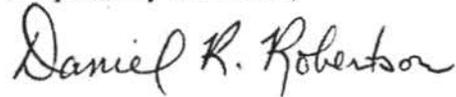
The Comporium Companies and KPMG have been working diligently in preparing the consolidated audit report for 2014. However, the finalized version of the report will not be completed until after the July 1, 2015 deadline due to delays in obtaining audited financial statements from Tide Mobility, LLC (“Tide”). Tide Mobility is a joint investment of Comporium, Horry Telephone Cooperative, and AT&T Mobility. Comporium contributed its wireless assets in exchange for an interest in Tide Mobility. Tide Mobility is audited by another audit firm. Accordingly, KPMG must rely on the other audit firm to provide the necessary financial information pertaining to Tide in order to complete the audit for the Comporium Companies. The other audit firm, however, did not provide the required financial information to KPMG in sufficient time for KPMG to finalize the audit by the July 1 deadline. Attached hereto is a letter from KPMG agreeing with the stated reasons as to why KPMG has been unable to complete its audit by the filing deadline.

Although the finalized version of the consolidated audit report will not be completed until after July 1, the Companies have been provided with a draft version of the report. Accordingly, the Companies will submit this draft version in their FCC Form 481 filing. Further, because the financial data in the draft version has been finalized, the Companies will populate that data in Lines 3027 – 3034 of their respective Form 481s. Accordingly, waiver of Section 54.313(f)(2)(ii) is sought only to be able to supplement the Form 481s within two months after the filing deadline so that the finalized version of the consolidated audit report can replace the draft versions. Such a limited waiver would further the public interest as strict compliance with

⁶ Northeast Cellular Telephone co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

this rule could result in each of the Companies having their high cost universal service support reduced on a pro-rata daily basis equivalent to the period of non-compliance,⁷ an extremely harsh penalty for these rural rate-of-return carriers.

Respectfully submitted,



The Comporium Companies

By: /s/ Daniel R. Robertson

Daniel R. Robertson
Executive Vice President – Chief Financial Officer
and Treasurer
The Comporium Companies
330 East Black Street
Rock Hill, South Carolina 29730

June 17, 2015

⁷ See 47 C.F.R. § 54.313(j).



REDACTED FOR PUBLIC INSPECTION

KPMG LLP

Duke Energy Center
Suite 3200
550 South Tryon Street
Charlotte, NC 28202-4214

Telephone +1 704 335 5300
Fax +1 704 335 5377
Internet www.us.kpmg.com

June 22, 2015

Comporium, Inc.
Attn: Mr. Dan Robertson
330 E Black Street
Rock Hill, SC 29731

Mr. Robertson:

Pursuant to Section 1.3 of the Federal Communications Companies Rules, we inform you that we have been furnished a copy of a petition of the Comporium, Inc. for Limited Waiver of Section 54.313(f)(2)(ii) to be filed by Comporium, Inc. (the Company) on or about June 22, 2015, which contains notification of the Company's inability to file its audited financial statements prepared in accordance with the requirement specified in Section 54.313(f)(2)(ii). This rule requires privately held rate-of-return carriers that are not recipients of loans from RUS whose financial statements are audited in the ordinary course of business to file a copy of their audited financial statement with their ETC Annual Report (otherwise known as the "Form 481") prescribed or permitted by the June 30, 2015. We have read the Company's statements contained therein and we agree with the stated reasons as to why we have been unable to complete our audit and report on the Company's financial statements for the year ended December 31, 2014 by that date.

Very truly yours,

KPMG LLP

Susanne P. Dixon
Partner

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026
ATTACHMENT REDACTED IN ENTIRETY