



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 18, 2015

Accepted / Filed

Via Hand Delivery

JUN 19 2015

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

Federal Communications Commission
Office of the Secretary

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Community Telephone Company
Study Area Code 442061**

Dear Ms. Dortch:

On behalf of Community Telephone Company ("Community"), 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 Community 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. 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

DOCKET FILE COPY ORIGINAL

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 12-1857 rel. Nov. 16, 2012 (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



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445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Community Telephone Company
Study Area Code 442061
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Community Telephone Company (the “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. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 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 See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

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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 Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains 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 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

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).

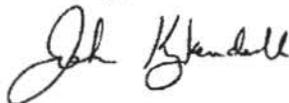
been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or 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

Accepted / Filed

JUN 19 2015

Federal Communications Commission
Office of the Secretary

<010> Study Area Code 442061

<015> Study Area Name COMMUNITY TEL CO

<020> Program Year 2016

<030> Contact Name: Person USAC should contact with questions about this data Cliff Humpert

<035> Contact Telephone Number: Number of the person identified in data line <030> 9404236201 ext.

<039> Contact Email Address: Email of the person identified in data line <030> cliffhumpert@comcell.net



(check box when complete)

<100> Service Quality Improvement Reporting (complete attached worksheet)

<200> Outage Reporting (voice) (complete attached worksheet)

<210> ← check box if no outages to report

<300> Unfulfilled Service Requests (voice) 0

<310> Detail on Attempts (voice) (attach descriptive document)

<320> Unfulfilled Service Requests (broadband) 0

<330> Detail on Attempts (broadband) (attach descriptive document)

<400> Number of Complaints per 1,000 customers (voice)

<410> Fixed 0.0

<420> Mobile 0.0

<430> Number of Complaints per 1,000 customers (broadband)

<440> Fixed 0.0

<450> Mobile 0.0

<500> Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)

<510> 442061tx510.pdf (attached descriptive document)

<600> Functionality in Emergency Situations (check to indicate certification)

<610> 442061tx610.pdf (attached descriptive document)

<700> Company Price Offerings (voice) (complete attached worksheet)

<710> Company Price Offerings (broadband) (complete attached worksheet)

<800> Operating Companies and Affiliates (complete attached worksheet)

<900> Tribal Land Offerings (Y/N)? (if yes, complete attached worksheet)

<1000> Voice Services Rate Comparability Certification Yes

<1010> (attach descriptive document)

<1100> Certify whether terrestrial backhaul options exist (Yes or No) (if not, check to indicate certification)

<1110> (complete attached worksheet)

<1200> Terms and Condition for Lifeline Customers (complete attached worksheet)

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

<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	442061
<015> Study Area Name	COMMUNITY TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035> Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@concell.net

<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

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

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

442061tx112.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

<010> Study Area Code	442061
<015> Study Area Name	COMMUNITY TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035> Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@comcell.net

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

- <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**

<010> Study Area Code	442061
<015> Study Area Name	COMMUNITY TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035> Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@comcell.net

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

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

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

<010> Study Area Code	442061
<015> Study Area Name	COMMUNITY TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035> Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@comcell.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP

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

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

(2006) Price Cap Carrier Additional Information
Data Collection Form
 Including Auto-Set-Up Carrier Information Form

<010>	Study Area Code	
<015>	Study Area Name	442061
<020>	Program Year	COMMUNITY TEL CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	CLIFF HUMPERT
<039>	Contact Email Address - Email Address of person identified in data line <030>	9404236201 ext. cliffhumpert@comcast.net

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

Incremental Connect America Phase I reporting

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

Name of Attached Document(s) Listing Required Information

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

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

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

- <2016> Certification Support Used to Build Broadband

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

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

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

DEDICATED FOR PUBLIC INSPECTION

(Identify each of the carrier's facilities that are subject to public inspection.)
Enter the following information:

<010> Study Area Code 442051
 <015> Study Area Name COMMUNITY TEL CO
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Cliff Humbert
 <035> Contact Telephone Number - Number of person identified in data line <030> 5404236201 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> cliffhumbert@comcast.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(f)) 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 3 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))
 Name of Attached Document Listing Required Information
 442061tx3010.pdf

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))
 Name of Attached Document Listing Required Information
 442061tx3012.pdf

(3013) Is your company a Privately Held NOR 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
 Name of Attached Document Listing Required Information
 442061tx3017.pdf

(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

(3019) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
 Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

(3020) If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:
 Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3021) Underlying information subjected to a review by an independent certified public accountant
 Underlying information subjected to an officer certification.

(3022) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
 Attach the worksheet listing required information

(3023) Name of Attached Document Listing Required Information
 442061tx3010.pdf

(3026) Attach the worksheet listing required information
 Name of Attached Document Listing Required Information
 442061tx3010.pdf

REDACTED FOR PUBLIC INSPECTION



<010> Study Area Code	442061
<015> Study Area Name	COMMUNITY TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035> Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@comcell.net

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]



<010>	Study Area Code	442061
<015>	Study Area Name	COMMUNITY TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035>	Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@comcell.net

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
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.	



<010> Study Area Code	442061
<015> Study Area Name	COMMUNITY TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cliff Humpert
<035> Contact Telephone Number - Number of person identified in data line <030>	9404236201 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cliffhumpert@comcell.net

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Lisa McLaughlin</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:	<u>Lisa McLaughlin</u>
Name of Reporting Carrier:	<u>COMMUNITY TEL CO</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/18/2015</u>
Printed name of Authorized Officer:	<u>Clifford Humpert</u>
Title or position of Authorized Officer:	<u>General Manager</u>
Telephone number of Authorized Officer:	<u>9404236201 ext.</u>
Study Area Code of Reporting Carrier:	<u>442061</u> Filing Due Date for this form: <u>07/01/2015</u>
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:	<u>COMMUNITY TEL CO</u>
Name of Authorized Agent or Employee of Agent:	<u>Lisa McLaughlin</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/18/2015</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Lisa McLaughlin</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Consultant</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5123380473 ext.</u>
Study Area Code of Reporting Carrier:	<u>442061</u> Filing Due Date for this form: <u>07/01/2015</u>
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

Community Telephone Company

Study Area Code: 442061

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – 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

Community Telephone Company (“Company”) hereby certifies that its voice service complies with applicable service quality standards and consumer protection rules under the Texas Administrative Code, Title 16, Part II, as established by the Public Utility Commission of Texas. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff which discloses rates, terms and conditions of service to customers pursuant to Subchapter J requirements in Sections 26.201-26.230; (2) adherence to state consumer protection requirements

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.

governing telephone providers as identified in Subchapter B, in Sections 26.21-26.37; and (3) service quality standards requirements as identified in Subchapter C, Sections 26.51 -26.57. In addition, the Company complies with numerous federal consumer protection standards including, but not limited to: (1) Truth-in-Billing Rules outlined in 47 CFR § 64.2401; and (2) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Texas Administrative Code by the Public Utility Commission of Texas, the Company discloses rates, terms and conditions on its public web site and the Company complies with applicable federal and state customer protection standards generally applicable to all businesses operating in Texas. In addition, the Company adheres 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.

Community Telephone Company

Study Area Code: 442061

**Response to Line 610 - Ability to Function in Emergency Situations
for Voice and Broadband**

Community Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Texas Administrative Code. The Company'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). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Public Utility Commission of Texas Substantive Rules §26.51 *Reliability of Operations of Telecommunications Providers* and §26.52 *Emergency Operations* which include obligations for continuity of service and emergency operations planning and service provision capability for dominant carriers. Any central office not equipped with permanently installed standby generators contains as a minimum four hours of battery reserve without voltage falling below the level required for proper operation of all equipment. In addition, all central offices without installed

¹Section 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."

emergency power facilities have a mobile power unit available which can be delivered and connected on short notice.

The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.

Community Telephone Company, Inc.

Study Area Code: 442061

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Community Telephone Company's tariff(s) on file with the Public Utility Commission of Texas. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:⁽¹⁾⁽²⁾

Exchange Name	R-1 Rate	Res. EAS Charge
Blue Grove	\$ 11.70	\$ 3.50
Joy	\$ 10.69	\$ 5.00
Lake Arrowhead	\$ 14.31	\$.89
Lake Kickapoo	\$ 11.70	\$ 3.50
Scotland	\$ 11.70	\$ 3.50
Windthorst	\$ 11.70	\$ 3.50

⁽¹⁾ Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Texas Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

⁽²⁾ Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

COMMUNITY TELEPHONE COMPANY, INC.
WINDTHORST, TEXAS

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**CUSTOMER SERVICES TARIFF
LOCAL EXCHANGE SERVICE**

IV. LIFELINE SERVICE (Continued)

B. Eligibility Requirements

1. The discounted service will be provided for one (1) residential telephone line per household, at the subscriber's principal place of residence.
2. The applicant must certify that their annual household income is at or below 150% of the annual federal poverty guidelines, be an eligible resident of Tribal lands, or participate in, or have a person or child who resides in the customer household who participates in, a program identified in Chapter 47 of the Code of Federal Regulations § 54.409 and in P.U.C. Substantive Rule 26.412 regarding consumer qualification for Lifeline.
3. Procedures for Establishing Lifeline Discounts
 - (a) Consumers within the Company's service area identified as eligible for Lifeline Service by the Low-Income Discount Administrator (LIDA) through the automatic enrollment process under Commission Substantive Rule 26.412, shall be provided Lifeline Service discounts unless the Company receives a customer request to be excluded from such discounts. Consumers who are eligible for Lifeline Service but do not have telephone service at the time the LIDA provides its eligibility list to the Company are responsible for contacting the Company and initiating a request for Link-Up Service from the Company.

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Box 130, Windthorst TX 76389

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COMMUNITY TELEPHONE COMPANY, INC.
WINDTHORST, TEXAS

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CUSTOMER SERVICES TARIFF
LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE (Continued)

B. Eligibility Requirements (Continued)

3. Procedures for Establishing Lifeline Discounts (Continued)

- (b) The LIDA shall provide the Company with a monthly list of consumers eligible for Lifeline Service.
- (c) Consumers who do not participate in one of the designated programs but who meet income qualifications by having an income at or below 150% of the federal poverty guidelines, may establish eligibility for Lifeline Service by contacting LIDA.

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WINDTHORST, TEXAS

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4th Revised Page 12
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CUSTOMER SERVICES TARIFF
LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE (Continued)

B. Eligibility Requirements (Continued)

4. Provision of Service

- (a) The Company shall provide Lifeline Service to all eligible consumers identified by the LIDA within its service area who subscribe to Company service. Within 30 days after receipt of the list, the Company shall begin reduced billing for those eligible low-income consumers subscribing to qualifying services.
- (b) If the eligible consumer changes the telephone service to qualifying services or initiates new qualifying service, the Company shall begin reduced billing at the time the change of service becomes effective or at the time the new service is established.
- (c) The Company will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.
- (d) The Company has provided a confidentiality agreement to the LIDA specifying the use of confidential client information is solely for providing Lifeline Service.

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COMMUNITY TELEPHONE COMPANY, INC.
WINDTHORST, TEXAS

SECTION 4
Original Page 12.1

**CUSTOMER SERVICES TARIFF
LOCAL EXCHANGE SERVICE**

IV. LIFELINE SERVICE (Continued)

C. Deposits

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1. Deposit requirements will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Restriction Service.

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CUSTOMER SERVICES TARIFF
LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE (Continued)

D. Lifeline Service Discounts

1. Eligible consumers who subscribe to Lifeline Service will receive the following discounts effective:

(a) Federal Reduction. The Company shall give qualifying low-income consumers support of \$9.25 per month or equal to the support amount as directed by the Federal Communications Commission in Chapter 47 of the Code of Federal Regulations § 54.403 regarding Lifeline support.

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(b) State Reduction. The Company shall give qualifying low-income consumers an additional state-approved reduction of up to \$3.50 in the monthly amount of intrastate charges due in addition to the Area Discount described below.

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(c) Area Discount. The Company shall give qualifying low-income consumers an area discount composed of up to 25% of any actual rate increase by the Company implemented after January 1, 2014. The discount shall be consistent with P.U.C. SUBST. R. 26.412 and the Small and Rural Incumbent Local Exchange Carrier Universal Service Plan (SRILEC USP). The area discount will apply to Lifeline providers operating within the Company's service area. The Lifeline Area Discount in the Windthorst and Bluegrove Exchanges is \$0.25 and the Lifeline Area Discount in the Lake Arrowhead Exchange is \$0.43.

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(d) Combined Lifeline Discounts. The Company shall apply the above discounts, however, the combined discounts shall not result in a rate of less than zero charged for the customer's basic local service.

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COMMUNITY TELEPHONE COMPANY, INC.
WINDTHORST, TEXAS

SECTION 4
1st Revised Page 14
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CUSTOMER SERVICES TARIFF
LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE (Continued)

E. Service Charges

1. Service charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
2. Service charges apply when:
 - (a) At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.
 - (b) A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangements, which preclude Lifeline Service eligibility.
 - (c) New residential applicants (those without existing local exchange access service) eligible for the Lifeline Program will be subject to applicable service charges, except those new customers who qualify for the Tribal Link Up program as specified in Section 5 of this tariff.
3. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges, except for cases where the charges would be reduced under the provisions of Tribal Link Up.

F. Payments and Disconnection of Service

1. The Company may not disconnect Lifeline Service for nonpayment of toll charges.
2. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Company's customers.

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APR 2 '12 CONTROL# TC. NO. 40225

TARIFF CLERK

Community Telephone Company

Study Area Code: 442061

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

Community Telephone Company 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, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

Community Telephone Company (SAC 42061)

**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. Community Telephone Company provided a list of community anchor institutions to which it provides service in its July, 2014 report and since that time, no new anchor institutions have been served.

Name	Address

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017
ATTACHMENT REDACTED IN ENTIRETY