



Wireless • Local Service • Long Distance • Internet • Cable TV • Directories

Main Office • PO Box 160 • 850 North Highway 414 • Mountain View, WY 82939 • 1-888-926-CARE (2273) • (307)-782-6131

Retail Locations: Casper, Cheyenne, Gillette, Jackson, Laramie, Riverton, Rock Springs & Saratoga, Wyoming • Craig & Steamboat Springs, Colorado

July 9, 2015

Via Electronic Filing

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

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

Dear Ms. Dortch,

Union Telephone Company, Inc. SAC 519905, a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC form 481 to the Commission with redacted financial data, in compliance with 47 C.F.R § 54.313 and 54.422.

As specified in the Protective Order issued on June 17, 2015 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked “REDACTED for PUBLIC INSPECTION”.

Sincerely,



Eric Woody  
Chief Technical Operations Officer  
Union Telephone Company  
Phone: (307) 782-6131  
Fax: (307) 782-6913

Cc: Chris Reno, Director of Accounting, Union Telephone Company

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

<010> Study Area Code	519905
<015> Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Chris Reno
<035> Contact Telephone Number: Number of the person identified in data line <030>	3077826131 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	creno@unionwireless.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54,313 Completion Required</b>	<b>54,422 Completion Required</b>
--	---	---

			(check box when complete)	
<b>&lt;100&gt;</b>	Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;200&gt;</b>	Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;210&gt;</b>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;300&gt;</b>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;310&gt;</b>	Detail on Attempts (voice)	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;320&gt;</b>	Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;330&gt;</b>	Detail on Attempts (broadband)	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;400&gt;</b>	Number of Complaints per 1,000 customers (voice)			
<b>&lt;410&gt;</b>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;420&gt;</b>	Mobile	11.0	<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;430&gt;</b>	Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;440&gt;</b>	Fixed		<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;450&gt;</b>	Mobile		<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;500&gt;</b>	Service Quality Standards & Consumer Protection Rules Compliance		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;510&gt;</b>	<i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;600&gt;</b>	Functionality in Emergency Situations		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;610&gt;</b>	<i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;700&gt;</b>	Company Price Offerings (voice)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;710&gt;</b>	Company Price Offerings (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;800&gt;</b>	Operating Companies and Affiliates		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>&lt;900&gt;</b>	Tribal Land Offerings (Y/N)?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;1000&gt;</b>	Voice Services Rate Comparability Certification		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;1010&gt;</b>	<i>(attach descriptive document)</i>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;1100&gt;</b>	Certify whether terrestrial backhaul options exist (Yes or No)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>&lt;1110&gt;</b>	<i>(complete attached worksheet)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;1200&gt;</b>	Terms and Condition for Lifeline Customers		<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

<b>&lt;2000&gt;</b>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;2005&gt;</b>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<b>&lt;3000&gt;</b>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<b>&lt;3005&gt;</b>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	519905
<015>	Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Chris Reno
<035>	Contact Telephone Number - Number of person identified in data line <030>	3077826131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	creno@unionwireless.com

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

519905WY112NarrativeandUMTS.pdf, 519905WY112GSMcoverage.pdf, 519905WY112LTEcoverage.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	Yes
<114> Report how much universal service (USF) support was received	Yes
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	Yes









Redacted for Public Inspection

<b>(900) Tribal Lands Reporting Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	519905
<015>	Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Chris Reno
<035>	Contact Telephone Number - Number of person identified in data line <030>	3077826131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	crenc@unicwireless.com

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

Wind River Reservation

<920> Tribal Government Engagement Obligation

519905WY920.pdf

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
Yes
Yes

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

<010> Study Area Code	519905
<015> Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Chris Reno
<035> Contact Telephone Number - Number of person identified in data line <030>	3077826131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	crenc@unionwireless.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).

<b>(1200) Terms and Condition for Lifeline Customers</b>	FCC Form 481
<b>Lifeline</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>	July 2013

<b>&lt;010&gt;</b>	Study Area Code	519905
<b>&lt;015&gt;</b>	Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<b>&lt;020&gt;</b>	Program Year	2016
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Chris Reno
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	3077826131 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	crenc@unionwireless.com

**<1210>** Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

**<1220>** Link to Public Website

HTTP [www.unionwireless.com](http://www.unionwireless.com)

"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.



<b>(3000) Rate Of Return Carrier Additional Documentation</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0985/OMB Control No. 3050-0819
	July 2013

<010> Study Area Code	519905
<015> Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Chris Reno
<035> Contact Telephone Number - Number of person identified in data line <030>	3077626131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	creno@unionwireless.com

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

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

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(i), 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

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

(3014) If yes, does your company file the RUS annual report  (Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

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

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

<b>(3000) Rate Of Return Carrier Additional Documentation (Continued)</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0815
	July 2013

<010> Study Area Code	519905
<015> Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Chris Repo
<035> Contact Telephone Number - Number of person identified in data line <030>	3277826131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	crepo@unionwireless.com

**Financial Data Summary**

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

## Redacted for Public Inspection

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

<010> Study Area Code	519905
<015> Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Chris Reno
<035> Contact Telephone Number - Number of person identified in data line <030>	3077826131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	creno@unionwireless.com

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	UNION TELEPHONE CO. DBA UNION CELLULAR
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/30/2015</span>
Printed name of Authorized Officer:	Chris Reno
Title or position of Authorized Officer:	Director of Accounting
Telephone number of Authorized Officer:	3077826131 ext.
Study Area Code of Reporting Carrier:	519905 <span style="float: right;">Filing Due Date for this form: 07/01/2015</span>
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

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

<010> Study Area Code	519905
<015> Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Chris Reno
<035> Contact Telephone Number - Number of person identified in data line <030>	3077826131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	creno@unionwireless.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) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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.	

## Attachments



## **Union Telephone Company**

### **Line 510 – Description of Compliance with Service Quality Standards and Consumer Protection**

#### **Rule 54.313(a)(5)**

Union Telephone Company follows applicable federal and state service quality and consumer protection rules. They comply with quality of service requirements including monitoring and reporting service quality metrics where required. Union Telephone Company has implemented numerous consumer protection measures to protect customer information. For example, Union Telephone Company implemented Customer Proprietary Network Information (CPNI) policies and procedures that are consistent with the FCC's regulations. Employees are required to complete CPNI training and in addition, employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication. Union Telephone Company data privacy and security policies are reinforced through periodic training required of all employees.

## **Line 610 – Functionality in Emergency Situations**

Section 54.202(a)(2) of the Commission's Rules requires that each eligible telecommunications carrier ("ETC") must "[d]emonstrate 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."<sup>1</sup> Section 54.313(a)(6) requires ETCs to certify that they are "able to function in emergency situations as set forth in §54.202(a)(2)"<sup>2</sup> in connection with their provision of voice and broadband services.

Union Wireless has deployed sufficient power generators 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.

**Union Cellular is able to function in emergency situations as certified with the FCC. The Company utilizes battery back-up systems and standby generators in all of its central office locations and remote carrier sites. The Company's generators are powered by natural gas and can run indefinitely. Additionally, if there is an emergency in a remote location, Union can move telecommunication facilities to the location to provide communications.**

---

<sup>1</sup> 47 C.F.R. § 54.202(a).

<sup>2</sup> 47 C.F.R. § 54.313(a)(6).

## TRIBAL ENGAGEMENT NARRATIVE

In accordance with 47 CFR 54.1009 (a)(5) & 54.1004, Union Telephone Company d/b/a Union Wireless ("Union Wireless" or "Company") has engaged and is continuing to engage with representatives of the Northern Arapaho Tribe and the Eastern Shoshone Tribe in order to provide services to the Tribal land network.

### I. Needs Assessment and Deployment Planning

Representatives of the Company met, and engaged in substantive discussions, with representatives of the Northern Arapaho Business Council on October 30, 2012. Union Wireless discussed its goal of working with the tribe to ensure adequate coverage, especially for anchor institutions. The Company asked tribal council members to identify geographic areas and anchor institutions that need better coverage. The Company communicated its deployment plans and showed the tribal council members a map showing these plans. (After the meeting, Union Wireless sent the Chairman of the tribal council a PDF map of the Company's coverage areas in the Wind River Reservation overlaid with the roads identified by the FCC as needing service.) The tribal council noted that, for marketing purposes, Union Wireless needs to emphasize lifestyle benefits. Points of contact for Union Wireless and the tribe were designated. The Company noted that it plans to include representatives of the historic preservation offices of the tribes in future tower planning to try to avoid building on cultural sensitive areas.

Representatives of the Company met, and engaged in substantive discussions, with representatives of the Eastern Shoshone Business Council on January 15, 2013. Union Wireless discussed its goal of working with the tribe to ensure adequate coverage, especially for anchor institutions. The Company asked tribal council members to identify geographic areas and anchor institutions that need better coverage. The tribal council identified that coverage in Crowheart is not good, and Union Wireless said that they will work to improve this coverage. Union Wireless also said that they would work with the tribal councils to enhance data coverage in the area of the Boisen Peak Tower. The Company communicated its deployment plans and showed the tribal council members a map showing these plans. The tribal council noted that, for marketing purposes, Union Wireless needs to emphasize lifestyle benefits. Points of contact for Union Wireless and the tribe were designated. The Company noted that it plans to include representative of the historic preservation offices of the tribes in future tower planning to try to avoid building on cultural sensitive areas.

Based on the needs assessments communicated by both tribal business councils, preliminary deployment plans were adjusted to include more extensive upgrades to the Crowheart, Wyoming area and an additional site in Ethete, Wyoming. The enhanced data coverage discussed in the area of the Boisen Peak Tower is outside the targeted unserved areas of census tract 56013940100 awarded support under the Mobility Fund Phase I.

Union Wireless is continuously working to deploy an enhanced data solutions to this identified underserved area and have several projects being proposed outside the scope of the Mobility Fund Phase I project. We will be revisiting the needs assessment conversation as we work through final approvals to ensure that no additional needs have been identified since these conversations last occurred.

## II. Feasibility / Sustainability Planning

The majority of the deployment plans communicated to the Northern Arapaho Business Council on October 30, 2012 and to the Eastern Shoshone Business Council on January 15, 2013 were planned near existing developments to: 1) Serve locations inhabited by permanent residents, 2) Reduce impact to tribal and private assets due to deployment of network infrastructure, 3) Reduce installation and operational costs for each facility.

One facility within the scope of the census tract 56013940100 Mobility Fund Phase I project is planned to be deployed on privately decided property in an undeveloped location with minimal access to grid power. Solar and wind power are planned to power this site to avoid extensive power lines across pristine tribal wilderness and to minimize impact to any culturally significant sites. The off-grid power sources also help to site the tower location to help provide services to a large area without extensive infrastructure deployment creating long-term sustainable services to the more remote areas of this census tract.

## III. Marketing Services in a Culturally Sensitive Manner

Union Wireless is working on a culturally sensitive marketing strategy that focuses on emphasizing the lifestyle benefits as requested by the Eastern Shoshone Business Council. The Company plans to engage with the tribes further about marketing campaigns after the final infrastructure deployments plans are reviewed and deemed to be in accordance to the wishes of the Northern Arapaho Business Council and the Eastern Shoshone Business Council.

## IV. Processes for: a) Right-Of-Way, b) Land Use Permits, c) Facilities Siting, d) Environmental Reviews

Since the last update, the tribes have disbanded the Joint Tribal Council. At this time, correspondence will be held with business councils from each tribe and approval must be obtained from each tribe's council: Eastern Shoshone Business Council and Northern Arapaho Business Council respectively. Specifically, all correspondence is directed to the superintendent of the Bureau of Indian Affairs on the Wind River Indian Reservation, the executive secretary of the Northern Arapaho Business Council, and the executive secretary of the Eastern Shoshone Business Council.

We have recently brought on tribally-owned consulting firm EnerTribe, Inc. to assist with this project. EnerTribe and their sister company Earthprint Technologies are working to help meet the technology, communication, and economic development needs of Indian County. As such, they have first-hand experience building and assisting businesses build out technology infrastructure on tribal lands and ensuring that the needs of the tribal governments are met. Our goal is that with the assistance of tribal technology departments, EnerTribe, and local government representatives we will be able to build infrastructure that is truly beneficial to the tribal people in our coverage area both within and beyond the scope of the Mobility Fund Phase I.

Union Wireless has currently received private approvals for the proposed projects, and we are working to apply for all necessary Tribal Government Right of Way and Land Use Permitting requirements. Please see below for more detail on these processes.

a. Right of Way Processes

For all development within tribal service areas, public record research at the county and tribal level has been conducted to determine access requirements to the facility. For leases and easements on deeded lands (fee-simple lands), including those commencing from Federal, State or county public access roads, the Company negotiates with the landowner(s) of the property. For leases and easements across tribal-owned lands, including those commencing from Federal, State or county public access roads, negotiations take place directly with each Tribal Business Council and require agreements from both to move forward. All leases and easements are required to have tribally-approved surveys and appraisals to verify fair market value and be recorded with the Bureau of Indian Affairs.

b. Land Use Permitting Requirements

For required land-use permits, approval is sought from both Tribal Business Councils as well as Bureau of Indian Affairs in addition to Fremont County and the State of Wyoming when necessary.

c. Facilities Siting Rules

Site location is determined to provide the best coverage area based on the geography of the location as well as from population/area served while not infringing upon known sacred regions. In addition, landownership requirements, power location and access to the site is weighted for time frame construction feasibility. Tribal approval of site location is sought from each Tribal Business Council.

d. Environmental Reviews

Each site, without regard to ownership or jurisdictional requirements, are mandated for environmental review per (47 CFR § 1.1307). Input from Federal, State, Tribal, and Local entities are sought for review as well as public notice and hearings prior to site construction. If required mitigation measures will be implemented.

V. Cultural Preservation Reviews

Prior to site development, cultural studies are implemented from Federal/State agencies or from contracted approved cultural service firms. National Programmatic Agreement (36 CFR § 800.16(b)) guidelines are followed for the cultural review process. From these studies determination of any impact to any cultural, archeological or historical are addressed. The State Historic Preservation Office (SHPO) and Tribal Historic Preservation Office (THPO) review site locations and cultural studies. If no significant cultural impact is found, then concurrence with the study is given. If SHPO or THPO determine impact exists, then consultation is addressed at the site location for final determination. Once final concurrence is received site development proceeds.

Of the sites proposed within the bounds of the Wind River Indian Reservation, the facility in Crowheart, Wyoming required new NPA review. The other facilities have already been reviewed and SHPO and THPO concurrence has been obtained and given to the tower owners.

Thru the TCNS process tribal review includes the Apache Tribe of Oklahoma, Cheyenne-Arapaho tribes of Oklahoma, Comanche Nation, Eastern Shoshone Tribe, Fort Peck Tribes, Keweenaw Bay Indian Community, Lower Brule Sioux Tribe, Northern Arapaho Tribe, Northern Cheyenne Tribe, Shoshone-Bannock Tribes, Southern Ute Tribe, Upper Sioux Community of Minnesota and the Ute Indian Tribe.

The Eastern Shoshone Tribe expressed interest in the proposed Crowheart, Wyoming facility and requested phone contact. On January 20, 2014, contact was made with Wilfred Ferris III, Eastern Shoshone Cultural Officer, via phone. Mr. Ferris was informed of the proposed site and had no concerns; however, he requested a representative of the tribe be present during excavation of the tower foundation. This has been added to the project stipulations. Final approval from the Eastern Shoshone and Northern Arapaho THPO offices are being sought at this time.

#### VI. Compliance with Tribal Business and Licensing Requirements

The facilities proposed within the bounds of the Wind River Indian Reservation are in the process of being submitted for tribal business and licensing requirements from the representing the Northern Arapaho and the Eastern Shoshone Tribes. All correspondence is directed to the superintendent of the Bureau of Indian Affairs on the Wind River Indian Reservation, the executive secretary of the Northern Arapaho Business Council, and the executive secretary of the Eastern Shoshone Business Council.

**Line 1010 – Descriptive Document for Voice Services Rate Comparability**

The Commission’s rules require a recipient of high-cost support to certify that “the pricing of the company’s voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau . . . .” 47 C.F.R. § 54.313(a)(1).<sup>1</sup> The Wireline Competition Bureau (“WCB”) released a Public Notice on March 20, 2014, specifying the national average urban rate for voice service and indicating that “each ETC, including competitive ETCs, must certify that the pricing of the voice services is no more than \$46.96.” Public Notice, DA 14-384 (rel. Mar. 20, 2014), at 2.

Union Telephone Co. d/b/a Union Cellular (“Union Cellular”) currently offers fixed voice services that are below the \$46.96 specified in the WCB Public Notice. Specifically, Union Cellular offers a [nationwide/regional/statewide] Simple plan providing unlimited Voice and SMS text for a monthly charge of \$40.00.<sup>2</sup> Given that the national average urban rate survey is based on local rate plans, an apples-to-apples comparison would value the local component of Union Cellular’s rate plan far below \$46.96. Accordingly, Union Cellular’s rate plans are well below \$46.96.

---

<sup>1</sup> In the *Further Notice*, the Commission sought comment on how to define the “basic offering” that a mobile wireless provider must report for voice rate comparability purposes. Specifically, the Commission asked how a mobile wireless “basic offering” should be defined in a way that “take[s] into account packages that offer varying numbers of minutes of usage and/or additional features such as texting[.]” *Connect America Fund Further Notice of Proposed Rulemaking*, WC Docket No. 10-90, *et al.*, 26 FCC Rcd 17663, 18046 (para. 1020). The Commission has not yet adopted a definition. In the absence of a definition of “basic offering” for purposes of the voice service rate comparability, Union Cellular provides an analysis with respect to a rate plan that is arguably its most “basic” offering.

<sup>2</sup> [Indicate whether the offering includes text messaging and/or picture messaging in addition to voice. Also indicate the amount of any per-minute or per-call overage charges that apply to the service.]



*Treating You Like a Neighbor - Not a Number*

Wireless • Landline • Long Distance • Internet

Main Office • 850 North Highway 414 • PO Box 160 • Mountain View, WY 82939 • 1-888-926-CARE (2273) • (307)-782-6131

Retail Locations: Casper, Cheyenne, Evanston, Gillette, Jackson, Laramie, Mountain View, Riverton, Rock Springs & Saratoga, Wyoming • Craig & Steamboat Springs, Colorado

July 23, 2013

Lucy Williamson-Director  
Wyoming Migrant Health Program  
1920 Thomas #100  
Cheyenne, WY 82001

Dear Lucy Williamson-Director:

Union Telephone consistently works to fulfill the needs of everyone in the community. Part of this effort involves assisting people on limited incomes through the **Lifeline and Toll Limitations** programs.

The **Lifeline and Toll Limitation** programs are designed to assist low-income families and individuals in establishing and maintaining telephone service. **Lifeline** lowers the cost of basic local telephone service with direct discounts to qualified eligible individual's monthly telephone bills and **Toll Limitation** provides free toll-blocking service to eliminate long-distance charges.

You may be eligible for Lifeline if you, or someone in your household, participates in one of the following federal assistance programs:

- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- National School Lunch Program's Free Lunch Program
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Bureau of Indian Affairs General Assistance
- Head Start (only households meeting the income qualifying standard)
- Tribally Administered Temporary Assistance for Needy Families (Tribal TANF)
- Food Distribution Program on Indian Reservations

Eligible consumers can receive up to \$9.25 per month in Lifeline discounts. In addition, eligible residents of Indian reservations or Tribal lands can receive up to an additional \$25 in Lifeline discounts.

To assist in alerting qualifying individuals to these programs, please find enclosed posters for you to display in the view of the public at your center(s). We are also running newspaper and radio campaigns on the programs to create the maximum public awareness.

Sincerely,



Jan Fasselin  
Director of Advertising and Creative

Copy: Chris Reno, Accounting Director

## **PUBLIC NOTICE**

### **Union Lifeline**

Lifeline is a public assistance program offering wireless and landline telephone discounts to qualified, low-income consumers. Eligible residents of federally recognized Tribal lands may qualify to receive additional discounts off the monthly charge for Lifeline service. Eligibility requirements vary by state. In many states, you may qualify for Lifeline assistance if you comply with certain income level requirements or you currently participate in certain public assistance programs.

For further information about Lifeline assistance or to receive an application form, please call Union Telephone.

  
**Union**  
Telephone / Wireless  
**888-926-CARE**

**NOTICE:** Lifeline is only available to Union subscribers in limited geographic areas. Limit of one wireline or wireless phone line per household. Additional restrictions apply.

## Public Notice

Union Wireless provides the following basic telecommunication services throughout our designated service area:

- Voice grade access to the public switched network
- Local usage
- Dual tone multi-frequency signaling or its functional equivalent
- Single party service or its functional equivalent
- Access to emergency services • Access to operator services
- Access to interexchange service • Access to directory assistance
- Toll limitation for qualifying low-income consumers



Discounts are available to low-income customers who qualify for participation in Lifeline and Link-Up telephone assistance programs. For more information, please call Union Telephone Customer Care at (888) 926-CARE (2273) or (307) 782-6131

Redacted for Public Inspection

Union Telephone Company DBA Union Wireless (SAC 519905)

Attachment – Line 3017

Attachment Redacted in Entirety