



525 Junction Rd
Madison, WI 53717
www.fdstelecom.com

REDACTED – AVAILABLE FOR PUBLIC INSPECTION

June 26, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

Received & Inspected

JUN 26 2015

FCC Mail Room

Re: Annual Reporting as Required by
47 C.F.R. Sections 54.313 and 54.422
WC Docket No. 14-58

Dear Ms. Dortch:

On behalf of its affiliates listed on Attachment 1, TDS Telecommunications Corporation hereby submits a redacted, public version of the Annual Report required by 47 C.F.R. Sections 54.313 and 54.422. The enclosed Reports have been marked "**REDACTED – AVAILABLE FOR PUBLIC INSPECTION.**"

TDS Telecommunications Corporation is also submitting, under separate cover, a confidential version of these Reports. The confidential version is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**"

An original and one copy of the Reports are enclosed.

Please contact the undersigned should you have any questions concerning the above-referenced enclosures or if you require any additional information.

Sincerely yours,

Sara Cole
Regulatory Counsel
TDS Telecommunications Corp.
(608) 664-8140

Attachment

No. of Copies rec'd 0 + 1
List ABCDE

REDACTED –AVAILABLE FOR PUBLIC INSPECTION

Attachment 1

State	Study Area Name	SAC
AL	Butler Telephone Company	250284
AL	Oakman Telephone Company, Inc.	250311
AL	Peoples Telephone Company, Inc.	250314
AR	Cleveland County Telephone Company, Inc.	401698
AR	Decatur Telephone Company	401699
AZ	Arizona Telephone Company	452171
AZ	Southwestern Telephone Company	452174
CA	Happy Valley Telephone Company	542321
CA	Hornitos Telephone Company	542322
CA	Winterhaven Telephone Company	542323
CO	Delta County Tele-Comm, Inc.	462184
CO	Strasburg Telephone Company	462207
FL	Quincy Telephone Company, FL	210338
GA	Blue Ridge Telephone Company	220346
GA	Camden Telephone & Telegraph Company, Inc.	220351
GA	Nelson-Ball Ground Telephone Company	220375
GA	Quincy Telephone Company, GA	220338
ID	Potlatch Telephone Company	472230
IN	Camden Telephone Company, Inc.	320744
IN	Communications Corporation of Indiana	320776
IN	Communications Corporation of Southern Indiana	320809
IN	Home Telephone Company, Inc. (IN)	320778
IN	S&W Telephone Company, Inc.	320816
IN	The Home Telephone Company of Pittsboro, Inc.	320777
IN	The Merchants and Farmers Telephone Company	320788
IN	Tipton Telephone Company, Inc.	320829
IN	Tri-County Telephone Company, Inc.	320830
IN	West Point Telephone Company, Incorporated	320837
KY	Leslie County Telephone Company	260411
KY	Lewisport Telephone Company	260412
KY	Salem Telephone Company	260417
ME	Cobbosseecontee Telephone Company	100005
ME	Hampden Telephone Company	100010
ME	Hartland & St Albans Telephone Company	100011
ME	Somerset Telephone Company	100024
ME	The Island Telephone Company, Inc. (ME)	100007
ME	The West Penobscot Telephone & Telegraph Company	100034
ME	Warren Telephone Company	100031
MI	Chatham Telephone Company	310685
MI	Communication Corporation of Michigan	310672

State	Study Area Name	SAC
MI	Island Telephone Company (MI)	310677
MI	Shiawassee Telephone Company	310726
MI	Wolverine Telephone Company	310738
MN	Arvig Telephone Company	361350
MN	Bridge Water Telephone Company	361362
MN	Mid-State Telephone Company	361433
MN	Mid-State Telephone Company, KMP	361413
MN	Winsted Telephone Company	361507
MS	Calhoun City Telephone Company, Inc.	280448
MS	Myrtle Telephone Company, Inc.	287449
MS	Southeast Mississippi Telephone Company, Inc.	283301
NC	Barnardsville Telephone Company	230469
NC	Saluda Mountain Telephone Company	230498
NC	Service Telephone Company	230500
NH	Contoocook Valley Telephone Company	123321
NH	Hollis Telephone Company, Inc.	123321
NH	Kearsarge Telephone Company	120045
NH	Merrimack County Telephone Company	120047
NH	Union Telephone Company	120049
NH	Wilton Telephone Company, Inc.	120050
NY	Deposit Telephone Company, Inc.	150089
NY	Edwards Telephone Company, Inc.	150092
NY	Oriskany Falls Telephone Corporation	150114
NY	Port Byron Telephone Company	150118
NY	Township Telephone Company, Inc.	150129
NY	Vernon Telephone Company, Inc.	150133
OH	Arcadia Telephone Company	300585
OH	Continental Telephone Company	300607
OH	Little Miami communications Corporation	300613
OH	Oakwood Telephone Company	300645
OH	The Vanlue Telephone Company	300662
OK	Mid-America Telephone, Inc.	432010
OK	Oklahoma Communications Systems, Inc.	431984
OK	Wyandotte Telephone Company	432034
OR	Asotin Telephone Company, OR	532404
PA	Mahanoy & Mahantango Telephone Company	170183
PA	Sugar Valley Telephone Company	170206

State	Study Area Name	SAC
SC	McClellanville Telephone Company, Inc.	240533
SC	Norway Telephone Company, Inc.	240535
SC	St. Stephen Telephone Company	240544
SC	Williston Telephone Company	240551
TN	Concord Telephone Exchange, Inc.	290559
TN	Humphreys County Telephone Company	290566
TN	Tellico Telephone Company, Inc.	290578
TN	Tennessee Telephone Company	290575
VA	Amelia Telephone Corporation	190217
VA	New Castle Telephone Company	193029
VA	Virginia Telephone Company	190253
VT	Ludlow Telephone Company	140058
VT	Northfield Telephone Company	140061
VT	Perkinsville Telephone Company, Inc.	140062
WA	Asotin Telephone Company, WA	522404
WA	Lewis River Telephone Company, Inc.	522427
WA	McDaniel Telephone Company	522430
WI	Badger Telecom, LLC	330844
WI	Black Earth Telephone Company, LLC	330849
WI	Bonduel Telephone Company, LLC	330851
WI	Burlington, Brighton & Wheatland Telephone Company, LLC	330856
WI	Central State Telephone Company, LLC	330859
WI	Dickeyville Telephone, LLC	330875
WI	Eastcoast Telecom of Wisconsin, LLC	330914
WI	Grantland Telecom, LLC	330930
WI	Mid-Plains Telephone, LLC	330881
WI	Midway Telephone Company, LLC	330909
WI	Mosinee Telephone Company, LLC	330915
WI	Mt. Vernon Telephone Company, LLC	330917
WI	Riverside Telecom, LLC	330943
WI	Scandinavia Telephone Company, LLC	330945
WI	Southeast Telephone Co. of Wisconsin, LLC	330952
WI	Stockbridge & Sherwood Telephone Company, LLC	330954
WI	Tenney Telephone Company, LLC	330958
WI	The Farmers Telephone Company, LLC	330880
WI	The State Long Distance Telephone Company, LLC	330955
WI	UTELCO, LLC	330963
WI	Waunakee Telephone Company, LLC	330968

REDACTED - AVAILABLE FOR PUBLIC INSPECTION

<010> Study Area Code 330915

<015> Study Area Name MOSINEE TEL CO Received & Inspected

<020> Program Year 2016 JUN 26 2015

<030> Contact Name: Person USAC should contact with questions about this data Bruce Schiefelbein

<035> Contact Telephone Number: Number of the person identified in data line <030> 6086645455 ext. FCC Mail Room

<039> Contact Email Address: Email of the person identified in data line <030> bruce.schiefelbein@tdstelecom.com



(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)

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

<320> Unfulfilled Service Requests (broadband)

<330> Detail on Attempts (broadband) 330915wi330.pdf (attach descriptive document)

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

<410> Fixed

<420> Mobile

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

<440> Fixed

<450> Mobile

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

<510> 330915wi510.pdf (attached descriptive document)

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

<610> 330915wi610.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 BOR Additional Documentation Worksheet

No. of Copies rec'd 0
LIST ABCDE

<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	330915
<015>	Study Area Name	MOSINEE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

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

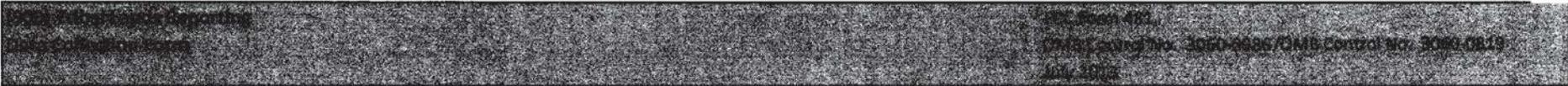
330915wi112.pdf

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



<010>	Study Area Code	330915
<015>	Study Area Name	MOSINEE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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.

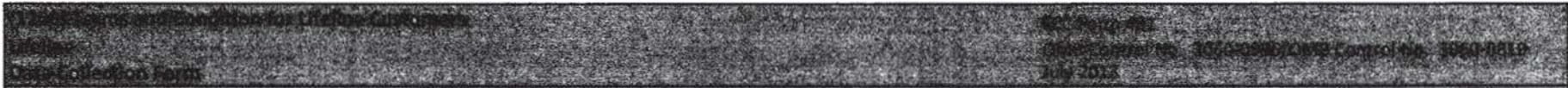
Select Yes or No or Not Applicable



<010> Study Area Code	330915
<015> Study Area Name	MOSINEE TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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).



<010>	Study Area Code	330915
<015>	Study Area Name	MOSINEE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@dstelecom.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



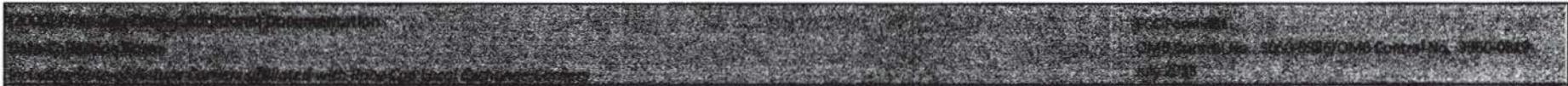
Name of Attached Document

<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.



<010>	Study Area Code	
<015>	Study Area Name	330915
<020>	Program Year	MOSINEE 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>	Bruce Schiereibein
<039>	Contact Email Address - Email Address of person identified in data line <030>	6066643455 ext.
		bruce.schiereibein@tdstelecom.com

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

Incremental Connect America Phase I reporting

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

Name of Attached Document(s) Listing Required Information

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

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

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

- <2016> Certification Support Used to Build Broadband

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

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

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

<010> Study Area Code	330915
<015> Study Area Name	MOSINEE TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@datelecom.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)]

330915wi3010.pdf

Name of Attached Document Listing Required Information

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

(3012) Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]

Name of Attached Document Listing Required Information

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

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

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

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

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

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

Name of Attached Document Listing Required Information

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

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

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

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

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

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

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

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

(3024) Underlying information subjected to an officer certification.

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

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information



<010> Study Area Code	330915
<015> Study Area Name	MOSINEE TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@dstelecom.com

Financial Data Summary

(3027) Revenue	<input type="text"/>
(3028) Operating Expenses	<input type="text"/>
(3029) Net Income	<input type="text"/>
(3030) Telephone Plant In Service(TPIS)	<input type="text"/>
(3031) Total Assets	<input type="text"/>
(3032) Total Debt	<input type="text"/>
(3033) Total Equity	<input type="text"/>
(3034) Dividends	<input type="text"/>



<010> Study Area Code	330915
<015> Study Area Name	MOSINEE TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@dstelecom.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:	MOSINEE TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/11/2015
Printed name of Authorized Officer:	Kevin Hess
Title or position of Authorized Officer:	Executive Vice President
Telephone number of Authorized Officer:	6086644160 ext.
Study Area Code of Reporting Carrier:	330915 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.	



<010> Study Area Code	330915
<015> Study Area Name	MOSINEE TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035> Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.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

Mosinee Telephone Company, LLC dba TDS Telecom

State: WISCONSIN

Study Area: 330915

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

As an Incumbent Local Exchange Carrier (ILEC) and Eligible Telecommunications Carrier (ETC), Mosinee has been providing ubiquitous, high-quality voice telecommunications services in its study area for many years. To accomplish and maintain this service level, Mosinee has made significant historical investment to deploy, operate, and maintain an integrated, highly-reliable network. In addition to its own capital spending, Mosinee draws from the federal Universal Service Fund (USF). Universal service support has been (and continues to be) critical in enabling Mosinee's services in its rural markets to be reasonably comparable in quality and price to services in more urban markets, as Congress mandated in the Telecommunications Act. Mosinee draws USF support because the cost of providing voice and data services in its rural study area are substantially higher than those in urban areas, and thus all of the costs cannot be recovered solely from Mosinee's customers while maintaining reasonably comparable prices. Mosinee has made investments to bring high speed data services to its customers when the level of customer revenues and universal service support has made it financially viable to do so.

For Mosinee, federal high cost support is used to help offset ongoing network costs, but the monies received cover only a portion of the cost of updating and operating the network. In 2014, Mosinee received \$479,100 in USF support while incurring [REDACTED] in operating expenses and investing [REDACTED] in new plant. The attached Schedule A contains a list of specific network improvement projects that were completed in 2014 at the wire center level. Where these projects related to specific DSAs within the wire center, it is so indicated and can be cross-referenced to the exchange map attached as Exhibit 1. As evidenced by these support and expenditure numbers provided for the current reporting year, the universal service support that Mosinee receives covers only a fraction of its cost to provide service. Continued receipt of USF support is vital to helping Mosinee maintain reasonably comparable rates for local exchange service; and to incrementally upgrade its telecommunications facilities and equipment to help meet evolving service requirements and maintain high quality service.

Because USF funding support is modest compared to Mosinee's ongoing network operating expense, the spending of USF support money is primarily focused on repair, maintenance and incremental upgrades to maintain existing service levels rather than further expansion of broadband services deeper



Mosinee Telephone Company, LLC dba TDS Telecom

State: WISCONSIN

Study Area: 330915

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

into the network. Given the current level of customer revenues, the level of universal support, and the technology available today, the additional costs associated with expanding broadband services to unserved portions of the study area, or increasing speeds to already served portions of the study area, far exceed Mosinee's financial ability to make such investments.

The telecommunications industry continues to change rapidly and significantly as a result of the unprecedented pace of technological advances, increasing customer needs and ongoing regulatory reforms. The level of uncertainty brought about by these factors make long-range network planning a difficult task. By necessity, significant capital investment in network upgrades is cyclical. Capital expenditures in one year are typically followed by a number of years of maintenance of the network to allow time for recovery and return on the investment before the next upgrade is undertaken.

Rapid and significant changes in technology are expected to continue to occur in the telecommunications industry over the next five years. Mosinee believes that its existing network architecture will enable it to incorporate many of these technological changes efficiently, but expects that such changes will also shorten product lifecycles and drive an increase in the rate of obsolescence experienced with existing network equipment. However, having the capability to evolve and being able to afford the cost to evolve, are both necessary to support the capital expenditure.

In an attempt to deliver products similar to those available in more urban areas, telecom companies, like Mosinee are under growing pressure to provide access to services and applications that are driving enormous growth in customer demand for bandwidth. Absent predictable and sufficient universal service support for broadband services, Mosinee will be unable to meet this growing demand.

In addition, Mosinee also faces significant regulatory uncertainty at this time. The FCC's Transformation Order and subsequent orders on reconsideration have put universal service revenue in a state of flux. Forecasting universal service revenues and developing long-range, detailed network plans that depend on those revenues has become all but impossible. While the FCC Transformation Order adopted a



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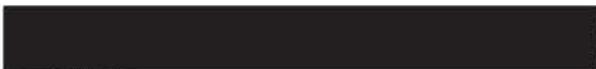
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number of comprehensive reforms to the universal service and intercarrier compensation mechanisms, it also left open the long term framework for universal service. Presently there are multiple plans in front of the FCC proposing new and different frameworks. While some plans provide for continued support under a rate of return (ROR) regime, others propose an optional plan to move in the direction of support based on a model which predicts the costs of a forward looking fiber to the home network. The details of these plans radically differ from one another, and the FCC has given little indication of which of these plans it will move towards. It is also possible that universal service reform for ROR companies will not be resolved in the near term, and that the current mechanisms will continue to struggle along. Given this backdrop, predicting next year's federal universal service amounts, let alone those for the next five years, is tenuous at best.

The most conservative approach would be to utilize status quo whereby we forecast based on past revenues. Yet even this approach is uncertain at best. For example, even under the "status quo" assumption, the FCC is considering (1) represeting the authorized interstate rate-of-return, possibly to a level lower than the current 11.25%; (2) eliminating high cost support in areas where there is an unsubsidized competitor offering service to less than 100% of customers; (3) limiting the recovery of Interstate Common Line Support (ICLS); and (4) lowering originating switched access rates similar to terminating rates. Having all these unknowns on the planning horizon (most, if not all of which could have a negative impact on Mosinee's level of support) make it near impossible to predict to what extent Mosinee can rely on universal service support at historic levels for continued aid in supporting its network. Any future rulemaking that results from these proposals could have significant impacts on the future network plans of Mosinee.

Given all of the uncertainty surrounding the industry, and the need for Mosinee to allocate scarce resources, invest prudently, and operate efficiently, long range predictive forecasting at any level of granularity is difficult and subject to revision as new information becomes known. Also, the speculative nature of planning in this type of environment hinders Mosinee's ability to effectively develop long-term network build out plans based on projected future USF support.



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The attached Schedule B summarizes Mosinee's USF received in 2014 and projected expenditures for 2015 – 2019. The projected 5-year period is based upon historical spending data, which, given the many unknown factors, may have limited value in predicting future network needs and may vary widely from actual spending incurred in the forecasted years, and thus should be treated with that in mind.

The content, timing, and specific geographic locations of projects that will be undertaken in the next five years, is unknown at this time. The selection of future projects will be based on the evaluation of many factors, including current consumer demand, limited capital resources and estimated amounts of universal service support. These and other external factors are not within Mosinee's control and are subject to change. Such changes may affect the assumptions and calculations regarding the optimal improvements to network facilities required to provide high-quality advanced services to Mosinee's customers.

With full recognition of the difficulty in predicting exact locations, specific projects or levels of expenditures, Mosinee commits to utilize available universal service support to help maintain and improve network quality, and if feasible, deploy advanced technologies and new services, expand coverage and improve broadband speeds for its customers.

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Schedule A

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2014 Capital Expenditures

Exchange	DSA	DSA Population	Description	Expenditure
MOSINEE	Customer specific	#N/A		
	13000	2,283		
	13000	2,283		
	13000	2,283		
	Customer specific	2,283		
	Customer specific	#N/A		
	13008	279		
	13013	2,122		
	13013	2,122		
	13014	181		
	13015	226		
	13015	226		
	13016	574		
	13017	198		
	13019	450		
	13020	254		
	13023	359		
	13024	540		
	13025	540		
	13026	342		
	13029	379		
	Various	#N/A		
	Various	#N/A		
	Various	#N/A		
ALL EXCHANGES	All Exchanges	#N/A		

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Line 100 - Service Quality Improvement Reporting

Rule 54.202(a)(1) and 54.313(a)(1)

USF Received in 2014

High Cost Loop Support	\$	-
ICLS Support	\$	289,860
Safety Net Additive	\$	-
Safety Value Additive		
CAF	\$	189,204
TOTAL	\$	479,064

Five-Year Plan

	2015	2016	2017	2018	2019
Operating Expenses	\$	[REDACTED]			
Capital Expenditures	\$				