



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 29, 2015

ACCEPTED/FILED

JUN 29 2015

Federal Communications Commission  
Office of the Secretary

Via Hand Delivery

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

Re: **WC Docket No. 14-58**  
**2015 ETC Annual Report of Big Bend Telephone Company**  
**Study Area Code 442039**

Dear Ms. Dortch:

On behalf of Big Bend Telephone Company (“Big Bend”), 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.<sup>1</sup> Big Bend seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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

No. of Copies rec'd 043  
List ABCDE

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

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

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

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

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

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

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



Your business is our business.

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

REDACTED – FOR PUBLIC INSPECTION

June 29, 2015

ACCEPTED/FILED

JUN 29 2015

Federal Communications Commission  
Office of the Secretary

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

Re: **WC Docket No. 14-58**  
**2015 ETC Annual Report of Big Bend Telephone Company**  
**Study Area Code 442039**  
**Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Big Bend Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> 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).<sup>2</sup>

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”).<sup>3</sup>
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 2015 Report.<sup>4</sup>
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.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

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

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

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

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

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

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> 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

---

<sup>5</sup> 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).

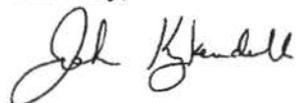
been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or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

ACCEPTED/FILED

JUN 29 2015

Federal Communications Commission Office of the Secretary

<010> Study Area Code 442039

<015> Study Area Name BIG BEND TEL CO INC

<020> Program Year 2016

<030> Contact Name: Person USAC should contact with questions about this data Russell Moore

<035> Contact Telephone Number: Number of the person identified in data line <030> 4323640089 ext.

<039> Contact Email Address: Email of the person identified in data line <030> rusty.moore@bbtco.com

ANNUAL REPORTING FOR ALL CARRIERS

	54.303 Completion Required	54.423 Completion Required
--	----------------------------	----------------------------

		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice) 0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband) 0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed 0.3963		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 442039tx510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 442039tx610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification Yes		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> [Redacted]	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110> [Redacted]	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

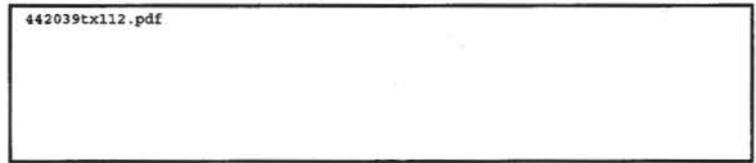
FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	442039
<015> Study Area Name	BIG BEND TEL CO INC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Russell Moore
<035> Contact Telephone Number - Number of person identified in data line <030>	4323640089 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rusty.moore@bbtco.com

<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	(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.



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









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

<b>&lt;010&gt; Study Area Code</b>	442039
<b>&lt;015&gt; Study Area Name</b>	BIG BEND TEL CO INC
<b>&lt;020&gt; Program Year</b>	2016
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Russell Moore
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	4323640089 ext.
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	rusty.moore@btco.com

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

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

Select Yes or No or Not Applicable

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

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

<010> Study Area Code	442039
<015> Study Area Name	BIG BEND TEL CO INC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Russell Moore
<035> Contact Telephone Number - Number of person identified in data line <030>	4323640089 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rusty.moore@bbtco.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> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	442039
<015>	Study Area Name	BIG BEND TEL CO INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Russell Moore
<035>	Contact Telephone Number - Number of person identified in data line <030>	4323640089 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rusty.moore@bbtco.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

442039tx1210.pdf

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.

<b>(2000) Price Cap Carrier Additional Documentation</b> <b>Date Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0086/OMB Control No. 3060-0819</b> <b>July 2013</b>
---	---

<b>&lt;010&gt;</b> Study Area Code	442039
<b>&lt;015&gt;</b> Study Area Name	
<b>&lt;020&gt;</b> Program Year	BIG BRND TEL CO INC
<b>&lt;030&gt;</b> Contact Name - Person USAC should contact regarding this data	2016
<b>&lt;035&gt;</b> Contact Telephone Number - Number of person identified in data line <030>	RUSSELL MOORE
<b>&lt;039&gt;</b> Contact Email Address - Email Address of person identified in data line <030>	4323040089 ext. rusty.moore@bbtco.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



REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 483

Data Collection Form

OMB Control No. 3060-0989 OMB Control No. 3060-0839

July 2013

<010> Study Area Code	442039
<015> Study Area Name	BIG BRND TEL CO INC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Russell Moore
<035> Contact Telephone Number - Number of person identified in data line <030>	4323640089 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rusty.moore@bhtco.com

Financial Data Summary

(3027) Revenue

[Redacted]

(3028) Operating Expenses

[Redacted]

(3029) Net Income

[Redacted]

(3030) Telephone Plant In Service(TPIS)

[Redacted]

(3031) Total Assets

[Redacted]

(3032) Total Debt

[Redacted]

(3033) Total Equity

[Redacted]

(3034) Dividends

[Redacted]

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0926/OMB Control No. 3060-0819 July 2013
---	--

<b>&lt;010&gt; Study Area Code</b>	442039
<b>&lt;015&gt; Study Area Name</b>	BIG BEND TEL CO INC
<b>&lt;020&gt; Program Year</b>	2016
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Russell Moore
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	4323640089 ext.
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	rusty.moore@bbtco.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:	
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>		FCC Form 485 OMB Control No. 3060-0086/OMB Control No. 3050-0019 July 2013
<010> Study Area Code	442039	
<015> Study Area Name	BIG BEND TEL CO INC	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Russell Moore	
<035> Contact Telephone Number - Number of person identified in data line <030>	4323640089 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	rusty.moore@bbtco.com	

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

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
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:	Lisa McLaughlin
Name of Reporting Carrier:	BIG BEND TEL CO INC
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date: 06/26/2015</span>
Printed name of Authorized Officer:	Russell Moore
Title or position of Authorized Officer:	General Manager
Telephone number of Authorized Officer:	4323641000 ext. 0089
Study Area Code of Reporting Carrier:	442039 <span style="float: right;">Filing Due Date for this form: 07/01/2015</span>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

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

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
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:	BIG BEND TEL CO INC
Name of Authorized Agent or Employee of Agent:	Lisa McLaughlin
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE <span style="float: right;">Date: 06/26/2015</span>
Printed name of Authorized Agent or Employee of Agent:	Lisa McLaughlin
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	442039 <span style="float: right;">Filing Due Date for this form: 07/01/2015</span>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

REDACTED FOR PUBLIC INSPECTION

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

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

**ATTACHMENT REDACTED IN ENTIRETY**

**Big Bend Telephone Company**

**Study Area Code: 442039**

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

**Compliance – Voice and Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> 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.<sup>3</sup> 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.”<sup>4</sup>

Big Bend 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

---

<sup>1</sup> *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*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *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.

<sup>4</sup> *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.

**Big Bend Telephone Company**

**Study Area Code: 442039**

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

Big Bend 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)<sup>1</sup> 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

---

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

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.







**Big Bend Telephone Company, Inc.**

**Study Area Code: 442039**

**Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges specified below are for basic local exchange service, including Tone Dialing and access to Caller ID at no charge. Rates and charges for ancillary services and facilities not specifically shown are presented in Big Bend 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 minimum contract 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:<sup>(1)(2)</sup>**

<b>Exchange Name</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>
Alamito	\$ 16.00	\$ -
Big Bend Park	\$ 16.00	\$ -
Big Canyon	\$ 16.00	\$ -
Calamity Creek	\$ 16.00	\$ -
Comstock	\$ 16.00	\$ -
Heath Canyon	\$ 16.00	\$ -
Lajitas	\$ 16.00	\$ -
Langtry	\$ 16.00	\$ -
Presidio	\$ 16.00	\$ -
Redford	\$ 16.00	\$ -
Sanderson	\$ 16.00	\$ -
Sheffield	\$ 16.00	\$ -
Six Shooter	\$ 16.00	\$ -
Terlingua	\$ 16.00	\$ -

<sup>(1)</sup> 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.

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

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES**

**C. Lifeline Program**

The Lifeline Program is a retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

**1. General**

- a. A qualifying low-income customer subscribing to the Lifeline Program shall receive federal and state reductions to their monthly tariffed residential local exchange access line rate and federal subscriber line charge.
- b. Nothing in this section shall prohibit a customer who is otherwise eligible for the Lifeline Program from obtaining and using telecommunications equipment and services designed to aid such customer in utilizing qualifying telecommunications service.
- c. The Lifeline Program rate reductions apply only to basic network service and do not apply to non-basic services, regulated or non-regulated, such as long distance service or custom calling services. Customers may subscribe to these services, where available, at their discretion. If the customer subscribes to a bundled service, where available, the discount shall only apply to the basic network service portion of the bundled service,

T  
|  
T

By: Mr. Justin Haynes  
Title: President

<b>PUBLIC UTILITY COMMISSION OF TEXAS APPROVED</b>	
MAY 11, '07	CONTROL# <u>TC. NO. 34170</u>
TARIFF CLERK	

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

**1. General (Continued)**

- d. The Lifeline Program rate reductions do not apply to service connection charges, except that customers eligible for the Tribal Link Up Program will receive a 50% reduction, or \$100.00, whichever is less, on applicable service connection charges, as provided in Section 2 of this tariff.
- e. The Company may not disconnect the service of a Lifeline Program customer for the non-payment of toll charges unless the Company has received a waiver from the Commission allowing disconnection of service for this reason.
- f. Upon subscribing to the Lifeline Program, a customer will be offered a subscription, at no charge, to toll blocking service (in exchanges where technically available) which denies the customer access to the long distance telecommunications network; however, the customer is under no obligation to accept the subscription to toll blocking.
- g. The Company will waive number portability charges, subject to the tariff, for the Lifeline customer.
- h. The Lifeline Program rate reductions will not be available on a retroactive basis except as directed by LIDA or the Commission.

T  
T  
D  
D  
T  
T  
T  
T

By: Mr. Justin Haynes  
Title: President

<p><b>PUBLIC UTILITY COMMISSION OF TEXAS</b>  <b>EFFECTIVE</b>  APR 2 '12 CONTROL# <u>TC. NO. 40225</u>  TARIFF CLERK</p>
---

**BIG BEND TELEPHONE COMPANY, INC.**  
Local Exchange Tariff

**SECTION 1**  
6<sup>th</sup> Revised Sheet 5  
Replacing 5<sup>th</sup> Revised Sheet 5

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

**2. Designated Lifeline Program Services**

The Company shall offer the voice telephony services or functionalities defined to be qualified, or designated, Lifeline Program service as enumerated in 47 Code of Federal Regulations §54.101(a) (relating to Supported Services for Rural, Insular and High Cost Areas).

T  
T  
D  
D

**3. Eligibility Requirement**

**a. Qualifying Low-income (Eligible) Customer Criteria**

The Lifeline Program rate reductions will be provided per eligible customer. 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.

T  
T

By: Mr. Justin Haynes  
Title: President

**PUBLIC UTILITY COMMISSION OF TEXAS**  
**EFFECTIVE**  
APR 2 '12 CONTROL# TC. NO. 40225  
TARIFF CLERK

**BIG BEND TELEPHONE COMPANY, INC.**  
Local Exchange Tariff

**SECTION 1**  
3rd Revised Sheet 6  
Replacing 2nd Revised Sheet 6

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

**3. Eligibility Requirement (Continued)**

**b. Obligations of the Customer**

- 1) A current customer of the Company may be automatically enrolled in the Lifeline Program by their participation in the qualifying programs or they may self-enroll by contacting the Texas Low-Income Discount Administrator (LIDA).
- 2) A customer who is eligible for the Lifeline Program, but does not have telephone service at the time of application, shall be responsible for initiating a request for service from the Company.

c. The LIDA reviews the customer application received and determines if the customer meets the eligibility criteria. The LIDA shall provide a list of eligible customers to the Company on a monthly basis.

d. Lifeline Program customers will lose their Lifeline Program eligibility once they cease to meet income criteria or cease to participate in one of the qualified programs. Customers will be notified by the LIDA for loss of eligibility and an opportunity given to prove eligibility. Reduced billing under the Lifeline Program will be terminated if eligibility ceases.

By: Mr. Justin Haynes  
Title: President

T  
|  
T  
T  
|  
T  
|  
D  
T  
|  
T  
|  
D  
D  
|  
T  
|  
T  
|

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

T

**4. Deposit and Credit Requirements**

- a. The Company shall be prohibited from charging a service deposit in order to initiate the Lifeline Program if the eligible customer voluntarily elects to receive toll blocking.
- b. The Company may charge a service deposit if:
  - i. The eligible customer denies subscription to toll blocking upon subscribing to the Lifeline Program.
  - ii. The Company receives a Commission waiver from having to provide toll blocking due to technical limitations.
- c. In instances where the Company may require a service deposit, the same credit verification procedures and deposit regulations used for all applicants who apply for service with the Company are also applicable to eligible customers of the Lifeline Program.

**5. Service Connection and Charges**

- a. Service connection charges do not apply to eligible customers with existing, qualifying service converting to the Lifeline Program.
- b. Service connection charges do apply when:
  - i. Existing eligible customers requesting additional non-qualifying services at the time Lifeline Program reduced billing is initiated.
  - ii. New customers (those without existing local exchange access service) eligible for the Lifeline Program and establishing qualifying service.
  - iii. Any subsequent moves or changes after the initial connection to the Lifeline Program.

By: Mr. Justin Haynes  
Title: President

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

**5. Service Connection and Charges (Continued)**

- c. In instances where service connection charges apply, customers qualifying for the Lifeline Program may qualify for the Tribal Link-Up Program and may be eligible to receive a reduction in the applicable service connection charges as provided in Section 2 of this tariff.
- d. Applicable service connection charges for the Company are specified in Section 2 of this tariff.

**6. Lifeline Program Rate Reduction**

**a. Implementation**

The Company shall provide reduced billing for all Lifeline Program eligible customers within its service area after receipt of the list of eligible customers from the LIDA. In instances where the customer makes direct inquiries regarding participation in the Lifeline program to the Company, the Company shall make every effort to assist the customer by explaining the necessary steps to become eligible to participate in the Lifeline Program and direct the customer to the LIDA for completion of the required forms for eligibility certification.

- i. If the eligible customer's existing telephone service arrangements meet the Lifeline Program criteria, the Company shall provide reduced billing as indicated above.
- ii. If the eligible customer's existing telephone service arrangements do not meet the Lifeline Program criteria, the Company shall advise the eligible customer by direct mail:
  - (a) The changes necessary to satisfy the Lifeline Program criteria;
  - (b) The waiver of service connection charges for changes in the eligible customer's telephone service arrangements in order to qualify for the Lifeline Program or the transfer of the account to the Lifeline Program;

By: Mr. Justin Haynes  
Title: President

<p><b>PUBLIC UTILITY COMMISSION OF TEXAS</b> <b>EFFECTIVE</b> APR 2 '12 CONTROL# <u>TC. NO. 40225</u> TARIFF CLERK</p>
--

**BIG BEND TELEPHONE COMPANY, INC.**  
Local Exchange Tariff

**SECTION 1**  
5<sup>th</sup> Revised Sheet 7.2  
Replacing 4th Revised Sheet 7.2

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

**6. Lifeline Program Rate Reduction (Continued)**

**a. Implementation (Continued)**

ii. If the eligible customer's existing telephone service arrangements do not meet the Lifeline Program criteria, the Company shall advise the eligible customer by direct mail: (Continued)

c) If the eligible customer chooses to make the necessary changes to their service arrangements, the eligible customer will receive reduced billing for the Lifeline Program at the time the change is effective or at the time new service is established.

**b. Amounts**

The Company shall apply Lifeline Program rate reductions, per eligible customer, as described below. Existing Tel-Assistance customers, as of September 1, 2001 receive reduced rates, shown in paragraph C. of subsection II, which were authorized upon discontinuance of the Tel-Assistance program.

i. Federal Reduction. The Company shall grant federal support to qualifying low-income consumers up to \$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.

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

By: Mr. Justin Haynes  
Title: President

**PUBLIC UTILITY COMMISSION OF TEXAS**  
**APPROVED / EFFECTIVE**  
Dec 1, 2014      TC. NO. 43696  
TARIFF CLERK

ET  
E  
N  
N  
M  
|  
M

**LOCAL EXCHANGE SERVICE**

**II. APPLICATION OF RATES (Continued)**

**C. Lifeline Program (Continued)**

**6. Lifeline Program Rate Reduction (Continued)**

**a. Amounts (Continued)**

iii. 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. 26.404 and the Small and Rural Incumbent Local Exchange Company Universal Service Plan (SRILEC USP). The area discount will apply to Lifeline providers operating in the Company's service area. The Lifeline Area Discount in all exchanges except those within the Sanderson - Group II rate group is \$0.50 and the Lifeline Area Discount in the Sanderson - Group II rate group is \$1.08.

iv. 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.

N  
N  
N  
N

By: Mr. Justin Haynes  
Title: President

**PUBLIC UTILITY COMMISSION OF TEXAS**  
**APPROVED / EFFECTIVE**  
Dec 1, 2014      TC. NO. 43696  
TARIFF CLERK

**Big Bend Telephone Company**

**Study Area Code: 442039**

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

Big Bend 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.



**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**