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August 15, 2014

St Croix Tribal Center
Stuart Bearheart
24663 Angeline Avenue
Webster, WI 54893

Re: FCC Order 11-161, DA 12-1165 Tribal Land Engagement.

Dear Stuart;

Lakeland Communications Group serves the St Croix Tribal area with phone and internet service. I am writing you today to initiate conversation with your Tribal government and leaders to discuss any and all options to better serve your lands with high speed technology. Specifically, I would like to discuss your specific communications goals, needs and priorities. We offer voice and High speed broadband services to your area today, and would like to initiate a conversation to see if there is anything we can do to assist you with further needs.

Please contact me at your convenience:

John K. Klatt
Lakeland Communications
PO Box 40
Milltown, WI 54858
715-825-2171
jkklatt@lakeland.ws

Sincerely,

A handwritten signature in black ink that reads 'John K. Klatt'. The signature is written in a cursive style with a large initial 'J'.

John K. Klatt
President/CEO

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$47.48, which includes the federal subscriber line charge ("SLC").

In all of the exchanges served by the Lakeland Communications Group, LLC - Milltown, the single-line residential local rate, including any mandatory extended area service charge, is \$15.40. When the federal SLC (\$6.50) and the other state fees are included, the rate becomes \$22.50. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$47.48.

SAC: 330910
State: Wisconsin
Lakeland Communications Group, LLC - Milltown
Form 481 Line No.: 1210 Terms and Conditions of Voice Telephony Lifeline

- Lakeland Communications Group, LLC (Milltown) offers Lifeline Service credit according to basic service requirements listed in Wisconsin Administrative Code 160.03 and 160.04:

PSC 160.03 Essential telecommunications services.

- 1) Each local exchange service provider shall make available to all its customers at affordable prices all essential telecommunications services.
- 2) "Essential telecommunications services" means all the following:
 - (a) Single-party voice-grade service with:
 1. Line quality capable of facsimile transmission.
 2. Line quality capable of data transmission as specified in s.PSC 160.031.
 3. Dual-tone multi-frequency touch tone and rotary pulse dialing operability.
 4. Access to emergency services numbers and 9-1-1 operability where requested by local authorities.
 5. Equal access to interlata interexchange carriers subject to federal communications commission orders and rules.
 6. Equal access to intralata interexchange carriers pursuant to schedules, terms and conditions imposed by commission orders and rules.
 7. Single party revertive calling, if 2 or more pieces of customer premises equipment can be simultaneously active on the line or channel being used by the customer.
 8. A reasonably adequate number of calls within a reasonably adequate local calling area as defined by the commission.
 9. Connectivity with all public toll, local, wireline and wireless networks, and with various internet service providers.
 10. Telecommunications relay service to facilitate communication between teletypewriter users and non-teletypewriter users.
 11. Access to operator service.
 12. Access to directory assistance.
 13. Toll blocking, 900 and 976 number blocking and extended community calling blocking options as specified in s.PSC 160.04.
 14. Intercept and announcements for vacant, changed, suspended and disconnected numbers in oral and TTY-readable formats.
 15. A directory listing with the option for non-listed and non-published service.
 - (b) Annual distribution of a local telephone directory in accordance with s.PSC 165,955.
 - (c) Timely repair.

PSC 160.04 Toll blocking.

- (1) **BLOCKING OBLIGATIONS.** Every local exchange service provider in the state shall offer the capability to block all long distance calls and, separately, the capability to block 900 and 976 number calls and the capability to block extended community calling unless a timely waiver has been granted to the local exchange service provider by the commission.

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State: Wisconsin

Lakeland Communications Group, LLC - Milltown

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(2) CHARGES. Blocking shall be without monthly or nonrecurring charge to low-income customers and at no charge other than for second and subsequent service activation orders for other residential and standard business line customers.

(3) EMERGENCY SERVICE. Blocking shall not prevent the customer from reaching the emergency service numbers appropriate for the customer's location.

- Lakeland Communications Group, LLC's (Milltown) Lifeline service offerings are listed in their Local Service Tariff Section 4, Sheet 3-5, Section 6, Sheet 3, Sheet 3 (attached).
- The Local Service Tariff is on file with the Wisconsin Public Service Commission.
- All Lifeline subscribers must meet the terms and conditions of Federal Lifeline Eligibility Rules.

Lakeland Communications Group, LLC (Milltown) does adhere to all Federal Lifeline eligibility rules and regulations as well as Wisconsin Administrative Code "Chapter PSC 160" which states:

PSC 160.02 Definitions.

- 8) "Low-income" means a household that receives benefits from one or more of the following programs:
- (a) Wisconsin Works
 - (b) Medical Assistance
 - (c) Supplemental security income
 - (d) Food stamps
 - (e) The low income household energy assistance program
 - (f) The Wisconsin homestead tax credit
 - (g) Badger care
 - (h) As approved by the commission, other state or federally administered programs for households with income levels equal to or less than 200% of the poverty line.

PSC 160.06 Eligibility for low-income programs.

(1) LOW-INCOME ASSISTANCE ELIGIBILITY. Local exchange service providers shall verify an applicant's eligibility for low-income assistance programs by making timely queries of the applicable databases of the Wisconsin department of workforce development, the Wisconsin department of revenue, or other state agencies. Applicant eligibility shall be verified by finding the applicant to be any of the following:

- (a) An active client of at least one of the programs listed in s. PSC 160.02(8).
- (b) A member of the active client's household whose low income qualifies the client for benefits under at least one of the programs listed in s. PSC 160.02(8).
- (c) A recipient of the Wisconsin homestead tax credit for the most recently completed tax year. If the applicant's tax filing for the most recently completed tax year has not been posted to the records of the Wisconsin department of revenue and if application for low-income assistance is made on or before June 30th, then the tax year prior to the most recently completed tax year may be used to determine eligibility.

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- (2) **ELIGIBILITY RECONFIRMATION.** Eligibility shall be reconfirmed on at least an annual basis for all customers receiving lifeline assistance.
- (3) **ELIGIBILITY INQUIRY.** Local exchange service providers shall inquire of the customer regarding eligibility of that customer for low-income programs on each order for initial or moved residential service and, orally or in writing, in the first contact with a customer during a year concerning disconnection or payment arrangements.
- (4) **QUERY AUTHORIZATION.** Local exchange service providers shall comply with client authorization requirements of the Wisconsin department of workforce development, the Wisconsin department of revenue, or other state agencies for database queries necessary for eligibility verification. Customers shall complete and remit any reasonably required query authorization forms or forfeit eligibility.
- (5) **EXCEPTIONS.** Lifeline and Link-Up programs are not available to customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the customer is more than 60 years of age.

PSC 160.062 Lifeline program.

- (1) All local exchange service providers shall offer a lifeline monthly rate to all qualified low-income customers.
- (2)
 - (a) The lifeline monthly rate includes single-party residential service, touch-tone service, any 9-1-1 charges billed on the telephone bill, the federal subscriber line charge and 120 local calls, excluding extended community calling calls.
 - (b) The lifeline monthly rate shall be the total of the residential monthly rates for the items in par. (a) minus \$7 or, if the total of the monthly residential rates for the items in par. (a) is greater than \$22, the lifeline monthly rate shall be \$15.
 - (c) Notwithstanding par. (b), in no case shall the lifeline monthly rate be less than \$3 or more than \$15.
- (3) The lifeline monthly rate may appear as a credit against the full standard tariffed rate on a customer's bill or as a special rate designation. Whenever possible, the lifeline rate shall begin to appear on an eligible customer's bill on the next bill date following the date of application for lifeline assistance. If the rate does not begin to appear on the next bill date, when it does appear back credit will be given. In cases where a customer's eligibility date as found in the records of the Wisconsin department of workforce development, the Wisconsin department of revenue, or other state agencies precedes the last bill date prior to application, credit shall also be given for one month's prior bill.
- (4)
 - (a) Eligibility for lifeline assistance continues until the next bill date following a failure to meet eligibility requirements.
 - (b) When the low income household energy assistance program is one of the customer's qualifying income assistance programs, the eligibility for lifeline assistance shall continue until the bill date in the next December following the close of the heating season. At that time, lack of eligibility shall be re-verified by the local exchange service provider before removing the lifeline assistance from the customer's bill.

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- (c) When the homestead tax credit is one of the customer's qualifying income assistance programs, the eligibility for lifeline assistance continues until the bill date in the next June following the end of the tax year. At that time, lack of eligibility shall be re-verified by the local exchange service provider before removing the lifeline assistance from the customer's bill.
- (5) Local exchange service providers may receive reimbursement from the universal service fund for 100% of that portion of the standard authorized rate for service which is in excess of the amount of the lifeline monthly rate which is eligible for reimbursement from federal lifeline program funds.
- (6) Customers eligible for lifeline or link-up America assistance may not be charged a deposit for service if they voluntarily accept toll blocking, may not be requested to pay in advance for more than one month's local service bill, and may not be disconnected from local service for nonpayment of toll charges billed by the local exchange service provider. Customers that otherwise would be subject to disconnection may be counseled to accept toll blocking.
- (7) A local exchange service provider acting under the limited conditions specified in its commission approved telecommunications customer assistance program under s. PSC 160.08 may impose toll blocking or restriction on lifeline customers.

PSC 160.063 Outreach for low-income assistance programs.

- (1) Funding shall be available to fund collaborative partnerships between community-based organizations and telecommunications providers to increase participation of the eligible populations in the universal service fund low-income support programs.
- (2) Funding from the universal service fund for these collaborative efforts shall not exceed \$250,000 in one year.
- (3) The commission shall annually review and grant funding based on complete responses to a request for proposals. Funding shall be limited to not more than 6 projects with at least one project focused statewide and one project focused on the Milwaukee area, if feasible.
- (4) The commission shall contract for an evaluation of the effectiveness of this program in promoting enrollment in low-income programs and subscribership to telephone service to be completed within 2 years of May 1, 2000. The cost of this evaluation shall not exceed \$25,000. This \$25,000 shall be included as part of the \$250,000 maximum total funding available under this section during the year in which the evaluation occurs.

PSC 160.08 Telecommunications customer assistance program.

The commission may authorize individual telecommunications providers to establish telecommunications customer assistance programs that meet authorized goals and objectives for increasing or stabilizing subscription levels for non-optional, essential telephone service within its service territory or to address avoidance of disconnection or limitation of service to low-income households with payment problems. Such programs may allow a provider to not make available certain essential services, as defined in s. PSC 160.03(2), in order to preserve at least minimal telephone service to certain low-income households with payment problems. The commission shall determine on a case-by-case basis whether or not a telecommunications customer assistance program may receive universal service fund monies.

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	3
Amendment Number:	600

LAKELAND COMMUNICATIONS GROUP, LLC

Utility Name

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE

A. DESCRIPTION

1. Lifeline Service is a residence service offering that provides a discounted monthly rate to Customers who qualify for low-income assistance programs as defined in s. PSC 160.02(8), Wis Adm. Code.
2. Lifeline Service provides a monthly discount to eligible residence Customers that have a network access line (including Extended Area Service), touch-tone service, 911 Service (billed on the Customer's telephone bill), and the End User Common Line Charge (EUCL). If the Customer has measured service, 120 local calls are provided. Extended Community Calling (ECC) Service is not included in Lifeline Service.
3. Lifeline Service monthly rates for residence Customers are established according to s. PSC 160.062(1), (2) and (3), Wis Adm. Code.

B. REGULATIONS

1. Lifeline Service is only available for residence Customers with a single line Network Access Line in the same household.
2. Lifeline Service is not available to Customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the Customer is more than 60 years old.
3. Lifeline Service Customers must complete and remit any required query authorization forms requested by the Company or forfeit eligibility for Lifeline Service.
4. Eligibility for Lifeline Service must be verified by the Company by finding the Social Security Number and name of the listed Customer in active records of the Department of Workforce Development (DWD), or the Wisconsin Department of Revenue.
5. Reconfirmation of Eligibility for Lifeline Service
 - a. Reconfirmation of eligibility for Lifeline Service will be done at least once each year, and in accordance with rules established by the FCC.

Applicable to Service Rendered on and after: 6/1/2013

Date Issued

PSCW Authorization by Order No.:

Letter Date

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	4
Amendment Number:	600

LAKELAND COMMUNICATIONS GROUP, LLC

Utility Name

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

B. REGULATIONS (Cont'd)

5. Reconfirmation of Eligibility for Lifeline Service (Cont'd)

- b. If a Customer cannot reconfirm eligibility for Lifeline Service, eligibility will continue until the next bill date following failure to meet the eligibility requirements.
- c. When the Low Income Household Energy Assistance Program is one of the Customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next December following the close of the heating season. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the Customers bill.
- d. When the Wisconsin Homestead Tax Credit is one of the Customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next June following the end of the tax year. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the Customers bill.

6. Lifeline Service will appear as a credit or rate reduction on the Customer's bill on the next bill date following the date the Customer applied for Lifeline Service. When the Customer's eligibility precedes the previous bill, credit will also be given on one month's prior bill.

7. A Lifeline Service Customer cannot be disconnected for the non-payment of toll charges.

8. If Call Blocking Service is available and the Customer has elected Call Blocking Service, a Service Deposit cannot be collected to establish Lifeline Service. If Call Blocking Service is not available, the Company may require a Service Deposit to establish Lifeline Service.

Applicable to Service Rendered on and after: 6/1/2013

Date Issued

PSCW Authorization by Order No.:

Letter Date

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	5
Amendment Number:	600

LAKELAND COMMUNICATIONS GROUP, LLC

Utility Name

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

C. RATES AND CHARGES

The applicable monthly rate for Lifeline Service is determined by the sum of the rates for the services specified in 1. following and applying a credit based on the sum of the credits as specified in 2. following.

1. Lifeline Service

Residence Network Access Line (including EAS) at the rate specified in Section 6 of this tariff.

Touch Calling Service (if applicable) at the rate specified in Section 6 of this tariff.

911 Service (if billed on the Customer's telephone number).

End User Common Line (EUCL) Charge.

2. Lifeline Service Credits

End User Common Line (EUCL) Charge as specified in the NECA Tariff.

Federal Lifeline support credit as specified by the Federal Communications Commission (FCC) for Universal Service Support for Low-Income Consumers, and by the Public Service Commission of Wisconsin in Wis. Admin. Code PSC 160.062, and as it may be modified in the future.

3. The Lifeline Service Monthly Credit is shown in Section 6 of this tariff.

Applicable to Service Rendered on and after: 6/1/2013

Date Issued

PSCW Authorization by Order No.:

Letter Date

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	6
Sheet Number:	3
Amendment Number:	601

LAKELAND COMMUNICATIONS GROUP, LLC

Utility Name

RATES AND CHARGES

	<u>Normal Working Hours</u>	<u>After Hours</u>	<u>Sundays And Holidays</u>
MAINTENANCE OF SERVICE CHARGE	\$50.00	\$65.00	\$85.00
RESTORAL OF SERVICE CHARGE	\$25.00		
RETURNED CHECK CHARGE	\$25.00		

Services described in Section 4

BASIC LOCAL EXCHANGE ACCESS RATES

	<u>Monthly Luck</u>	<u>WI State USF Assessment</u>
Business 1 Party	\$ 16.50	\$0.60 (I)
Residence 1 Party ¹	15.40 (I)	0.60 (I)
Key System Lines	17.25	0.60 (I)
PBX, PABX, EPABX Trunks	23.50	0.60 (I)

NOTE 1: Monthly Basic Local Exchange Access Rates, including Federal and State taxes, are not applicable for the second exchange line when the second exchange line is requested by hearing-impaired Customers to use Two Line Voice Carryover as defined in the Wis. Admin. Code PSC 160.02 (12).

LIFELINE SERVICE

The Lifeline Service monthly credit is \$10.00.
The Lifeline Service monthly credit in Tribal Lands is \$19.22.

Applicable to Service Rendered on and after: 12/1/2014

Date Issued

PSCW Authorization by Order No.:

Letter Date

SAC: 330910
State: Wisconsin
Lakeland Communications Group, LLC - Milltown
Form 481 Line No.: 3010 Milestone Certification

Lakeland Communications Group, LLC - Milltown 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 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/1Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

SAC: 330910
State: Wisconsin
Lakeland Communications Group, LLC - Milltown
Form 481 Line No.: 3012 Community Anchor Institutions

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service.

In 2014, Lakeland Communications Group, LLC - Milltown did not add any new anchor institutions.

REDACTED:

Lakeland Communications Group, LLC - Milltown

Financial Data 2014 - 2013