

**MOSS ADAMS** LLP

Certified Public Accountants • Business Consultants

**REDACTED- FOR PUBLIC INSPECTION**

June 30, 2015

Received & Inspected

JUN 01 2015

FCC Mail Room

**VIA OVERNIGHT DELIVERY**

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

CONFIDENTIAL

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 14-58, 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208. Before the Federal Communications Commission**

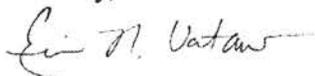
Dear Ms. Dortch:

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

As specified in the Protective Order issued on November 16, 2012 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,



Eric N. Votaw, Senior Manager for  
Moss Adams LLP

Enclosures

cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division  
Ducor Telephone Company

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

0+1

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0966/OMB Control No. 3060-0815  
July 2013

<010> Study Area Code	542313
<015> Study Area Name	DUCOR TELEPHONE CO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Eric N. Votaw
<035> Contact Telephone Number: Number of the person identified in data line <030>	2094832355 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	eric.votaw@mossadams.com

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JUL 01 2015  
FCC Mail Room

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313 Completion Required</b>	<b>54.422 Completion Required</b>
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			<i>(check box when complete)</i>	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 542313CA510.pdf	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 542313CA610.pdf	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> 542313CA1010.pdf	<i>(attach descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<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>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

<3000>	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	542313
<015>	Study Area Name	DUCOR TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@moasadans.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
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<010> Study Area Code	542313
<015> Study Area Name	DUCOR TELEPHONE CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mosadams.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

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	942333
<015>	Study Area Name	DUCOR TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mosadama.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
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<010>	Study Area Code	542313
<015>	Study Area Name	DUCOR TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mcpsadams.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

542313CA1210.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>Data Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0827 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	542313
<b>&lt;015&gt;</b>	Study Area Name	DUCOK TELEPHONE CO
<b>&lt;020&gt;</b>	Program Year	2018
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	ERIC N. VOCAW
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2044032335 WVA
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	ERIC.VOCAW@PROGRESSVA.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))
- <2011a>** 3rd Year Certification (47 CFR § 54.313(b)(1)iii)
- <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	

**(8000) Rate Of Return Carrier Additional Documentation**  
**Data Collection Form**

FCC Form 483  
 OMB Control No. 3060-0866/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	542313
<015> Study Area Name	DUNOR TELEPHONE CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Eric N. Yocaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.yocaw@comcast.com

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

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

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(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)  
 (3014) If yes, does your company file the RUS annual report  (Yes/No)

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

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

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

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

Name of Attached Document Listing Required Information

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

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

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

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

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

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

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

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

(3024) Underlying information subjected to an officer certification.

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

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

LINE 3000 RATE OF RETURN DATA

REDACTED FOR PUBLIC INSPECTION

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	542313
<015> Study Area Name	DUCOR TELEPHONE CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.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:
<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>	

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

<010> Study Area Code	542313
<015> Study Area Name	DUCOR TELEPHONE CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2094832355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.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) <u>Eric N. Votaw</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:	Eric N. Votaw
Name of Reporting Carrier:	DUCOR TELEPHONE CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/30/2015
Printed name of Authorized Officer:	Eric Wolfe
Title or position of Authorized Officer:	Executive Vice President
Telephone number of Authorized Officer:	6618347700 ext.
Study Area Code of Reporting Carrier:	542313 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.	

**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:	DUCOR TELEPHONE CO
Name of Authorized Agent or Employee of Agent:	Moss Adams, LLP
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/30/2015
Printed name of Authorized Agent or Employee of Agent:	Eric N. Votaw
Title or position of Authorized Agent or Employee of Agent:	Senior Manager
Telephone number of Authorized Agent or Employee of Agent:	2094832355 ext.
Study Area Code of Reporting Carrier:	542313 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.	

## Attachments

LINE 100 INITIAL FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

REDACTED FOR PUBLIC INSPECTION

Response Line 510  
Ducor Telephone Company  
Study Area 542313

### **Voice Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Ducor Telephone Company ("DTC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. DTC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. Ducor also conducts subscriber outreach regarding CPNI by periodically placing CPNI explanation messages onto its website at [www.ducortelephone.com](http://www.ducortelephone.com), which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition DTC, trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

DTC also outlines its rates, terms, and conditions under which DTC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. DTC keeps its tariffs available for public inspection at its business offices.

### **Broadband Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Ducor Telephone Company ("DTC") is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. DTC provides access to broadband services in compliance with applicable federal rules and regulations. DTC does not provide direct broadband service to its subscribers but does offer access to broadband to Internet Service Providers.

DTC also outlines its rates, terms, and conditions under which DTC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610  
Ducor Telephone Company  
Study Area 542313

#### Functionality in Emergency Situations:

##### Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Ducor Telephone Company ("DTC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to DTC central by use of a fixed generator and batteries that provide it with 8 hours of emergency power. In addition, DTC field electronics have 8 to 12 hours of back-up power by use of fixed and mobile generators and batteries. DTC also has SONET technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. DTC has sufficient spare cards for its fiber optic network to provide almost instantaneous replacements should there be a card failure in the core network and proper staff in place to repair any fiber cuts in a timely manner. In addition, DTC has connectivity to the neighboring exchanges to pass traffic and also has connectivity to the LATA Tandem which further provides capabilities of handling traffic. Lastly, DTC is prepared and capable of managing traffic spikes resulting from emergency situations and has developed procedures for employees to follow during emergency situations.

##### Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Ducor Telephone Company ("DTC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to DTC central by use of a fixed generator and batteries that provide it with 8 hours of emergency power. In addition, DTC field electronics have 8 to 12 hours of back-up power by use of fixed and mobile generators and batteries. DTC also has SONET technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. DTC has sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network and proper staff in place to repair any fiber cuts in a timely manner. In addition, DTC has connectivity to the neighboring exchanges to pass traffic. Lastly, DTC is prepared and capable of managing traffic spikes resulting from emergency situations and has developed procedures for employees to follow during emergency situations.







Response to Line 1010  
Ducor Telephone Company  
Study Area 542313

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10 ) Ducor Telephone Company ("DTC") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$47.48 as specified in Public Notice DA 15-470 issued on April 16, 2015. DTC's current total local end-user rate<sup>1</sup> of:

<u>Exchange</u>	<u>Rate Explanation</u>
Ducor	\$22.44(which includes a local fee of \$20.25, mandated state fees of \$.84 and mandatory extended area service charges of \$1.35)
Kennedy Meadows	\$21.09 (which includes a local fee of \$20.25 and mandated state fees of \$.84)
Rancho Tehama	\$21.09 (which includes a local fee of \$20.25 and mandated state fees of \$.84)

None of the DTC exchanges are above the standard deviation as specified in the USF/ICC transformation Order. <sup>2</sup>

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<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Schedule No. A-15

UNIVERSAL LIFELINE TELEPHONE SERVICE

APPLICABILITY

Applicable to eligible residence customers for Universal LifeLine Telephone Service (ULTS) a.k.a. California LifeLine Program or LifeLine furnished pursuant to the Moore Universal Telephone Service Act and in accordance with General Order 153. The Utility as listed throughout this Schedule is identified as the California LifeLine Service Provider in GO 153.

TERRITORY

Within the exchange areas, as said areas are defined on maps filed as part of the tariff schedules.

RATES AND CHARGES

	<u>Rate per Month</u>	(T)
(1) Local Exchange Service:		
a. Extended Area Service (EAS)		
1. Ducor exchange:		
(a) Individual access line		
1. Local Flat Rate Service	\$20.25	
2. End User Common Line (EUCL) Charge	6.50	(N)
3. EAS Increment	1.35	(T)
4. Federal Lifeline Credit	9.25	(C)
5. California Specific Support Credit (includes 67 cent EAS support)	<u>12.06</u>	(I)
6. California LifeLine Flat Rate Service	\$6.79	(T)
b. Flat Rate Exchange Service		
1. Kennedy Meadows and Rancho Tehama exchanges		
(a) Individual access line		
1. Local Flat Rate Service	\$20.25	
2. End User Common Line (EUCL) Charge	6.50	(N)
3. Federal Lifeline Credit	9.25	(C)(T)
4. California Specific Support Credit	<u>11.39</u>	(I)
5. California LifeLine Flat Rate Service	\$6.11	(T)
		(D)
		(D)

(Continued)

(To be inserted by the utility)  
 Advice Letter No. 343

Issued by

(To be inserted by Cal. P.U.C.)  
 Date Filed June 18, 2012

Decision No. \_\_\_\_\_

Galen D. Norsworthy

Effective June 18, 2012

NAME

President

Resolution No. \_\_\_\_\_

TITLE

Schedule No. A-15

UNIVERSAL LIFELINE TELEPHONE SERVICE  
 (Continued)

RATES AND CHARGES - (Continued)

Service Charge

(T)

(2) Service Connection Charges:  
 (See Special Conditions 5)

a. Each New Service Order for Initial Install:

1. New Service Order Charge	\$23.50	
2. Central Office Connection Work Charge	<u>25.50</u>	
	49.00	
3. Federal Link Up Credit	0.00	(R)
4. California LifeLine Credit	<u>39.00</u>	(I)
5. California LifeLine Service Connection Charge	\$10.00	

b. Each Subsequent New Service Order:

1. New Service Order Charge	\$23.50
2. Central Office Connection Work Charge	<u>25.50</u>
	49.00
3. California LifeLine Credit	<u>39.00</u>
4. California LifeLine Service Connection Charge	\$10.00

c. Each Non-Payment Reconnect Charge:

1. Restoral Charge	\$40.00
2. California LifeLine Credit	<u>30.00</u>
3. California LifeLine Service Connection Charge	\$10.00

d. Each change to convert to ULTS:

1. Change Charge	\$11.50
2. California LifeLine Credit	<u>1.50</u>
3. California LifeLine Service Conversion Charge	\$10.00

(D)

(D)

(Continued)

(To be inserted by the utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 342

Date Filed April 4, 2012

Galen D. Norsworthy

Decision No. \_\_\_\_\_

NAME

Effective April 4, 2012

President

TITLE

Resolution No. \_\_\_\_\_