

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Universal Service High-Cost Filing Deadlines	)	WC Docket No. 08-71
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Petition of MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. for Waiver of Sections 54.307 and 54.903 of the Commission’s Rules	)	
_____	)	

**SUPPLEMENT TO PETITION FOR RECONSIDERATION AND WAIVER OF  
MTA COMMUNICATIONS, LLC D/B/A MTA WIRELESS/MATANUSKA-KENAI, INC.**

On December 15, 2015, MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. (“MTAC”) submitted a Petition for Reconsideration and Waiver<sup>1</sup> of the Federal Communications Commission’s (“Commission”) and Wireline Competition Bureau’s (“Bureau”) streamlined resolution of requests for review, requests for waiver, and petitions for reconsideration of decisions related to actions taken by the Universal Service Administrative Company (“USAC”) in decision DA 15-1368, released November 27, 2015, in which the Bureau denied MTAC’s request for waiver.<sup>2</sup> MTAC requested a waiver of the March 30, 2015 FCC

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<sup>1</sup> *Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, CC Docket No. 96-45, Petition for Reconsideration and Waiver of MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc., before the FCC (Dec. 15, 2015) (“*Petition for Reconsideration*”).

<sup>2</sup> *Universal Service High Cost Filing Deadlines, et al.*, WC Docket Nos. 02-60, 96-45, 08-71, CC Docket Nos. 96-45, 02-6, Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company, DA 15-1368 (rel. Nov. 27, 2015) (“*FCC Order*”).

Form 525 high-cost line count filing deadline set forth in sections 54.307 and 54.903 of the Commission's rules because its filing did not include ICLS line count data.<sup>3</sup>

MTAC spent significant time and resources attempting to determine what caused its ICLS data to fail to send to USAC. During conversations with USAC, MTAC learned that the Form 525 interface that it uses is not identical to the one used by USAC, a fact that USAC staff themselves were not aware of during the early part of MTAC's investigation.<sup>4</sup> This meant that USAC inadvertently believed there was a section within the Form 525 portal that would allow MTAC to easily verify that all submissions were successfully transmitted.<sup>5</sup> After learning about this mistaken belief, MTAC continued to investigate the Form 525 submission process. MTAC now realizes the error occurred in the transmission of data to USAC, not in the entering of the data. MTAC was correct in stating that it failed to check the box for ICLS support, but that this statement may be subject to misinterpretation so MTAC respectfully submits this supplement.

## **I. STATEMENT OF FACTS.**

MTAC is an Alaska company that provides an array of telecommunications services to high-cost customers in Alaska including, but not limited to: (1) traditional voice grade access to the public switched network; (2) local usage; (3) access to operator, directory assistance and emergency services; and (4) wireless cellular services, including a locally-based wireless alternative. MTAC has upgraded most of its network to state-of-the-art code division multiple access technology. MTAC has provided high quality telecommunications services to Alaska customers since 1991 and has received high-cost federal universal service funding since 2005.

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<sup>3</sup> 47 C.F.R. §§ 54.307, 54.903.

<sup>4</sup> See *Petition for Reconsideration* at Exhibit B.

<sup>5</sup> See *Petition for Reconsideration* at Exhibit B (“Unfortunately, as we were helping the FCC gather information for the waiver request, I did notice that I had misspoke during our phone conversation about the external-facing site having a Submission Log page to indicate filed funds – that page is internal only.”).

Currently, MTAC's service area extends across nearly 9,000 square miles and the company serves almost 8,000 high-cost Alaska telecommunications customers in approximately nineteen communities.<sup>6</sup> MTAC operates a reliable network, transmits a high-quality signal, and provides high-quality service. MTAC implemented multiple back-up and redundancy features that allow it to assure reliable, safe and efficient telecommunications service to its rural Alaska customers. In remote areas, MTAC provides essential safety services for customers in distress, some of whom are engaged in outdoor activities for whom MTAC is the only signal they can receive.

MTAC timely filed its FCC Form 525 on March 24, 2015, well before the March 30, 2015 deadline.<sup>7</sup> MTAC followed the exact procedure it certified to the Commission<sup>8</sup> that it would follow: MTAC's regulatory specialist input the actual line count data into the Form 525 portal, and then informed MTAC's Chief Financial Officer ("CFO") that the Form 525 was ready for certification.<sup>9</sup> The CFO verified that the data was inputted and correct, certified the form, and submitted the data. During the CFO's certification of the data, there are two spots where the CFO confirmed the ICLS data was present: first, the ICLS tab on Form 525 was reviewed to ensure the line counts were correct.<sup>10</sup> Second, immediately before the filing is

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<sup>6</sup> The communities in which MTAC provides high-cost telecommunications services include, but are not necessarily limited to, Big Lake, Butte, Chickaloon, Deshka, Glenn Highway Flats, Goose Bay/Port McKenzie, Hatcher Pass, Meadow Lakes, Houston, Palmer, Petersville, Sheep Mountain, South Big Lake, Sutton, Skwenta, Talkeetna, Trapper Creek, Wasilla and Willow.

<sup>7</sup> See *Petition for Reconsideration* at Exhibit A, p. 2.

<sup>8</sup> See *Universal Service High-Cost Filing Deadlines, Federal-State Joint Board on Universal Service*, WC Docket No. 08-71, CC Docket No. 96-45, Order, before the FCC (rel. Mar. 27, 2014) ("*MTA Waiver Request Order*") at para. 10 ("We rely on both Cordova and MTAW to fulfill their commitments to adhere to their revised filing procedures, and do not anticipate either carrier will seek similar waivers again."); see also *Petition for Reconsideration* at Exhibit A, p.2 ("MTAC also requires that the form be completed by the regulatory specialist and certified as complete and correct by the Chief Financial Officer.").

<sup>9</sup> See Exhibit A at 2.

<sup>10</sup> See Exhibit A at 2. MTAC knows that the ICLS data was entered into Form 525 because the Disaggregation Zone Names and Wire Center Codes are present on the original Form 525, and these codes must be entered manually each time MTAC submits the Form 525. See *Universal Service High-Cost Filing Deadlines, Federal-State Joint Board on Universal Service*, WC Docket No. 08-71, CC Docket No. 96-45, *Petition of MTA Communications, LLC*, d/b/a

submitted, a pop-up box appeared that stated “This submission only includes line counts for the following components: HCLS/LSS, ICLS. Continue with submission?”<sup>11</sup> If the ICLS data was not input into Form 525, the popup box would not include ICLS in the components being submitted. Based on these two verifications, MTAC submitted the line count data.

MTAC’s investigation revealed that after the data is submitted, the USAC portal generates a summary sheet and the actual Form 525 filing that is submitted to USAC. The summary sheet indicates what data was successfully transmitted to USAC. MTAC did not review the USAC generated summary sheet because its procedures at the time did not contemplate a failure of data to be transmitted to USAC. Therefore MTAC did not discover the missing checkbox which indicates the ICLS line counts were not transmitted until much later, when it did not receive its expected ICLS funding. MTAC did not check the boxes on the USAC generated Form 525 and summary sheet for accuracy because it was not aware of the possibility of this type of error. Upon discovering the error when its monthly disbursement from USAC was \$141,653 short of expected, MTAC conducted an internal review and promptly contacted USAC.<sup>12</sup>

During discussions with USAC officials, MTAC learned that the external USAC portal and the internal USAC portal do not have similar interfaces. The internal USAC interface has a summary sheet that allows the user to instantly confirm that all relevant tabs have been checked.<sup>13</sup> The external interface that MTAC and other similarly situated carriers<sup>14</sup> use lacks a

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MTA Wireless/Matanuska-Kenai, Inc., for Waiver of Sections 54.307 and 54.903 of the Commission’s Rules, before the FCC (Oct. 6, 2013) (“Waiver Request”) at Exhibit A.

<sup>11</sup> See Exhibit A at 2-3.

<sup>12</sup> MTA’s disbursement report was dated August 28, 2015 and MTA contacted USAC on September 14, 2015.

<sup>13</sup> See *Petition for Reconsideration* at Exhibit B.

summary sheet. If there is an error in the transmission of data, as was the case here, the only way MTAC would know would be to log into the Form 525 after it is certified and submitted and print a copy of the USAC generated Form 525 and summary sheet. If this summary sheet shows an error, then MTAC will know that the submission was incorrect and will immediately revise its filing and submit again. This step was not previously contemplated by MTAC because it never had this submission error before. MTAC added this step to its data submission process to ensure that the USAC database always accepts and processes the submitted data.

## **II. GOOD CAUSE EXISTS FOR THE COMMISSION TO WAIVE SECTIONS 54.307 AND 54.903 OF ITS RULES IN THIS INSTANCE.**

The Commission may waive its rules for good cause shown.<sup>15</sup> Specifically, the Commission may exercise its discretion to waive a rule where the particular facts at issue make strict compliance with the rule inconsistent with the public interest.<sup>16</sup> The Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>17</sup> In sum, a waiver of a filing deadline is appropriate when special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.<sup>18</sup>

The Commission previously found that good cause exists to waive filing deadlines where the petitioning party demonstrates that the missed deadline was the result of a minor ministerial,

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<sup>14</sup> Very few carriers continue to use Form 525, as only those carriers continuing to receive frozen CLEC support must continue to file line count data. The software supporting Form 525 is not a priority since so few carriers need it.

<sup>15</sup> 47 C.F.R. § 1.3.

<sup>16</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972) (“*WAIT*”); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

<sup>17</sup> *WAIT*, 418 F.2d at 1159; *Northeast Cellular*, 897 F.2d at 1166.

<sup>18</sup> *NetworkIP, LLC v. FCC*, 548 F.3d 116, 127-28 (D.C. Cir. 2008); *Northeast Cellular*, 897 F.2d at 1166.

clerical or procedural error.<sup>19</sup> The Commission has also held that good cause exists when the petitioning party promptly remedies its failure to timely file and revises its internal procedures to ensure compliance.<sup>20</sup> Consistent with Commission precedent, a waiver is justified in this case. Absent a waiver, MTAC will lose approximately \$425,000 in high-cost federal universal service funding. These funds are critical to MTAC's ability to serve its high-cost Alaska customers and the loss of such funding would be detrimental to the public interest. Failure to receive these funds would limit the telecommunications choices and mobility available to rural Alaska communities and compromise the ability of MTAC's customers to access critical health and safety services when away from their residences.

Good cause exists in this case because MTAC timely filed the Form 525 seven days prior to the March 30, 2015 deadline. MTAC precisely followed its internal procedures that were designed to ensure the filing was made timely and completely. Nothing in MTAC's internal procedures was designed to ensure that a technical error outside of MTAC's control would be immediately caught. Despite following its procedures, MTAC immediately took steps to rectify the error. It would be unjust to MTAC and MTAC's customers for a single mistake outside of MTAC's control to deprive it of approximately \$425,000. MTAC took all reasonable steps to correct this problem shortly after learning of it. MTAC reacted as quickly as possible after learning that its ICLS data was not transmitted. Thus, hardship and equity considerations support the grant of MTAC's requested waiver.<sup>21</sup>

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<sup>19</sup> See *In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, Order, DA 13-2094, (rel. Oct. 29, 2013) at para. 7.

<sup>20</sup> See, e.g., *In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, CC Docket No. 96-45, Order, DA 10-107 (rel. Jan. 22, 2010) at para. 22.

<sup>21</sup> *In the Matter of Federal-State Joint Board on Universal Service, et al.*, CC Docket No. 96-45, Order, DA 06-2584 (rel. Dec. 28, 2006) at para. 5 (finding that “[i]n this case, . . . considerations of hardship and equity – as well as North River’s longstanding history or submitting timely data – weigh in favor of granting the requested waiver” and stating that previous waivers had been granted to ““ensure that consumers in all regions of the Nation, including low-

### **III. MTAC’S ERROR WAS AN EXTERNAL TECHNICAL ERROR.**

MTAC timely submitted its FCC Form 525 seven days before the March 30, 2015 deadline. Unfortunately, the USAC portal that MTAC uses to submit the Form 525 data does not contain an external verification that would allow MTAC to confirm information was correctly received by USAC. MTAC’s correspondence with USAC noted that USAC was able to discern there was missing data in under 10 seconds, but MTAC had no knowledge of the missing information until its high-cost funding was significantly below expectations. The only way for MTAC to determine that its data is submitted properly is to log into the Form 525 a second time and print out a copy of the USAC generated Form 525 and summary sheet. MTAC has added this step to its internal procedures to ensure future submissions do not have this error, but this was an unforeseen circumstance during the March 2015 submission.

An “all or nothing” approach to high-cost funding is inappropriate if the USAC portal does not provide a method for carriers to verify that their information was correctly submitted. There is little reason why the internal USAC portal should show USAC that the carrier’s information and verifications were incomplete while the external portal withholds that information. Such a system leaves carriers in the position of believing they correctly submitted their data until their high-cost support funding is significantly below expectations. MTAC understands that very few companies continue to submit Form 525 and therefore there is little need do a serious update to the USAC portal. However, MTAC and MTAC’s customers should not be victims of a technical oversight that nobody expected to occur.

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income consumers and those in rural, insular, and high-cost areas, have access to telecommunications and information services.”).

#### **IV. MTAC HAS IMPLEMENTED ADDITIONAL INTERNAL CONTROLS TO PREVENT THIS TYPE OF ERROR FROM REOCCURRING.**

MTAC emphasizes that upon learning that its line count information had not been properly received by USAC and the Commission, MTAC conducted an internal review and promptly contacted USAC to determine the cause.<sup>22</sup> After discovering that the only method to ensure a successful submission was to print the USAC generate Form 525 and summary sheet and review the checkboxes on the summary sheet, MTAC reviewed and modified its internal procedures. Specifically, MTAC developed an internal procedure that requires MTAC to submit FCC Form 525 several days prior to the filing deadline so that additional MTAC personnel can review the USAC generated forms to verify that the proper information was received by USAC. This internal procedure is in addition to the procedures implemented by MTAC as a result of the 2013 waiver request. MTAC fully understands the importance of submitting timely and complete filings to USAC and is implementing this procedure to ensure that future line count filings are made in complete accordance with the Commission's rules.

#### **CONCLUSION**

The loss of approximately \$425,000 in high-cost funding would cause MTAC and its customers undue hardship. The loss of this funding would result in the decreased availability of telecommunications services to high-cost customers in Alaska and compromise access to critical health and safety services. MTAC engaged in a lengthy and detailed internal examination to identify the error that occurred, only to realize that the error occurred outside of MTAC's control. MTAC implanted additional internal controls to ensure that even these external errors will be immediately caught and rectified prior to future filing deadlines. MTAC apologizes if its language regarding the situation in prior filings was imprecise, but now believes the record

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<sup>22</sup> MTA's disbursement report was dated August 28, 2015 and MTA contacted USAC on September 14, 2015.

precisely reflects the events that occurred surrounding its March 2015 Form 525 submission.

MTAC respectfully requests that the lost support be restored as soon as possible.

Respectfully submitted this 29<sup>th</sup> day, December, 2015.

DYKEMA GOSSETT, PLLC  
Attorneys for MTA Communications, LLC d/b/a MTA  
Wireless/Matanuska-Kenai, Inc.

By:     /s/ Shannon M. Heim      
Shannon M. Heim  
Erik Levy  
4000 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: (612) 486-1586  
Facsimile: (855) 223-7059  
Email:       sheim@dykema.com  
              elevy@dykema.com

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Universal Service High-Cost Filing	)	WC Docket No. 08-71
Deadlines	)	
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	
Petition of MTA Communications, LLC d/b/a	)	
MTA Wireless/Matanuska-Kenai, Inc. for	)	
Waiver of Sections 54.307 and 54.903 of the	)	
Commission's Rules	)	
_____	)	

**AFFIDAVIT OF WANDA TANKERSLEY**

STATE OF ALASKA                    )  
  )SS.  
BOROUGH OF MATANUSKA        )

Wanda Tankersley, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.

2. I am the Chief Financial Officer of Matanuska Telephone Association, Inc. Matanuska Telephone Association, Inc. is the sole member of MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. ("MTAC"). Acting on behalf of MTAC, I have read the Supplement to Petition for Reconsideration to which this Affidavit is attached. I have knowledge of the facts stated in the Application and those facts are true to the best of my knowledge and belief.

3. MTAC's internal procedure for submitting Form 525 begins with MTAC's regulatory specialist inputting the line count data in Form 525. The regulatory specialist will then inform me that the Form 525 is read for certification and submission.

4. In the Form 525 portal, the first tab contains information regarding MTAC and the personnel who input the line count data. I verify the contents of this tab for accuracy. A screenshot of this tab is attached to this Affidavit as Attachment 1.

5. The second tab contains the High-Cost Loop Support and Local Switching Support line count data as inputted by the regulatory specialist. I compare what is currently on the screen, line by line, with a printout of what the regulatory specialist input into the form. A screenshot of this tab is attached to this Affidavit as Attachment 2.

6. The third tab contains the Interstate Common Line Support data as inputted by the regulatory specialist. I compare what is currently on the screen, line by line, with a printout of what the regulatory specialist input into the form. A screenshot of this tab is attached to this Affidavit as Attachment 3.

7. The fourth and fifth tabs are where High-Cost Model Support and Interstate Access Support data would be inputted. MTAC does not receive either of these supports, so I simply verify that the screens contain no data.

8. The sixth tab is the certification of the data. I enter my information as the officer of MTAC that is certifying the data and then click certify. A screenshot of this tab is attached to this Affidavit as Attachment 4.

9. After I click certify, a popup box appears that states "This submission only includes line counts for the following components: HCLS/LSS, ICLS. Continue with

submission?" I verify that both HCLS/LSS and ICLS are in the popup box, and then click "Yes."

A screenshot of this popup box is attached to this Affidavit as Attachment 5.



Wanda Tankersley  
Wanda Tankersley  
Chief Financial Officer

The foregoing instrument was acknowledged before me this 29<sup>th</sup> day of December, 2015 by Wanda Tankersley.

Corinne M. Egger  
Notary Public

My Commission Expires: 8/7/2019




Logged in as [wankersley@mta-teleco.com](mailto:wankersley@mta-teleco.com)  
 12/28/2015 15:50:00

Carrier Info	HCL/SS	ICLS	HCM	IAS	UNE Reporting	Certify/Submit
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SPIN: 143000432  
 SAC: 619003  
 Study Area Name: MATANUSKA-KENAI, INC. - CL

**Quarterly Submission for 4Q2015**  
 HCL/SS lines as of: Jun 30, 2015 due Dec 30, 2015  
 ICLS lines as of: Jun 30, 2015 due Dec 30, 2015  
 HCM lines as of: Jun 30, 2015 due Dec 30, 2015  
 IAS lines as of: Sep 30, 2015 due Dec 31, 2015

FCC Form 525

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Company Legal Name: MATANUSKA-KENAI, INC. - CL  
 Filer 499 ID: 809610

Contact Name  
 (8) First Name\*  Sonja  
 (9) Title\*  Regulatory Reporting

Address  
 (7) Street/PO Box\*  1740 S Chugach Street  
 (7) Address Line 2   
 (7) City\*  Palmer  
 (7) State\*  AK-61  
 (7) ZIP Code\*  99645

(8) Last Name\*  Nelson  
 (11) Email\*  snelson@mta-teleco.com  
 (10) Phone\*  907-761-2439

Save  Return to 525 List

\* indicates required field



Logged in as wdankersley@mta.telco.com  
12/28/2015 15:50:35

Carrier Info HCL/LSS ICLS HCM IAS UNE Reporting Certify/Submit

SPIN: 143000432  
SAC: 619003  
Study Area Name: MATANUSKA-KENAI, INC. - CL

Quarterly Submission for 4Q2015  
HCL/LSS lines as of: Jun 30, 2015 due Dec 30, 2015

FCC Form 525

(16) and (17)\*  Select ILEC Name and SAC  
(22) Lines\*

(20)  Select Disaggregation Zone  
(23) UNE

(21)  Select Wire Center

Add Line Counts

(16) ILEC Name	(17) ILEC SAC	(18) EIC?	(19) Path	(20) Disaggregation Zone	(21) Wire Center CLLI	(22) Total Lines In Service	(23) UNEs?	Remove
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	362	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Cantwell Zone 2	ONTWAKXA	6	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 1	PLWRKAKXA	2340	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 2	PLWRKAKXA	311	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Talkeena Zone 1	TLKTAKXA	198	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Talkeena Zone 2	TLKTAKXA	61	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 1	WSLLAKXA	1843	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 2	WSLLAKXA	1676	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Willow Zone 2	WLLWAKXA	355	N	X

Upload Data

Delete All Rows

Save

Return to 525 List

\* indicates required field

<https://hdi.universalservice.org/usac/form525> for Pandora Radio - Listen to Free L... Universal Service Administration... x  
 File Edit View Favorites Tools Help

Universal Service Administrative Company  
**High Cost**  
 Logged in as wankeraley@mta-telco.com  
 12/28/2015 15:51:08

Carrier Info: HCL/LSS HCM IAS UNE Reporting Certify/Submit  
 SPIN: 143000432  
 SAC: 619003  
 Study Area Name: MATANUSKA-KENAI, INC. - CL  
 Quarterly Submission for **4Q2015**  
 ICLS lines as of: Jun 30, 2015 due Dec 30, 2015  
 FCC Form 525

(24) and (25)\*  Select ILEC Name and SAC  
 (30) Residence and Single Line Business\*  0  
 (31) Multi-Line Business\*  0  
 (28)  Select Disaggregation Zone  (32) Total Lines  0  
 (29)  Select Wire Center  (23) UNE

Add Line Counts  
 Upload Data Save Return to 525 List

(24) ILEC Name	(25) ILEC SAC	(26) ETC?	(27) Path	(28) Disaggregation Zone	(29) Wire Center CLLI	(30) Residence and Single Line Business	(31) Multi-Line Business	(32) Total Lines	(23) UNE	Remove
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	354	8	362	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Cantwell Zone 2	CNTWAKXA	6	0	6	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 1	PLMRKAXA	1962	378	2340	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 2	PLMRKAXA	304	7	311	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 1	TLKTAKXA	172	26	198	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 2	TLKTAKXA	61	0	61	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 1	WSLLAKXA	1695	148	1843	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 2	WSLLAKXA	1607	69	1676	N	X
MATANUSKA TEL ASSOC	613015	Y	3	Willow Zone 2	WILLWAKXA	346	9	355	N	X

<https://hcli.universalservice.org/usac/form525/for> | 
 [Pandora Radio - Listen to Free L...](#) | 
 Universal Service Administrati...

File Edit View Favorites Tools Help



**High Cost**

Logged in as wankersley@mba.telco.com  
12/28/2015 15:52:26

Carrier Info	HCI/ISS	ICLS	HCM	IAS	UNE Reporting	Certify/Submit																																																								
<p>FCC Form 525</p> <p>Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier</p> <p>I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.</p> <table border="1"> <tr> <td>Name of Reporting Carrier</td> <td colspan="6">MATANUSKA-KENAI, INC. - CL</td> </tr> <tr> <td>Service Provider Identification Number</td> <td colspan="6">143000432</td> </tr> <tr> <td>Signature of authorized officer or employee</td> <td colspan="6">By logging into my account and clicking the Certify/Submit button below, I am electronically signing this form. Wanda Tankersley</td> </tr> <tr> <td>Printed name of authorized officer or employee*</td> <td colspan="6">CFO</td> </tr> <tr> <td>Title or position of authorized officer or employee*</td> <td colspan="6">907.761.2654</td> </tr> <tr> <td>Telephone number of authorized officer or employee*</td> <td colspan="6">819003</td> </tr> <tr> <td>Study Area Code of Reporting CETC</td> <td colspan="6">12/30/2015</td> </tr> <tr> <td>Filing Due Date for this form (mm/dd/yyyy)</td> <td colspan="6"></td> </tr> </table> <p>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. 1/241/2-502, 503(0), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. 1/241/1001.</p> <p> <input type="button" value="Certify/Submit"/> <input type="button" value="Validate Form 525"/> <input type="button" value="Return to 525 List"/> </p>							Name of Reporting Carrier	MATANUSKA-KENAI, INC. - CL						Service Provider Identification Number	143000432						Signature of authorized officer or employee	By logging into my account and clicking the Certify/Submit button below, I am electronically signing this form. Wanda Tankersley						Printed name of authorized officer or employee*	CFO						Title or position of authorized officer or employee*	907.761.2654						Telephone number of authorized officer or employee*	819003						Study Area Code of Reporting CETC	12/30/2015						Filing Due Date for this form (mm/dd/yyyy)						
Name of Reporting Carrier	MATANUSKA-KENAI, INC. - CL																																																													
Service Provider Identification Number	143000432																																																													
Signature of authorized officer or employee	By logging into my account and clicking the Certify/Submit button below, I am electronically signing this form. Wanda Tankersley																																																													
Printed name of authorized officer or employee*	CFO																																																													
Title or position of authorized officer or employee*	907.761.2654																																																													
Telephone number of authorized officer or employee*	819003																																																													
Study Area Code of Reporting CETC	12/30/2015																																																													
Filing Due Date for this form (mm/dd/yyyy)																																																														

\* indicates required field

Browser interface showing the URL: <https://hcll.universalservice.org/usac/form525/form525/for...> and the page title: Universal Service Administration... x. The browser window includes standard navigation buttons (back, forward, refresh, home, search) and a search bar. The page content features the USAC logo (Universal Service Administrative Company) and a prominent yellow banner with the text "High Cost" and a small image of two children.

This submission only includes line counts for the following components: HCL/L\$, ICL\$. Continue with submission?