



New Lisbon Telephone Co., Inc.  
[www.NLTC.net](http://www.NLTC.net)

**Filed via ECFS**

January 19, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554  
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

New Lisbon Telephone Company (“New Lisbon” or the “Company”), Study Area Code 320796, hereby notifies the Federal Communications Commission (“FCC” or “Commission”) and the Wireline Competition Bureau (“WCB” or “Bureau”) of changes that the Company will be making to its Form 477. The changes described herein contribute to a significant impact in the Alternative Connect America Model (“A-CAM”) for New Lisbon. New Lisbon respectfully requests that the Commission incorporate its forthcoming, modified Form 477 in the A-CAM and ensure that no impact is caused to the Company or its neighboring ILECs in Indiana as a result of New Lisbon’s previously-filed Form 477.

New Lisbon’s previously-filed FCC Form 477 containing data as of December 31, 2014 had incorrectly identified numerous census blocks in its study area as having fiber-to-the-home broadband service. The mislabeled blocks were an inadvertent error that came to light when New Lisbon began reviewing the A-CAM in depth, and realized that many of its census blocks were “knocked out” of support for being served by fiber, when in fact they are not.

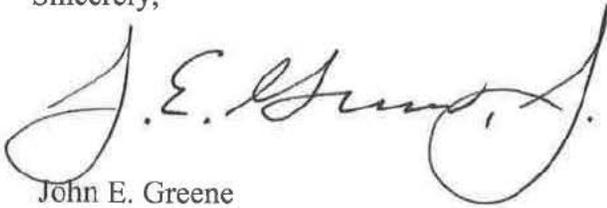
Once New Lisbon realized that it had overshot the number of census blocks served by fiber, the Company immediately took action and began reviewing its network technology deployment census block by census block in order to make corrections to the Form 477 as soon as possible. However, New Lisbon remains concerned that these changes will not be incorporated into the forthcoming versions of the A-CAM in a timely manner.

Furthermore, New Lisbon is aware of other rural ILECs who are undertaking a similar exercise to ensure that the A-CAM includes the most accurate data possible. Inaccurate Form 477 data

has been revealed through the A-CAM analysis process, and any ILEC who realizes its own broadband deployment inaccuracies should have a chance to correct the errors before the final version of the A-CAM is adopted. New Lisbon supports the letters that have been filed with the FCC recently by other ILECs who wish to ensure that modified Form 477 data is incorporated in the A-CAM.

New Lisbon respectfully requests that the FCC allow its forthcoming corrections to be included in the A-CAM to reflect accurately these facts. Without these corrections, future versions of the A-CAM will not reflect the facts pertaining to the census blocks served by New Lisbon with the correct broadband technology and service area. Without these corrections, the Commission's universal service policy for New Lisbon's study area will be challenged as the amount of support available will not be sufficient to advance broadband technology in the area.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. E. Greene, J.", written in black ink.

John E. Greene  
CEO and GM  
New Lisbon Telephone Company