



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](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 17, 2016

**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  
2016 ETC Annual Report of Baraga Telephone Company  
Study Area Code 310675**

Dear Ms. Dortch:

On behalf of Baraga Telephone Company (“Baraga”), JSI files the attached confidential version 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> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is 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 the Company’s Five-Year Service Quality Improvement Plan Progress Report 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)

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

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (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).



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

**Re: WC Docket No. 14-58  
2016 ETC Annual Report of Baraga Telephone Company  
Study Area Code 310675  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Baraga 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. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2016 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 Progress Report provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<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> 47 C.F.R. §§ 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

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> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain 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

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<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).

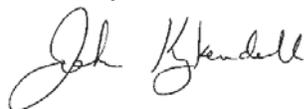
the attachment under seal. The Company uses the information contained in the Progress Report to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory 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 Progress Report 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)

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

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

<010> Study Area Code	310675
<015> Study Area Name	BARAGA TEL CO
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Paul W. Stark
<035> Contact Telephone Number: Number of the person identified in data line <030>	9063536644 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	pwstark@up.net
Form Type	54.313 and 54.422

**(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	310675
<015>	Study Area Name	BARAGA_TEL_CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pwstark@up.net

<110> Has your company received its ETC certification from the FCC?  (yes / no)  (yes / no)

<111> If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?  (yes / no)  (yes / no)

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing "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	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Yes



**(300) Unfulfilled Service Request  
Data Collection Form**

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

<010> Study Area Code 310675  
 <015> Study Area Name BARAGA TEL CO  
 <020> Program Year 2017  
 <030> Contact Name - Person USAC should contact regarding this data Paul W. Stark  
 <035> Contact Telephone Number - Number of person identified in data line <030> 9063536644 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> pwstark@up.net

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice) \_\_\_\_\_  
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband) 310675mi.330.pdf  
Name of Attached Document

<p>(400) Number of Complaints per 1,000 customers Data Collection Form</p>	<p>FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013</p>
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<010>	Study Area Code	310675
<015>	Study Area Name	BARAGA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line	pwstark@up.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form**

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

<010> Study Area Code	310675
<015> Study Area Name	BARAGA TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035> Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pwstark@up.net
<500> Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	310675mi510.pdf

**(600) Functionality in Emergency Situations  
Data Collection Form**

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FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	310675
<015> Study Area Name	BARAGA TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035> Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pwestark@up.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	310675mi610.pdf







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

<010> Study Area Code 310675  
 <015> Study Area Name BARAGA TEL CO  
 <020> Program Year 2017  
 <030> Contact Name - Person USAC should contact regarding this data Paul W. Stark  
 <035> Contact Telephone Number - Number of person identified in data line <030> 9063536644 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> pwstark@up.net

<900> Does the filing entity offer tribal land services? (Y/N) Yes

Keweenaw Bay Indian Community

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

310675mi920.pdf

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each of 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:

Select Yes or No or Not Applicable
Yes

- <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.

**(1000) Voice and Broadband Service Rate Comparability Data Collection Form**

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

<010> Study Area Code 310675  
 <015> Study Area Name BARAGA TEL CO  
 <020> Program Year 2017  
 <030> Contact Name - Person USAC should contact regarding this data Paul W. Stark  
 <035> Contact Telephone Number - Number of person identified in data line <030> 9063536644 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> pwstark@up.net

<1000> Voice services rate comparability certification Yes  
 <1010> Attach detailed description for voice services rate comparability compliance  
 <1020> Broadband comparability certification  
 Name of Attached Document  
 Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau  
 <1030> Attach detailed description for broadband comparability compliance  
 Name of Attached Document

**(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	310675
<015>	Study Area Name	BARAGA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pwstark@up.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<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).

**(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form**

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

<010>	Study Area Code	310675
<015>	Study Area Name	BARAGA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pwestark@up.net

310675mi1210.pdf	
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<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.baragatelephone.com/tariff.php>

"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.

(2000) Price Cap Carrier Additional Documentation  
 Data Collection Form  
 Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

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

<010> Study Area Code 310675  
 <015> Study Area Name BARAGA TEL CO  
 <020> Program Year 2017  
 <030> Contact Name - Person USAC should contact regarding this data Paul W. Stark  
 <035> Contact Telephone Number - Number of person identified in data line <030> 9063536644 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> pwstark@up.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental 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) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(iii). Round 2 recipients only. Name of Attached Document Listing Required Information
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13- Name of Attached Document Listing Required Information
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

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

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**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)}**

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

[Redacted]

[Redacted]

[Redacted]

Name of Attached Document Listing Required Information

[Redacted]

Name of Attached Document Listing Required Information

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

(3005) Rate Of Return Carrier Additional Documentation  
Data Collection Form

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

<010>	Study Area Code	310675
<015>	Study Area Name	BARAGA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pwestark@up.net

Complete the items below to note compliance with 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.

Progress Report on 5 Year Plan  
(3009) Carrier certifies to 54.313(f)(1)(iii)

(3010A) Milestone Certification (47 CFR § 54.313(f)(1)(i)) Yes - Attach Certification

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii)) Yes - Attach New Community Anchors

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No)  Yes  No

(3014) If yes, does your company file the RUS annual report (Yes/No)  Yes  No

Please check these boxes to confirm that the attached PDF, 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) with 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)  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 Borrowers

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

(3021) Management letter and/or 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

**REDACTED - FOR PUBLIC INSPECTION**

(3005) Rate Of Return Carrier Additional Documentation (Continued)  
 Data Collection Form  
 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	310675
<015>	Study Area Name	BARAGA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pwestark@up.net

<b>Financial Data Summary</b>	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

(4005) Rural Broadband Experiment Additional Documentation  
Data Collection Form

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

<010>	Study Area Code	310675
<015>	Study Area Name	BARAGA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pwstark@up.net

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

**If yes to 4003A, please provide a response for 4003B.**

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information \_\_\_\_\_

**Broadband Deployment Locations – FCC 14-98 (paragraph 80)**

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information \_\_\_\_\_

**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information \_\_\_\_\_

<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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<b>&lt;010&gt;</b>	Study Area Code	310675
<b>&lt;015&gt;</b>	Study Area Name	BARAGA TEL CO
<b>&lt;020&gt;</b>	Program Year	2017
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	pwstark@up.net

**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 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	310675
<015> Study Area Name	BARAGA TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Paul W. Stark
<035> Contact Telephone Number - Number of person identified in data line <030>	9063536644 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pwstark@up.net

**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>JSI</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: <u>JSI</u>	
Name of Reporting Carrier: <u>BARAGA TEL CO</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/10/2016</u>
Printed name of Authorized Officer: <u>Paul Stark</u>	
Title or position of Authorized Officer: <u>President</u>	
Telephone number of Authorized Officer: <u>9063536644 ext.</u>	
Study Area Code of Reporting Carrier: <u>310675</u>	Filing Due Date for this form: <u>07/01/2016</u>
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: <u>BARAGA TEL CO</u>	
Name of Authorized Agent Firm: <u>JSI</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>06/10/2016</u>
Name of Authorized Agent Employee: <u>Cassandra Heyne</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>3014597590 ext.</u>	
Study Area Code of Reporting Carrier: <u>310675</u>	Filing Due Date for this form: <u>07/01/2016</u>
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

REDACTED - FOR PUBLIC INSPECTION

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

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

**ATTACHMENT REDACTED IN ENTIRETY**

REF	CUSTOMER NAME	DESCRIPTION OF SERVICE REQUESTED	SERVICE REQUESTED (✓ ALL APPLICABLE TO UNFULFILLED REQUEST)		BROADBAND	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
			BROADBAND	VOICE	SPEED REQUESTED	
1	Greg	DSL	X		"8/1	Delayed this large job until 2017. 2.75 miles of cable, mostly through a swamp.
2	John 1	DSL	X		"8/1	Fiber / DSLAM project completed 2015
3	Jeff 1	DSL	X		"8/1	Fiber / DSLAM project completed 2015
4	Paul	DSL	X		"8/1	Fiber / DSLAM project completed 2015
5	Lloyd	DSL	X		"8/1	Fiber / DSLAM project completed 2015
6	Alan	DSL	X		"8/1	Fiber / DSLAM project completed 2015
7	Steve	DSL	X		"8/1	Fiber / DSLAM project completed 2015
8	Brian	DSL	X		"8/1	Fiber / DSLAM project completed 2015
9	Gary	DSL	X		"8/1	Fiber / DSLAM project completed 2015
10	Jeff 2	DSL	X		"8/1	Fiber / DSLAM project completed 2015
11	Tom	DSL	X		"8/1	Fiber / DSLAM project completed 2015
12	John 2	DSL	X		"8/1	Fiber / DSLAM project for 2016

## **Baraga Telephone Company's Demonstration of Compliance with Service Quality Standards and Consumer Protection Rules for Voice and Broadband Services:**

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 Commission 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>

Baraga Telephone Company (“Company”) hereby certifies that it is complying with state and federal service quality standards and consumer protection rules. The Company is subject to consumer protection obligations for voice services under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Michigan Public Service Commission (MPSC), as specified in Section 202(b) of the Michigan Telecommunications Act (MTA) and MPSC Case No. U-11103, which disclose rates, terms and conditions of service to customers; (2) adherence to Michigan state consumer protection requirements governing telephone providers, Prohibitions as identified in Sections 305 and 502 of the MTA, Costing

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<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.

Procedures as determined by the MPSC in Case No. U-11103, and Compliance with Anti-Slamming Procedures as adopted in MPSC Case No. U-11757 and Case No. 11900; and (3) CPNI, Red Flag Rules and other federal and state requirements governing the protection of customers' privacy.

The Company is subject 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.

**Baraga Telephone Company's demonstration of ability to function in emergency situations for voice and broadband services:**

Baraga 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 Michigan Telecommunications Act (MTA). 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 will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites in accordance with the specifications identified in Section 305c(a) of the MTA, 484.2305c Emergency power requirements; compliance.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur. The company complies with the FCC's backup power requirements, effective October 16, 2015.

<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."







# Baraga Telephone Co.

May 31, 2016

Tribal Lands Engagement Letter  
Keweenaw Bay Indian Community  
Baraga, MI 49908

**Re: Form 481 Line 900 – Tribal Reporting**

Dear Sirs:

Line 900 – Tribal Land Offerings: Yes, The Baraga Telephone Company, BTC, serves the portion of the Keweenaw Bay Indian Community, KBIC, located within Baraga County, Michigan.

Line 920. “Tribal Engagement”: It should be noted that I am a member of this Indian Community, enrollment number 5179. Although I do not involve myself in Tribal politics, I do vote in all Tribal elections. I also participated in a KBIC Natural Resources Department food study.

The Baraga Telephone Company also has an ongoing contract with the Keweenaw Bay Community College for I.T. support.

Line 921. “Needs assessment and deployment planning”: Yes, I met twice in 2015 with the Tribal Council to discuss tribal issues. I also talk with the Tribal CEO about issues. One example was a desire by the Tribe to eliminate State sales tax for Tribal Member telephone bills on the reservation. Tribal members at present have to notify the State Treasurers office to get permission for a sales tax exemption. The Tribal council wanted to know if we could get a blanket exemption. I worked with the Telephone Association of Michigan, TAM, lobbyist, Ms. Jennifer Greenberg, to approach the State Treasury Department to see what could be done. It seems that without an agreement between the Tribe and the State the issue would remain as is. The KBIC is the only tribe in Michigan without a State agreement.

Line 922. “Feasibility and Sustainability Planning”: Yes, Personnel from the Baraga Telephone Company communicate regularly (almost daily) with Tribal personnel to discuss network changes or upgrades to Tribal services. For Instance, in October we started planning a boring project to connect a new solar project with the associated

.....

June 2, 2016

Page 2

Tribal Health clinic. We met primarily with Mr. Bruce LaPointe, the Tribal Director of Public Works. The project will take place in 2016.

Line 923. "Marketing Services in a Culturally Sensitive Manner: Yes, The Baraga Telephone Company does most of its marketing by direct personal contact. The Baraga Telephone Company employs two Tribal members besides myself. Our primary Customer Service Representative Julie Petosky is a Tribal member. She consults often with Tribal accounting concerning billing questions. Another of our Tribal member employees is Tim Gerard. Tim is our main contact person with the Tribe concerning their internal telephone system and telephone service in general. Another BTC employee, our Network Manager consults often with the Tribal IT manager to resolve both internal Tribal network issues and bandwidth upgrades.

Line 924 – Compliance with Right of Way Processes:

Line 925 – Compliance with Land Use Permitting Requirements:

Line 926 – Compliance with Facility Siting Rules:

Line 927 – Compliance with Environmental Review Processes:

Line 928 – Compliance with Cultural Preservation Review Processes: Yes, the Baraga Telephone Company consults with Tribal representatives anytime construction takes place on or near Tribal land.

Line 929 – Compliance with Tribal Business and Licensing Requirements: In December of 2015, the Baraga Telephone Company applied for and was granted a Tribal Business license for 2016. BTC had already been granted a license for 2015.

The following Tribal anchor institutions are connected with Baraga Telephone Company fiber optic cable for connection to the outside world and also for an internal Tribal network:

- The Tribal Industrial Park, including Tribal Housekeeping / Tribal Maintenance, Tribal Public Works, Ojibwa Plumbing & Heating and the Tribal Transfer Station.
- KBIC Social Services
- KBIC Casino & Motel
- KBIC Tribal Center
- Keweenaw Bay Community College campuses in Baraga and in L'Anse
- KBIC Pre Primary Education Program
- Office of Domestic Violence against Women
- The KBIC Health & Education Center
- The Tribal Radio Station
- The Tribal Office of Planning & Development
- The Tribal Police Office
- The Pines Convenience Center (Service Station)
- Tribal Court & the KBIC Office of Child Support

*June 2, 2016*

*Page 3*

- The Tribal Cultural Center (Located in the Ojibwa Park)
- KBIC Senior Citizens Building
- The Tribal Housing Commission Building
- The Tribal Fish Hatchery
- The old Tribal Construction building (not used at present)

The following Tribal office was added to the Tribal network with fiber optic cable in 2015:

- The Keweenaw Bay Ojibwa Housing & Community Development Corporation office in L'Anse, MI

Sincerely,

Paul W. Stark

[pwstark@up.net](mailto:pwstark@up.net)

President and General Manager, Baraga Telephone Company

Michigan Lifeline Administration Service  
**LIFELINE APPLICATION**

Eligible customers will receive \$11.25 off their monthly phone bill  
 and seniors aged 65 and older can receive additional discounts.

**TOLL FREE 1-866-321-2323**

To apply for Lifeline Service, complete the application below and send it to:  
**Lifeline Administration Service**  
**PO Box 11037, Lansing, Michigan 48901 OR fax to 517-482-3548**

**IDENTIFICATION INFORMATION (PLEASE PRINT)**

Applicant's phone number:		Name of phone company:	
Date of Birth:	Last 4-digits of Social Security Number:		
Last Name:	First Name:	M.I.:	
Street:			

**Residential street address only; FCC regulations prohibit the use of P.O. Boxes for the Lifeline program**

City:	State:	ZIP Code:
This is my permanent address: Yes <input type="checkbox"/> No <input type="checkbox"/> This is a rural address with no postal route: Yes <input type="checkbox"/> No <input type="checkbox"/>		
Billing Address, City, State and Zip Code (if different from Service Address)		

There are multiple unique households (e.g. nursing home, assisted living facility) at my address, as defined in this program.

YES

NO

**PROGRAM QUALIFICATION INFORMATION**

To be eligible for Lifeline discounts, regulations require you to qualify via one of the two methods below. Please fill out one section only.

**Method 1. My income is within the guidelines and I am providing the following photocopies that document my total household income, which is stated below. Please check all that apply.**

**TOTAL MONTHLY INCOME: \$** **NUMBER OF HOUSEHOLD MEMBERS:**

# of Household Members	Gross Monthly Income	Gross Annual Income*
1	\$1,485	\$17,820
2	\$2,003	\$24,030
3	\$2,520	\$30,240
4	\$3,038	\$36,450

\*Add \$6,240 (\$520 monthly) for each additional household member.

<input type="checkbox"/> Prior year's state or federal tax return.	<input type="checkbox"/> Current Annual Income Statement from Employer
<input type="checkbox"/> Social Security statement of benefits	<input type="checkbox"/> Paycheck stubs or other official document containing income information for any 3 consecutive months within last 12 months
<input type="checkbox"/> Retirement/pension statement of benefits	<input type="checkbox"/> Veterans Administration statement of benefits
<input type="checkbox"/> Unemployment/Worker's Compensation Statement of Benefits	<input type="checkbox"/> Divorce decree or child support document containing income information

**Method 2. I, or the member of my household named below, receives assistance from one of the listed programs. I am providing documentation of participation in the checked program.**

Name: \_\_\_\_\_

<input type="checkbox"/> Food stamps	<input type="checkbox"/> Federal Public Housing Assistance or Section 8
<input type="checkbox"/> Medicaid	<input type="checkbox"/> Temporary Assistance for Needy Families (TANF)
<input type="checkbox"/> Supplemental Security Income	<input type="checkbox"/> National School Lunch – Free Lunch Program
<input type="checkbox"/> Low-Income Home Energy Plan (LIHEAP)	

**LIFELINE ADMINISTRATION SERVICE PROCESSES APPLICATIONS FOR THE FOLLOWING COMPANIES**

AcenTek	Climax Telephone Company	Springport Telephone Company
Allband Communications Coop.	Deerfield Farmers' Telephone Co.	TDS Telecom
Baraga Telephone Company	Hiawatha Telephone Company	Thumb Cellular
Barry County Telephone Company	Kaleva Telephone Company	Upper Peninsula Telephone Company
Blanchard Telephone Company	Lennon Telephone Company	Waldron Telephone Company
Bloomington Communications	Michigan Central Broadband Co.	Westphalia Broadband, Inc./Comlink
Carr Telephone Company	Midway Telephone Company	Westphalia Telephone Company
CenturyLink of Michigan	Ogden Communications	Winn Telecom
CenturyLink of Midwest Michigan	Ontonagon County Telephone Co.	Winn Telephone Company
CenturyLink of Northern Michigan	Pigeon Telephone Company	
CenturyLink of Upper Michigan	Sand Creek Telephone Company	
Chapin Telephone Company	Southwest Michigan Communications	

**For more information, please call 1-866-321-2323.**

If your phone company is not on the list above, please contact them directly to apply for Lifeline discounts.

**APPLICANT ACKNOWLEDGEMENTS****PLEASE READ AND INITIAL EACH OF THE FOLLOWING STATEMENTS TO INDICATE THAT YOU UNDERSTAND AND AGREE:**

- I understand and consent to Lifeline Administration Service providing my Lifeline service account information, including but not limited to, my name, residential address, phone number, date of birth, the last 4 digits of my social security number, the date on which my Lifeline service was initiated/terminated, the amount of Lifeline support provided, and the means through which I qualified for Lifeline, to the Universal Service Administrative Company (USAC), USAC's agents and/or the National Lifeline Accountability Database to ensure the proper administration of the Lifeline program. I understand that if I fail to provide this consent, Lifeline Administration Service will deny me Lifeline service.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Lifeline support is only available for a single phone line at my principal residence and no one else in my household is receiving Lifeline discounts. (A "household" is defined as any individual or group of individuals who live together at the same address and share income and expenses.)
- Violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in the subscriber's de-enrollment from the program and potentially prosecution by the US government.
- I understand that if I am identified as receiving more than one Lifeline benefit, all telephone service providers involved may be notified so that I may select one service and be de-enrolled from the other(s).
- I will notify my telephone company within 30 days if I no longer qualify for Lifeline and I may be subject to penalties if I fail to do so.
- I will notify my telephone company within 30 days of any changes to my residential address.
- I will be required to certify my continued eligibility for Lifeline at least once a year and know failure to do so will result in termination of my participation in the program.

**APPLICANT SIGNATURE**

**I certify, under penalty of perjury, that the information provided in this application and supporting documentation is true and complete.**

Signature:

Date:

**REVISED 2/2016**

Lifeline Administrative Service  
 REDACTED - FOR PUBLIC INSPECTION  
 Lifeline Household Worksheet

Name	
Address	
Telephone Number	

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household **expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income** includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

**You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.**

- Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner)      YES      NO
  - If you checked **YES**, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.
  - If you checked **NO**, please answer question #2.
- Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?
 

A. A parent	<u>    </u> YES <u>    </u> NO	D. An adult roommate	<u>    </u> YES <u>    </u> NO
B. An adult son or daughter	<u>    </u> YES <u>    </u> NO	E. Other _____	<u>    </u> YES <u>    </u> NO
C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.)	<u>    </u> YES <u>    </u> NO		

  - If you checked **NO** for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.
  - If you checked **YES**, please answer question #3.
- Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?      YES      NO
  - If you checked **NO**, then your address includes **more than one household**. Please initial lines A and B below, and sign and date the worksheet.
  - If you checked **YES**, then your address includes only **one household**. You may not sign up for Lifeline because someone in your household already receives Lifeline.

**CERTIFICATION**

Please initial the certifications below and sign and date this worksheet. Submit this worksheet to \_\_\_\_\_ [insert company or agency name] along with your Lifeline application.

- A. \_\_\_\_\_ I certify that I live at an address occupied by multiple households.
- B. \_\_\_\_\_ I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Baraga Telephone Company  
Tariff M.P.S.C. No. 1 (R)

7th Revised Sheet No. 11  
Cancels 6th Revised Sheet No. 11

LOCAL TELEPHONE EXCHANGE SERVICE

LIFELINE SERVICE

A. DESCRIPTION

- 1. Lifeline Service applies discounts to monthly recurring rates for qualifying residential customers. These discounts are applied to existing tariffed rates and charges for residential telephone service.
- 2. In order to be eligible for Lifeline Service a residential customer's household income must be at or below 150% of the poverty level as determined by the United States Office of Management and Budget and as approved by the State Treasurer, or the customer must participate in one of the following federal assistance programs:
  - a. Medicaid
  - b. Supplemental Nutrition Assistance Program (SNAP) - Food stamps
  - c. Supplemental Security Income (SSI) (C)
  - d. Federal Public Housing Assistance/Section 8 ↑
  - e. Low Income Home Energy Assistance Program (LIHEAP)
  - f. National School Lunch Program's free lunch program ↓
  - g. Temporary Assistance for Needy Families (TANF) aka Family Independence Program (C)

In addition to the criteria above, applicants residing on Tribal Lands (referenced in Title 25 Code of Federal Regulations, Section 20.1) may qualify if they participate in one of the following federal assistance programs:

- a. Bureau of Indian Affairs general assistance
- b. Tribally administered Temporary Assistance for Needy Families (TANF)
- c. Head Start (must meet program's income qualifying standard)
- d. Food Distribution on Indian Reservations (FDPIR) (N)

Applicants residing on Tribal Lands must sign under penalty of perjury that he/she resides on Federally-recognized Tribal Land, as defined in Title 47 Code of Federal Regulations, Section 54.400(e), or Section 54.412, and receives benefits from at least one of the programs referenced above. The Tribal Lands Applicant also must agree to notify the Company if they cease to participate in the program. (N)

- 3. Lifeline Service includes the services and functionalities enumerated in by the F.C.C. as follows: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to operator services; access to interexchange service; access to directory assistance; and toll blocking for qualifying customers.
- 4. Other services can be provided with the Lifeline Service at applicable rates and charges. (M)

(M) Material previously on this page now appears on Page 11.05

Issued: June 5, 2013

Effective: June 7, 2013

Issued under the authority of Public Acts 179 of 1991 as amended and Case No. U-17019.

By: Paul W. Stark, President  
204 State Avenue  
Baraga, MI 49908

(906) 353-6644  
ccollins@up.net

**RECEIVED**  
*By Patti Witte at 8:49 am, Jul 24, 2013*

Lifeline Administrative Service  
 REDACTED - FOR PUBLIC INSPECTION  
 Lifeline Household Worksheet

Name	
Address	
Telephone Number	

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household **expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income** includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

**You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.**

- Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner)  YES  NO
  - If you checked **YES**, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.
  - If you checked **NO**, please answer question #2.
- Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?
 

A. A parent	<input type="checkbox"/> YES <input type="checkbox"/> NO	D. An adult roommate	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. An adult son or daughter	<input type="checkbox"/> YES <input type="checkbox"/> NO	E. Other _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.)	<input type="checkbox"/> YES <input type="checkbox"/> NO		

  - If you checked **NO** for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.
  - If you checked **YES**, please answer question #3.
- Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?  YES  NO
  - If you checked **NO**, then your address includes **more than one household**. Please initial lines A and B below, and sign and date the worksheet.
  - If you checked **YES**, then your address includes only **one household**. You may not sign up for Lifeline because someone in your household already receives Lifeline.

**CERTIFICATION**

Please initial the certifications below and sign and date this worksheet. Submit this worksheet to \_\_\_\_\_ [insert company or agency name] along with your Lifeline application.

- A. \_\_\_\_\_ I certify that I live at an address occupied by multiple households.
- B. \_\_\_\_\_ I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Baraga Telephone Company  
Tariff M.P.S.C. No. 1 (R)

Original Sheet No. 11.05

LOCAL TELEPHONE EXCHANGE SERVICE  
LIFELINE SERVICE

## B. REGULATIONS

1. Regulations specified elsewhere in the Company's tariffs apply to Lifeline Service.
2. Lifeline Service is available only with residence services, excluding foreign exchange service. Lifeline Service is limited to one line per household at the customer's primary residence.
3. A miscellaneous service charge does not apply when Lifeline Service is added or discontinued to existing service when that is the only work being done.
4.
  - a. A discount of 20% of the Basic Local Exchange rate or \$11.25 whichever is greater, on the monthly rate for Basic Local Exchange Service for Lifeline customers is applicable. For Lifeline customers 65 years of age or more, the discount will be 25% of the Basic Local Exchange rate or \$12.35, whichever is greater. The total discount shall not exceed 100% of all end-user common line charges and the Basic Local Exchange rate.
  - b. The credit will be applied in the following order: (1) The Interstate End User Access Charge, National Exchange Carriers Association, Inc. Tariff F.C.C. No. 5, Section 17.1.2.(A); (2) The Access Recovery Charge, National Exchange Carriers Association, Tariff F.C.C. No. 5, Section 17.8; and (3) The balance of the credit, if any, will be applied as a credit to the Basic Local Exchange rate. (C)  
(C)  
(C)
  - c. The Company will provide, at the qualifying customer's option, toll blocking service at no charge. The Company defines toll blocking as a service provided by the Company that lets the customer elect not to allow the completion of outgoing toll calls from their telecommunications channel.
  - d. The Company will not require a service deposit in order to initiate Lifeline Service if the qualifying customer voluntarily elects toll blocking service.
  - e. The Company will not disconnect Lifeline Service for non-payment of toll charges by qualifying customers.
5. The Lifeline plan will apply after receipt and processing of a completed Company or community/government provided application, including documentation indicating that the household income meets the eligibility standards established above.
6. Customers of Lifeline Service must notify the Company of any changes which would affect qualification. Reverification of eligibility will take place on an ongoing basis. When the customer is no longer eligible for Lifeline service, the Lifeline discount would be discontinued and regular tariff rates and charges would apply.

## C. MONTHLY RATE FOR NON LIFELINE CUSTOMERS

A rate specified in MECA's Tariff M.P.S.C No. 25 Part XVII - General applies per exchange access line to cover the costs of the Lifeline service, to the Telephone Company intrastate services as listed below: (C)

- Business and Residence exchange services excluding Lifeline customers.
- PBX Trunk Services
- Centrex Services

(D)  
(D)

(M) Material on this page previously appeared on Pages 11 & 11.1

**RECEIVED**

**By Patti Witte at 8:47 am, Jul 24, 2013**

Issued: June 5, 2013

Effective: June 7, 2013

Issued under the authority of Public Acts 179 of 1991 as amended and Case No. U-17019.

By: Paul W. Stark, President  
204 State Avenue  
Baraga, MI 49908

(906) 353-6644  
ccollins@up.net

REDACTED - FOR PUBLIC INSPECTION

Baraga Telephone Company  
Tariff M.P.S.C. No. 1 (R)

2nd Revised Sheet No. 11.1  
Cancels 1st Revised Sheet No. 11.1

LOCAL TELEPHONE EXCHANGE SERVICE  
LIFELINE SERVICE

(M)



(M)

## D. TRIBAL LINK UP PROGRAM

(C)

1. A discount on the line connection charges, specified elsewhere in this tariff, is also available to qualifying customers, for the installation or transfer of service from one residential premises to another.

2. a. In order to be eligible for the Tribal Link Up Program, a residential customer must live on federally recognized tribal lands, and the residential customer's household income must be at or below 150% of the poverty level as determined by the United States Office of Management and Budget and as approved by the State Treasurer.

(C)

(C)

(C)

b. A qualifying customer may receive a reduction in the installation charges, or transfer of service charges, for connection at the customer's principal place of residence of 100% of the customary charges up to \$100.00, whichever is less.

(C)

(C)

b. A qualifying customer may then make payments for the connection charges on a deferred schedule in which the qualifying customer does not pay interest. The interest charges not charged to the qualifying customer shall be for connection charges of up to \$200.00 that are deferred for a period not to exceed one year. Charges assessed for installation or transfer of service include any charges that the Company customarily assesses to connect subscribers to the network. These charges do not include any permissible security deposit requirements.

c. A qualifying customer may choose one or both of the programs set forth in 2.a. and 2.b. of this section.

d. A qualifying customer can receive the benefits of the Tribal Link Up Program for a second and subsequent time only for a principal place of residence with an address different from the residence address at which the Link Up assistance was provided previously.

(C)

(C)

(M) Material previously on this page now appears on Page 11.05

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## LOCAL TELEPHONE EXCHANGE SERVICE

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\*New or Revised sheet

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Baraga Telephone Company  
Tariff M.P.S.C. No. 1 (R)

1<sup>st</sup> Revised Sheet No. 11.05  
Cancels Original Sheet No. 11.05

## LOCAL TELEPHONE EXCHANGE SERVICE

## LIFELINE SERVICE

## B. REGULATIONS

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  - c. Qualified participants residing on Tribal lands will receive, in addition to the discounts listed above, an additional federal approved credit of up to \$25.00 applied to the remaining charges after the credit in (b) above is applied. The additional federal approved credit will be applied to any amount remaining after credits in (b) above are applied: in the following order: (1) The Interstate End User Access Charge, National Exchange Carriers Association, Inc. Tariff F.C.C. No. 5, Section 17.1.2.(A); (2) The Access Recovery Charge, National Exchange Carriers Association, Tariff F.C.C. No. 5, Section 17.8; and (3) The balance of the credit, if any, will be applied as a credit to the Basic Local Exchange rate.
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(N)  
↑  
↓  
(N)

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**Baraga Telephone Company (SAC 310675)**

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

Baraga Telephone Company hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, 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.

## Anchor Institutions - Line 3012B

**Number**

**Name**

1

Copper County Mental Health - L'Anse Center  
15644 Skanee Rd., L'Anse, MI 49946

REDACTED - FOR PUBLIC INSPECTION

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**