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September 29, 2010

Ms. Marlene H. Dortch (VIA ECFS)
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Ms. Karen Majcher (VIA FEDEX)
Vice President, High Cost & Low Income Div.
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

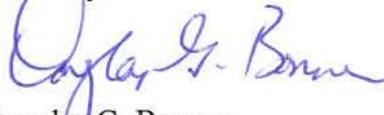
Re: Standing Rock Telecommunications, Inc. (SAC 389014) Eligible
Telecommunications Carrier ("ETC") Annual Report and Certification in
Compliance with 47 C.F.R. §54.209(a)

Dear Ms. Dortch and Ms. Majcher:

Pursuant to 47 C.F.R. §54.209(a) and the Federal Communications Commission's ("Commission") August 24, 2010 Memorandum Opinion and Order ("Order") in WC Docket 09-197 designating Standing Rock Telecommunications Inc. ("Standing Rock") as an ETC, we enclose for filing Standing Rock's Annual Report and Certification. Standing Rock, as a tribally-owned telecommunications carrier, is not subject to the jurisdiction of a state commission and, as directed by the Order, is filing its Annual Report and Certification with the Commission and USAC.

If you have any questions, please contact me.

Sincerely,



Douglas G. Bonner
Counsel for Standing Rock Telecommunications, Inc.

Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Federal State Joint Board) CC Docket No. 96-45
)
On Universal Service)

**STANDING ROCK TELECOMMUNICATIONS, INC. (SAC 389014) ELIGIBLE
TELECOMMUNICATIONS CARRIER ANNUAL REPORT AND CERTIFICATION IN
COMPLIANCE WITH 47 C.F.R. § 54.209(a)**

I. Introduction

In accordance with the requirements established by the Federal Communications Commission (“Commission”), Standing Rock Telecommunications, Inc. (“Standing Rock”) submits its Annual Report and Certification, and respectfully requests that the Commission certify its eligibility to receive both high cost and low income support from the federal universal service fund as of the effective date of its designation, as provided under the Commission’s Order designating Standing as an Eligible Telecommunications Carrier (“ETC”).¹

II. Background

On December 18, 2009, Standing Rock filed a petition for designation as an Eligible Telecommunications Carrier (“ETC”) in WC Docket No. 09-197. On February 18, 2010, Standing Rock also filed a petition to redefine rural service areas in WC Docket No. 09-197. On August 24, 2010, the Chief of the Wireline Competition Bureau, on behalf of the Commission, adopted a Memorandum Opinion and Order designating Standing Rock as an ETC in certain

¹ *In the Matter of Telecommunications Carriers Eligible for Universal Service Support; Standing Rock Telecommunications, Inc. Petition for Designation as an Eligible Telecommunications Carrier; Petition of Standing Rock Telecommunications, Inc. To Redefine Rural Service Areas*, Memorandum Opinion and Order, WC Docket 09-197 (Aug. 24, 2010)(“Order”), at ¶¶ 30-31

entire wire centers. The Commission also granted Standing Rock's request to redefine the service area of the one incumbent rural telephone company, to the extent of three entire wire centers within Standing Rock's licensed service area within the Standing Rock Sioux Reservation. USAC has assigned Study Area Code (SAC) 389014 to Standing Rock for its service area in North Dakota.

III. Standing Rock's Annual Reporting in Accordance With Section 54.209(a)

Section 54.209(a) of the Commission's Rules requires a telecommunications carrier previously designated as an ETC by the Commission to annually report certain information no later than October 1st of each year. This is Standing Rock's first annual report and it is reporting the information as required for the previous calendar year, or through the end of 2009.

A. Standing Rock's Progress Report On Its Service Improvement Plan

Section 59.209(a)(1) of the Commission's Rules requires an ETC to provide a progress report on its previously filed service plan. For calendar year 2009, Standing Rock has no changes to report to its previously filed service plan filed on December 18, 2009 that differs from the Service Area coverage maps (Exhibit 8) and its Five Year Plan (Exhibit 11)(Confidential) that Standing Rock filed with its ETC application on December 18, 2009. As of calendar year 2009, Standing Rock had sixteen (16) new tower sites in seven different exchanges within its service area. SRTI offers a larger local calling area on the Standing Rock Sioux Reservation than is available from any one of the incumbent local exchange carriers.

B. Standing Rock Network Outages in its Designated Area

Section 59.209(a)(2) of the Commission's Rules requires an ETC to annually report network outages in its Designated Area. Standing Rock had no qualifying network outages in 2009.

C. Standing Rock's Unfulfilled Requests for Service

Section 59.209(a)(3) of the Commission's Rules requires an ETC to annually report unfulfilled requests for service. Standing Rock had no unfulfilled requests for service in 2009.

D. Standing Rock's Complaints Per 1,000 Handsets

Section 59.209(a)(4) of the Commission's Rules requires an ETC to annually report the number of complaints per 1,000 handsets. Standing Rock did not have any customer complaints that were filed with a regulatory body in 2009.

E. Standing Rock's Certification Regarding Applicable Service Quality Standards and Consumer Protection Rules

Section 59.209(a)(4) of the Commission's Rules requires an ETC to certify that it is complying with applicable service quality standards and consumer protection rules. As stated in its ETC Petition, SRTI will continue to adhere to the principles of the CTIA Consumer Code for Wireless Service, which meet this requirement.

F. Standing Rock's Certification Regarding Its Ability to Function in Emergency Situations

Section 59.209(a)(4) of the Commission's Rules requires an ETC to certify an ability to function in emergency situations as provided in Section 54.202(a)(2) of the Commission's Rules. Standing Rock has developed a redundant network architecture, including battery back-up and power supplies, an IP-based microwave backhaul transport system to facilitate re-routing of traffic, portable generators that can be moved to cell site to supplement back-up batteries, cell site alarming equipment, and remote monitoring at the SRTI Network Operations Center. Based on the foregoing, SRTI certifies that it is able to function in emergency situations as set forth in Section 59.202(a)(2).

G. Standing Rock's Certification Regarding Its Offering of a Comparable Local Usage Plan.

Section 59.209(a)(7) of the Commission's Rules requires an ETC to certify it is offering a local usage plan comparable to the incumbent LEC(s) in the relevant service areas. SRTI offers calling plans that provide customers that is comparable to the incumbent LECs when taking into account its wireless MTA-wide local calling, and all of the additional benefits of SRTI's current service offerings. SRTI currently offers post-paid calling plans that include nationwide long distance calling and roaming within the United States. All of SRTI's local calling plans inherently include the added value of being able to use a mobile service in SRTI's large and sparsely populated service area, which significantly increases their value over competing wireline local calling plans.

Based on the foregoing, SRTI certifies that it offers and will continue to offer at least one comparable local usage plan as required by Section 54.209(a)(7).

H. Standing Rock's Certification Regarding the Commission's Ability to Require It To Provide Equal Access

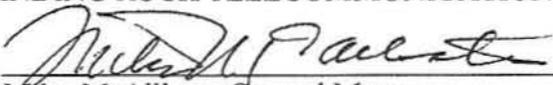
Standing Rock hereby certifies that it may be required to provide equal access to long distance carriers pursuant to 47 U.S.C. § 332(c)(8) in the event that no other ETC is providing equal access within its Designated Area.

IV. Conclusion

Based on the foregoing information, Standing Rock respectfully requests that the Commission certify its eligibility to receive federal high cost and low income universal service support from the federal universal service fund as of the effective date of its ETC designation.

Dated on September 29, 2010

STANDING ROCK TELECOMMUNICATIONS, INC.

By: 
Miles McAllister, General Manager

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

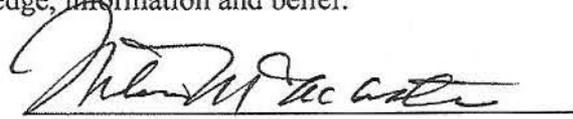
In the Matter of)
Federal State Joint Board) CC Docket No. 96-45
On Universal Service)

CERTIFICATION

The undersigned, Miles McAllister, does hereby certify as follows:

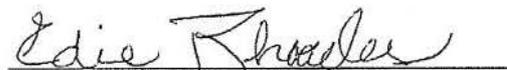
1. I serve as General Manager of Standing Rock Telecommunications, Inc. ("Standing Rock") and am a corporate officer of Standing Rock.
2. This certification is submitted in support of Standing Rock's ETC Annual Report and Certification in compliance with 47 C.F.R. § 54.209(a).
3. I have reviewed the ETC Certification and Annual Report and the information stated therein is true and correct to the best of my knowledge, information and belief.

By:


Miles McAllister

Subscribed and sworn to before me
this 29 day of September, 2010

(Notary Seal)


Notary Public in and for the State of North Dakota
Residing at Fort Yates, North Dakota

My Commission Expires: _____

