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March 28, 2012

FILED/ACCEPTED

MAR 28 2012

Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90
Section 54.313 Filing of Armstrong Telephone Company – West Virginia

Dear Ms. Dortch:

On behalf of Armstrong Telephone Company – West Virginia (the "Company"), attached hereto is the Company's proposed plan filed in response to the requirements of Section 54.313 of the Commission's Rules as clarified in paragraphs 6-14 of action by the Commission taken on February 3, 2012. *See In the Matter of Connect America Fund, et al., Order*, WC Docket No. 10-90, *et al.*, DA 12-147, released February 3, 2012 at paras. 6-14; 47 C.F.R. §54.313.

A copy of the attached filing is also being provided this day to Universal Service Administrative Company at its Washington, D.C., offices and is being overnighted to the Public Service Commission of West Virginia today.

Please acknowledge receipt on the duplicate "stamp and return" document attached for this purpose. All correspondence and inquiries concerning this filing should be addressed to the undersigned.

Sincerely,

Thomas J. Moorman

Thomas J. Moorman
Counsel to
Armstrong Telephone Company –
West Virginia

cc: Ms. Karen Majcher, Universal Service Administrative Company
Ms. Sandra Squire, Executive Secretary, Public Service Commission of West Virginia

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Section 54.313 Report of
Armstrong Telephone Company – West Virginia
Status – Rate of Return and Rural Telephone Company
Study Area Code: 200256

Filing Deadline – April 1, 2012

Pursuant to the requirements of 47 C.F.R. §54.313 as clarified by the Federal Communications Commission (the "Commission") (*see In the Matter of Connect America Fund, et al., Order*, WC Docket No. 10-90, et al., DA 12-147, released February 3, 2012 (the "*Clarification Order*"), Armstrong Telephone Company – West Virginia (the "Company"), an incumbent local exchange carrier operating in rural areas of the State of West Virginia, hereby provides the following information. Should requests for additional information be made by the Commission, the Company is willing to work with the Commission to address such requests.

A. Progress report on its five-year service quality improvement plan pursuant to §54.202(a), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year. The information shall be submitted at the wire center level or census block as appropriate. (47 C.F.R. §54.313(a)(1))

Pursuant to the *Clarification Order* at paragraph 7, the Company will continue "to file a service quality improvement plan or annual updates" with the West Virginia Public Service Commission ("WVa PSC") as required by the WVa PSC. *Clarification Order* at para. 7. Accordingly, the Company "is not required to send a copy to the Commission."

B. Detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) At least ten percent of the end users served in a designated service area; or (ii) A 911 special facility, as defined in 47 CFR 4.5(e). (47 C.F.R. §54.313(a)(2))

The Company is required to file information similar to the requested information in the referenced Commission rule with the WVa PSC by no later than July 1, 2012. Accordingly, pursuant to paragraph 10 of the *Clarification Order*, the Company reports the following information that is compliant with that required by the WVa PSC's requirements.

The Company reports that it had no such outage during calendar year 2011.

C. The number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. The carrier shall also detail how it attempted to provide service to those potential customers. (47 C.F.R. §54.313(a)(3))

The Company is required to file information similar to the requested information in the referenced Commission rule with the WVa PSC by no later than July 1, 2012. Accordingly, pursuant to paragraph 10 of the *Clarification Order*, the Company reports the following information that is compliant with that required by the WVa PSC's requirements.

To the best of my information and belief, there were no unfilled requests for service received by the Company during calendar year 2011.

D. The number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year. (47 C.F.R. §54.313(a)(4))

The Company is required to file information similar to the requested information in the referenced Commission rule with the WVa PSC by no later than July 1, 2012. Accordingly, pursuant to paragraph 10 of the *Clarification Order*, the Company reports the following information that is compliant with that required by the WVa PSC's requirements.

The Company provides the following good faith estimates of the complaints received by it in calendar year 2011. The Company received two formal complaints from the WVa PSC and 189 trouble tickets from customers regarding its local exchange service in calendar year 2011, all of which the Company believes were resolved to the satisfaction of the customer and the Company. As a result, the Company received on average approximately 6.5 complaints/trouble tickets per month per 1000 access lines.

E. Certification that it is complying with applicable service quality standards and consumer protection rules. (47 C.F.R. §54.313(a)(5))

The Company is required to file information similar to the requested information in the referenced Commission rule with the WVa PSC by no later than July 1, 2012. Accordingly, pursuant to paragraph 10 of the *Clarification Order*, the Company reports the following information that is compliant with that required by the WVa PSC's requirements.

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I hereby certify that, to the best of my information and belief, the Company is complying with applicable service quality standards and consumer protection rules set forth by the Commission within its rules and regulations.

F. Certification that the carrier is able to function in emergency situations as set forth in §54.202(a)(2). (47 C.F.R. §54.313(a)(6))

The Company is required to file information similar to the requested information in the referenced Commission rule with the WVa PSC by no later than July 1, 2012. Accordingly, pursuant to paragraph 10 of the *Clarification Order*, the Company reports the following information that is compliant with that required by the WVa PSC's requirements.

I hereby certify that, to the best of my information and belief, the Company is able to continue to operate its network during emergency situations through sufficient battery power/generator back-up. A description of the Company's current network emergency power back-up capability is provided in Attachment A, hereto

G. A listing of the carrier's price offerings in a format as specified by the Wireline Competition Bureau. (47 C.F.R. §54.313 (a)(7))

The Company is waiting further instructions from the Commission's Wireline Competition Bureau regarding the filing of this information.

H. Report of the carrier's holding company, operating companies, affiliates, and any branding (a "dba," or "doing-business-as company" or brand designation), as well as universal service identifiers for each such entity by Study Area Codes, as that term is used by the Administrator. For purposes of this paragraph, "affiliates" has the meaning set forth in section 3(2) of the Communications Act of 1934, as amended (47 C.F.R. §54.313 (a)(8))

Pursuant to paragraph 12 of the *Clarification Order*, the Company will await further instructions from the Commission's Wireline Competition Bureau regarding the filing of this information. *See Clarification Order* at para. 12.

I. A full and complete annual report of the company's financial condition and operations as of the end of the preceding fiscal year, which is audited and certified by an independent certified public accountant in a form satisfactory to the Commission, and accompanied by a report of such audit. The annual report shall include balance sheets, income statements, and cash flow statements along with necessary notes to clarify the financial statements. The income statements shall

itemize revenue, including non-regulated revenue, by its sources. (47 C.F.R. §54.313 (f)(2))

Pursuant to paragraph 13 of the *Clarification Order*, the Company will await further instructions from the Commission's Wireline Competition Bureau regarding the filing of this information. *See Clarification Order* at para. 13.

J. A report all of the carrier's flat rates for residential local service, as well as state fees as defined pursuant to § 54.318(e) of this subpart. Carriers must also report all rates that are below the local urban rate floor as defined in § 54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of January 1. (47 C.F.R. §54.313 (h))

The Company is waiting further instructions from the Commission's Wireline Competition Bureau regarding the filing of this information.

CERTIFICATION

I, James D. Mitchell, Vice President of Armstrong Telephone Company – West Virginia (the "Company"), do hereby declare under penalties of perjury that I have read the foregoing, and that the information contained therein regarding the Company is true and accurate to the best of my knowledge, information, and belief.

James D. Mitchell
Vice-President

Date: March 27, 2012

Attachment A
to
Section 54.313 Report of
Armstrong Telephone Company – West Virginia
Status – Rate of Return and Rural Telephone Company
Study Area Code: 200256

Filing Deadline – April 1, 2012

Emergency Operations Capability

The Company provides the following information regarding central office and remote battery and emergency generator capabilities during commercial power failures within its operating areas. The Company has deployed batteries in its central offices and remotes that will produce a minimum of eight (8) hours of DC reserve power in sites that do not have a permanently installed generator. When a permanent generator is present, batteries are sized to carry the load for a minimum of four (4) hours.

Permanently installed generators are designed to come on line within seconds of the loss of commercial power. Portable generators are transported to and, at times, shared between our other sites when the loss of commercial power is expected to exceed two (2) hours.

The Company maintains permanently installed and portable back-up gasoline, diesel, natural gas, and propane powered generators. These generators provide back-up power dependent upon the availability of fuel and personnel access to the sites where needed. Generators provide sufficient power to maintain continuous service throughout the duration of the loss of commercial power absent some unforeseen breakdown. The Company maintains a sufficient quantity of portable generators to power simultaneously approximately half of our sites not equipped with a permanently installed generator. Should circumstances warrant, additional portable generators may be brought in from other Company locations or obtained locally.

Absent catastrophic failure of the network or elements of it, the Company has the capability to engage in limited rerouting of traffic based on the facilities that are damaged. In conjunction with Verizon (now Frontier), we constructed redundant fiber routes to prevent facility-caused network isolation to the access tandem. While the Company has engineered its network based on accepted industry engineering practices, changing call routing may, to some extent, permit the Company to manage traffic patterns throughout its network during emergency situations.