



Michael Garrett, CPA
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June 15, 2012

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Karen Majcher
Universal Service Administrative Company
2000 L Street NW, Suite 200
Washington, D.C. 20036

**RE: Bettles Telephone, Inc. (613002) – WC Docket No. 10-90
Annual Reporting Requirements pursuant to 54.313(2)-(6)**

Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Federal Communications Commission's rules, enclosed are the 2012 annual reporting requirements and certifications for ***Bettles Telephone, Inc.***, Study Area Code **613002**. Bettles Telephone, Inc. is a state-designated ETC, and as such, is submitting to the Commission relevant information from reports it files with its state commission for §54.313 (a)(2) through (a)(4).

Should you have any questions, please contact me via email at mike.g@aptalaska.com or by phone at (360) 385-1733 Ext. 160.

Sincerely,

A handwritten signature in cursive script that reads "Michael Garrett".

Michael Garrett
Executive Vice President
P.O. Box 3222
Port Townsend WA 98368
Phone: (360) 385-1733 x160
Email: mike.g@aptalaska.com

Enclosures

Outage Reporting – 54.313(a)(2)

- My company collected this information pursuant to state utility commission requirements, a copy of the report is attached.

Unfulfilled Service Requests – 54.313(a)(3)

- My company collected this information pursuant to state utility commission requirements, a copy of the report is attached.

Customer Complaints per 1,000 connections – 54.313(a)(4)

- My company collects this information but not on a per 1,000 connections. A copy of the report that is required by the State of Alaska is attached. Bettles Telephone, Inc. had no complaints in 2011.

Certifications

54.313(a)(5) – I certify that Bettles Telephone, Inc. is in compliance with applicable quality standards and consumer protection rules.

54.313(a)(6) – I certify that Bettles Telephone, Inc. can function in emergency situations as set forth in 47 CFR 54.202(a)(2). Specifically, Bettles Telephone, Inc. 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.



Michael Garrett

Executive Vice President

Corporate Officer Title

June 15, 2012

Date

Bettles Telephone, Inc. – Study Area Code - 613002
PO Box 3222
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February 29, 2012

Regulatory Commission of Alaska
701 West Eighth, Suite 300
Anchorage, Alaska 99501-3469

Regarding: ETC Report in Compliance with 3 AAC 53.460

Dear Commissioners:

This report is being submitted to comply with all aspects of 3 AAC 53.460 as they relate to Bettles Telephone, Inc. ("BTI"). BTI is an eligible telecommunications carrier, providing carrier of last resort, wireline service in Bettles, Allakaket and Alatna, Alaska. All information and certifications requested in the above referenced code section are incorporated in this report.

BTI is a subsidiary of Alaska Power & Telephone ("AP&T"). BTI fulfills its requirement under 3 AAC 53.450(c) to maintain, in an easily accessible location on the company website, consumer complaint procedures. Those procedures can be found at the following URL:

<http://www.aptalaska.com/index.php?action=switchPage&pageID=109>

The format for this report will list the appropriate code and subsection of 3 AAC 53.460 followed by a brief summary of the data requested. Immediately following the brief summary will be the information / certification. At the end of the report I will attest that all the data provided is true and correct. Please note, subsection 3 AAC 53.460(a)(9)(c) eliminates the need for BTI to respond to the items in 3 AAC 53.460(a)(1)(A) and (D).

3 AAC 53.460 Subsections relevant to BTI:

Subsection (a)(1)(B) – The amount of universal service support received.

<i>Response – USF Support received in 2011</i>	
<i>HCLS</i>	<i>\$192</i>
<i>ICLS</i>	<i>\$23,748</i>
<i>LSS</i>	<i>\$31,332</i>
<i>Safety Net Additive</i>	<i>\$0</i>
<i>Lifeline and Linkup</i>	<i>\$7,411</i>
<i>AUSF</i>	<i>\$1,124</i>
<i>Total</i>	<i>\$63,807</i>

Subsection (a)(1)(C) – An explanation of how support was used in the previous year to improve service quality, coverage, or capacity.

Response – BTI receives very little HCLS but the small amount it does receive is used to lower local telephone rates. Other USF funds help recover its revenue requirement (which includes recovery of plant in service invested) and invest in new plant, including but not limited to upgrading cable and wire facilities and battery storage. While BTI's cable plant is capable of broadband service, it is not offered because there is no affordable middle mile transport to connect customers to an internet peering point.

Subsection (a)(1)(E) – Revisions to previous network deployment plans.

Response – BTI has not previously submitted network deployment plans. As a carrier of last resort since statehood, BTI has built out service to all customers within its service area. Given the current services covered by Universal Service Funding (“USF”), it provides 100% coverage.

Subsection (a)(2) – Certification the ETC provides service throughout study area in the past year to all requesting service

Response – I, Michael Garrett, certify that BTI has provided common carrier services throughout its study area in the past calendar year to all customers requesting service.

Subsection (a) (3) – If services were denied in (2), explain why.

Response – No customers were denied service in the last calendar year.

Subsection (a)(4) – compare the number of commission complaints to the number of access lines

Response – BTI had a total of 0 Commission complaints in the previous calendar year. BTI ended the year with 201 access lines.

Subsection (a)(5) – Certify BTI is in compliance with service standards in 3 AAC 53.450.

Response – I, Michael Garrett, certify that BTI complies with the applicable consumer protection and service quality standards set forth in 3 AAC 53.450. Many of the standards in this section relate to wireless or cellular service and thus are not applicable to BTI as a wireline carrier.

Subsection (a)(6) – Certify BTI is in compliance with 3 AAC 53.410 (a)(12) regarding functionality in emergency situations.

Response – I, Michael Garrett, certify that BTI complies and has at a minimum, 8 hours of backup power in all its exchanges and to the extent feasible has the ability to re-route traffic around damaged facilities during an outage. Employees have procedures to follow in an emergency to prevent and minimize service interruptions.

Subsection (a)(7) – Copies of Outage Reports for the previous calendar year.

Response – BTI experienced no outages in the previous calendar year.

Subsection (a)(8) – Certify that BTI complies with 3 AAC 53.410(a)(14) related to local usage.

Response – BTI is the incumbent local exchange carrier (“ILEC”) so this subsection is not applicable. Given this section uses the ILEC as the standard for local usage, BTI need not respond.

Subsection (a)(9) – publication affidavits for the advertising of eligible services.

Response – The locations served by BTI do not have newspapers. BTI advertised eligible services including lifeline services in the preceding year by including billing inserts in its bills and information in the AP&T phonebook. Copies of these advertisements are included with this submission.

Subsection (b) – not applicable as it pertains to newly established ETC’s.

I certify as Executive Vice President for Bettles Telephone Inc. that I have prepared this report and to the best of my knowledge, information and belief, all statements of fact contained in this report are true and the report is a correct statement of the business.

Sincerely,

A handwritten signature in cursive script that reads "Michael Garrett". The signature is written in black ink and is positioned above a horizontal line.

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Advertising Copies



A Reminder to our Customers

The following list of Basic Universal Telephone Services are available in each of our service exchanges to subscribers of AP&T telephone service.

-  Voice grade access to the public switched network
-  Local (Calling) Usage
-  Dual tone multi-frequency signalling or its functional equivalent
-  Single-Party service or its functional equivalent
-  Toll limitation for qualifying low-income consumers
-  Access to emergency services
-  Access to operator services
-  Access to interexchange service
-  Access to directory assistance





Other Products & Services

UNIVERSAL SERVICE & AFFORDABLE TELEPHONE SERVICES FOR INCOME ELIGIBLE CONSUMERS

Lifeline/Link-Up

The Low Income Program of the Universal Service Fund, which is administered by the Universal Service Administrative Company (USAC), is designed to ensure that quality telecommunications services are available to low-income customers at just, reasonable, and affordable rates. Similar programs have existed since at least 1985. The Telecommunications Act of 1996 reiterated their importance by including the principle that "consumers in all regions of the nation, including low-income consumers . . . should have access to telecommunications and information services . . ."

A Reminder to our Valued Customers: the following list of Universal Telephone Services is available in each of our exchanges to subscribers of AP&T Telephone Service regardless of income. Simply contact your local AP&T office for assistance.

- Voice grade access to the public switched network.
- Local (Calling) Usage.
- Dual tone multi-frequency signaling or its functional equivalent.
- Single-Party service or its functional equivalent.
- Toll limitation for qualifying low-income consumers.
- Access to Emergency Services.
- Access to Operator Services.
- Access to Interexchange Service.
- Access to Directory Assistance.

What Benefits are Available Under the Lifeline and Link-Up Programs?

- **Lifeline Assistance** provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. These discounts can be up to \$10.00 per month, depending on your state.
- **Link-Up America** helps income-eligible consumers initiate telephone service. This program pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional wireline telephone or activation fee for a wireless telephone for a primary residence. It also allows participants to pay the remaining amount they owe on a deferred schedule, interest-free.

Residents of Native American Indian and Alaska Native tribal communities may qualify for enhanced Lifeline assistance (up to an additional \$25.00) and expanded Link-Up support (up to an additional \$70.00). For more information and registration applications for these enhanced Lifeline and Link-Up programs, please contact your local AP&T Office, or you may visit our website at www.APTalaska.com or www.fcc.gov/cgb/consumerfacts/tribalfactsheet.html.



Employee-Owned ~ Community-Minded