



7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED – FOR PUBLIC INSPECTION

September 27, 2012

By Hand Delivery

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

**Re: WC Docket No. 12-233
WCB/Pricing No. 12-09
Direct Case of Bluffton Telephone Company**

Dear Ms. Dortch:

John Staurulakis, Inc. hereby files the attached Direct Case on behalf of Bluffton Telephone Company pursuant to the Commission's *Order Designating Issues for Investigation*, DA 12-1430, released August 31, 2012 in the above-referenced docket. The Direct Case is filed as confidential under the Commission's Protective Order.¹ Pursuant to the Protective Order, provided are one copy of the confidential version and two copies of the redacted version. The redacted version has also been filed on the Electronic Comment Filing System.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

John Kuykendall
Vice President
301-459-7590
jkuykendall@jsitel.com

Attachment

cc: Robin Cohn, Pricing Policy Division, via email.

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB/Pricing File No. 12-09, Protective Order, DA 12-1518, rel. Sept. 21, 2012.

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

In the Matter of)
) WC Docket No. 12-233
Investigation of Certain 2012 Annual)
Access Tariffs) WCB/Pricing No. 12-09
)

**DIRECT CASE OF
BLUFFTON TELEPHONE COMPANY**

Bluffton Telephone Company, (“Bluffton”) pursuant to the August 31, 2012 Designation Order,¹ hereby files its Direct Case in the above-referenced matter.

I. INTRODUCTION

On June 18, 2012, Bluffton Telephone Company, (alternatively “Bluffton” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) filed under Transmittal No. 165 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”) revisions in accordance with the Commission’s March 28, 2012 release entitled In the Matter of July 3, 2012 Annual Access Charge Tariff Filings, WCB/Pricing File No. 12-07, Order, DA 12-482 (“June 18th filing”). Bluffton is an Issuing Carrier of the JSI Tariff.

Bluffton elected to file an Access Recovery Charge (“ARC”) pursuant to Section 51.917(e), to be effective July 3, 2012, and a Connect America Fund (“CAF”) election pursuant to Section 51.917(f). The Company made the appropriate filing on June 18, 2012. On July 2, 2012, the Wireline Competition Bureau released an Order that suspended for one day and set for investigation the ARC rates contained in the 2012

¹ Investigation of Certain 2012 Annual Access Tariffs, WC Docket No. 12-233, WCB/Pricing No. 12-09, *Order Designating Issues for Investigation*, DA 12-1430 (rel. August 31, 2012) (“Designation Order”).

Annual Access Tariff filings of all issuing incumbent local exchange carriers (“ILECs”) that charged an ARC, including those filed on behalf of Bluffton. Pursuant to the *Designation Order*, Bluffton hereby submits the required information and demonstrates that in light of the adjustments discussed in this Direct Case, Bluffton’s ARC rates are just and reasonable.

The financial information presented in this Direct Case as Exhibit 1, the 2012 ROR ILEC Interstate Rates Worksheet and the 2012 ROR ILEC Intrastate Rates Worksheet,² is confidential and is being submitted with this Direct Case in both confidential and redacted versions. This revised financial information will also be filed USAC as directed by the *Designation Order*. In addition, the holding company Rate Ceiling Tariff Review Plan for Hargray Communications Group has been revised appropriately and is included as Exhibit 4.

II. ISSUES DESIGNATED FOR INVESTIGATION

A. Whether LEC has Reasonably Determined the Amount of its Base Period Revenue

1. Fiscal Year 2011 Revenue Determination

A rate-of-return Local Exchange Carrier’s (“LEC’s”) Base Period revenue is made up of three components: 1) its 2011 Interstate Switched Access Revenue Requirement; 2) Fiscal Year 2011 revenues from rate elements included in the definition of Transitional Intrastate Access Service received by March 31, 2012; and 3) Fiscal Year 2011 reciprocal compensation revenues received by March 31, 2012, less Fiscal Year 2011 reciprocal compensation payments made by March 31, 2012 (net reciprocal

² Also referred to as the Tariff Review Plan or financial information.

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compensation revenues). Base Period Revenue also includes revenues from non-recurring charges associated with the switched access services in question.

Bluffton bills its carrier access bills (“CABs”) on a mid-month cycle. Consequently, intrastate terminating billing usage reflected in the June 18th filing for Bluffton was based on the time period from September 16, 2010 through September 15, 2011 and not the October 2010 through September 2011 Fiscal Year put forth by the Commission. Although this time period does not align exactly with the October 1, 2010 through September 30, 2011 Fiscal Year noted above, the fifteen day variance in the time frames has a de minimus impact on the Base Period Revenues included in the June 18th filing. The CABs are used to ensure that the revenues are for services provided during Fiscal Year 2011, eliminate billed revenues not related to services provided such as late fees which are identified separately on the CABs and to make certain that billed revenues were collected by March 31, 2012.

The effort involved in subtracting and adding fifteen days to Bluffton’s CABs billed revenues time frame reflected in the June 18th filing in order to match identically with the October 1, 2010 through September 30, 2011 Fiscal Year designated by the Commission, is unwarranted given the minimal impact such an adjustment will have on the Base Period Revenue amount. By way of an example, and to help quantify the impact of such an adjustment, Fairpoint Telephone Companies indicated in a recently filed Amended Transmittal No. 31, Supplement to Description and Justification filing that

such an adjustment using the designated Fiscal Year would result in a less than one percent increase.³

Bluffton asserts that in light of the fact that there is only a fifteen day variance between Bluffton's intrastate terminating billing usage time frame of September 16, 2010 through September 15, 2011 and the October 1, 2010 through September 30, 2011 Fiscal Year put forth by the Commission, like Fairpoint, the effort and expense associated with making this adjustment to "calendarize" this data is unwarranted when considering the minimal impact this adjustment will likely have on the ultimate ARC computation.

2. Non-recurring charges inclusions and eliminations

Bluffton does not have any non-recurring charges associated with the services in question. As a result, Base Period Revenue is not impacted by non-recurring charges. Non-recurring charges not related to these services were also excluded from the billed revenues used in the June 18th filing and in this Direct Case.

B. Whether LEC has Reasonably Calculated its Required Intrastate Rate Reductions

Bluffton has followed the appropriate procedure when determining its required intrastate rate reductions for the purposes of the June 18th filing, and for this Direct Case, and is not subject to review of this issue as outlined in the Commission's *Designation Order*.

³ See the Fairpoint Telephone Companies Amended Transmittal No. 31, Supplement to Description and Justification, filed July 30, 2012. See also In the Matter of *July 3, 2012 Annual Access Tariff Filings*, WCB/Pricing No. 12-07, Order, DA 12-482 (Wireline Comp. Bur., rel. March 28, 2012).

C. Whether LEC has Reasonably Estimated its Projected Interstate and Intrastate Switched Access Demand

LECs were directed to use existing demand estimation methods to project demand for the 2012-2013 tariff period. In calculating the Eligible Recovery, a LEC must also subtract certain projected intrastate and interstate access revenues from its Base Period.

Please reference Exhibit 1. As indicated on the 2012 ROR ILEC Interstate Rates Worksheet, the LSS amount reflected in cell F-7 is [REDACTED] and the projected annual percentage rate of demand change reflected in the calculation of the amount in cell F-10 is -13.88%. As indicated on the 2012 ROR ILEC Intrastate Rates Worksheet, the projected annual percentage rate of demand change reflected in the calculation of the amount in cell G-9 is -7.49.

This review indicated that Bluffton's initial projected interstate and/or intrastate demand loss exceeded an annualized rate of fifteen percent. Accordingly, Bluffton did not fall within the safe harbor and is re-filing with the Commission in conjunction with this Direct Case, a revised 2012 ROR ILEC Interstate Rates Worksheet and a revised 2012 ROR ILEC Intrastate Rates Worksheet in order to reflect a demand loss annualized rate of fifteen percent for the applicable time period.

D. Whether NECA's Allocation of Projected Pool Interstate Switched Access Revenues Based on Projected Switched Access Billed Revenues was Reasonable

Not applicable to Bluffton Telephone Company.

E. Whether the Suspended Access Recovery Charge Rates are Just and Reasonable and, if not, the Process for Requiring Refunds

Please reference Exhibit 2 which is a Table reflecting Bluffton's filed ARC rates and the ARC rates supported by this Direct Case. In this Direct Case, Bluffton reaffirms the ARC rates that were established in the June 18th filing and asserts that the ARC rates established in the June 18th filing were just and reasonable. Bluffton is also filing Exhibit 3 with this Direct Case, which is the completed Tariff Review Plan showing the calculation of its ARC rates. In light of the fact that no changes are being proposed to the ARC rates calculations, this Tariff Review Plan will not be re-filed and Bluffton will not be filing revised ARC rates with the Commission in conjunction with this Direct Case.

III. CONCLUSION

Bluffton presents this Direct Case in compliance with the aforementioned August 31, 2012 *Designation Order*. Bluffton has reasonably determined the amount of its Base Period Revenue, reasonably calculated its required intrastate rate reductions, and reasonably estimated its projected interstate and intrastate switched access demand.

Accordingly, and in light of the adjustments described in this Direct Case, Bluffton's suspended ARC rates are just and reasonable and are reaffirmed by this Direct Case.

Respectfully submitted,

September 27, 2012

Bluffton Telephone Company

/s/ Andrew Rein
Andrew Rein
Vice President
P.O. Box 346
Bluffton, SC 29910

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EXHIBIT 1

- 2012 ROR ILEC Interstate Rates Worksheet
- 2012 ROR ILEC Intrastate Rates Worksheet

	A	B	C	D	E	F	G	H	
1	Filing Date: June 18, 2012								
2	Filing Entity: Bluffton Telephone Company								
3	Transmittal Number: JSI Transmittal 165								
4	COSA: 0512AN12								
5									
6									
7	Most Recently Filed Interstate Switched Access Revenue Requirement					Input			
8	TY 2012-2013 Baseline Adjustment Factor (BAF)						0.95		
9	BAF X Most Recently Filed Interstate Switched Access Revenue Requirement					F7*F8			
10	Total TY 2012-2013 Expected Maximum Interstate Revenue					Sum of Col. H			
11	TY 2012-2013 Interstate Eligible Recovery					F9-F10			
12									
13									
14	Interstate Tariff Section	USOC	Interstate Switched Access Rate Element	Unit of Demand (e.g., MOU or DS1)	12/29/11 Interstate Rate	7/1/2012 Proposed Rate			
15	Input	Input	Input (Note 1)	Input	Input	Input			
16	** LOCAL SWITCHING **								
17			Local Switching	MOU	0.003571				
18									
19									
20									
21									
22	** INFORMATION **								
23			Information	MOU	0.002415				
24									
25									
26									
27									
28	** TANDEM-SWITCHED TRANSPORT AND TANDEM **								
29			Tandem Switching Facility	MOU per Mile		0.000034			
30			Tandem Switched Termination	MOU per Term		0.000165			
31									
32									
33									
34	** SIGNALING FOR TANDEM SWITCHING **								
35									
36									
37									
38									
39									
40	** DIRECT-TRUNKED TRANSPORT **								
41			Direct Trunk Transport Facility	DS1's per Mile		14.78			
42			Direct Trunk Transport Termination	DS1's per Term		72.85			
43									
44									
45									
46	** DEDICATED SIGNALING TRANSPORT **								
47									
48									
49									
50									
51									
52	** ENTRANCE FACILITIES **								
53			Entrance Facilities	DS1's		136.49			
54									
55									
56									
57									
58	** LINE INFORMATION DATABASE **								
59			800 Database Query -Basic	Queries	0.0026	0.0026			
60			800 Database Query -Vertical	Queries	0.0027	0.0027			
61									
62									
63									
64	** BILLING NAME AND ADDRESS **								
65									
66									
67									
68									
69									
70									
71	Total TY 2012-2013 Expected Maximum Interstate Revenue (Sum of Col. H)								
72									
73									
74	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.								

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
1	Filing Date: June 18, 2012																		
2	Filing Entity: Bluffton Telephone Company																		
3	Transmittal Number: JSI Transmittal 165																		
4	COSA: 0512AN12																		
5																			
6																			
7	Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements														Sum of Col. O				
8	95% of Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements														Sum of Col. P				
9	Total TY 2012-2013 Expected Maximum Transitional Intrastate Access Service Revenue														Sum of Col. R				
10	Total TY 2012-2013 Intrastate Eligible Recovery														Sum of Col. S				
11																			
12																			
13	Intrastate Tariff Section	Interstate Tariff Section	USOC	Intrastate and Interstate Switched Access Rate Elements for Transitional Intrastate Access Service Categories	Unit of Demand (e.g., MOU or DS1)	12/29/2011 Intrastate Rate	12/29/2011 Interstate Rate	FY 2011 Intrastate Units: Terminating for Non- Dedicated or Originating and Terminating for Dedicated Elements											
14	Input	Input	Input	Input (Note 1)	Input	Input	Input	Input											
15	** TERMINATING END OFFICE ACCESS SERVICE **																		
16	<u>Terminating Carrier Common Line</u>																		
17																			
18																			
19																			
20																			
21																			
22	<u>Terminating Local Switching</u>																		
23	Local Switching - Terminating				MOU	0.007779	0.003571	11,809,362											
24																			
25																			
26																			
27																			
28	<u>Terminating Other (e.g., Information surcharge, Transport or Residual Interconnection Charges)</u>																		
29	Information Surcharge				MOU	0.037402	0.002415	118,094											
30	SC Interim LEC Fund Bulk-Billed Access - Terminating Portion				Billed Monthly														
31																			
32																			
33																			
34	** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **																		
35	<u>Terminating Tandem-Switched Common Transport</u>																		
36	Local Transport Facility - Terminating (avg miles w/ BIP = 0.1237)				MOU x Miles	0.00004		1,460,818											
37	Local Transport Termination - Terminating				MOU	0.00036		11,809,362											
38	Tandem Switched Facility - (composite rate)				MOU x Miles		0.000034	11,809,362											
39	Tandem Switched Termination (composite rate)				MOU x Terms		0.000165	11,809,362											
40																			
41	<u>Terminating Tandem Switching</u>																		
42																			
43																			
44																			
45																			
46																			
47	** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **																		
48	<u>Originating and Terminating Entrance Facilities</u>																		
49																			
50																			
51																			
52																			
53	<u>Originating and Terminating Tandem-Switched Dedicated Transport</u>																		
54																			
55																			
56																			
57																			
58																			
59																			
60	<u>Originating and Terminating Direct-Trunked Transport</u>																		
61	Direct Trunk Facility				DS1's per mile														
62	Direct Trunk Termination				DS1's per term														
63																			
64																			
65																			
66																			
67	Total																		
68																			
69																			
70	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.																		

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EXHIBIT 2

Initial ARC Rate and Direct Case ARC Rate

Comparison Table

BLUFFTON TELEPHONE COMPANY

Exhibit 2

Initial ARC Rate and Direct Case ARC Rate Comparison Table

	Initial ARC Rate	Direct Case ARC Rate
Primary Residential or Single Line Business End User Common Line Charge	\$0.50	\$0.50
Multi-Line Business End User Common Line Charge	\$1.00	\$1.00

*Excludes Lifeline Customers

*Only applies to the Limited Use rate plan

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EXHIBIT 3

Tariff Review Plan

Calculation of ARC Rates

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date (enter w/leading '): June 18, 2012
 Holding Company: Hargray Communications Group
 Filing Name: Bluffton Telephone Company

ARCCTR-CAF-1

Study Area	EXCHANGES	Rate Ceiling Component Charges Calculation (51.915(b)(11))										MULTI-LINE BUSINESS
		RESIDENCE / NP / BRI / SLB (excluding Lifeline)										
		Stand-alone	Mandatory	Mandatory				State	Federal	Total Rate		
		<u>R1 rate</u>	<u>EAS</u>	<u>Zone</u>	<u>SLC</u>	<u>E911</u>	<u>TRS</u>	<u>USF</u>	<u>SLC</u>	<u>Comp. Chgs</u>	<u>SLC-MLB</u>	
240512	Bluffton	\$ 23.99	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$0.90	\$6.50	\$32.14	\$ 9.20	
240512	Bluffton Limited Use	\$ 16.60	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$0.69	\$6.50	\$24.54	\$ -	

REDACTED VERSION FOR PUBLIC REVIEW

ARCRTRP-CAF-2

Filing Date (enter w/leading '): June 18, 2012
 Holding Company: Hargray Communications Group
 Filing Name: Bluffton Telephone Company

Eligible Revenue - Current Yr Recovery \$ 839,851
 Maximum Imputed ARC Revenue [REDACTED]
 Tariffed ARC Revenue [REDACTED]
 Expected CAF ICC Support \$ 758,767

Eligible Revenue - Current Yr Recovery [REDACTED]
 Tariffed ARC Revenue + Expected CAF ICC Support [REDACTED]

Residential Rate Ceiling: (51.915(b)(12)) \$ 30.00
 Maximum MLB SLC+ARC (51.915(e)(5)(iv)) \$ 12.20
 Max ARC for current year: Res/SLB \$ 0.50
 Max ARC for current year: MLB \$ 1.00

Totals [REDACTED]

Exchange/RG	RESIDENCE / NP / BRI / SLB (excluding Lifeline)				MULTI-LINE BUSINESS			
	Residential Total Rate Ceiling Chgs	RES/NP/BRI Current Year Maximum ARC Rate	Tariffed ARC Rate	SLB Tariffed ARC Rate	MLB Federal SLC	MLB Curr. Yr. Maximum ARC Rate	NonCentrex Tariffed ARC Rate	Centrex Tariffed ARC Rate
Bluffton	\$ 32.14	\$ -	\$ -	\$ 0.50	\$ 9.20	\$ 1.00	\$ 1.00	\$ 1.00
Bluffton Limited Use	\$ 24.54	\$ 0.50	\$ 0.50	\$ 0.50	\$ -	\$ 1.00	\$ 1.00	\$ 1.00

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EXHIBIT 4

Hargray Communications Group

**Holding Company Rate Ceiling
Tariff Review Plan**

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date: June 18,2012
 Holding Company: Hargray Communications Group
 Filing Name: Hargray & Bluffton Telephone Company

ARC-CAF-1

Study Area	EXCHANGES	Rate Ceiling Component Charges Calculation (51.915(b)(11))										MULTI-LINE BUSINESS
		RESIDENCE / NP / BRI / SLB (excluding Lifeline)										
		Stand-alone	Mandatory	Mandatory		State		State		Federal	Total Rate	
<u>R1 rate</u>	<u>EAS</u>	<u>Charges</u>	<u>SLC</u>	<u>E911</u>	<u>TRS</u>	<u>USF</u>	<u>SLC</u>	<u>Comp. Chgs</u>				
240512	Bluffton	\$ 23.99	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$ 0.90	\$6.50	\$32.14		
240512	Bluffton - Limited Use	\$ 16.60	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$ 0.69	\$6.50	\$24.54		
240523	Hilton Head	\$ 23.99	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$ 0.90	\$6.50	\$32.14		
240523	Hilton Head - Limited Use	\$ 16.60	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$ 0.69	\$6.50	\$24.54		
240523	Hardeeville	\$ 23.99	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$ 0.90	\$6.50	\$32.14		
240523	Hardeeville - Limited Use	\$ 16.60	\$ -	\$ -	\$ -	\$0.60	\$0.15	\$ 0.69	\$6.50	\$24.54		
	All Exchanges											

REDACTED VERSION FOR PUBLIC REVIEW

ARC-CAF-2

Filing Date: June 18,2012

Holding Company: Hargray Communications Group

Filing Name: Hargray & Bluffton Telephone Company

Eligible Revenue - Current Yr Recovery \$ 3,976,780

Maximum ARC opportunity Revenue \$ 237,966

Maximum CAF ICC Support \$ 3,738,814

Residential Rate Ceiling: (51.915(b)(12)) \$ 30.00

Maximum MLB SLC+ARC: (51.915(e)(5)(iv)) \$ 12.20

Max ARC for current year: Res/SLB \$ 0.50

Max ARC for current year: MLB \$ 1.00

	Primary/Non Primary Residential/BRI	SLB	MLB	Total Eligible Lines
Study Area				Tariff Period
All Exchanges				Projected Eligible
Total				Line Demand

REDACTED VERSION FOR PUBLIC REVIEW

ARC-CAF-3

Filing Date: June 18,2012

Holding Company: Hargray Communications Group

Filing Name: Hargray & Bluffton Telephone Company

Residential Rate Ceiling: (51.915(b)(12))	\$	30.00
Maximum MLB SLC+ARC (51.915(e)(5)(iv))	\$	12.20
Max ARC for current year: Res/SLB	\$	0.50
Max ARC for current year: MLB	\$	1.00

Holding Company Eligible Recovery	Holding Company Maximum ARC Revenues	Maximum CAF ICC Support
\$3,976,780	\$237,966	\$ 3,738,814

Study Areas	Primary/Non Primary Residential/BRI		SLB		MLB		Total ARC Eligible Tariff Period Projected Line Demand	Maximum Residential ARC Revenue Opportunity (from eligible lines)	Maximum SLB ARC Revenue Opportunity	Maximum MLB ARC Revenue Opportunity	Total Maximum ARC Revenue Opportunity	Eligible Recovery	Maximum ARC Revenue Shortfall
	All Tariff Period Projected Lines	ARC Eligible Tariff Period Projected Lines	All Tariff Period Projected Lines	ARC Eligible Tariff Period Projected Lines	All Tariff Period Projected Lines	ARC Eligible Tariff Period Projected Lines							
All Exchanges												\$ 3,976,780	
Total													\$3,738,814

**Certification of Officer
to Authorize an Agent to File Data on Behalf of Reporting Carrier**

I certify that (Name of Agent) John Staurulakis, Inc. (JSI) is authorized to submit 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 data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent are accurate.

Name of Authorized Agent	John Staurulakis, Inc. (JSI)		
Name of Reporting Carrier	Bluffton Telephone Company, Inc.		
Signature of Authorized Officer		Date: 09/27/2012	
Printed name of Authorized Officer	Andrew Rein		
Title or position of Authorized Officer	Vice President		
Telephone number of Authorized Officer.	(843) 686-1246 ext. _ _ _ _		
Study Area Code of Reporting Carrier	240512	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012

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.

Certification of Officer as to the Accuracy of the CAF ICC Data Reported

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Bluffton Telephone Company, Inc.**

Signature of Authorized Officer



Date: 09/27/2012

Printed name of Authorized Officer **Andrew Rein**

Title or position of Authorized Officer **Vice President**

Telephone number of Authorized Officer.

(843) 686-1246 ext. ____

Study Area Code of Reporting Carrier

240512

Filing Due Date for this form
(mm/dd/yyyy)

09/27/2012

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.

Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f).

Name of Reporting Carrier		Bluffton Telephone Company, Inc.	
Signature of Authorized Officer			
		Date: 09/27/2012	
Printed name of Authorized Officer		Andrew Rein	
Title or position of Authorized Officer		Vice President	
Telephone number of Authorized Officer.		(843) 686-1246 ext. _ _ _ _	
Study Area Code of Reporting Carrier	240512	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012

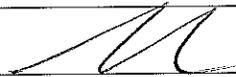
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per §51.917(d)(vii).

Name of Reporting Carrier **Bluffton Telephone Company, Inc.**

Signature of Authorized Officer



Date: 09/27/2012

Printed name of Authorized Officer **Andrew Rein**

Title or position of Authorized Officer **Vice President**

Telephone number of Authorized Officer. **(843) 686-1246** ext. ____

Study Area Code of Reporting Carrier

240512

Filing Due Date for this form
(mm/dd/yyyy)

09/27/2012

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.