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June 27, 2013

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

ORIGINAL FILED/ACCEPTED

JUN 27 2013

Re: **WC Docket No. 10-90**
Section 54.313(h) Filing of Highland Telephone Cooperative, Inc.

Federal Communications Commission
Office of the Secretary

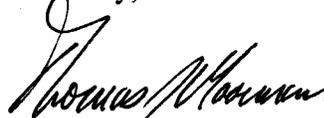
Dear Ms. Dortch:

On behalf of the Highland Telephone Cooperative, Inc. ("Company") attached hereto is the Company's filing pursuant to the requirements of 47 C.F.R. §54.313(h) as required in the June 10, 2013 decision issued by the Federal Communications Commission. *See In the Matter of Connect America Fund, Order*, WC Docket No. 10-90, DA 13-1348, released June 10, 2013.

A copy of this filing is also being provided this day to the Universal Service Administrative Company and is being filed with the Tennessee Regulatory Authority.

Please direct any inquiries concerning this matter to the undersigned.

Sincerely,



Counsel to
Highland Telephone Cooperative, Inc.

Attachment

cc: Tennessee Regulatory Authority
Ms. Karen Majcher, Universal Service Administrative Company

No. of Copies rec'd 0+4
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**47 C.F.R. §54.313(h) Information Submission of
Highland Telephone Cooperative, Inc.
Status – Rate of Return and Rural Telephone Company
Study Area Code: 290565**

Filing Deadline – July 1, 2013

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Pursuant to the requirements of 47 C.F.R. §54.313(h) and the requirements of the Federal Communications Commission (the “Commission” or the “FCC”) (*see In the Matter of Connect America Fund, Order*, WC Docket No. 10-90, DA 13-1348, released June 10, 2013 (the “*June 10 Clarification Order*”)), and in a manner consistent with the FCC’s requirements originally established in its November 18, 2011 decision,¹ Highland Telephone Cooperative, Inc. (the “Company”), hereby provides the following information. The Company is an incumbent local exchange carrier (“ILEC”) operating in rural areas of the State of Tennessee and under the FCC’s rate of return regulatory framework for its interstate operations. Should requests for additional information be made by the Commission to that provided below, the Company is willing to work with the Commission to address such requests.

- A. 47 C.F.R. §54.313(h): All incumbent local exchange carrier recipients of high-cost support must report all of their rates for residential local service for all portions of their service area, as well as state fees as defined pursuant to § 54.318(e), to the extent the sum of those rates and fees are below the rate floor² as defined in § 54.318, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.**

The Company has no lines below the rate floor.

¹ *See In the Matter of Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011), appeal pending, In Re: FCC 11-161, No. 11-9900 (10th Cir.) (“*ICC/USF Transformation Order*”). The Company’s submission of the information contained in this filing is without waiver of positions taken by various rural ILEC interests and the outcome of that appeal.

² *ICC/USF Transformation Order* at paragraph 239 that states in part: “We will phase in this rate floor in three steps, beginning with an initial rate floor of \$10 for the period July 1, 2012 through June 30, 2013 and \$14 for the period July 1, 2013 through June 30, 2014. Beginning July 1, 2014, and in each subsequent calendar year, the rate floor will be established after the Wireline Competition Bureau completes an updated annual survey of voice rates.” The *June 10 Clarification Order* at paragraph 5 states in part that lines are to be reported “to the extent the sum of those rates and fees as of June 1, 2013 are below \$14 . . .”

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CERTIFICATION

I, G. Mark Patterson of Highland Telephone Company, Inc. (the “Company”), do hereby declare under penalties of perjury that I have read the foregoing, and the information contained therein regarding the Company is true and accurate to the best of my knowledge, information, and belief.



Date: June 26, 2013

G. Mark Patterson
General Manager – Chief Operating Officer
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