



REDACTED- FOR PUBLIC INSPECTION

October 10, 2013

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

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Ms. Dortch:

Project Telephone Company, a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted financial data, in compliance with 47 C.F.R. §§ 54.313 and 54.422

As specified in the Protective Order issued on November 16, 2012 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,

Twyla Holum
Regulatory Compliance Coordinator
Project Telephone Company
406-783-2264
twyla.holum@nemont

Enclosures

.cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division
Montana Public Service Commission

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/QMB Control No. 3060-0819 July 2013
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<010> Study Area Code	482250
<015> Study Area Name	PROJECT TEL CO
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	TWYLA HOLUM
<035> Contact Telephone Number: Number of the person identified in data line <030>	406-783-2264
<039> Contact Email Address: Email of the person identified in data line <030>	Lwyla.holum@nemont.coop

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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			54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input style="width: 100px;" type="text" value="17"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<input style="width: 100px;" type="text" value="482250mt310"/>	<i>(attach descriptive document)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input style="width: 100px;" type="text"/>		<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<input style="width: 100px;" type="text"/>	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	<input style="width: 100px;" type="text" value="0.0"/>		<input type="checkbox"/>	<input type="checkbox"/>
<420> Mobile	<input style="width: 100px;" type="text"/>		<input type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)			<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	<input style="width: 100px;" type="text"/>		<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	<input style="width: 100px;" type="text"/>		<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <input style="width: 100px;" type="text" value="482250mt510"/>	<i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <input style="width: 100px;" type="text" value="482250mt610"/>	<i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input checked="" type="radio"/> <input type="radio"/>	<i>(if yes, complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	<input style="width: 100px;" type="text"/>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<1010> <input style="width: 100px;" type="text"/>	<i>(attach descriptive document)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	<i>(if not, check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	482250
<015>	Study Area Name	PROJECT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035>	Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039>	Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.coop
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	482250
<015>	Study Area Name	PROJECT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035>	Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039>	Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.coop
<910>	Tribal Land(s) on which ETC Serves	Crow Agency Indian Reservation

<920>	Tribal Government Engagement Obligation	482250mt910
		Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

	Select (Yes, No, NA)
<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	Yes
<922> Feasibility and sustainability planning;	Yes
<923> Marketing services in a culturally sensitive manner;	Yes
<924> Compliance with Rights of way processes	Yes
<925> Compliance with Land Use permitting requirements	Yes
<926> Compliance with Facilities Siting rules	Yes
<927> Compliance with Environmental Review processes	Yes
<928> Compliance with Cultural Preservation review processes	Yes
<929> Compliance with Tribal Business and Licensing requirements.	Yes

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	482250
<015>	Study Area Name	PROJECT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035>	Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039>	Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.coop

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	482250
<015>	Study Area Name	PROJECT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035>	Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039>	Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.coop

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP nemont.net/telephone-assistance.php

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	482250
<015>	Study Area Name	PROJECT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035>	Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039>	Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.coop

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010>
2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011>
3rd Year Certification {47 CFR § 54.313(b)(2)}

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012>
2013 Frozen Support Certification
- <2013>
2014 Frozen Support Certification
- <2014>
2015 Frozen Support Certification
- <2015>
2016 and future Frozen Support Certification

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016>
Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017>
3rd year Broadband Service Certification
- <2018>
5th year Broadband Service Certification
- <2019>
Interim Progress Certification
- <2020>
Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021>
Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation FCC Form 481
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	482250
<015>	Study Area Name	PROJECT TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035>	Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039>	Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

<p>(3010) Milestone Certification (47 CFR § 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.</p>	<p>Name of Attached Document Listing Required Information</p>	<p><input type="checkbox"/></p>
<p>(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (3014) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:</p>	<p>Name of Attached Document Listing Required Information</p>	<p><input checked="" type="checkbox"/> (Yes/No) <input checked="" type="checkbox"/> (Yes/No)</p>
<p>(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)</p>		<p><input checked="" type="checkbox"/></p>
<p>(3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<p><input checked="" type="checkbox"/></p>
<p>(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation</p>	<p>Name of Attached Document Listing Required Information</p>	<p>482250mc3017</p>
<p>(3018) If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:</p>	<p>Name of Attached Document Listing Required Information</p>	<p><input type="checkbox"/> (Yes/No)</p>
<p>(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications</p>		<p><input type="checkbox"/></p>
<p>(3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<p><input type="checkbox"/></p>
<p>(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.</p>		<p><input type="checkbox"/></p>
<p>(3022) Underlying information subjected to a review by an independent certified public accountant</p>		<p><input type="checkbox"/></p>
<p>(3023) Underlying information subjected to an officer certification.</p>		<p><input type="checkbox"/></p>
<p>(3024) Underlying information subjected to an officer certification.</p>		<p><input type="checkbox"/></p>
<p>(3025) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<p><input type="checkbox"/></p>
<p>(3026) Attach the worksheet listing required information</p>	<p>Name of Attached Document Listing Required Information</p>	<p><input type="checkbox"/></p>

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	482250
<015> Study Area Name	PROJECT TEL CO
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<030> Contact Name - Person USAC should contact regarding this data	TWYLA HOLUM
<035> Contact Telephone Number - Number of person identified in data line <030>	406-783-2264
<039> Contact Email Address - Email Address of person identified in data line <030>	twyla.holum@nemont.coop

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	PROJECT TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date 10/07/2013
Printed name of Authorized Officer:	Remi Sun
Title or position of Authorized Officer:	CFO
Telephone number of Authorized Officer:	406.783.2359
Study Area Code of Reporting Carrier:	482250 Filing Due Date for this form: 10/15/2013
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.	

Attachments

Annual Reporting for High-Cost Recipients
47 C.F.R. 54.313
Project Telephone Company

UNFILLED SERVICE REQUESTS – 54.313(a)(3)

VOICE

There were **405** requests for voice service in Project Telephone Company's service area during calendar year 2012. Of these requests, **17** were unfilled. Project Telephone follows the Aid to Construction policy for all unfilled requests.

Any individual, business, or developer/builder requesting communications services at a location currently un-served by the Company, must have on file a completed application for service, approved by properly designated personnel.

The applicant must provide some assurance that service installation is of a permanent nature before any line construction commences. Any facilities that are constructed remain the property of the Company and maintenance is the responsibility of the Company. Facilities construction will be based on route distance from the subscriber location to the nearest reasonable and serviceable telephone plant facilities as determined by the Company.

- 0-5,280' (one mile) No charge – any additional costs related to engineering, ROW, permitting, boring, locates, or costs of a similar nature, are paid by the Company
- Over 5,280' – Subscriber agrees to a service contract - No charge for construction; any additional costs related to engineering, ROW, permitting, boring, locates, or costs of a similar nature, are paid in advance at a rate of 30% of these total additional costs; the advance payment will then be applied against the subscriber account in equal installments, based on the cost of local service, end user charge, and any applicable taxes and fees that are in effect at the time construction is started, until the entire advance payment is paid back to the subscriber. Should the subscriber disconnect service for any reason, any unapplied advance payment is forfeited and remains with the Company.

Exceptions to the following standards would include, but are not limited to, the following: (a) circuits used to provide a communications service other than POTS, (b) temporary, (c) seasonal, (d) cabin sites (e) requests for service solutions other than that recommended by the Company.

Annual Reporting for High-Cost Recipients
47 C.F.R. §54.313
Project Telephone Company

§54.313(a)(5) – COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES

Service Quality Standards and Consumer Protection Rules Annual Certification for Voice and Broadband Service

<u>Remi Sun</u>	<u>Chief Financial Officer</u>	<u>Project Telephone Company</u>
Printed Name of Officer	Title of Officer	Company Name

I am authorized to provide this certification on behalf of the Company. I hereby certify that, to the best of my knowledge, the Company is in compliance with consumer protection rules of the Federal Communications Commission and the Montana Public Utilities Commission for voice service. At this time the Montana Public Utilities Commissions has not "adopted" the FCC QoS Standards. Project Telephone Company complies with all FCC and Montana Public Service Commission protection rules and reporting requirements, which include; annual Do-Not-Call rules/notifications to subscribers, Opt-Out letters sent annually to customers, filing of Annual RCCI certification for Accessibility, and new employee and annual employee/company CPNI/Red Flag Training and certification. An explanation of our CPNI practices and FAQ's, as well as other consumer protection information and where to file complaints can be found at www.nemont.net/consumer-info.php.

Executed on _____ 9/19/13 _____
Date

Signature _____  _____

Printed/Typed Name _____ Remi Sun _____

Annual Reporting for High-Cost Recipients
47 C.F.R. §54.313
Project Telephone Company

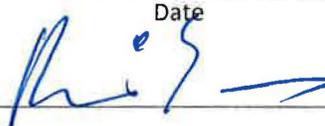
§54.313(a)(6) – ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Ability to Function in Emergency Situations Annual Certification

Remi Sun	Chief Financial Officer	Project Telephone Company
Printed Name of Officer	Title of Officer	Company Name

I am authorized to provide this certification on behalf of the Company. I hereby certify that, to the best of my knowledge, the Company is capable of functioning in emergency situations. The Company has a reasonable amount of back-up power to ensure functionality of voice and internet services without an external power source. Buildings and Central Offices are equipped with UPS using battery backup and standalone generators. Access Nodes are equipped with 8 hours of battery backup and plug in's for portable generators. The Company is able to reroute voice, internet and cellular traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Project Telephone is fully protected for all voice, internet and cellular traffic which will fail over to the redundant path in case of an emergency or maintenance. All network transport is designed and installed in a redundant, geo diverse, ring architecture that will automatically fail over in case of a disruption in service. This includes redundant routing / switching hardware to facilitate a seamless transfer of traffic.

Executed on _____ 9/11/13 _____
Date

Signature _____  _____

Printed/Typed Name Remi Sun _____

Annual Reporting for High-Cost Recipients
47 C.F.R. §54.313
Project Telephone Company

§54.313(a)(9) – COMPLIANCE WITH TRIBAL OUTREACH AND LICENSING REQUIREMENTS

Project Telephone serves tribal lands on the Crow Agency Indian Reservation of its service territory. During 2012, the Company had a series of meetings, telephone discussions, and email exchanges with the Crow Agency Tribal Government. During these meetings and discussions, the following items were addressed: needs assessment and deployment planning to include updates on stimulus projects; feasibility and sustainability planning; marketing services in a culturally sensitive manner to include presentation of stimulus projects to the public, donation to Crow Tribal Education and support/donations to local Tribal events; cultural and environmental preservation to include discussion of cultural programmatic agreements with the THPO office, and contract for Cultural Survey work with THPO office. Project Telephone attended meetings with TERO officials to determine requirements for all contractors working on the reservation, and notified the THPO of an opportunity to observe plowing of fiber optics. Project Telephone follows the 25 CFR Part 169 which applies to the procedural requirements in preparing a Grant of Easement for Right-of-Way (ROW) across lands in trust or restricted status under the jurisdiction of the Bureau of Indian Affairs (BIA). In the preparation of a Grant of Easement for ROW, a thorough investigation of all aspects of the property, ownership, and potential conflicts with statutes, laws, and regulations is required. The long term best interest of the landowner(s), and the conservation and protection of the trust asset must also be considered. When required by the BIA, cultural inventories (Archeological surveys) are completed and submitted with applications.

**Annual Reporting for High-Cost Recipients
47 C.F.R. §54.313
Project Telephone Company**

§54.313(f)(2) – Financial Reporting for Privately Held Rate-of-Return Carriers

REDACTED - FOR PUBLIC INSPECTION