



GVNW CONSULTING, INC.

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KERRVILLE, TX 78028  
TEL 830.896.5200  
FAX 830.896.5202

October 18, 2013

**REDACTED – FOR PUBLIC INSPECTION**

*VIA FedEx and ECFS*

Marlene H. Dortch, Secretary  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
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.  
Form 481 – Carrier Annual Reporting Data Collection, 2013

Dear Ms. Dortch:

On behalf of Dell Telephone Cooperative, Inc. (“Dell”), GVNW Consulting, Inc. hereby submits the attached redacted and confidential versions of its “FCC Form 481 – Carrier Annual Reporting Data Collection” information pursuant to sections 54.313 and 54.422 of the Commission’s rules, as filed with the Universal Service Administrative Company. A copy is also being submitted to the New Mexico Public Regulatory Commission.

Dell requests confidential treatment under the Protective Order adopted in this proceeding for the section 54.313(f)(2) financial information included in this report on the grounds that it is competitively sensitive information that is secure from public access and this information should not be released publicly for inspection as it could be used to disadvantage or harm Dell.

In accordance with the Protective Order, two redacted copies marked “REDACTED – FOR PUBLIC INSPECTION” and one non redacted confidential version marked “CONFIDENTIAL – NOT FOR PUBLIC INSPECTION” are being filed with the Commission. A redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please contact me at [sgatto@gvnw.com](mailto:sgatto@gvnw.com) or 830-895-7226.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Gatto", is written over a horizontal line.

Stephen Gatto  
Consultant  
GVNW Consulting, Inc.

Enclosures

Cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies, confidential)

<b>FCC Form 481 - Carrier Annual Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	492066
<015> Study Area Name	DELL TEL CO-OP - NM
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Denny Bergstrom
<035> Contact Telephone Number: Number of the person identified in data line <030>	915-964-2352
<039> Contact Email Address: Email of the person identified in data line <030>	dbergstrom@delltelco.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313 Completion Required</b>	<b>54.422 Completion Required</b>
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			(check box when complete)	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>		<input checked="" 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				
<300> Unfulfilled Service Requests (voice)	0		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<i>(attach descriptive document)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)			<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<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	2.0			
<420> Mobile				
<430> Number of Complaints per 1,000 customers (broadband)			<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed				
<450> Mobile				
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 492066nm510	<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> 492066nm610	<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 type="radio"/> <input checked="" type="radio"/>	<i>(if yes, complete attached worksheet)</i>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<1010> <input type="checkbox"/>	<i>(attach descriptive document)</i>		<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	<i>(if not, check to indicate certification)</i>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>		<input 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

<010> Study Area Code	492066
<015> Study Area Name	DELL TEL CO-OP - NM
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035> Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039> Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com
<110> Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 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.

<input type="checkbox"/>









<b>(900) Tribal Lands Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	492066
<015>	Study Area Name	DELL TEL CO-OP - NM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

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:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	492066
<015> Study Area Name	DELL TEL CO-OP - NM
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035> Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039> Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<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

<010>	Study Area Code	492066
<015>	Study Area Name	DELL TEL CO-OP - NM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans 492066nm1210  
 Name of attached document (.pdf)

<1220> Link to Public Website HTTP \_\_\_\_\_

"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.

<b>(2000) Price Cap Carrier Additional Documentation</b> <b>Data Collection Form</b> <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	492066
<015>	Study Area Name	DELL TEL CO-OP - NM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

**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.**

<b>Incremental Connect America Phase I reporting</b>		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>
<b>Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}</b>		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
<b>Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}</b>		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
<b>Connect America Phase II Reporting {47 CFR § 54.313(e)}</b>		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<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.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information _____

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

<b>&lt;010&gt;</b>	Study Area Code	492066	
<b>&lt;015&gt;</b>	Study Area Name	DELL TEL CO-OP - NM	
<b>&lt;020&gt;</b>	Program Year	2014	
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom	
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	915-964-2352	
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.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><b>(3010)</b> 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</p>	<p>Name of Attached Document Listing Required Information</p> <p>_____</p>	<p><input type="checkbox"/></p>
<p><b>(3011)</b> 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><b>(3012)</b> Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))</p>	<p>Name of Attached Document Listing Required Information</p> <p>_____</p>	<p><input checked="" type="checkbox"/> (Yes/No)</p>
<p><b>(3013)</b> Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))</p>		<p><input checked="" type="checkbox"/> (Yes/No)</p>
<p><b>(3014)</b> 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><input checked="" type="checkbox"/></p>
<p><b>(3015)</b> Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)</p>		<p><input checked="" type="checkbox"/></p>
<p><b>(3016)</b> PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<p><input checked="" type="checkbox"/></p>
<p><b>(3017)</b> 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>492066nm3017</p>	
<p><b>(3018)</b> 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>_____ (Yes/No)</p>	<p><input type="checkbox"/></p>
<p><b>(3019)</b> 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><b>(3020)</b> PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<p><input type="checkbox"/></p>
<p><b>(3021)</b> 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:</p>		<p><input type="checkbox"/></p>
<p><b>(3022)</b> 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><b>(3023)</b> Underlying information subjected to a review by an independent certified public accountant</p>		<p><input type="checkbox"/></p>
<p><b>(3024)</b> Underlying information subjected to an officer certification.</p>		<p><input type="checkbox"/></p>
<p><b>(3025)</b> PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<p><input type="checkbox"/></p>
<p><b>(3026)</b> Attach the worksheet listing required information</p>	<p>Name of Attached Document Listing Required Information</p> <p>_____</p>	

<b>Certification - Reporting Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	492066
<015>	Study Area Name	DELL TEL CO-OP - NM
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<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delitelco.com

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	492066
<015> Study Area Name	DELL TEL CO-OP - NM
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035> Contact Telephone Number - Number of person identified in data line <030>	915-964-2352
<039> Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Stephen Gatto</u> is authorized to submit the 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 annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Stephen Gatto
Name of Reporting Carrier:	DELL TEL CO-OP - NM
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 10/07/2013
Printed name of Authorized Officer:	Denny Bergstrom
Title or position of Authorized Officer:	GM EVP
Telephone number of Authorized Officer:	915-964-2352
Study Area Code of Reporting Carrier:	492066 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.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	DELL TEL CO-OP - NM
Name of Authorized Agent or Employee of Agent:	Steve Gatto
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 10/07/2013
Printed name of Authorized Agent or Employee of Agent:	Steve Gatto
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	830-895-7226
Study Area Code of Reporting Carrier:	492066 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

**DELL TELEPHONE COOPERATIVE, INC., NM – SAC 492066**

**FCC Form - Program Year 2014**

**Line 510**

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

Dell Telephone Cooperative, Inc. (“Dell” or “the Cooperative”) complies with all applicable service quality standards and consumer protection rules as required by the New Mexico Public Regulatory Commission (“PRC”) and the Federal Communications Commission (“FCC”).

The rates, terms and conditions under which the Cooperative operates are identified in its Local Service Tariff, which is approved by the PRC. The Cooperative’s tariff contains provisions regarding its customer service and protection practices, including resolving customer disputes, applying for, refusing, disconnection and cancellation of service. Rates and terms of service are disclosed to customers upon application for service as part of a packet of information for new customers.

Service quality standards are established by the PRC and Dell consistently meets or exceeds those requirements. The Cooperative provides an annual report to the New Mexico PRC pursuant to the commission’s rules.

The protection of its customers’ privacy and information is a constant part of Dell’s quality of service. The Cooperative has a policy and operating procedures that comply with the FCC’s Customer Proprietary Network Information (“CPNI”) rules (47 C.F.R 64.2001 – 64.2011). Certification of Dell’s compliance with the FCC’s CPNI rules is filed with the FCC annually.

**DELL TELEPHONE COOPERATIVE, INC. – SAC 492066**

**FCC Form 481 - Program Year 2014**

**Line 610**

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

Dell Telephone Cooperative, Inc. (“Dell” or “the Cooperative”) is capable of functioning in emergency situations. Dell has a reasonable amount of back-up power to ensure functionality without a commercial external power source. The Cooperative has permanently installed standby power generators at its exchange switching offices and remote switching locations have a minimum of eight (8) hours of backup battery capacity. These remote sites are also equipped to accept portable emergency power if necessary. The Cooperative’s network is capable of managing traffic spikes resulting from emergency conditions.



According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and is subject to federal laws and regulations regarding confidential information, which will be treated as confidential.	
<b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>		Borrower Name <b>Dell Telephone Cooperative, Inc.</b>  (Prepared with Audited Data)	
INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December, 2012	BORROWER DESIGNATION TX0569
<b>CERTIFICATION</b>			
We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.			
<b>ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.</b>			
<b>DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII</b> (Check one of the following)			
<input type="checkbox"/> All of the obligations under the RUS loan document have been fulfilled in all material respects.		<input type="checkbox"/> There has been a default in the fulfillment of the obligation under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report	
DATE			

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
<b>CURRENT ASSETS</b>			<b>CURRENT LIABILITIES</b>		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. <i>Notes:</i>			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. <i>Non-Affiliates:</i>			31. Current Mat.-Capital Loans		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			<b>LONG-TERM DEBT</b>		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 thru 9)			39. Funded Debt-Other		
<b>NONCURRENT ASSETS</b>			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Nonacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Loans		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			<b>OTHER LIAB. &amp; DEF. CREDITS</b>		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits		
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
<b>PLANT, PROPERTY, AND EQUIPMENT</b>			<b>EQUITY</b>		
18. Telecom, Plant-In-Service			51. Cap. Stock Outstanding, & Subscribed		
19. Property Held for Future Use			52. Additional Paid-In Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			55. Other Capital		
23. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

USDA-RUS		BORROWER DESIGNATION
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		TX0569
INSTRUCTIONS- See RUS Bulletin 1744-2		PERIOD ENDING December, 2012
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS		
ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 6 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or Margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+20) / 26]		
48. DSCR [(31+20+10+11) / 44]		

REDACTED-FOR PUBLIC INSPECTION

USDA-RUS						BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS						TX0589	
INSTRUCTIONS - See RUS Bulletin 1744-2						PERIOD ENDED	
						December, 2012	
Part C: SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
028	20.00	21.40					
029	25.00	18.05					
003	20.00	21.40					
004	25.00	10.85					
001	20.00	21.40					
000	25.00	18.05					
007	20.00	21.40					
000	25.00	18.05					
Mobile/Wireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges	8						

REDACTED-FOR PUBLIC INSPECTION

USDA-RUS					BORROWER DESIGNATION			
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS					TX0560			
INSTRUCTIONS - See RUS Bulletin 1744-2					PERIOD ENDED December, 2012			
Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION								
4. BROADBAND SERVICE								
Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	StandAlone/Pckg (g)	Type Of Technology (h)
820				384	250	49.95	StandAlone	DSL
828				384	250	49.95	StandAlone	DSL
983				384	250	49.95	StandAlone	DSL
084				384	250	49.95	StandAlone	DSL
081				384	250	49.95	StandAlone	DSL
080				384	250	49.95	StandAlone	DSL
087				384	250	49.95	StandAlone	DSL
080				384	250	49.95	StandAlone	DSL
Total				384	250	49.95	StandAlone	DSL

USDA-RUS <b>OPERATING REPORT FOR                  TELECOMMUNICATIONS BORROWERS</b>		BORROWER DESIGNATION TX0569			
INSTRUCTIONS- See RUS Bulletin 1714-2		PERIOD ENDING December, 2012			
<b>PART D. SYSTEM DATA</b>					
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile		
15	9	10,500	.11		
<b>PART E. TOLL DATA</b>					
1. Study Area ID Code(s)		2. Types of Toll Settlements (Check one)			
a. 142066 b. 192066 c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____		Intrastate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis Intrastate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis			
<b>PART F. FUNDS INVESTED IN PLANT DURING YEAR</b>					
1. RUS, RTB, & FFB Loan Funds Expended					
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					
6. Salvaged Materials					
7. Contribution in Aid to Construction					
8. Gross Additions to Telecom. Plant (1 thru 7)					
<b>PART G. INVESTMENTS IN AFFILIATED COMPANIES</b>					
INVESTMENTS	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
(a)	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

<b>USDA-RUS</b> <b>OPERATING REPORT FOR</b> <b>TELECOMMUNICATIONS BORROWERS</b>	BORROWER DESIGNATION TX0569
	PERIOD ENDING December, 2012

**PART H. CURRENT DEPRECIATION RATES**

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

YES       NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

USDA-RUS		BORROWER DESIGNATION TX0569	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		PERIOD ENDED December, 2012	
INSTRUCTIONS -- See help in the online application.			
<b>PART I - STATEMENT OF CASH FLOWS</b>			
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>			
2.	Net Income		
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>			
3.	Add: Depreciation		
4.	Add: Amortization		
5.	Other (Explain) Interest Receivable, Accrued Taxes		
<i>Changes in Operating Assets and Liabilities</i>			
6.	Decrease/(Increase) in Accounts Receivable		
7.	Decrease/(Increase) in Materials and Inventory		
8.	Decrease/(Increase) in Prepayments and Deferred Charges		
9.	Decrease/(Increase) in Other Current Assets		
10.	Increase/(Decrease) in Accounts Payable		
11.	Increase/(Decrease) in Advance Billings & Payments		
12.	Increase/(Decrease) in Other Current Liabilities		
13.	Net Cash Provided/(Used) by Operations		
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>			
14.	Decrease/(Increase) in Notes Receivable		
15.	Increase/(Decrease) in Notes Payable		
16.	Increase/(Decrease) in Customer Deposits		
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits		
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital		
20.	Loss: Payment of Dividends		
21.	Less: Patronage Capital Credits Retired		
22.	Other (Explain) Miscellaneous Equity Credits		
23.	Net Cash Provided/(Used) by Financing Activities		
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>			
24.	Net Capital Expenditures (Property, Plant & Equipment)		
25.	Other Long-Term Investments		
26.	Other Noncurrent Assets & Jurisdictional Differences		
27.	Other (Explain) Plant Retirements, TPUC, Basis adjustments		
28.	Net Cash Provided/(Used) by Investing Activities		
29.	Net Increase/(Decrease) in Cash		
30.	Ending Cash		

<b>USDA-RUS</b> <b>OPERATING REPORT FOR</b> <b>TELECOMMUNICATIONS BORROWERS</b>	<b>BORROWER DESIGNATION</b> <b>TX0569</b>
<b>INSTRUCTIONS - See RUS Bulletin 1744-2</b>	<b>PERIOD ENDED</b> December, 2012
<b>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>	
<b>Independent Accountants' Compilation Report</b>	
To the Board of Directors	
Dell Telephone Cooperative, Inc.	
Dell City, TX	
<p>We have compiled the balance sheets of Dell Telephone Cooperative, Inc (a Texas Cooperative) as of December 31, 2012 and 2011, and the statements of income and retained earnings or margins and cash flows for the year ended December 31, 2012, included in the accompanying prescribed form. We have also compiled the supplementary information in Parts "E", "F", "G" and "H" of the accompanying prescribed form. We have not audited or reviewed the financial statements and the supplementary information in Parts "E", "F", "G" and "H" and, accordingly, do not express an opinion or provide any assurance about whether the financial statements and the supplementary information in Parts "E", "F", "G", and "H" is in accordance with the form prescribed by the Rural Development Utilities Program.</p>	
<p>Management is responsible for the preparation and fair presentation of the financial statements and the supplementary information in Parts "E", "F", "G" and "H" in accordance with requirements prescribed by Rural Development Utilities Program and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statement and the supplementary information in Parts "E", "F", "G" and "H".</p>	

See Accountant's Compilation Report

<p>USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	<p>BORROWER DESIGNATION TX0569</p>
<p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>PERIOD ENDED December, 2012</p>
<p>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	
<p>Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist the management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statement and the supplementary information in Parts "E", "F", "G" and "H".</p>	
<p>These financial statements and the supplementary information in Parts "E", "F", "G" and "H" are presented in accordance with the requirements of the Rural Development Utilities Program, which differ from accounting principles generally accepted in the United States of America. This report is intended solely for the information and use of the Rural Development Utilities Program and is not intended to be and should not be used by anyone other than this specified party.</p>	
<p>The supplementary information contained in Parts "C" and "D" of the accompanying prescribed form has not been audited, reviewed, or compiled by us, and, accordingly, we assume no responsibility for that information.</p>	
<p>KIESLING ASSOCIATES LLP</p>	
<p>Colorado Springs, Colorado</p>	
<p>April 16, 2013</p>	

See Accountant's Compilation Report

REDACTED-FOR PUBLIC INSPECTION

<b>USDA-RUS</b> <b>OPERATING REPORT FOR</b> <b>TELECOMMUNICATIONS BORROWERS</b>	<b>BORROWER DESIGNATION</b> TX0569
<b>INSTRUCTIONS - See RUS Bulletin 1744-2</b>	<b>PERIOD ENDED</b> December, 2012
<b>CERTIFICATION LOAN DEFAULT/ NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>	

See Accountant's Compilation Report



## INDEPENDENT ACCOUNTANT'S COMPILATION REPORT

To The Board of Directors  
Dell Telephone Cooperative, Inc.  
Dell City, TX 79837

We have compiled the balance sheets of Dell Telephone Cooperative, Inc (a Texas Cooperative) as of December 31, 2012 and 2011, and the statements of income and retained earnings or margins and cash flows for the year ended December 31, 2012, included in the accompanying prescribed form. We have also compiled the supplementary information in Parts "E", "F", "G" and "H" of the accompanying prescribed form. We have not audited or reviewed the financial statements and the supplementary information in Parts "E", "F", "G" and "H" and, accordingly, do not express an opinion or provide any assurance about whether the financial statements and the supplementary information in Parts "E", "F", "G", and "H" is in accordance with the form prescribed by the Rural Development Utilities Program.

Management is responsible for the preparation and fair presentation of the financial statements and the supplementary information in Parts "E", "F", "G" and "H" in accordance with requirements prescribed by Rural Development Utilities Program and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statement and the supplementary information in Parts "E", "F", "G" and "H".

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist the management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statement and the supplementary information in Parts "E", "F", "G" and "H".

These financial statements and the supplementary information in Parts E, F, G and H are presented in accordance with the requirements of the Rural Development Utilities Program, which differ from accounting principles generally accepted in the United States of America. This report is intended solely for the information and use of the Rural Development Utilities Program, Federal Communications Commission, Universal Service Administrative Company and the Texas Public Utilities Commission and is not intended to be and should not be used by anyone other than this specified party.

The supplementary information contained in Parts "C" and "D" of the accompanying prescribed form has not been audited, reviewed, or compiled by us, and, accordingly, we assume no responsibility for that information.

A handwritten signature in cursive script that reads 'Kiesling Accountants LLP'.

Colorado Springs, CO  
April 16, 2013