



Your business is our business.

DOCKET FILE COPY ORIGINAL

REDACTED - FOR PUBLIC INSPECTION

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September 27, 2013

ACCEPTED/FILED

SEP 27 2013

Federal Communications Commission
Office of the Secretary

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. 10-90, WC Docket No. 11-42
2013 ETC Annual Report of Lennon Telephone Company
Study Area Code 310708**

Dear Ms. Dortch:

On behalf of Lennon Telephone Company "Lennon", JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Lennon seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

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

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 043
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-512

Accepted/Filed

<010> Study Area Code	310708	SEP 27 2013
<015> Study Area Name	LENNON TEL CO	
<020> Program Year	2014	FCC Office of the Secretary
<030> Contact Name: Person USAC should contact with questions about this data	Randy Fletcher	
<035> Contact Telephone Number: Number of the person identified in data line <030>	810-621-3301	
<039> Contact Email Address: Email of the person identified in data line <030>	rfletcher@lental.com	

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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			(check box when complete)	
<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			
<300>	Unfulfilled Service Requests (voice)	<i>(attach descriptive document)</i>	<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)	<i>(attach descriptive document)</i>	<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	0.0		
<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>	310708mi510	<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>	310708mi610	<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>		<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"/>
<2005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>
<3005>	<i>(complete attached worksheet)</i>	<input checked="" 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	310708
<015> Study Area Name	LENNON TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035> Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039> Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.com

<110> Has your company received its ETC certification from the FCC? (yes / no)

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)

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"/>	<input type="checkbox"/>

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	310708
<015> Study Area Name	LENNON TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035> Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039> Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lental.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)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310708
<015>	Study Area Name	LENNON TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Randy Fletcher
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<039>	Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.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	310708
<015> Study Area Name	LENNON TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035> Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039> Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans 310708mi1210
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.

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	310708
<015>	Study Area Name	LENNON TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035>	Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039>	Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.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.

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. 3080-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	310708
<015>	Study Area Name	LENNON TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035>	Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039>	Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.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> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>	<div style="border: 1px solid black; width: 15px; height: 15px; margin-left: auto;"></div>
<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> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input checked="" type="checkbox"/> (Yes/No) <input type="checkbox"/> (Yes/No) </div>
<p>(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) (3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>	<p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input type="checkbox"/> <input type="checkbox"/> </div>
<p>(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation (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> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input checked="" type="checkbox"/> (Yes/No) </div>
<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 (3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>	<p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> </div>
<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>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input checked="" type="checkbox"/> <input type="checkbox"/> </div>
<p>(3022) Underlying information subjected to a review by an independent certified public accountant (3023) Underlying information subjected to an officer certification. (3024) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>	<p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input type="checkbox"/> <input type="checkbox"/> </div>
<p>(3025) Attach the worksheet listing required information</p>	<p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 100%;"></div>	<div style="display: flex; justify-content: flex-end; align-items: center;"> <input type="checkbox"/> <input type="checkbox"/> </div>
		310708m13026

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	310708
<015> Study Area Name	LENNON TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035> Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039> Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.com

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:	
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.	

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

<010> Study Area Code	310708
<015> Study Area Name	LENNON TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Randy Fletcher
<035> Contact Telephone Number - Number of person identified in data line <030>	810-621-3301
<039> Contact Email Address - Email Address of person identified in data line <030>	rfletcher@lentel.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>John Staurulakis, Inc.</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:	John Staurulakis, Inc.
Name of Reporting Carrier:	LENNON TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 09/20/2013
Printed name of Authorized Officer:	Randy Fletcher
Title or position of Authorized Officer:	General Manager
Telephone number of Authorized Officer:	810-621-3301
Study Area Code of Reporting Carrier:	310708 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:	LENNON TEL CO
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 09/20/2013
Printed name of Authorized Agent or Employee of Agent:	Alice Lewis
Title or position of Authorized Agent or Employee of Agent:	Manager
Telephone number of Authorized Agent or Employee of Agent:	217-498-6863
Study Area Code of Reporting Carrier:	310708 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

Lennon Telephone Company's demonstration of complying with applicable service quality standards and consumer protection rules:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."⁴

Lennon Telephone Company ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Michigan Public Service Commission (MPSC), as specified in Section 202(b) of the Michigan Telecommunications Act (MTA) and MPSC Case No. U-11103, which disclose rates, terms and conditions of service to customers; (2) adherence to Michigan state consumer protection requirements governing telephone providers,

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

⁴ *Id.* at n. 72.

Prohibitions as identified in Sections 305 and 502 of the MTA, Costing Procedures as determined by the MPSC in Case No. U-11103, and Compliance with Anti-Slamming Procedures as adopted in MPSC Case No. U-11757 and Case No. 11900; and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Lennon Telephone Company's demonstration of ability to function in emergency situations:

Lennon Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Michigan Telecommunications Act (MTA). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites in accordance with the specifications identified in Section 305c(a) of the MTA, 484.2305c Emergency power requirements; compliance.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

Lennon Telephone Company
MPSC No. 1R

9th Revised Sheet No. 7
Cancels 8th Sheet No. 7

PRIMARY BASIC LOCAL EXCHANGE SERVICE

DESCRIPTION OF SERVICE

A. General Exchange: Lennon Durand Area (C)

1. The provision of service at the rates shown below is subject to the regulations given in the General Rules and Regulations as they now exist and are filed with and form part of this Tariff.
2. The rates shown below entitle the customer to messages without other charge to all stations bearing the designation of a central office at the following exchanges, which comprise the Local Calling Area.

DURAND	FLUSHING	LENNON	OWOSSO
FLINT	GAINES	NEW LOTHROP	SWARTZ CREEK

Messages to the above exchanges will be treated as being within the Local Calling Area, and a customer will receive no other charge, if the provider terminating the call has made interconnection arrangements with Lennon Telephone Company.

B. PRIMARY BASIC LOCAL EXCHANGE SERVICE (PBLES)

Access Line Charge, Per Line, Per Month 26.94

PBLES is for residential use only. PBLES is for voice communication only.

For calls to the exchanges listed in A. above, the Company will charge the following:

First 100 outgoing calls in a month:	0.00 per call
Outgoing calls in excess of 100 in a month:	0.09 per call

The Company will measure conversation minutes from the time the Company's switching equipment receives answer supervision to the earlier of when the Company's switch receives disconnection supervision from its own switch or from the terminating switch. The Company will measure conversation minutes to the next higher whole minute per call. The Company will not bill the end user for non-conversation time related to local calls.

The Company will not provide call record detail in the end user's monthly bill. No minutes or calls are carried forward from month to month.

PBLES is a stand-alone service that does not include any unregulated features.

PBLES provides unlimited incoming local calls.

A customer desiring to subscribe to PBLES must notify the Company.

Primary Basic Local Exchange Service entitles customer to 12,000 outgoing minutes per month in local calling. Charges for calls in excess of 12,000 are set forth in C., below.

Issued: December 30, 2008

Effective: January 1, 2009

Issued under the authority of PA 235 of 2005 and
the Commission's December 20, 2005, Order in Case No. U-14731

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Lennon Telephone Company
Tariff MPSC No. 1R

2nd Revised Sheet No. 7.1
Cancels 1st Revised Sheet No. 7.1

PRIMARY BASIC LOCAL EXCHANGE SERVICE

DESCRIPTION OF SERVICE

B. PRIMARY BASIC LOCAL EXCHANGE SERVICE (PBLES) (Cont'd)

A person with disabilities or who is voluntarily providing a service for an organization classified by the Internal Revenue Service as a 501(c)(3) or (19) organization, or a person who provides a service for a congressionally chartered veterans organization or their duly authorized foundations, is exempt from the 100 calls per month limitation.

Only one Primary Basic Local Exchange Service will be provided to an address.

Calls made to a telephone number with an NPA NXX that is associated with the rate center that is within the customer's local calling area are local calls regardless of the physical location of the called party.

(N)
|
(N)

C. MISCELLANEOUS UNREGULATED RATES RELATED TO PRIMARY BASIC LOCAL EXCHANGE SERVICE*

Outgoing conversation minutes in excess of 12,000 in a month: \$0.05 per minute

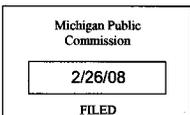
Use of Primary Basic Local Exchange Service for data communication will incur a charge of \$0.05 per minute, irrespective of whether Customer has used 12,000 minutes in a month. Data communication calls and minutes will not count toward the 100 monthly call or 12,000 monthly minute allowances.

*The rates under this Section C. are unregulated. The Company lists such rates in accordance with § 402 of the Michigan Telecommunications Act, as amended by 2005 PA 235.

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LOCAL TELEPHONE EXCHANGE SERVICE

LIFELINE SERVICE

A. DESCRIPTION

1. Lifeline Service applies discounts to monthly recurring rates for qualifying residential customers. These discounts are applied to existing tariffed rates and charges for residential telephone service.
2. In order to be eligible for Lifeline service a residential customer's annual income must be at or below 150% of the poverty level as determined by the United States office of Management and Budget and as approved by the State Treasurer, or the customer must participate in one of the following federal assistance programs:
 - a. Medicaid
 - b. Food stamps
 - c. Supplemental security income
 - d. Federal public housing assistance
 - e. Low-income home energy assistance program
 - f. National school lunch program's free lunch program
 - g. Temporary assistance for needy families
3. Lifeline Service includes the services and functionalities enumerated in by the F.C.C. as follows: voice grade access to the public switched network; local usage; dual tone multi frequency signaling or its functional equivalent; single party service or its functional equivalent; access to operator services; access to interexchange service; access to directory assistance; and toll blocking for qualifying customers.
4. Other services can be provided with the Lifeline service at applicable rates and charges.

B. REGULATIONS

1. Regulations specified elsewhere in the Company's tariffs apply to Lifeline service.
2. Lifeline service is available only with residence services, excluding foreign exchange service. Lifeline service is limited to one line per household at the customer's primary residence.
3. A miscellaneous service charge does not apply when Lifeline service is added or discontinued to existing service when that is the only work being done.

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By: Paul Bowman, Manager

Effective: January 7, 2006
Lennon, Michigan

Lennon Telephone Company
MPSC No. 1R

6th Revised Sheet No. 13.1
Cancels 5th Revised Sheet No. 13.1

LOCAL TELEPHONE EXCHANGE SERVICE

LIFELINE SERVICE

B. REGULATIONS (Cont'd)

4. a. A discount of 20% of the Basic Local Exchange rate or \$11.25, whichever is greater, on the monthly rate for residential exchange service for Lifeline customers is applicable. For Lifeline customers 65 years of age or more, the discount will be 25% of the Basic Local Exchange rate or \$12.35, whichever is greater. The total discount shall not exceed 100% of all end-user common line charges and the Basic Local Exchange rate.
- b. The credit will be applied in the following order: (1) The Interstate End User Access Charge, National Exchange Carriers Association, Inc., Tariff FCC. No. 5, Access Service. (2) The balance of the credit, if any, will be applied as a credit to the basic residential service. (D)
- c. The Company will provide, at the qualifying customer's option, toll blocking service at no charge. The Company defines toll blocking as a service provided by the Company that lets the customer elect not to allow the completion of outgoing toll calls from their telecommunications channel.
- d. The Company will not require a service deposit in order to initiate Lifeline Service if the qualifying customer voluntarily elects toll blocking services.
- e. The Company will not disconnect Lifeline Service for non-payment of toll charges by qualifying customers.
5. The Lifeline plan will apply after receipt and processing of a completed Company or community/government provided application, including documentation indicating that the household income meets the eligibility standards established above.
6. Customers of Lifeline Service must notify the Company of any changes which would affect qualification. Reverification of eligibility will take place on an ongoing basis. When the customer is no longer eligible for Lifeline service, the Lifeline discount will be discontinued and regular tariff rates and charges would apply.

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Lennon Telephone Company
MPSC No. 1R

3rd Revised Sheet No. 13.2
Cancels 2nd Revised Sheet No. 13.2

LOCAL TELEPHONE EXCHANGE SERVICE

LIFELINE SERVICE

C. MONTHLY RATE FOR NON LIFELINE CUSTOMERS

A rate specified in MECA's Tariff M.P.S.C. No. 25, Part XVII, Section 7.1.2.1 applies per exchange access line to cover the costs of the Lifeline service, to the Telephone Company intrastate services as listed below:

Business and Residence exchange services excluding Lifeline customers.

PBX Trunk Services

Centrex Services

The rate for business Centrex station lines will be computed based on the trunk Equivalence Table specified in the Company's Tariff M.P.S.C. No. 2R.

(D)

(D)

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REDACTED – FOR PUBLIC INSPECTION

LENNON TELEPHONE COMPANY (SAC 310708)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY