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AFFILIATED SOUTH AMERICAN OFFICES
ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
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EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

WRITER'S CONTACT INFORMATION
sta@bloostonlaw.com
202-828-5562

**REDACTED – FOR PUBLIC INSPECTION**

*VIA HAND DELIVERY AND ECFS*

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

RE: Form 481 – Carrier Annual Reporting Data Collection, 2013
WC Dockets No. 10-90 and 11-42

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules[1] and the Commission's Public Notice in this proceeding,[2] Electra Telephone Company ("the Company") hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," which was timely filed with the Universal Service Administrative Company and the appropriate state commission on or before October 15, 2013.

The Company seeks confidential treatment under the Protective Order adopted by the Commission in this proceeding for the financial information included in its report pursuant to

[1] 47 CFR §§54.313 and 54.422.
[2] *Wireline Competition Bureau Announces Filing Deadline of October 15, 2013 for Eligible Telecommunications Carriers to File High-Cost and Low-Income Annual Reports,* PUBLIC NOTICE, WC Dockets No. 10-90 and 11-42, DA 13-1707, released August 6, 2013.

§54.313(f)(2).[3] Confidential treatment of this information is appropriate on the grounds that it is commercially sensitive information that is not normally released to the public. In accordance with the Protective Order, the Company is submitting two redacted copies and one stamped confidential copy via hand delivery to the Secretary's Office, and two stamped confidential copies via hand delivery to Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 5-A452, Washington, D.C. 20554. The Company is also submitting a redacted copy via the Electronic Comment Filing System, as directed by the Public Notice.

Due to temporary closure of the Commission's filing window, mail room, and electronic filing systems beginning October 1, 2013, this filing is being submitted on the business day following the day of return to normal operations in accordance with the Commission's Public Notice on filing procedures in the event of a lapse in funding.[4] If you have any questions, please do not hesitate to contact the undersigned counsel.

Sincerely,

Salvatore Taillefer, Jr.

Filed:

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[3] *In the Matter of Connect America Fund, et al.,* PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 12-1857, released November 16, 2013.

[4] *Procedures for Filings in the Event of a Lapse in Funding,* PUBLIC NOTICE, released October 1, 2013.

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**FCC Form 481 - Carrier Annual Reporting**
**Data Collection Form**

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name: Person USAC should contact with questions about this data | Deborah Nobles |
| <035> | Contact Telephone Number: Number of the person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address: Email of the person identified in data line <030> | dnobles@townes.net |

**ANNUAL REPORTING FOR ALL CARRIERS**

*(check box when complete)*

| Line | Item | Entry | Instruction | 54.313 Completion Required | 54.422 Completion Required |
|---|---|---|---|---|---|
| <100> | Service Quality Improvement Reporting | | *(complete attached worksheet)* | ✓ | |
| <200> | Outage Reporting (voice) | | *(complete attached worksheet)* | ✓ | ✓ |
| <210> | | ✓ <-- check box if no outages to report | | | |
| <300> | Unfulfilled Service Requests (voice) | 0 | | ✓ | |
| <310> | Detail on Attempts (voice) | | *(attach descriptive document)* | | |
| <320> | Unfulfilled Service Requests (broadband) | | | | |
| <330> | Detail on Attempts (broadband) | | *(attach descriptive document)* | | |
| <400> | Number of Complaints per 1,000 customers (voice) | | | ✓ | ✓ |
| <410> | Fixed | 0.0 | | | |
| <420> | Mobile | | | | |
| <430> | Number of Complaints per 1,000 customers (broadband) | | | | |
| <440> | Fixed | | | | |
| <450> | Mobile | | | | |
| <500> | Service Quality Standards & Consumer Protection Rules Compliance | | *(check to indicate certification)* | ✓ | ✓ |
| <510> | | 442069tx510 | *(attached descriptive document)* | ✓ | ✓ |
| <600> | Functionality in Emergency Situations | | *(check to indicate certification)* | ✓ | ✓ |
| <610> | | 442069tx610 | *(attached descriptive document)* | ✓ | ✓ |
| <700> | Company Price Offerings (voice) | | *(complete attached worksheet)* | | |
| <710> | Company Price Offerings (broadband) | | *(complete attached worksheet)* | | |
| <800> | Operating Companies and Affiliates | | *(complete attached worksheet)* | ✓ | ✓ |
| <900> | Tribal Land Offerings (Y/N)? | ○ ◉ (N) | *(if yes, complete attached worksheet)* | ✓ | |
| <1000> | Voice Services Rate Comparability | | *(check to indicate certification)* | | |
| <1010> | | | *(attach descriptive document)* | | |
| <1100> | Terrestrial Backhaul (Y/N)? | ◉ ○ (Y) | *(if not, check to indicate certification)* | | |
| <1110> | | | *(complete attached worksheet)* | | |
| <1200> | Terms and Condition for Lifeline Customers | | *(complete attached worksheet)* | | ✓ |

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

| Line | Instruction | 54.313 | 54.422 |
|---|---|---|---|
| <2000> | *(check to indicate certification)* | | |
| <2005> | *(complete attached worksheet)* | | |

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

| Line | Instruction | 54.313 | 54.422 |
|---|---|---|---|
| <3000> | *(check to indicate certification)* | ✓ | |
| <3005> | *(complete attached worksheet)* | ✓ | |

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**(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 | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

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

<111> 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. ☐

# REDACTED - FOR PUBLIC INSPECTION

| (200) Service Outage Reporting (Voice)<br>Data Collection Form | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|---|

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

<220>

| <a> NORS Reference Number | <b1> Outage Start Date | <b2> Outage Start Time | <b3> Outage End Date | <b4> Outage End Time | <c1> Number of Customers Affected | <c2> Total Number of Customers | <d> 911 Facilities Affected (Yes / No) | <e> Service Outage Description (Check all that apply) | <f> Did This Outage Affect Multiple Study Areas (Yes / No) | <g> Service Outage Resolution | <h> Preventative Procedures |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | -- See attached worksheet -- | | | | | |

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

| | | |
|---|---|---|
| <701> | Residential Local Service Charge Effective Date | 1/1/2013 |
| <702> | Single State-wide Residential Local Service Charge | |

<703>

| <a1> State | <a2> Exchange (ILEC) | <a3> SAC (CETC) | <b1> Rate Type | <b2> Residential Local Service Rate | <b3> State Subscriber Line Charge | <b4> State Universal Service Fee | <b5> Mandatory Extended Area Service Charge | <c> Total per line Rates and Fees |
|---|---|---|---|---|---|---|---|---|
| | | | | -- See attached worksheet -- | | | | |

10/10/2013

**(710) Broadband Price Offerings**
**Data Collection Form**

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

<711>

| <a1> State | <a2> Exchange (ILEC) | <b1> Residential Rate | <b2> State Regulated Fees | <c> Total Rate and Fees | <d1> Broadband Service - Download Speed (Mbps) | <d2> Broadband Service - Upload Speed (Mbps) | <d3> Usage Allowance (GB) | <d4> Usage Allowance Action Taken When Limit Reached (*select*) |
|---|---|---|---|---|---|---|---|---|
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| | | -- See attached worksheet -- | | | | | | |
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**(800) Operating Companies**
**Data Collection Form**

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

| | | |
|---|---|---|
| <810> | Reporting Carrier | Electra Telephone Company |
| <811> | Holding Company | Townes Telecommunications, Inc. |
| <812> | Operating Company | N/A |

<813>

| <a1> Affiliates | <a2> SAC | <a3> Doing Business As Company or Brand Designation |
|---|---|---|
| -- See attached worksheet -- | | |

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| (900) Tribal Lands Reporting<br>Data Collection Form | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|---|

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

<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:

| | | Select (Yes,No, NA) |
|---|---|---|
| <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. | |

| (1100) No Terrestrial Backhaul Reporting<br>Data Collection Form | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|---|

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

<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 | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans — 442069tx1210

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<br>Data Collection Form<br>*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers* | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|---|

| | | |
|---|---|---|
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| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

**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 ______________________

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(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
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| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

**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**

(3010) Milestone Certification (47 CFR § 54.313(f)(1)(i)) — Name of Attached Document Listing Required Information: ☐
Please check this box to confirm that the attached PDF, on line 3012,

(3011) 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.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) — Name of Attached Document Listing Required Information:

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) ☑ (Yes/No)

(3014) If yes, does your company file the RUS annual report ☐ (Yes/No)

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:

(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 ☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation — Name of Attached Document Listing Required Information:

(3018) If the response is no on line 3014, is your company audited? ☑ (Yes/No)

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 :

(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 ☑

(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:

(3022) 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, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) PDF of Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3026) Attach the worksheet listing required information — Name of Attached Document Listing Required Information: 442069tx3026

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

**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: ELECTRA TELEPHONE CO

Signature of Authorized Officer: CERTIFIED ONLINE Date 10/10/2013

Printed name of Authorized Officer: Deborah Nobles

Title or position of Authorized Officer: Vice President of Regulatory Affairs

Telephone number of Authorized Officer: 904-688-0029

Study Area Code of Reporting Carrier: 442069 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.

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

**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)____________________ 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:

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.

**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:

Name of Authorized Agent or Employee of Agent:

Signature of Authorized Agent or Employee of Agent: Date:

Printed name of Authorized Agent or Employee of Agent:

Title or position of Authorized Agent or Employee of Agent

Telephone number of Authorized Agent or Employee of Agent:

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.

# Attachments

Carrier Name: Electra Telephone Company
Carrier SPIN: 143002424
Carrier SAC: 442069
Operating State: Texas

Line 510: Service Quality Standards and Consumer Protection Rules Compliance

Electra Telephone Company ("Electra" or "the Company") complies with the following Texas rules in Administrative Code ("TAC"), Title 16, Part II, Chapter 26 – Substantive Rules Applicable to Telecommunications Service Providers:

Subchapter B. – Customer Service and Protection §26.21- §26.37
Subchapter C. – Infrastructure and Reliability §26.51- §26.57
Subchapter F. – Regulation of Telecommunications Service §26.121 - §26.134

Quarterly Service Quality Reports are submitted by the Company to the Texas Public Utility Commission ("TPUC") in accordance with Subchapter D §26.81. The reports show that Electra has achieved the service objectives and performance benchmarks established by the TPUC.

Electra complies with the following federal consumer protection rules and regulations:

FCC 47 C.F.R. §§64.2001-64.2011 – Customer Proprietary Network Information ("CPNI")
FTC 16 C.F.R. §681.2 – Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003
All customer protection and disclosures established by the Fair Credit Reporting Act (15 U.S.C. §§1681, *et seq.*) and the Truth in Lending Act (15 U.S.C. §§1601, *et seq.*)

The Company has a CPNI Policy Manual detailing and enforcing the requirements of the federal CPNI rules. Each year, the CPNI Compliance Officer (1) communicates with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervises the training of Company employees and agents who use or have access to CPNI; (3) supervises the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintains records regarding the use of CPNI in marketing campaigns; and (5) receives, reviews and resolves questions or issues regarding use, disclosure, distribution or provision of access to CPNI. The CPNI Compliance Officer certifies compliance annually with the FCC by March 1.

The Company has an Identity Theft Prevention Program ("the Program") that was approved by the Board of Directors in September 2008. The Board appointed Red Flag Coordinator is responsible for updating the Program as necessary; the day-today supervision of the Program; training Company employees regarding their responsibilities with respect to the Program; and responding to employee questions and concerns regarding identity theft or the Program. The Red Flag Coordinator is required to annually prepare an Identity Theft Prevention Program Compliance Report for the Board's approval by October 1. The Identity Theft Prevention Program Compliance Report evaluates the effectiveness of the Program; the nature and extent of the Company's service provider arrangements and their impact on the effectiveness of the

Program; reports any significant incidents involving identity theft and the Company's response to such incidents; and provides recommendations to the Board for periodic reviews of the Program and the adoption of material changes and other revisions, modifications and updates to the Program.

| | |
|---|---|
| Carrier Name: | Electra Telephone Company |
| Carrier SPIN: | 143002424 |
| Carrier SAC: | 442069 |
| Operating State: | Texas |
| Line 610: | Functionality in Emergency Situations |

Electra Telephone Company ("Electra" or "the Company") has an Emergency Operations Plan ("EOP" or "the Plan") in accordance with Substantive Rule §26.51(b) of the Texas Public Utility Commission's rules applicable to telecommunications providers, that addresses the requirements for continuity of service and systematic restoration of service after loss of service due to an emergency. The EOP is administered and maintained by a member of senior management of the parent company, Townes Telecommunications, Inc., and is reviewed annually to ensure that each applicable section is accurate and any changes or updates to the Plan are made on a timely basis.

An Emergency Director has been authorized to implement the provisions of the EOP. The Emergency Director conducts training with employees and is responsible for ensuring that all new employees are provided a 30 minute overview of the Plan as part of their orientation. Specific supervisory personnel receive additional intense instructions regarding special areas of the Plan. Annual Tabletop Drills are conducted, in which company personnel are required to run through an emergency scenario, activating the emergency response and service restoration plan.

The Plan established an Emergency Committee made up of senior management and key company personnel, who upon notification by the Emergency Director that a potential emergency exists, convene to declare an emergency, notify affected parties and assume control of restoration of service efforts.

An emergency control center is established at the Company's business office, which is equipped with a back-up power generator and a wireless telephone set. Depending upon the severity and type of emergency and the safety of the emergency location, a control center may be established at the site of the event.

In case of power outages, batteries in the central office will last on average from 4-8 hours depending on how many lines (AMP load) are served at that particular location. The stand-by generator has 24 hour diesel capacity and small generators are available to be put on smaller concentrators if power is lost. The small generators have to be refueled every few hours.

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(800) Operating Companies
Data Collection Form

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

| | | |
|---|---|---|
| <010> | Study Area Code | 442069 |
| <015> | Study Area Name | ELECTRA TELEPHONE CO |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Deborah Nobles |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 904-688-0029 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dnobles@townes.net |

| | | |
|---|---|---|
| <810> | Reporting Carrier | Electra Telephone Company |
| <811> | Holding Company | Townes Telecommunications, Inc. |
| <812> | Operating Company | N/A |

<813>

| <a1> Affiliates | <a2> SAC | <a3> Doing Business As Company or Brand Designation |
|---|---|---|
| Choctaw Telephone Company | 421893 | N/A |
| Electra Telephone Company | 442069 | N/A |
| Haxtun Telephone Company | 462190 | N/A |
| MoKan Dial, Inc. - KS | 411807 | N/A |
| MoKan Dial, Inc. - MO | 421807 | N/A |
| Northeast Florida Telephone Company | 210335 | d/b/a NEFCOM |
| Pymatuning Independent Telephone Company | 170200 | N/A |
| Tatum Telephone Company | 442150 | N/A |
| Walnut Hill Telephone Company | 401729 | N/A |

Carrier Name: Electra Telephone Company
Carrier SPIN: 143002424
Carrier SAC: 442069
Operating State: Texas

Line 1210: Terms and Conditions for Lifeline Program Customers

Electra Telephone Company ("Electra" or "the Company") complies with the FCC CFR 47 §§54.4, Universal Service Support for Low-Income Customers and the Texas Administrative Code, Title 16, Part 2, chapter 26, subchapter P, rule 26.412 – Lifeline Service program. Lifeline is a non-transferable retail service offering for which qualifying low-income consumers receive a $9.25 federal discount and a $3.50 state discount on flat rated basic local telephone service, whether it is purchased on a stand-alone basis or as part of a bundled service that includes voice and data services and optional calling features. Lifeline customers are charged a separate charge for toll calls, but are provided Toll Blocking free of charge if they elect to subscribe to the service. The Lifeline supported services are as shown below:

| | **Electra** | |
|---|---|---|
| Residence Access Line | 11.15 | |
| ELCS | 3.50 | |
| Federal SLC | 6.50 | |
| Total Monthly Rate | 21.15 | |
| **Lifeline Discounts to Total Monthly Rate:** | | |
| Federal Flat Rate Lifeline Support | (9.25) | *FCC 497: Lifeline Worksheet* |
| State Lifeline Support | (3.50) | *Form RMT-1" TUSF Worksheet* |
| Total Lifeline Service Monthly Rate | **(12.75)** | |
| | | |
| **Net Monthly Local Service for Lifeline Customer** | **8.40** | |

Additional Services:
Toll Blocking is free to Lifeline customers who subscribe to this service.

The company is required to include the Lifeline Service Program in their Local Exchange Tariff. The rates for basic local residential service are also contained in the Local Exchange Tariff and the rates for the federal SLC are included in the NECA Tariff No. 5. Changes to any of these rates must be approved by the appropriate regulatory agency.

# REDACTED - FOR PUBLIC INSPECTION

| | | |
|---|---|---|
| (3005a) Operating Report for Privately-Held Rate of Return Carriers | | FCC Form 481 |
| Balance Sheet - Data Collection Form | | OMB Control No. 3060-0986 |
| Page 1 of 3 | | July 2013 |
| <010> | Study Area Code | <010> 442069 |
| <015> | Study Area Name | <015> Electra Telephone Company |
| <020> | Program Year | <020> 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | <030> |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | <035> |
| <039> | Contact Telephone Email Address - Email Address of person identified in data line <030> | <039> |

☐ Files as reviewed single company ☑ Filed as audited single company

☐ Filed as reviewed consolidated company ☐ Filed as audited consolidated company

☐ Filed as subsidiary of reviewed consolidated company ☐ Filed as subsidiary of audited consolidated company

## CERTIFICATION

*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.*

| | |
|---|---|
| Deborah Nobles | 10/10/2013 |
| Signature | Date |

## PART A. BALANCE SHEET

| ASSETS | BALANCE PRIOR YEAR | BALANCE END OF PERIOD | LIABILTIES AND STOCKHOLDERS' EQUITY | BALANCE PRIOR YEAR | BALANCE END OF PERIOD |
|---|---|---|---|---|---|
| CURRENT ASSETS | | | CURRENT LIABILITIES | | |
| 1. Cash and Equivalents | [redacted] | [redacted] | 25. Accounts Payable | [redacted] | [redacted] |
| 2. Cash-RUS Construction Fund | | | 26. Notes Payable | | |
| 3. Affiliates: | | | 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. Non-Affiliates: | | | 31. Current Mat.-Capital Leases | | |
| 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 | | | LONG-TERM DEBT | | |
| 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 | | |
| | | | 40. Funded Debt-Rural Develop. Loan | | |
| NONCURRENT ASSETS | | | 41. Premium (Discount) on L/T Debt | | |
| 11. Investment in Affiliated Companies | | | 42. Reacquired Debt | | |
| a. Rural Development | | | 43. Obligations Under Capital Lease | | |
| b. Nonrural Development | | | 44. Adv. From Affiliated Companies | | |
| 12. Other Investments | | | 45. Other Long-Term Debt | | |
| a. Rural Development | | | 46. Total Long-Term Debt (36 thru 45) | | |
| b. Nonrural Development | | | OTHER LIAB. & DEF. CREDITS | | |
| 13. Nonregulated Investments | | | 47. Other Long-Term Liabilities | | |
| 14. Other Noncurrent Assets | | | 48. Other Deferred Credits | | |
| 15. Deferred Charges | | | 49. Other Jurisdictional Differences | | |
| 16. Jurisdictional Differences | | | 50. Total Other Liabilities and Deferred Credits (47 thru 49) | | |
| 17. Total Noncurrent Assets (11 thru 16) | | | EQUITY | | |
| | | | 51. Cap. Stock Outstanding & Subscribed | | |
| PLANT, PROPERTY, AND EQUIPMENT | | | 52. Additional Paid-in-Capital | | |
| 18. Telecom. Plant-in-Service | | | 53. Treasury Stock | | |
| 19. Property Held for Future Use | | | 54. Membership and Cap. Certificates | | |
| 20. Plant Under Construction | | | 55. Other Capital | | |
| 21. Plant Adj., Nonop. Plant & Goodwill | | | 56. Patronage Capital Credits | | |
| 22. Less Accumulated Depreciation | | | 57. Retained Earnings or Margins | | |
| 23. Net Plant (18 thru 21 less 22) | | | 58. Total Equity (51 thru 57) | | |
| | | | | | |
| 24. TOTAL ASSETS (10+17+23) | | | 59. TOTAL LIABILITIES AND EQUITY (35+46+50+58) | | |

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(3005b) Operating Report for Privately-Held Rate of Return Carriers
Balance Sheet - Data Collection Form
Page 2 of 3

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

| | | | |
|---|---|---|---|
| <010> | Study Area Code | <010> | 442069 |
| <015> | Study Area Name | <015> | Electra Telephone Company |
| <020> | Program Year | <020> | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | <030> | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | <035> | |
| <039> | Contact Telephone Email Address - Email Address of person identified in data line <030> | <039> | |

| PART B. STATEMENTS OF INCOME AND RETAINED EARINGS OR MARGINS | | |
|---|---|---|
| ITEM | PRIOR YEAR | THIS YEAR |
| 1. Local Network Services Revenues | [redacted] | |
| 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 5 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+26)/26] | | |
| 48. DSCR [(31+26+10+11)/44] | | |

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

| | | | |
|---|---|---|---|
| <010> | Study Area Code | <010> | 442069 |
| <015> | Study Area Name | <015> | Electra Telephone Company |
| <020> | Program Year | <020> | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | <030> | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | <035> | |
| <039> | Contact Telephone Email Address – Email Address of person identified in data line <030> | <039> | |

PART C. STATEMENTS OF CASH FLOWS

| | | | |
|---|---|---|---|
| 1. | **Beginning Cash (Cash and Equivalents plus RUS Construction Fund)** | | [redacted] |
| | **CASH FLOWS FROM OPERATING ACTIVITIES** | | [redacted] |
| 2. | **Net Income** | | [redacted] |
| | Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities | | [redacted] |
| 3. | Add: Depreciation | | [redacted] |
| 4. | Add: Amortization | | [redacted] |
| 5. | Other (Explain) | | [redacted] |
| | Changes in Operating Assets and Liabilities | | [redacted] |
| 6. | Decrease/(Increase) in Accounts Receivable | | [redacted] |
| 7. | Decrease/(Increase) in Materials and Inventory | | [redacted] |
| 8. | Decrease/(Increase) in Prepayments and Deferred Charges | | [redacted] |
| 9. | Decrease/(Increase) in Other Current Assets | | [redacted] |
| 10. | Increase/(Decrease) in Accounts Payable | | [redacted] |
| 11. | Increase/(Decrease) in Advance Billings & Payments | | [redacted] |
| 12. | Increase/(Decrease) in Other Current Liabilities | | [redacted] |
| 13. | **Net Cash Provided/(Used) by Operations** | | [redacted] |
| | **CASH FLOWS FROM FINANCING ACTIVITIES** | | [redacted] |
| 14. | Decrease/(Increase) in Notes Receivable | | [redacted] |
| 15. | Increase/(Decrease) in Notes Payable | | [redacted] |
| 16. | Increase/(Decrease) in Customer Deposits | | [redacted] |
| 17. | Net Increase/(Decrease) in Long Term Debt (Including Current Maturities) | | [redacted] |
| 18. | Increase/(Decrease) in Other Liabilities & Deferred Credits | | [redacted] |
| 19. | Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital | | [redacted] |
| 20. | Less: Payment of Dividends | | [redacted] |
| 21. | Less: Patronage Capital Credits Retired | | [redacted] |
| 22. | Other (Explain) | | [redacted] |
| 23. | **Net Cash Provided/(Used) by Financing Activities** | | [redacted] |
| | **CASH FLOWS FROM INVESTING ACTIVITIES** | | [redacted] |
| 24. | Net Capital Expenditures (Property, Plant & Equipment) | | [redacted] |
| 25. | Other Long-Term Investments | | [redacted] |
| 26. | Other Noncurrent Assets & Jurisdictional Differences | | [redacted] |
| 27. | Other (Explain) | | [redacted] |
| 28. | **Net Cash Provided/(Used) by Investing Activities** | | [redacted] |
| 29. | **Net Increase/(Decrease) in Cash** | | [redacted] |
| 30. | **Ending Cash** | | [redacted] |

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George Frederick Certified Public Accountant PLLC

[illegible] Way Scottsdale, AZ 85266 [illegible] www.gfcpa.com

# Report of Independent Accountants

The Board of Directors and Stockholders
Electra Telephone Company, Inc.
Electra, Texas

[redacted]

George Frederick

GEORGE FREDERICK CPA PLLC
February 27, 2013