Your business is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED – FOR PUBLIC INSPECTION

October 9, 2013

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 Shidler Telephone Company
Study Area Code 432023

Dear Ms. Dortch:

On behalf of Shidler Telephone Company "Shidler", 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] Shidler 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)

[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).

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	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
<030>	Contact Name: Person USAC should contact with questions about this data	Lisa Patton
<035>	Contact Telephone Number: Number of the person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address: Email of the person identified in data line <030>	lisa@stinternet.net

ANNUAL REPORTING FOR ALL CARRIERS			54.313 Completion Required	54.422 Completion Required
			(check box when complete)	
<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>	4320230K510	(attached descriptive document)	✔	✔
<600>	Functionality in Emergency Situations	(check to indicate certification)	✔	✔
<610>	4320230K610	(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)? ● ○	(if yes, complete attached worksheet)	✔	
<1000>	Voice Services Rate Comparability	(check to indicate certification)		
<1010>		(attach descriptive document)		
<1100>	Terrestrial Backhaul (Y/N)? ● ○	(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

<2000>		(check to indicate certification)		
<2005>		(complete attached worksheet)		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)	✔	
<3005>		(complete attached worksheet)	✔	

(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	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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.	☐

(200) Service Outage Reporting (Voice)
Data Collection Form

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

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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	432023
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<020>	Program Year	2014
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<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

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

<703>

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

(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	432023
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<020>	Program Year	2014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<711>

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

(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	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
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<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	
<812>	Operating Company	

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**

-- See attached worksheet --

(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	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

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

Osage Nation

<920> Tribal Government Engagement Obligation

432023OK920

Name of Attached Document (.pdf)

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

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

(1100) No Terrestrial Backhaul Reporting Data Collection Form

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

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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	432023
<015>	Study Area Name	SHIDLER TEL CO
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<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans — 432023OK1210

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

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<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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 _____

(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	432023
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<020>	Program Year	2014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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)} Please check this box to confirm that the attached PDF , on line 3012,	Name of Attached Document Listing Required Information	☐
(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	4320230K3017
(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	

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

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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:

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	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2014
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<035>	Contact Telephone Number - Number of person identified in data line <030>	(918) 793-2211
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.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) Karen Gunkel **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: Karen Gunkel

Name of Reporting Carrier: SHIDLER TEL CO

Signature of Authorized Officer: CERTIFIED ONLINE Date: 10/09/2013

Printed name of Authorized Officer: Lisa Patton

Title or position of Authorized Officer: Vice President

Telephone number of Authorized Officer: 918-793-2211

Study Area Code of Reporting Carrier: 432023 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: SHIDLER TEL CO

Name of Authorized Agent or Employee of Agent: Karen Gunkel

Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 10/09/2013

Printed name of Authorized Agent or Employee of Agent: Karen Gunkel

Title or position of Authorized Agent or Employee of Agent Consultant- Revenue Requirements

Telephone number of Authorized Agent or Employee of Agent: 512-338-0473

Study Area Code of Reporting Carrier: 432023 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

Shidler Telephone Company

Response to Lines 500-510 - Service Quality Standards and Consumer Protection Rules Compliance

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. 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."[3]

Shidler Telephone Company ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1)); 2) the responsibility for adequate and safe service (OAC 165:55-13-20); 3) the response to customer complaint inquiries (OAC 165:55-13-25); 4) customer access to provider (OAC 165:55-13-26); 5) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC rules at OAC 165:55-9-1; and 6) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

---

[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.

Shidler Telephone Company

Response to Lines 600-610 - Ability to Function in Emergency Situations

Shidler 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] 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 also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office

[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."

facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. Shidler Telephone Company complies with all of the aforementioned OCC rules.

(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	432023
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	
<812>	Operating Company	

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
Shidler Telephone Internet, LLC		

Shidler Telephone Company

Response to Line 920- Tribal Engagement Obligation

Shidler Telephone Company ("Company") serves the Osage Nation located in northern Oklahoma. The Company reached out to the Osage Nation in 2012 in an attempt to engage in discussion of the Osage Nation's needs assessment and deployment planning for the communications needs of Tribal members and the Tribal government institution per the requirements of 47 C.F.R. §54.313(a)(9). The Osage Nation responded at the time that they were not prepared to discuss communications issues and would contact the Company at such time as they were ready to engage in those discussions. The following pages provide support for the attempt at communication made by the Company.

The Company makes best efforts to bring advanced telecommunications services and broadband services to all individuals within its service territory, including all Tribal members. The Company looks forward to further contact in 2013 to determine how the Company's service plans can be coordinated with the Osage Nation's special needs and projects planned either in the area or nearby that would affect service.

SHIDLER TELEPHONE COMPANY
PO Box 25
120 Broadway
Shidler, OK 74652
Telephone: (918) 793-2211 Fax: (918) 793-7211

October 25, 2012

Chief John Red Eagle
627 Grandview Ave.
Pawhuska, OK 74056-4201

Re: Request for a meeting to discuss the communications needs of your Tribal community

Dear Chief Red Eagle,

On behalf of Shidler Telephone Company we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this I would like to have a meeting with you or others you may designate to discuss a needs assessment and deployment planning for the communications needs of your Tribal members and Tribal government institutions. Shidler Telephone Company is not only an authorized telecommunications provider for some or all of the Tribal Lands of your Nation but our company provides a full array of communications services, including local telephone service in the Shidler, Webb City, Foraker, Grainola and Wynona areas and broadband and internet access.

I would like to discuss, at a minimum, the following areas:

1. The communications needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communications needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule. If you do not feel a need to meet with me, please let me know.

Sincerely,

John M. White
President/General Manager

Email: jw@stinternet.net
lisa@stinternet.net

REDACTED - FOR PUBLIC INSPECTION

Osage Nation
Office of Information Technologies

To: Vendors

Re: Broadband Initiative

Date: 11/14/2012

On behalf of Osage Nation Information Technologies Department, we would like to express our appreciation for your interest in accommodating our vendor need for the broadband initiative. However, at this time we are in the infancy of the planning and requirement inventory needs assessment and will need to accomplish these basics prior to engaging a vendor. We will be happy to keep your information and contact you when we are at that point in our project. If you require any further information, please contact Gayle Deese at gdeese@osagetribe.org.

Respectfully,

Information Technologies,

Osage Nation

627 Grandview
Pawhuska, OK 74056
918-287-5499 Fax 918-287-5217

Subject:	Tribal Information
From:	Lisa Patton (lisa@stinternet.net)
To:	gdeese@osagetribe.org;
Cc:	jw@stinternet.net;
Date:	Wednesday, November 28, 2012 10:31 AM

Good Morning Gayle,
Thank you for your quick response to our letter regarding our telecommunication offerings to the Osage tribe.

I am writing on behalf of our President, John White, regarding any help we can give you in the planning of your needs. Shidler Telephone Company offers local telephone service and DSL services in the Shidler, Webb City, Foraker, Grainola and Wynona areas.

If we can be of any assistance to you, please don't hesitate to contact us.

Thank you,
Lisa Patton
Vice President
Shidler Telephone Company
Ph: 918-793-2211

Subject:	RE: Tribal Information
From:	Gayle Deese (gdeese@osagetribe.org)
To:	lisa@stinternet.net;
Cc:	jw@stinternet.net;
Date:	Wednesday, November 28, 2012 10:40 AM

Lisa,

Thank you again for your interest, I will maintain your companies information and reach out when we are at that point in the project.

Respectfully,

Gayle Deese

Operations Manager

Osage Nation I.T.

627 Grandview Ave.

Pawhuska, OK 74056

WK 918-287-5450 Cell 918-625-0194

From: Lisa Patton [mailto:lisa@stinternet.net]
Sent: Wednesday, November 28, 2012 10:32 AM
To: Gayle Deese
Cc: JW
Subject: Tribal Information

Good Morning Gayle,

Thank you for your quick response to our letter regarding our telecommunication offerings to the Osage tribe.

I am writing on behalf of our President, John White, regarding any help we can give you in the planning of your needs. Shidler Telephone Company offers local telephone service and DSL services in the Shidler, Webb City, Foraker, Grainola and Wynona areas.

If we can be of any assistance to you, please don't hesitate to contact us.

Thank you,

Lisa Patton

Vice President

Shidler Telephone Company

Ph: 918-793-2211

---------- Email Disclaimer ----------
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Also: This email message has been scanned for viruses and content by Iron Port, Sophos, and Trend Micro. Check your email security settings to determine how attachments are handled.

SHIDLER TELEPHONE COMPANY
PO Box 25
120 Broadway
Shidler, OK 74652
Telephone: (918) 793-2211 Fax: (918) 793-7211

January 31, 2013

Gayle Deese
Operations Manager
Osage Nation I.T.
627 Grandview Ave.
Pawhuska, OK 74056

Dear Gayle,

I am sending you (via email) the FCC Form 555 report for Shidler Telephone Company. This report is being provided pursuant to the FCC's Order issued in WC Docket No. 11-42 released February 6, 2012.

If you have any questions, please don't hesitate to contact me.

Thank you.

Sincerely,

Lisa Patton

Lisa Patton
Vice President

Shidler Telephone Company

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Shidler Telephone Company's tariff(s) on file with the Oklahoma Corporation Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates[(1)(2)]:

Exchange Name	R-1 Rate	Res. EAS Charge
Foraker	$ 15.35	$ -
Grainola	$ 15.35	$ -
Shidler	$ 15.35	$ -
Webb City	$ 15.35	$ -
Wynona	$ 11.85	$ 7.64

[(1)] Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Oklahoma Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

[(2)] Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

A. Applicability

1. Lifeline Service is a telecommunications service assistance program designed to provide eligible residential customers with a credit to be applied to the price of basic local exchange service.

2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their basic local exchange access service.

3. Customers shall not receive more than one Lifeline credit regardless of the number of residential access lines or locations the customer receives service within the State of Oklahoma.

4. All charges, either recurring or nonrecurring, for any service or feature other than Lifeline Service shall be billed at the tariffed rate.

5. Lifeline Service shall not be available on a retroactive basis.

B. Designated Services Available to Lifeline Customers (1)

The following services shall be offered to eligible Lifeline customers:

1. Single Party Service
2. Local Usage
3. Touch Tone Services
4. Voice Grade Access to the Public Switched Network
5. Access to Emergency Services
6. Access to Operator Services
7. Access to Interexchange Services
8. Access to Directory Assistance
9. Availability of Toll Restriction at No Charge (2)

C. Eligibility Requirements

1. Customers or applicants seeking a Lifeline service credit must provide documentation to the Company establishing that the customer or applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

(1) Lifeline service may not be disconnected for non-payment of toll charges.
(2) Eligible customers accepting toll restriction services shall not be required to pay a deposit.

APPROVED
JAN 01 1998
DIRECTOR OF
PUBLIC UTILITIES

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

C. Eligibility Requirements (Continued)

a. The applicant or customer must meet the requirements for eligibility for either Medicaid, Food Stamps, federal public housing, Low-Income Energy Assistance Program, or Supplemental Security Income. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or

b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or

c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.

d. For federal income tax purposes, the applicant is not a dependant unless over sixty years of age.

2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.

3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.

4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.

5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

APPROVED

JAN 01 1998

DIRECTOR OF
PUBLIC UTILITIES

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

D. Lifeline Credits

		Monthly Credit (1)
1)	federal subscriber line charge credit	(2)
2)	initial federal credit to residential access line	$1.75
3)	initial state credit to residential access line	$1.17
4)	additional federal credit to residential access line (3)	$0.58

(1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate. In no instance will a subscriber's monthly local exchange rate be less than $2.50 after application of the Lifeline credits.

(2) Lifeline Service has been certified by the FCC, therefore, eligible Lifeline customers will receive the appropriate waiver of the Subscriber Line Charge (SLC) as specified by the FCC.

(3) Half of the amount specified on line 3, not to exceed $1.75.

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands AT

1. The applicant or customer seeking to obtain Lifeline Service on Tribal Lands (see definition in 2.a. below) must demonstrate their current participation in at least one of the following assistance programs. The Applicant or customer shall complete and sign, under penalty of perjury, an authorization and self certification form provided by the Company. The Applicant or customer must check all of the following that apply.
   a. Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps)
   b. Temporary Assistance for Needy Families (TANF)
   c. Supplemental Security Income (SSI)
   d. Medical Assistance (Medicaid/Soonercare) AT
   e. Vocational Rehabilitation (including aid to the hearing impaired)
   f. Oklahoma Sales Tax Relief
   g. Federal Public Housing Assistance
   h. Low Income Home Energy Assistance Program
   i. Food Distribution Program on Indian Reservations ("FDPIR") AT
   j. 135% of the Federal Poverty Guidelines AT
   k. Bureau of Indian Affairs general assistance; (1)
   l. Temporary Assistance for Needy Families (TANF) tribally-administered block grant programs; (2)
   m. Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
   n. National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals).

2. The applicant or customer must also certify:
   a. Residence on Tribal Lands as described in Title 25, Code of Federal Regulations, Section 20.1, paragraph (v).
   b. Agreement to notify Company if applicant or customer no longer participates in the program or programs described in paragraph 1. above, for which the Applicant or Customer certified their participation in.
   c. The applicant must not be a dependent for Federal Income Tax purposes, unless the applicant is over the age of 60.

3. Upon receipt of the completed self certification, Company will begin providing the credit set forth in F. below. Lifeline credits will not be implemented or continued unless telephone service arrangements are and remain, within the Lifeline Service criteria specified above.

(1) Applicant must "have sufficient resources to meet the basic and special needs defined by the Bureau Standard of assistance," 25 C.F.R. § 20.21.
(2) 42 U.S.C. § 612 and 45 C.F.R. § 286.

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LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued) AT

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.

5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.

6.. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

F. Lifeline Credits on Tribal Lands DT

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in its Twelfth Report and Order entered into in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits as, Supplemental Nutrition Assistance Program ("SNAP" f/k/a Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR")or Oklahoma Sales Tax Relief Act (68 O.S.§5011, et seq.), then the Customer should receive credits as follows: AT AT

	Monthly Credit[1]	
Federal Lifeline Credit:	$9.25	CR
Oklahoma Universal Service Fund Credit:	$1.17	CR
Additional Federal Credit to Residential Access Line necessary to reduce customer's bill to $1.00	(See footnote (2) below)	

DT

(1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, less $1.00. In no instance will a subscriber's monthly local exchange rate be less than $1.00 after the application of the Lifeline Credits.

(2) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed $25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

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LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

F. Lifeline Credits on Tribal Lands (Continued) DT

2. If a customer indicates his eligibility to receive Lifeline credits as only one or more of the following: Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Bureau of Indian Affairs general assistance, Temporary Assistance for Needy Families (TANF) tribally administered block grant programs, Head Start Programs (only those meeting its income qualifying eligibility provision), 135% of the Federal Poverty Guidelies or National School Lunch Program (only Applicant or customer who satisfy the income standard of the program for free meals), then the Customer should receive credits as follows: AT

	Monthly Credit (3)	
Federal Lifeline Credit:	$9.25	CR
Additional Federal Credit to Residential Access Line necessary to reduce customer's bill to $1.00 (See footnote (4) below)		DT

(3) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate less $1.00. In no instance will a subscriber's monthly local exchange rate be less than $1.00 after the application of the Lifeline Credits.

(4) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed $25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

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REDACTED – FOR PUBLIC INSPECTION

SHIDLER TELEPHONE COMPANY (SAC 432023)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY