



Law Offices of Bennet & Bennet, PLLC

Maryland

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District of Columbia

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Washington, DC 20002

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Daryl A. Zakov^
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Erin P. Fitzgerald
Of Counsel
Tara B. Shostek

^Admitted in DC & WA Only
#Admitted in DC & FL Only

October 22, 2013

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Docket No. 10-90; WC Docket No. 11-42
2013 ETC Annual Report of Keystone Wireless, LLC
Study Area Code: 179007

Dear Ms. Dortch:

On behalf of Keystone Wireless, LLC (“Keystone”) and pursuant to Sections 54.313 and 54.422 of the Commission’s rules,¹ we are filing the attached FCC Form 481 - Carrier Annual Reporting Data Collection Form which was hand-delivered and emailed to USAC and electronically filed with the Pennsylvania Public Utility Commission on October 15, 2013.

If you have any questions regarding this filing, please contact the undersigned.

Respectfully submitted,

/s/ Kenneth C. Johnson

By:

Kenneth C. Johnson
Bennet & Bennet, PLLC
6124 MacArthur Boulevard
Bethesda, MD 20816
Direct No.: (202) 551-0015

Attachments

¹ 47 C.F.R. §§ 54.313, 54.422



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Admitted in DC & FL Only

October 15, 2013

Via Email (Form481@usac.org) and Hand Delivery

Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, D.C. 20036

Re: WC Docket No. 10-90; WC Docket No. 11-42
2013 ETC Annual Report of Keystone Wireless, LLC
Study Area Code: 179007

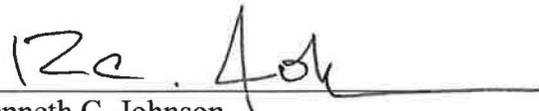
Dear Madam or Sir:

On behalf of Keystone Wireless, LLC (“Keystone”) and pursuant to Sections 54.313 and 54.422 of the Commission’s rules,¹ we are filing Keystone’s attached fully executed Excel version of its FCC Form 481 - Carrier Annual Reporting Data Collection Form.

If you have any questions regarding this filing, please contact the undersigned.

Respectfully submitted,

By:


Kenneth C. Johnson
Bennet & Bennet, PLLC
6124 MacArthur Boulevard
Bethesda, MD 20816
Direct No.: (202) 551-0015

Attachments

cc: Pennsylvania Public Utility Commission
Charles Tyler, Telecommunications Access Policy Division, FCC (two copies)

¹ 47 C.F.R. §§ 54.313, 54.422

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB 3060-0066 OMB 3060-0619 <small>Avg. Burden Estimate per Respondent: 20 Hours</small>
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<010> Study Area Code 179007

<015> Study Area Name Keystone Wireless, LLC

<020> Program Year 2014

<030> Contact Name: Person USAC should contact with questions about this data Linda C. Martin

<035> Contact Telephone Number: Number of the person identified in data line <030> (239) 335-1330

<039> Contact Email: Email of the person identified in data line <030> lmartin@pcmtg.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
-----------------------------------	----------------------------------	----------------------------------

			(check box when complete)	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>		
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report				
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>		
<310> Detail on Attempts (voice)	<input type="text"/>			
<320> Unfulfilled Service Requests (broadband)		N/A		
<330> Detail on Attempts (broadband)	<input type="text"/>			
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<410> Fixed	<input type="text" value="0"/>			
<420> Mobile	<input type="text" value="0"/>			
<440> Number of Complaints per 1,000 customers (broadband)		N/A		
<440> Fixed	<input type="text"/>			
<450> Mobile	<input type="text"/>			
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<510> <i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<610> <i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	N/A		
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	N/A		
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (N)	<i>(if yes, complete attached worksheet)</i>			
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>	N/A		
<1010> <i>(attach descriptive document)</i>		N/A		
<1100> Terrestrial Backhaul (Y)	<i>(if not, check to indicate certification)</i>			
<1110> <i>(complete attached worksheet)</i>				
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>			

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	179007
<015> Study Area Name	Keystone Wireless, LLC
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035> Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039> Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmgt.com

<110> Has your company received its ETC certification from the FCC?	NO
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	
<111>	

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 receives only frozen support, your progress report is only required to address voice telephony service

Name of Attached Document (.pdf)

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

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

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

<010>	Study Area Code	179007
<015>	Study Area Name	Keystone Wireless, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035>	Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmgmt.com

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

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

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

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

Select (Yes, No, NA)

**(1110) 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	179007
<015>	Study Area Name	Keystone Wireless, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035>	Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmgt.com

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

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

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986
	OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	179007
<015>	Study Area Name	Keystone Wireless, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035>	Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmgt.com

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

(2005) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
---	---

<010>	Study Area Code	179007
<015>	Study Area Name	Keystone Wireless, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035>	Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmgt.com

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

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting {47 CFR § 54.313(e)}		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information _____

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	179007
<015> Study Area Name	Keystone Wireless, LLC
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035> Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039> Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmet.com

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

Progress Report on 5 Year Plan

(3010) Milestone Certification (47 CFR § 54.313(f)(1)(i)) (3011) Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(i), 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.	Name of Attached Document Listing Required Information _____ <input type="checkbox"/>	
(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (3014) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: (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	Name of Attached Document Listing Required Information _____ <input type="checkbox"/> (Yes/No) <input type="checkbox"/> (Yes/No)	_____ _____ _____
(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation (3018) If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: (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 _____ <input type="checkbox"/> (Yes/No)	_____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

**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	179007
<015>	Study Area Name	Keystone Wireless, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035>	Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcmgt.com

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

<p>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.</p>	
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: 10/15/2013
<p>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.</p>	

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	179007
<015>	Study Area Name	Keystone Wireless, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Linda C. Martin
<035>	Contact Telephone Number - Number of person identified in data line <030>	(239) 335-1330
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmartin@pcomgt.com

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Bennet & Bennet, PLLC</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>Bennet & Bennet, PLLC</u>	
Name of Reporting Carrier: <u>Keystone Wireless, LLC</u>	
Signature of Authorized Officer: <u><i>Linda C. Martin</i></u>	Date: <u>10/15/2013</u>
Printed name of Authorized Officer: <u>Linda C. Martin</u>	
Title or position of Authorized Officer: <u>Executive Vice President</u>	
Telephone number of Authorized Officer: <u>(239) 335-1330</u>	
Study Area Code of Reporting Carrier: <u>179007</u>	Filing Due Date for this form: <u>10/15/2013</u>
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: <u>Keystone Wireless, LLC</u>	
Name of Authorized Agent or Employee of Agent: <u>Bennet & Bennet, PLLC</u>	
Signature of Authorized Agent or Employee of Agent: <u><i>Michael R. Bennet</i></u>	Date: <u>10/15/13</u>
Printed name of Authorized Agent or Employee of Agent: <u>MICHAEL R. BENNET</u>	
Title or position of Authorized Agent or Employee of Agent: <u>ATTORNEY</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>(202) 371-1500</u>	
Study Area Code of Reporting Carrier: <u>179007</u>	Filing Due Date for this form: <u>10/15/2013</u>
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	

(3005a) Operating Report for Privately-Held Rate of Return Carriers Balance Sheet - Data Collection Form Page 1 of 3	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
--	---

<010> Study Area Code _____

<015> Study Area Name _____

<020> Program Year _____

<030> Contact Name - Person USAC should contact **regarding this data** _____

<035> Contact Telephone Number - Number of person identified in data line <030> _____

<039> Contact Email Address - Email Address of person identified in data line <030> _____

Filed as reviewed single company

Filed as reviewed consolidated company

Filed as subsidiary of reviewed consolidated company

Filed as audited single company

Filed as audited 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.

_____ Signature _____ Date _____

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
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)		

(3005b) Operating Report for Privately-Held Rate of Return Carriers Income Statement - Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
Page 2 of 3	

<010> Study Area Code _____

<015> Study Area Name _____

<020> Program Year _____

<030> Contact Name - Person USAC should contact regarding this data _____

<035> Contact Telephone Number - Number of person identified in data line <030> _____

<039> Contact Email Address - Email Address of person identified in data line <030> _____

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS		
ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 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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<010> Study Area Code _____

<015> Study Area Name _____

<020> Program Year _____

<030> Contact Name - Person USAC should contact regarding this data _____

<035> Contact Telephone Number - Number of person identified in data line <030> _____

<039> Contact Email Address - Email Address of person identified in data line <030> _____

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

**Demonstration of Complying with Applicable
Service Quality Standards and Consumer Protection Rules**

Keystone Wireless, LLC d/b/a Immix Wireless (“Keystone”) hereby certifies as to its compliance with applicable consumer protection and service quality standards. In the Federal Communications Commission’s (“FCC”) *2005 ETC Order*, the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers”¹ and that wireless ETCs compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement.”² The sufficiency of other commitments would be considered on a case-by-case basis.³ A commitment to comply with CTIA’s Consumer Code for Wireless Service (“CTIA Code”) will satisfy this requirement for a wireless applicant seeking ETC designation.

Keystone is committed to consumer protection and service quality. Keystone has adopted the CTIA Code and is committed to compliance with CTIA’s Code throughout its service area. Keystone certifies that it has implemented the following practices consistent with the CTIA Code: (1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy. Additionally, Keystone has agreed to cooperate with the Pennsylvania Public Utility Commission’s Bureau of Consumer Service in resolving any consumer complaints.

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46, ¶28 (rel. Mar 17, 2005) (“*2005 ETC Order*”).

² *Id.*

³ *Id.* at n. 71.

Demonstration of Ability to Function in Emergency Situations

Keystone Wireless, LLC d/b/a Immix Wireless (“Keystone”) hereby certifies 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 in accordance with the FCC’s rules.¹ Keystone is committed to remaining functional and providing service in emergency situations. Keystone has all critical switching facilities backed up with battery and uninterruptible power supply systems, which enable its core facilities to remain operational for an extended period of time during external power outages. All cell sites have battery back-up facilities which enable Keystone’s network to remain operational for an extended period of time during external power outages. Further, Keystone maintains a number of mobile generators that may be deployed when and where needed. In order to reroute traffic around damaged facilities, and manage traffic spikes resulting from emergency situations, Keystone’s core network traffic routes, including fiber and IP facilities, have full redundancy.

¹ 47 C.F.R. § 54.202(a)(2).