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 11, 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 West Kentucky Rural Telephone Cooperative Corp., Inc. – TN**
**Study Area Code 290598**

Dear Ms. Dortch:

On behalf of West Kentucky Rural Telephone Cooperative Corp., Inc. "West Kentucky", 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] West Kentucky 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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name: Person USAC should contact with questions about this data | Todd Crandall |
| <035> | Contact Telephone Number: Number of the person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address: Email of the person identified in data line <030> | tcrandall@tmsvcs.com |

| 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> | 290598tn510 | (attached descriptive document) | ✔ | ✔ |
| <600> | Functionality in Emergency Situations | (check to indicate certification) | ✔ | ✔ |
| <610> | 290598tn610 | (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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

| | | |
|---|---|---|
| <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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

<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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

| | | |
|---|---|---|
| <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** |
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**(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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

<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*}** |
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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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

| | | |
|---|---|---|
| <810> | Reporting Carrier | West Kentucky Rural Telephone Cooperative Corporation, Inc. |
| <811> | Holding Company | |
| <812> | Operating Company | West Kentucky Rural Telephone Corporation, Inc. |

**<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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.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:

| | | 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 Data Collection Form**

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

| | | |
|---|---|---|
| <010> | Study Area Code | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans: 290598tn1210

Name of attached document (.pdf)

<1220> Link to Public Website: HTTP http://www.wktelecom.coop/qcms/index.asp?Page=lifeline

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ✔

<1222> Details on the number of minutes provided as part of the plan, ✔

<1223> Additional charges for toll calls, and rates for each such plan. ✔

**(2000) Price Cap Carrier Additional Documentation**
**Data Collection Form**
*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

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

| | | |
|---|---|---|
| <010> | Study Area Code | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

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

**Incremental Connect America Phase I reporting**

<2010> 2nd Year Certification {47 CFR § 54.313(b)(1)} ☐

<2011> 3rd Year Certification {47 CFR § 54.313(b)(2)} ☐

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

<2012> 2013 Frozen Support Certification ☐

<2013> 2014 Frozen Support Certification ☐

<2014> 2015 Frozen Support Certification ☐

<2015> 2016 and future Frozen Support Certification ☐

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification Support Used to Build Broadband ☐

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017> 3rd year Broadband Service Certification ☐

<2018> 5th year Broadband Service Certification ☐

<2019> Interim Progress Certification ☐

<2020> Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

<2021> Interim Progress Community Anchor Institutions — Name of Attached Document Listing Required Information _____

**(3000) Rate Of Return Carrier Additional Documentation**

**Data Collection Form**

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

| | | |
|---|---|---|
| <010> | Study Area Code | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.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)} 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 | 290598tn3017 |
| (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<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|---|

| | | |
|---|---|---|
| <010> | Study Area Code | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

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

**Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients**

**I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.**

Name of Reporting Carrier:

Signature of Authorized Officer: Date

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier: Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

**Certification - Agent / Carrier**
**Data Collection Form**

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

| | | |
|---|---|---|
| <010> | Study Area Code | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.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)** Todd Crandall **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: Todd Crandall

Name of Reporting Carrier: WEST KENTUCKY RURAL TELEPHONE

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

Printed name of Authorized Officer: Todd Crandall

Title or position of Authorized Officer: Chief Financial Officer

Telephone number of Authorized Officer: 270.856.9983

Study Area Code of Reporting Carrier: 290598 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: WEST KENTUCKY RURAL TELEPHONE

Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.

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

Printed name of Authorized Agent or Employee of Agent: Alice Lewis

Title or position of Authorized Agent or Employee of Agent Manager

Telephone number of Authorized Agent or Employee of Agent: 217-498-6863

Study Area Code of Reporting Carrier: 290598 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

**(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 | 290598 |
| <015> | Study Area Name | WEST KENTUCKY RURAL TELEPHONE |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Todd Crandall |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 270-856-9983 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tcrandall@tmsvcs.com |

| | | |
|---|---|---|
| <810> | Reporting Carrier | West Kentucky Rural Telephone Cooperative Corporation, Inc. |
| <811> | Holding Company | |
| <812> | Operating Company | West Kentucky Rural Telephone Corporation, Inc. |

<813>

| <a1> | <a2> | <a3> |
|---|---|---|
| **Affiliates** | **SAC** | **Doing Business As Company or Brand Designation** |
| West Kentucky Networks, Inc. | | West Kentucky Rural Telephone Cooperative, Inc. |

**West Kentucky Rural Telephone Cooperative Corporation's demonstration of complying with applicable service quality standards and consumer protection rules:**

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

**As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives,** West Kentucky Rural Telephone Cooperative Corporation ("Company") is not governed by the Rules of the Tennessee Regulatory Authority for service quality standards and consumer protection rules. However, the Company in the interest of protecting its own customers has incorporated consumer protection procedures comparable to those required of ILEC's in the State of Tennessee, allowing the Company to meet or exceed existing TRA rules. These procedures include, but are not limited to, the following: (1) publishing the rates,

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[1] *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").
[2] *Id.* at para. 28.
[3] *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.
[4] *Id.* at n. 72.

terms, and conditions of service; (2) implementation of anti-slamming and consumer protection procedures; (3) modeling bill presentation to reflect the truth-in-billing requirements; and (4) CPNI, Red Flag Rules, and other applicable federal requirements governing the protection of customers' privacy.

**West Kentucky Rural Telephone Cooperative Corporation's Ability to Function in Emergency Situations**

West Kentucky Rural Telephone Cooperative Corporation ("Company") hereby certifies that it is able to function in emergency situations as set forth in 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 will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, West Kentucky Rural Telephone Cooperative Corporation is not governed by the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2, 1220-4-2-.23 Emergency Operation. However, in compliance with Federal emergency situations rules the Company's central offices have adequate provision for emergency power a condition allowing them to meet or exceed existing TRA rules for emergency operations. Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system

[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."

changes are made to reroute traffic. Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment.

REDACTED - FOR PUBLIC INSPECTION

West Kentucky Rural Tel Coop Corp

Attachment - Line 1210

WK&T
WEST KENTUCKY AND TENNESSEE
TELECOMMUNICATIONS COOPERATIVE

YOUR TRUSTED CONNECTION

FLITE
NEWSLETTERS
SPECIAL OFFERS
YOUR WK&T ACCOUNT
CUSTOMER SERVICE
TECHNICAL SUPPORT
TELEPHONE SERVICE
INTERNET SERVICES
WK&T ENTERTAINMENT
CHANNEL1
SECURE CONNECT
CONTACT US
ABOUT US
PRINTABLES/ESIGNS
HOME

**Your Path:** Home > Lifeline

## Lifeline

**Do you need help paying your phone bill?**

Through cooperation with the Public Service Commission, WK&T offers the Lifeline program to help eligible members with their phone bill.

**You are eligible to enroll in the WK&T lifeline program if you participate in one of the following:**

- Medicade
- SNAP
- Federal Public Housing
- Supplemental Security Income
- Low-Income Home Energy Assistance Program
- Temporary Assistance to Needy Families
- National School Free Lunch Program
- Or if you have income at or below 135% of the federal poverty guidelines and if you have paid or made payments for any outstanding balance for telephone services by any member of your household at your current address.

**Enrollment in the Lifeline program provides:**

- Waiver of universal service fee
- Reduction in monthly line charges
- Waiver of deposit on toll services if restricted
- Free toll blocking services

For more information on this program or to inquire about how to enroll, contact WK&T Customer Service at 1-877-954--8748.

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# West Kentucky Rural Telephone Cooperative Corporation, Inc.

## 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. 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)]:

| Exchange Name | R-1 Rate |
|---|---|
| All Exchanges | $14.56 |

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

**REDACTED – FOR PUBLIC INSPECTION**

**WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORP. (SAC 290528)**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**