



Your business is our business.

DOCKET FILE COPY ORIGINAL

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 15, 2013

ACCEPTED/FILED

OCT 23 2013

Federal Communications Commission
Office of the Secretary

VIA 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 Leaco Rural Telephone Cooperative Inc.
Study Area Code 499002

Dear Ms. Dortch:

On behalf of Leaco Rural Telephone Cooperative, Inc. "Leaco", 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 Also attached is a letter requesting confidential treatment of section 54.313(a)(2) outage reporting under section 0.459.² 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

No. of Copies rec'd 0+3
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² 47 C.F.R. § 0.459.

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

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

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

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2013 ETC Annual Report of Leaco Rural Telephone Cooperative Inc.
Study Area Code 499002
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client, Leaco Rural Telephone Cooperative, Inc. (“Leaco” or “the Company”), hereby requests, pursuant to Section 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the report submitted in fulfillment of the above-referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Eligible Telecommunications Carriers (“ETCs”) must file with the Commission the reporting information which is contained in the attachment to the Report pursuant to Sections 54.313 and 54.422 and as specified in the August 6, 2013 Public Notice.⁴
3. The information contained in the attachment to the Report for which Leaco seeks the withholding from public inspection is data pertaining to the Company’s outages provided at FCC Form 481 attachment Line 200, Service Outage Reporting.

¹ 47 C.F.R. § 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See Wireline Competition Bureau Announces Filing Deadline of October 15, 2013 for Eligible Telecommunications Carriers to File High-Cost and Low-Income Annual Reports, and Announces Filing Deadline of December 16, 2013 for States and ETCs to File Annual Use Certifications, DA 13-1707 (rel. Aug. 6, 2013) (“August 6, 2013 Public Notice”).

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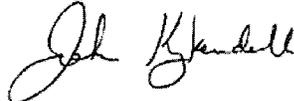
547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.
5. With respect to identifying possible exposure to competitive harm, the information contained in the attachment is information that is not customarily released to the public. Because the telecommunications market is highly competitive, release of this information could substantially harm the Company's telecommunications business.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The attachment has also been filed with the New Mexico Public Regulation Commission under seal.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁵ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to FCC Form 481 attachment at Line 200, Service Outage Reporting. Please contact the undersigned with any questions regarding this request.

Sincerely,



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

⁵ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

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

OCT 23 2013

Federal Communications Commission
Office of the Secretary

<010> Study Area Code	499002
<015> Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Dale Snider
<035> Contact Telephone Number: Number of the person identified in data line <030>	575-370-5010
<039> Contact Email Address: Email of the person identified in data line <030>	DSnider@leaco.org

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

<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<i>(check box when complete)</i>	
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>		
<210> <input type="checkbox"/> <i><-- check box if no outages to report</i>			
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>		
<310> Detail on Attempts (voice)	<i>(attach descriptive document)</i>		
<320> Unfulfilled Service Requests (broadband)			
<330> Detail on Attempts (broadband)	<i>(attach descriptive document)</i>		
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	<input type="text" value="0.0"/>		
<420> Mobile	<input type="text" value="0.0"/>		
<430> Number of Complaints per 1,000 customers (broadband)			
<440> Fixed			
<450> Mobile			
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>		
<510> 499002NM510	<i>(attached descriptive document)</i>		
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>		
<610> 499002NM610	<i>(attached descriptive document)</i>		
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>		
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>		
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>		
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	<i>(if yes, complete attached worksheet)</i>		
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>		
<1010>	<i>(attach descriptive document)</i>		
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	<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>	<i>(check to indicate certification)</i>		
<2005>	<i>(complete attached worksheet)</i>		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

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

**(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	499002
<015> Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Dale Snider
<035> Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039> Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

<110> Has your company received its ETC certification from the FCC? 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) <input type="radio"/> <input checked="" type="radio"/>
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

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	<input type="checkbox"/>
<114> Report how much universal service (USF) support was received	<input type="checkbox"/>
<115> How (USF) was used to improve service quality	<input type="checkbox"/>
<116> How (USF) was used to improve service coverage	<input type="checkbox"/>
<117> How (USF) was used to improve service capacity	<input type="checkbox"/>
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

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

FCC Form 481

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

July 2013

<010>	Study Area Code	499002
<015>	Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dale Snider
<035>	Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039>	Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

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

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

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

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

Select (Yes, No, NA)

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

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

<010>	Study Area Code	499002
<015>	Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dale Snider
<035>	Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039>	Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

<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	499002
<015>	Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dale Snider
<035>	Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039>	Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP <http://www.leaco.net/index.php/telephone/affordable-services>

"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 <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
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<010>	Study Area Code	499002
<015>	Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dale Snider
<035>	Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039>	Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

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 _____

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0386/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	499002
<015>	Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dale Snider
<035>	Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039>	Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

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
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<010>	Study Area Code	499002
<015>	Study Area Name	LEACO RURAL TELEPHONE COOP., INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dale Snider
<035>	Contact Telephone Number - Number of person identified in data line <030>	575-370-5010
<039>	Contact Email Address - Email Address of person identified in data line <030>	DSnider@leaco.org

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>Karen Gunkel</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:	Karen Gunkel
Name of Reporting Carrier:	LEACO RURAL TELEPHONE COOP., INC.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 10/11/2013
Printed name of Authorized Officer:	Dale Snider
Title or position of Authorized Officer:	Chief Financial Officer
Telephone number of Authorized Officer:	575-370-5010
Study Area Code of Reporting Carrier:	499002 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:	LEACO RURAL TELEPHONE COOP., INC.
Name of Authorized Agent or Employee of Agent:	Karen Gunkel
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 10/11/2013
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:	499002 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

Leaco Rural Telephone Cooperative, Inc.

Study Area Code: 499002

**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 FCC 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

Leaco Rural Telephone Cooperative, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with the Cellular Telecommunications Industry Association Consumer Code for Wireless Service (“CTIA Code”) as attached, as well as reporting requirements under Title 17, Chapter 11, Part 27 and Title 17, Chapter 11, Part 10, Section 24 of the New Mexico Administrative Code.

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.

Leaco Rural Telephone Cooperative, Inc. (Leaco) adheres to 11 points within the CTIA Consumer Code, including disclosing rates, additional taxes, fees, surcharges and terms of service; providing coverage maps; making customer service readily accessible; and allowing a trial period for new service.

1. LEACO DISCLOSES RATES AND TERMS OF SERVICE TO CONSUMERS

For each service plan offered to new consumers, Leaco discloses to consumers at point of sale and on its web sites, at least the following information, as applicable: (a) the coverage area for the service; (b) any activation or initiation fee; (c) the monthly access fee or base charge; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer's wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (l) the amount and nature of any early termination fee that may apply; and (m) the trial period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

2. LEACO MAKES AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Leaco makes available at point of sale and on its web sites maps depicting approximate domestic coverage applicable to each of their service plans currently offered to consumers. To enable consumers to make comparisons among carriers, Leaco generated this map using generally accepted methodologies and standards to depict outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. Leaco periodically updates such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, Leaco incorporates coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

3. LEACO PROVIDES CONTRACT TERMS TO CUSTOMERS AND CONFIRMS CHANGES IN SERVICE

When a customer initiates new service or a change in existing service, Leaco provides or confirms any new material terms and conditions of the ongoing service with the customer.

4. LEACO ALLOWS A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates postpaid service with Leaco, the customer will be informed of and given a period of not less than 14 days to try out the service. Leaco does not impose an early termination fee if the customer cancels service within this period, provided that the customer

complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

5. LEACO PROVIDES SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service plans or devices, Leaco discloses material charges and conditions related to the advertised prices and services, including if applicable and to the extent the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free;" (l) for any service plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; and (i) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

6. LEACO SEPARATELY IDENTIFIES CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, Leaco distinguishes (a) monthly charges for service and features, and other charges collected and retained by Leaco, from (b) taxes, fees and other charges collected by Leaco and remitted to federal state or local governments. Leaco will not label cost recovery fees or charges as taxes.

7. LEACO PROVIDES CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS

Leaco will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable advance notice of a proposed modification and allowing those customers a time period of not less than 14 days to cancel their contracts with no early termination fee.

8. LEACO PROVIDES READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access Leaco's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Leaco provides information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information is included, at a minimum, on all billing statements, in written responses to customer inquiries and on Leaco's web sites. Leaco also makes such contact information available, upon request, to any customer calling customer

service departments.

9. LEACO PROMPTLY RESPONDS TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES

Leaco responds in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

10. LEACO ABIDES BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Leaco abides by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and makes available to the public its privacy policy concerning information collected online. Leaco abides by the CTIA Best Practices and Guidelines or Location-Based Services.

11. LEACO PROVIDES CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND MESSAGING USAGE, AND INTERNATIONAL ROAMING

Leaco provides, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Leaco generates the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Leaco clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

Leaco Rural Telephone Cooperative, Inc.

Study Area Code: 499002

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

Leaco Rural Telephone Cooperative, Inc. ("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 part 17.11.22.10 of the New Mexico Administrative Code. Specifically, these regulations require telecommunications service providers to maintain a minimum of four hours of battery reserve rated for peak traffic load requirements and to have available a mobile power unit which can be delivered and connected within four hours. The New Mexico regulations also require all local exchange carriers to establish and maintain a written emergency procedure plan and to train employees on such procedures. All such plans are on file with the New Mexico Public Regulation Commission.

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."

In addition, the Company's network for cellular operations is homed back to a central switching center that is fully supported by automated emergency back-up generators. The connecting trunking and signaling circuits are also on a diverse route to avoid prolonged outages. The Company's tower sites have one to eight hours of battery back-up and strategic sites have emergency generators. If necessary, in emergency situations, the company can deploy portable or temporary cellular base stations.

