

REDACTED – FOR PUBLIC INSPECTION

Received & Inspected
OCT 24 2013
FCC Mail Room

October 14, 2013

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

Re: *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208*

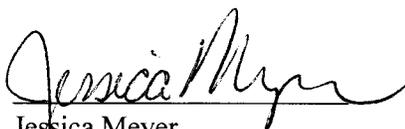
Dear Ms. Dortch:

On behalf of Kennebec Telephone Company (“Kennebec”), please find enclosed two copies of Kennebec’s FCC Form 481, along with the redacted versions of the Confidential Financial Information.

One copy of the FCC Form 481, containing Confidential Financial Information is being filed under separate cover.

Please do not hesitate to contact me at (402) 441-4315 if you have any questions regarding this submission.

Respectfully submitted,



Jessica Meyer
Consultant
Consortia Consulting, Inc.

No. of Copies rec'd 0
List ABCDE



FCC Form 481 - Carrier Annual Reporting Data Collection Form
 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0219
 July 2013

<010> Study Area Code	391668
<015> Study Area Name	KENNEBEC TEL CO
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Judy Christiansen
<035> Contact Telephone Number: Number of the person identified in data line <030>	402-398-0062
<039> Contact Email Address: Email of the person identified in data line <030>	jchristiansen@consortiaconsulting.com

Received & Inspected
 OCT 24 2013
 FCC Mail Room

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<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"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)		
<320> Unfulfilled Service Requests (broadband)	<input type="text"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)		
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<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)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	<input type="text"/>		
<450> Mobile	<input type="text"/>		
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 391668sd510	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 391668sd610	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)		
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)		
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(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 391668

<015> Study Area Name KENNEBEC TEL CO

<020> Program Year 2014

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

<035> Contact Telephone Number - Number of person identified in data line <030> 402-398-0062

<039> Contact Email Address - Email Address of person identified in data line <030> jchristiansen@consortiaconsulting.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.

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.

<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							
<input type="checkbox"/>							

<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.

Name of Attached Document (.pdf)

(900) Tribal Lands Reporting Data Collection Form

OMB Control No. 3060-0985 / OMB Control No. 3060-0819
 July 2013

<010> Study Area Code 391668
 <015> Study Area Name KENNEBEC TEL CO
 <020> Program Year 2014
 <030> Contact Name - Person USAC should contact regarding this data Judy Christiansen
 <035> Contact Telephone Number - Number of person identified in data line <030> 402-398-0062
 <039> Contact Email Address - Email Address of person identified in data line <030> jchristiansen@consortiaconsulting.com

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

<920> Tribal Government Engagement Obligation 391668d920
 Name of Attached Document (.pdf)

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

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

391668
KENNEBEC TEL CO
2014
Judy Christiansen
402-398-0062
jchristiansen@consortiaconsulting.com

FCG Form 481

OMB Control No: 3060-0986/OMB Control No: 3060-0819
July 2013

<010> Study Area Code 391668

<015> Study Area Name KENNEBEC TEL CO

<020> Program Year 2014

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

<035> Contact Telephone Number - Number of person identified in data line <030> 402-398-0062

<039> Contact Email Address - Email Address of person identified in data line <030> jchristiansen@consortiaconsulting.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 391668
 <015> Study Area Name KENNEBEC TEL CO
 <020> Program Year 2014
 <030> Contact Name - Person USAC should contact regarding this data Judy Christiansen
 <035> Contact Telephone Number - Number of person identified in data line <030> 402-398-0062
 <039> Contact Email Address - Email Address of person identified in data line <030> jchristiansen@consortiaconsulting.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans 391668sd1210
 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.

FCC Form 481
OMB Control No. 3060-9986/OMB Control No. 3060-9989
July 2013

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

<010> Study Area Code 391668
 <015> Study Area Name KENNEBEC TEL CO
 <020> Program Year 2014
 <030> Contact Name - Person USAC should contact regarding this data Judy Christiansen
 <035> Contact Telephone Number - Number of person identified in data line <030> 402-398-0062
 <039> Contact Email Address - Email Address of person identified in data line <030> jchristiansen@consortiaconsulting.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))	<input type="checkbox"/> <input type="checkbox"/>
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	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d)) 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 <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)(iii), 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"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<2021> Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information

FCO Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0919
July 2013

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

<010> Study Area Code 391668
 <015> Study Area Name KENNEBEC TEL CO
 <020> Program Year 2014
 <030> Contact Name - Person USAC should contact regarding this data Judy Christensen
 <035> Contact Telephone Number - Number of person identified in data line <030> 402-398-0062
 <039> Contact Email Address - Email Address of person identified in data line <030> jchristiansen@consortiaconsulting.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	Name of Attached Document Listing Required Information	
(3010)	Milestone Certification (47 CFR § 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF, on line 3012, 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.		<input type="checkbox"/>
(3011)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii)) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) 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: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/> (Yes/No) <input checked="" type="checkbox"/> (Yes/No)
(3012)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3013)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation		<input checked="" type="checkbox"/>
(3014)	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: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3015)	Management letter issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
(3016)	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: 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.		<input type="checkbox"/>
(3017)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3018)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3019)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3020)	Attach the worksheet listing required information		<input type="checkbox"/>
(3021)			
(3022)			
(3023)			
(3024)			
(3025)			
(3026)			

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	391668
<015>	Study Area Name	KENNEBEC TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Judy Christiansen
<035>	Contact Telephone Number - Number of person identified in data line <030>	402-398-0062
<039>	Contact Email Address - Email Address of person identified in data line <030>	jchristiansen@consortiaconsulting.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
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<010> Study Area Code	391668
<015> Study Area Name	KENNEBEC TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Judy Christiansen
<035> Contact Telephone Number - Number of person identified in data line <030>	402-398-0062
<039> Contact Email Address - Email Address of person identified in data line <030>	jchristiansen@consortiaconsulting.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>JUDY CHRISTIANSEN</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:	JUDY CHRISTIANSEN
Name of Reporting Carrier:	KENNEBEC TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 10/09/2013
Printed name of Authorized Officer:	ROD BOWAR
Title or position of Authorized Officer:	PRESIDENT/MANAGER
Telephone number of Authorized Officer:	605-869-2220
Study Area Code of Reporting Carrier:	391668 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:	KENNEBEC TEL CO
Name of Authorized Agent or Employee of Agent:	Judy Christiansen
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 10/09/2013
Printed name of Authorized Agent or Employee of Agent:	Judy Christiansen
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	402-398-0062
Study Area Code of Reporting Carrier:	391668 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

Kennebec Telephone Company

Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

Service Quality Standards

The Company:

- Provides voice grade access to the public switched network.
- Provides flat rated local exchange service with no additional charge to end users.
- Provides access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911.
- Provides toll blocking and toll limitation services.
- Advertises the availability of its services and the charges using media of general distribution and on its website.
- Maintains a business office providing customers with access to a customer service representative either in person or via a local telephone call or toll-free telephone number during normal business hours.
- Directs after hour calls to the Company's answering service.
- Directs trouble reports to the on-call technician.
- Tracks all service orders to ensure they are completed in a timely manner.
- Measures its service connection and service interruption performance on a regular basis.
- Trains employees to:
 - Answer all incoming calls promptly.
 - Respond to all inquiries for information promptly and courteously.
 - Investigate thoroughly all customer complaints and handle appropriately according to the Company's guidelines for resolution of customer complaints.
 - Be knowledgeable about products and service offerings so they can assist the customer with selecting the best service option.
- Has a process for periodic inspection, testing and preventive maintenance of its equipment to permit the rendering of safe, adequate and continuous service at all times.

Consumer Protection Rules

The Company has established operating procedures designed to facilitate compliance with applicable consumer protection rules which include compliance with the Customer Proprietary Network Information (CPNI) rules. The operating procedures include:

- Appointment of a compliance officer.
- A manual detailing the specific procedures for protecting consumer information.
- Employee training on an annual basis.
- A disciplinary process for improper use of consumer information.

Kennebec Telephone Company

Functionality in Emergency Situations

Back-Up Power

The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Switch, Remote, DLCs and ONTs all have minimum 8 hour battery backup. Switch and Remote have standby generators, and we have portable generators to provide power to DLC cabinets if needed. We have a plan to replace ONT batteries with charged spare batteries.

Rerouting of Traffic around Damaged Facilities

The Company is able to reroute traffic around damaged facilities. Our regulated inter-exchange and intra-exchange traffic is on a SONET ring with diverse routing to prevent being isolated by a fiber cut.

Traffic Spikes

We have a significant amount of unused switching capacity to handle sporadic traffic spikes resulting from emergency situations. We have 96 2-way trunks between Kennebec Telephone Company and SDN for inter-exchange traffic. We have 24 trunks for incoming wireless from SDN or outgoing LNP traffic to SDN. We have one T1 for incoming traffic from Century Link.

Kennebec Telephone Company, Inc.

Description of Tribal Engagement

For Form 481 Line 920 thru Line 929

The Company provides services in Lower Brule Reservation. On October 15, 2012, by letter sent via certified mail to Michael Jandreau, the Company requested a meeting with the Lower Brule Sioux Tribe to exchange information and discuss issues related to the deployment and provisioning of communications services on Tribal lands. The Company did not receive a response to this letter. The Company submitted another letter via certified mail on December 5, 2012, and a meeting with the Lower Brule Sioux Tribe was held on January 24, 2013.

In accordance with provisions in the FCC's USF and ICC Transformation Order, paragraphs 636 and 637, and 47 CFR 54.313(a)(9), at the meeting with the Lower Brule Sioux Tribe, the Company outlined the following topics to be discussed throughout the process:

- Needs Assessment and Deployment Planning
- Communications Needs
- Feasibility and Sustainability Planning
- Marketing Services in a Culturally Sensitive Manner
- Rights of Way and Other Permitting and Review Process
- Tribal Business and Licensing Requirements

The Company will schedule another meeting with the Tribal Authorities to continue further discussions, along with tribal input, on all of the above topics. In particular, the Company and the Tribal Authority discussions relating to needs and service deployment will be focused on community anchor institutions. The feasibility and sustainability of communications services on tribal lands will be discussed and the Company will, with assistance from the Tribal Authorities, attempt to identify additional steps that can be taken to make essential communications services deployed on Tribal lands both feasible and sustainable. The Company and Tribal Authorities will also discuss and explore ways in which they can coordinate or partner to ensure that services are marketed on tribal lands in a manner that will relate to the community and resonate with consumers, with the aim of increasing service adoption. At such meetings, the Company will also be prepared to discuss the relevant rights-of-way and other permitting and review processes, as well as any challenges associated with these processes. And finally, the Company will come to any such meetings prepared to discuss and engage the Tribal Authorities on any relevant and applicable Tribal business and licensing requirements.



October 15, 2012

Michael Jandreau
PO Box 187
Lower Brule, SD 57548-0187

Dear: Mr. Jandreau,

The Federal Communications Commission (FCC), as part of a recent Order reforming the federal universal service mechanisms related to telecommunications and information services, has adopted new requirements that are intended to facilitate engagement between telecommunications companies serving Tribal Lands. The FCC's new "Tribal Engagement" provisions are intended to improve communications and foster a greater understanding between service providers and Tribal entities of the factors necessary to deploy and sustain telecommunication services on Tribal lands. The ultimate aim is to benefit Tribal government leaders, carriers/service providers, and consumers living on Tribal lands by providing greater connectivity to 21st century economic opportunities, education, health care, and public safety. See FCC Public Notice, Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Engagement Obligation Provisions of the Connect America Fund, DA 12-1165, released July 19, 2012.

Although the FCC's rules related to Tribal Engagement still await approval by the federal Office of Management and Budget (OMB) and will not legally take effect until that occurs, Kennebec Telephone Co., Inc. would, as soon as possible, like to begin discussions with the Lower Brule Sioux Tribe in a manner consistent with the pending FCC rules. Accordingly, we would request a meeting with the Tribe and it is our hope that this meeting could be held sometime prior to the end of November of this year. The purpose of this meeting will, generally, be to exchange information related to the deployment and provisioning of communications services on the Lower Brule Reservation.

In regard to this requested meeting, it is important that at least some of the individuals attending the meeting are "decision-makers." As noted in the FCC's July 19th Public Notice providing further guidance, "this engagement cannot be merely between sales and marketing individuals on one side and administrative staff or advisors on the other. The perspectives on needs, expectations, priorities, and abilities that would formulate meaningful exchange often can come only from those with the requisite authority to make decisions."

In hopes of soon proceeding with Tribal Engagement on these matters related to the provisioning of communications services on the Lower Brule Reservation, we ask at this time that the Lower Brule Sioux Tribe respond with the name and contact information for a Tribal representative who could assist in scheduling and arranging a meeting with the appropriate Tribal government staff and leaders to discuss the items referenced above. This information may be provided to the undersigned by calling (605) 869-2220, or through an e-mail directed to knbctel@kennebectelephone.com.

Thank you for your cooperation in this matter. We look forward to discussing these important matters with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod Bowar", with a long horizontal stroke extending to the right.

Rod Bowar
President/Manager
Kennebec Telephone Co., Inc.



December 5, 2012

Michael Jandreau
PO Box 187
Lower Brule, SD 57548-0187

Re: FCC Tribal Engagement Provisions - Urgent

Dear: Mr. Jandreau,

As noted in my earlier letter to you dated October 15, 2012 the Federal Communications Commission (FCC), as part of a recent Order reforming the federal universal service mechanisms related to telecommunications and information services, has adopted new requirements that are intended to facilitate engagement between telecommunications companies serving Tribal Lands. The FCC's new "Tribal Engagement" provisions are intended to improve communications and foster a greater understanding between service providers and Tribal entities of the factors necessary to deploy and sustain telecommunication services on Tribal lands. The ultimate aim is to benefit Tribal government leaders, carriers/service providers, and consumers living on Tribal lands by providing greater connectivity to 21st century economic opportunities, education, health care, and public safety. See FCC Public Notice, Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Engagement Obligation Provisions of the Connect America Fund, DA 12-1165, released July 19, 2012.

Although the FCC's rules related to Tribal Engagement still await approval by the federal Office of Management and Budget (OMB) and will not legally take effect until that occurs, Kennebec Telephone Co., Inc. would, as soon as possible, like to have discussions with the Lower Brule Sioux Tribe in a manner consistent with the pending FCC rules. We request that a meeting with the Tribe be scheduled promptly and that it be held prior to the end of this year. The purpose of this meeting will, generally, be to exchange information related to the deployment and provisioning of communications services on the Lower Brule Reservation.

In regard to this requested meeting, it is important that at least some of the individuals attending the meeting are "decision-makers." As noted in the FCC's July 19th Public Notice providing further guidance, "this engagement cannot be merely between sales and marketing individuals on one side and administrative staff or advisors on the

other. The perspectives on needs, expectations, priorities, and abilities that would formulate meaningful exchange often can come only from those with the requisite authority to make decisions."

It is Kennebec Telephone's desire to promptly proceed with Tribal Engagement on these matters related to the provisioning of communications services on the Lower Brule Reservation and, accordingly, we ask at this time for the name and contact information of someone with the Lower Brule Sioux Tribe who can assist in scheduling and arranging a meeting with the appropriate Tribal government staff and leaders to discuss the items referenced above. Again, as noted above it is important that this meeting being held prior to the end of this month. The contact information requested may be provided to the undersigned by calling (605) 869-2220, or through an e-mail directed to rodb@kennebectelephone.com.

Thank you for your cooperation in this matter. We look forward to discussing these important matters with you.

Sincerely,



Rod Bowar
President/Manager
Kennebec Telephone Co., Inc.

Kennebec Telephone Co., Inc.

“Tribal Engagement” Meeting

January 24, 2013, 2:00 p.m.

Council Chambers Lower Brule Sioux Tribal Offices

Meeting Attendees:

Lower Brule Sioux Tribe – Chairman, Mike Jandreau; Vice-Chairman, Boyd Gourneau; Secretary/Treasurer, John McCauley; Council Members, Darrell Middle Tent, Orville Langdeau; Personal Assistant to the Tribal Chairman, Patti Gourneau; Tribal General Manager, Lee Brannan

Kennebec Telephone Co., Inc. –President/Manager, Rod Bowar; Plant Manager, Matt Collins; Office and Administrative Support Specialist, Debbie Miller

After all at the meeting were introduced, Rod Bowar, General Manager of the Kennebec Telephone Company (“KTCI”) provided a brief history of KTCI and its current service area or coverage area both on and off the Lower Brule reservation.

Needs Assessment and Deployment Planning

*Rod then gave an overview of all network facilities existing on the reservation, outlining specifically the extent of fiber in the loop. He further noted that at present, to KTCI’s knowledge, there were no unfulfilled requests for service (either POTS or Broadband). It was noted that all households/dwellings on the reservation served by KTCI have access to high speed broadband services of at least 4 mbps download/1mbps upload. Rod also provided the tribal representative present information on KTCI’s membership with and partial ownership of SDN Communications which provides the backbone network facilities that are necessary to connect to the outside world and assists KTCI in economically providing state-of-the-art telecommunications and information services.

*Following these initial comments by Rod Bowar, some discussion followed between KTCI representatives and tribal representatives present as to possible future increased tribal involvement in the actual provisioning of communications services to tribal members. KTCI representatives assured the tribal representatives present that KTCI is always willing to work

with the Tribal council to address all concerns, but further also emphasized that the company was doing everything possible to meet tribal member needs.

*There was also discussion concerning the unavailability of "extended area service" throughout the Lower Brule Reservation. Tribal members communicated concern that without EAS two ends of the reservation are in ways disconnected.

--Those living near edge of Reservation borders are 22 miles apart yet everything is long distance

--KTCI indicated that it would visit with Golden West Telecommunications Cooperative, Midstate Communications, and possibly Century Link to see what it could do to arrange for greater EAS

--As part of this discussion, there was some conversation concerning tribal member dependency cell phones vs. landlines

*Tribal representatives indicated that they were interested in assisting KTCI in making high quality communication services available on the Reservation? The Tribal council members indicated that they would like to help where they can.

Communications Needs

*Rod Bowar reviewed with the tribal representative various brochures that KTCI uses to inform all of its customers, including Tribal member customers, of its available voice and broadband communications services. This included a review of the telephone, long distance, and Internet services provided by KTCI; customer information such as billing and pricing information for various telephone bundles and Internet services; and Lifeline and Linkup brochures and forms and the benefits they can bring to those who qualify. Mr. Bowar indicated that it is KTCI's desire to meet the specific needs of all its customers, including those on tribal land.

*Rod asked the Tribal representative present if there were other communications service needs, in addition to those already discussed, that needed KTCI's attention. Tribal council members indicated that there was not.

Feasibility and Sustainability planning

*Mr. Bowar then shared with Tribal representatives general information as to challenges presently faced by rural telephone companies in providing communications services to high cost rural areas, such as those served by KTCI.

*Service provisioning costs and financing issues were commented on.

*In relation to feasibility and sustainability planning, Rod emphasized the importance of the existing Lifeline and Link up programs which provide an enhanced benefit to qualified tribal members. Rod indicated that KTCI has aggressively advertised the availability of Lifeline and Link Up to all consumers within its service area. He provided for review copies of this specific advertising.

Marketing services in a culturally sensitive manner

*Mr. Bowar inquired with the Tribal representatives if they had any concerns as to how KTCI markets its communications services, in particular to tribal members. No concerns in this area were communicated by the tribal representatives present.

Rights of way and other permitting and review process

*There was mention of need for rock to be hauled into a specific approach located on Tribal land, that was part of an existing easement for KTCI's use. KTCI representatives indicated in response that this would be addressed as soon as possible.

*Relative to right-of-way permitting and easements, tribal council members present noted agreement that KTCI currently follows all proper procedures when installing or upgrading facilities on the reservation. KTCI representative expressed thanks to the council members for all of their cooperation, to date, on such matters.

Tribal business and licensing requirements

*Again KTCI inquired as to whether the Tribal representative had any concerns with respect to KTCI compliance, in particular, relative to tribal business and licensing requirements. None of the Tribal representatives present indicated that there were any issues in this area.

*As the meeting moved to a close, Mr. Bowar asked if there were any further questions or concerns that needed to be addressed.

*Comments and discussion followed concerning advertising by KTCI at certain annual Tribal events in the area. KTCI indicated that it would continue to participate and do more in such area if possible.

At this point, at approximately 3:35 p.m. the meeting concluded