FCC Form 481 - Carrier Annual Reporting Data Collection Form

REDACTED FOR PUBLIC INSPECTION

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

<010>	Study Area Code	454426
<015>	Study Area Name	CITZENS-FRNTER-WH MT
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Cassandra Guinness
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	cassandra.guinness@ftr.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)			
<310> Detail on Attempts (voice) 454426AZ310.pdf	(attach descriptive document)	✓	
<320> Unfulfilled Service Requests (broadband)		✓	
<330> Detail on Attempts (broadband) 454426AZ330.pdf	(attach descriptive document)	✓	
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed 0.57		✓	✓
<420> Mobile 0.0			
<430> Number of Complaints per 1,000 customers (broadband)		✓	
<440> Fixed 0.0			
<450> Mobile 0.0			
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	✓	✓
<510> 454426AZ510.pdf	(attached descriptive document)	✓	✓
<600> Functionality in Emergency Situations	(check to indicate certification)	✓	✓
<610> 454426AZ610.pdf	(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
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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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

Please check these boxes below to confirm that the attached documents(s), 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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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

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(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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

<703>

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

-- See attached worksheet --

(710) Broadband Price Offerings
Data Collection Form

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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*}**

-- See attached worksheet --

(800) Operating Companies
Data Collection Form

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<810>	Reporting Carrier	Citizens Telecommunications Company of the White Mountains Inc
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of the White Mountains 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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

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

White Mountain Apache Tribe of the Fort Apache Reservation, Arizona

<920> Tribal Government Engagement Obligation

454426AZ920.pdf

Name of Attached Document

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

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

(1100) No Terrestrial Backhaul Reporting Data Collection Form

FCC Form 481
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July 2013

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<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
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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

454426AZ1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP // www frontier.com/discountprograms/lifelineprogram

"Please check these boxes below to confirm that the attached document(s), 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
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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 document(s), 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

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(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	454426
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<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification {47 CFR § 54.313(f)(1)(i)}

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier 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 document(s), 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) Document(s) for 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

(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) Document(s) for 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) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

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

<010>	Study Area Code	454426
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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: CITZENS-FRNTER-WH MT

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/02/2014

Printed name of Authorized Officer: Ken Mason

Title or position of Authorized Officer: VP, Business Operations

Telephone number of Authorized Officer: 5857775645 ext.

Study Area Code of Reporting Carrier: 454426 Filing Due Date for this form: 06/30/2014

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	454426
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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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)_____ 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:

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.

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:

Name of Authorized Agent or Employee of Agent:

Signature of Authorized Agent or Employee of Agent: Date:

Printed name of Authorized Agent or Employee of Agent:

Title or position of Authorized Agent or Employee of Agent

Telephone number of Authorized Agent or Employee of Agent:

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.

Attachments

FCC Form 481

Line 100 – Service Quality Improvement Reporting
[47 CFR 54.313(a)(1)]

In the FCC's Public Notice DA 14-951, released May 1, 2014, the FCC waived the requirement for price cap ETCs to file a five-year plan.[1]

[1] The Public Notice stated, in relevant part:

We now grant a waiver of this requirement for price cap ETCs for an additional year. Because the Bureau just finalized the Connect America Cost Model, and price cap carriers have not yet had the opportunity to make a state-level commitment for Connect America Phase II, we find that it is not in the public interest to require price cap ETCs to file new five-year plans in 2014 for the same reason as last year: they do not yet know which areas they will be serving in the future.

FCC Form 481
Line 310 - Unfulfilled Voice Telephony Service Requests Resolution
(Business and Residence; No Special Access)

ARIZONA
CTC White Mountains
454426

Year: 2013

(B)	(C)	(D)	(E)
Date When the Request was Considered Unfulfilled (mm/dd/yyyy)	Name of Exchange/ Wire Center	Description of Service Request	How Service Fulfillment was Attempted/Reason for Unfulfillment (**If fulfilled in 2014, include date of fulfillment**)
[redacted]			

FCC Form 481
Line 330 - Unfulfilled Broadband Service Requests Resolution

State: Arizona
Study Area Code: 454426
Study Area Name: Citizens Telecommunications Company Of The White Mountains, Inc.

Year: 2013

(A) Date of Potential Customer's Request (mm/dd/yyyy)	(B) Date When the Request was Considered Unfulfilled (mm/dd/yyyy)	(C) Name of Exchange/ Wire Center	(D) Description of Service Request	(E) How Service Fulfillment was Attempted/Reason for Unfulfillment (If fulfilled in 2013, include date of fulfillment.)
[redacted]				

Line 510 – Description of Compliance with Service Quality Standards and Consumer Protection:

The Frontier ILEC companies certify that they comply with applicable state and FCC service quality standards. Service quality metrics are monitored and reported on a monthly basis. Frontier has implemented numerous Consumer Protection measures to protect customer information from improper use and disclosure as well as to protect against fraud. For example, Frontier has implemented Customer Proprietary Network Information (policies and procedures) that are consistent with the FCC's regulations. Frontier regularly trains employees who have access to CPNI on the rules and our procedures for securing accounts and authenticating callers. Frontier also has a comprehensive Identity Theft Protection Program (or Red Flag program) which is consistent with the FTC's guidance on measures to detect and prevent identity theft. All employees are trained on Frontier's Code of Business Conduct and Ethics, which requires employees to protect sensitive customer information from improper use and disclosure. Frontier also has a Data Privacy and Security policy which applies to all employees. Further, Frontier also has implemented a strict third-party qualification protocol to prevent unauthorized charges ("Cramming") from appearing on customer's bills. Frontier also follows a "First Call" resolution policy, which aims to resolve customer complaints about unauthorized charges in one call, without referral to any third party. In addition to the foregoing, Frontier, has implemented customary IT security measures to protect our network and customer information.

Frontier certifies compliance with Arizona state consumer protection rules; Title 14. Public Service Corporations, Article 5 Telephone Utilities, Article 19 Consumer Protections for Unauthorized Carrier Changes, Article 20 Consumer Protections for Unauthorized Carrier Charges, Article 21 Customer Proprietary Network Information.

The Arizona state consumer protection rules are available at:

http://www.azsos.gov/public_services/Title_14/14-02.htm#ARTICLE_5

http://www.azsos.gov/public_services/Title_14/14-02.htm#ARTICLE_19

http://www.azsos.gov/public_services/Title_14/14-02.htm#ARTICLE_20

http://www.azsos.gov/public_services/Title_14/14-02.htm#ARTICLE_21

Row 610 - Description of Functionality in Emergency Situations

In December 2013, the FCC adopted new rules to promote 911 resiliency. Frontier is currently reviewing its back-up power, circuit auditing and network monitoring practices to ensure compliance with the FCC's direction. Frontier's procedures are described below; to the extent that there is any conflict between the FCC's new 911 resiliency rules and Frontier's existing procedures, the existing procedures will be updated to conform to FCC standards within the timeframe specified by the FCC.

The Frontier ILEC companies certify that they follow best practices that are designed to allow them to remain functional in an emergency situation through the use of back-up power to ensure functionality in the event of a limited commercial power failure. Frontier's policy is that at sites where there is a generator, it will also have batteries capable of providing three-to-four hours of backup power. Sites that are provisioned to allow portable generators typically have up to eight hours of battery backup power available. Frontier adheres to formal maintenance and testing schedules of batteries and generators based on the GTE practices, the Bell standard and manufacturer standards. Batteries are load tested routinely. On site generators are tested monthly with an annual "blackout" test also incorporated. Routine maintenance occurs regularly throughout the year. Portable generators are load tested once a year along with performing the manufacturer recommended maintenance.

The companies' network is engineered to provide maximum capacity in order to handle excess traffic in the event of traffic spikes resulting from emergency situations. Carrier audits its circuits in order to provide redundancy in its network where feasible for use in re-rerouting traffic when facilities are damaged.

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(700) Price Offerings including Voice Rate Data
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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<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**
AZ	All - flat		FR	15.6	0.0	0.01	0.0	15.61
AZ	All - Meas		MS	10.9	0.0	0.01	0.0	10.91

(710) Broadband Price Offerings
Data Collection Form

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

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<015>	Study Area Name	CITZENS-FRNTER-WH MT
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

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State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	Total Rates 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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(800) Operating Companies
Data Collection Form

FCC Form 481
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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<810>	Reporting Carrier	Citizens Telecommunications Company of the White Mountains Inc
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of the White Mountains Inc

<813>	<a1>	<a2>	<a3>
	Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
	Frontier Comm. of Alabama, Inc.	250306	Frontier Communications of Alabama, LLC
	Frontier Comm. of Lamar County	250301	Frontier Communications of Lamar County, LLC
	Frontier of the South - Alabama	250318	Frontier Communications of the South, LLC
	CTC White Mountains	454426	Frontier Communications of the White Mountains
	Citizens Utilities Rural Company	452172	Frontier Citizens Utilities Rural
	Frontier Comm. of the Southwest, Inc (AZ-Contel)	452302	Frontier Communications of the Southwest Inc.
	Navajo Comm - Arizona	454449	Frontier Navajo Communications / Frontier Navajo Communications Company
	CTC California	542308	Frontier Communications of California
	CTC California (Golden St)	543402	Frontier Communications of California
	CTC California (Tuolomne)	544342	Frontier Communications of California
	Frontier Comm. of the Southwest, Inc (CA-Contel)	541863	Frontier Communications of the Southwest Inc.
	CTC California (West Coast)	542344	Frontier Communications of California
	CTC-California (Global Valley)	542315	Frontier Communications of California
	Frontier of the South - Florida	210318	Frontier Communications of the South, LLC
	Frontier Comm. of Fairmount	220362	Frontier Communications of Fairmount LLC
	Frontier Comm. of Georgia, Inc.	220387	Frontier Communications of Georgia LLC
	Frontier Comm. of Iowa, Inc.	351127	Frontier Communications of Iowa, LLC
	CTC Idaho	474427	Frontier Communications of Idaho
	Frontier Comm. Northwest, Inc (ID-GTE)	472416	Frontier Communications Northwest Inc.
	CTC Illinois	341183	Frontier Citizens Communications of Illinois
	Frontier Comm. - Schuyler, Inc.	341079	Frontier Communications - Schuyler, Inc.
	Frontier Comm.- Midland, Inc.	341055	Frontier Communications - Midland, Inc.
	Frontier Comm. of Illinois, Inc.	341038	Frontier Communications of Illinois, Inc.

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<810>	Reporting Carrier	Citizens Telecommunications Company of the White Mountains Inc
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of the White Mountains Inc

<813>	<a1>	<a2>	<a3>
	Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
	Frontier Comm. of Lakeside, Inc.	341011	Frontier Communications of Lakeside, Inc.
	Frontier Comm. of Mt. Pulaski	341061	Frontier Communications of Mt. Pulaski, Inc.
	Frontier Comm. of Orion, Inc.	341067	Frontier Communications of Orion, Inc.
	Frontier Comm. of Prairie, Inc.	341073	Frontier Communications - Prairie, Inc.
	Frontier Comm. of the Carolinas, Inc (IL-Alltel)	343035	Frontier Communications of the Carolinas LLC
	Frontier Comm.-DePue, Inc.	340998	Frontier Communications of DePue, Inc.
	Frontier North, Inc (IL-GTE)	341015	Frontier North Inc.
	Frontier North, Inc. (IL-Contel)	341036	Frontier North Inc.
	Frontier Comm. of Indiana, Inc.	320750	Frontier Communications of Indiana LLC
	Frontier Comm. of Thorntown, Inc.	320828	Frontier Communications of Thorntown LLC
	Frontier Midstates, Inc (IN-Alltel)	323034	Frontier Midstates Inc.
	Frontier North, Inc (IN-Contel)	320779	Frontier North Inc.
	Frontier North, Inc (IN-GTE)	320772	Frontier North Inc.
	Frontier Comm. of Michigan, Inc.	310682	Frontier Communications of Michigan, Inc.
	Frontier Midstates, Inc (MI-Alltel)	313033	Frontier Midstates Inc.
	Frontier North, Inc (MI-GTE)	310695	Frontier North Inc.
	CTC Minnesota-Lakes	361123	Frontier Citizens Communications of Minnesota
	CTC Minnesota-South	367123	Frontier Citizens Communications of Minnesota
	Frontier Comm. of Minnesota, Inc.	361367	Frontier Communications of Minnesota, Inc.
	Frontier Comm. of Mississippi	280460	Frontier Communications of Mississippi LLC
	CTC Montana	484322	Frontier Communications of Montana
	Frontier Comm. of the Carolinas, Inc (NC-Contel)	230509	Frontier Communications of the Carolinas LLC
	Frontier Comm. of the Carolinas, Inc (NC-GTE)	230479	Frontier Communications of the Carolinas LLC

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<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of the White Mountains Inc

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<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
CTC Nebraska	371128	Frontier Communications of Nebraska
Navajo Comm - New Mexico	494449	Frontier Navajo Communications / Frontier Navajo Communications Company
CTC of Nevada - North	554431	Fronter Communications of Nevada
CTC of Nevada - South	554432	Fronter Communications of Nevada
Frontier Comm. of the Southwest, Inc (NV-Contel)	552302	Frontier Communications of the Southwest Inc.
CTC of NY - Red Hook	154533	Frontier Communications of New York
CTC of NY - Upstate	154532	Frontier Communications of New York
CTC of NY - Western Counties	154534	Frontier Communications of New York
CTC Ogden, Inc.	150110	Frontier Ogden Telephone Company
Frontier Comm. of New York	150100	Frontier Communications of New York, Inc.
Frontier Comm. of Sylvan Lake	150128	Frontier Communications of Sylvan Lake, Inc.
Frontier Comm.-Ausable Valley	150072	Frontier Communications of AuSable Valley, Inc.
Frontier Comm.-Seneca Gorham	150122	Frontier Communications of Seneca-Gorham, Inc.
Frontier Telephone of Rochester	150121	Frontier Telephone of Rochester, Inc.
Frontier North, Inc (OH-GTE)	300615	Frontier North Inc.
Frontier of Michigan, Inc. - Ohio	300682	Frontier Communications of Michigan, Inc.
CTC Oregon	533401	Frontier Communications of Oregon
Frontier Comm. Northwest, Inc (OR-GTE)	532416	Frontier Communications Northwest Inc.
Commonwealth of PA	170161	Frontier Communications Commonwealth Telephone Company
Frontier Comm. of Breezewood	170149	Frontier Communications of Breezewood, LLC
Frontier Comm. of Canton, Inc.	170152	Frontier Communications of Canton, LLC
Frontier Comm. of Oswayo River	170194	Frontier Communications of Oswayo River LLC
Frontier Comm. of Pennsylvania	170168	Frontier Communications of Pennsylvania, LLC

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<812>	Operating Company	Citizens Telecommunications Company of the White Mountains Inc

<813>

<a1>	<a2>	<a3>
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
Frontier Comm.of Lakewood, Inc	170178	Frontier Communications of Lakewood, LLC
Frontier Comm. of the Carolinas, Inc (SC-Contel)	240526	Frontier Communications of the Carolinas LLC
Frontier Comm. of the Carolinas, Inc (SC-GTE)	240479	Frontier Communications of the Carolinas LLC
CTC Tennessee	294336	Frontier Communications of Tennessee
CTC Volunteer State	290580	Frontier Communications of the Volunteer State
CTC Utah	504429	Frontier Communications of Utah
Navajo Comm - Utah	504449	Frontier Navajo Communications / Frontier Navajo Communications Company
Frontier Comm. Northwest, Inc (WA-Contel)	522449	Frontier Communications Northwest Inc.
Frontier Comm. Northwest, Inc (WA-GTE)	522416	Frontier Communications Northwest Inc.
Frontier Comm of St. Croix	330944	Frontier Communications - St. Croix LLC
Frontier Comm. of Mondovi, Inc.	330912	Frontier Communications of Mondovi LLC
Frontier Comm. of Viroqua, Inc.	330967	Frontier Communications of Viroqua LLC
Frontier Comm. of Wisconsin, Inc.	330964	Frontier Communications of Wisconsin LLC
Frontier North, Inc (WI-GTE)	330886	Frontier North Inc.
Rhinelander Telco - Crandon	330870	Frontier Rhinelander Telephone Company
Rhinelander Telco - Headwaters	330891	Frontier Rhinelander Telephone Company
Rhinelander Telco - Rhinelander	330940	Frontier Rhinelander Telephone Company
Rhinelander Telco - Rib Lake	330941	Rib Lake Telecom, Inc.
CTC West Virginia - Bluefield	204339	Frontier Communications of West Virginia
CTC West Virginia - Mountain St.	200271	Frontier Communications of West Virginia
CTC West Virginia - St. Marys	204338	Frontier Communications of West Virginia
Frontier West Virginia, Inc	205050	Frontier West Virginia Inc.

Line 920 – Tribal Government Engagement Obligation

During the months of May through July of 2013, the company contacted the tribal leader of each Tribal Land identified on line 910 by mailing, via U.S. Postal Service Certified Mail, an Annual Tribal Government Engagement letter, of which an example is included as Attachment "A". The letter included a copy of the FCC's Public Notice DA 12-1165, released July, 19, 2012, which provided guidance on the Tribal Engagement Obligation. The letter also included an informational bulletin describing the Federal Tribal Lifeline and Tribal Linkup support programs.

In follow up to the letter, the company's local general manager or representative responsible for making decisions contacted, or attempted to contact, each tribal leader, either by telephone or in person, to initiate ongoing discussions to address the Tribal Engagement Obligations.

Attachment "A"

Mailing: 831 E. Hall St.
Show Low, AZ 85901

June 12, 2013

Mr. Ronnie Lupe, Chairman
White Mountain Apache Tribe of the Fort Apache Reservation, Arizona
P.O. Box 700
Whiteriver, Arizona 85941

RE: Annual Tribal Government Engagement and Lifeline Availability

Dear Chairman Lupe:

In November 2011 the Federal Communications Commission (FCC) issued its *USF/ICC Transformation Order* reforming the federal Universal Service Fund (USF) and intercarrier compensation system.[1] As part of the *USF/ICC Transformation Order*, the FCC adopted a Tribal government engagement requirement for all eligible telecommunications carriers that are currently serving or are seeking to serve tribal lands.[2] The Tribal government engagement requirement is intended to benefit Tribal government leaders, communication service providers and consumers living on Tribal lands, ultimately providing greater connectivity to 21st century economic opportunities, education, health care and public safety.

Enclosed is a copy of the Public Notice released July 19, 2012, by the FCC's Office of Native Affairs and Policy, which provides further guidance on the Tribal government engagement obligations.

At your earliest convenience, I would appreciate hearing from you in order to schedule a meeting and begin discussing these important issues which are vitally important to the successful deployment and provision of communication services on Tribal lands.

I have also enclosed an informational bulletin which describes the Federal Tribal Lifeline and Tribal Linkup support programs available to eligible residents of Tribal lands. I hope you find this information helpful and will share it with your tribal members and constituents.

Sincerely,

Mark K. Jeffries

Mark Jeffries
General Manager

Telephone: 928-537-6660
Email: Mark.jeffries@ftr.com

Attachments

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[1] *See Connect America Fund, et al.*, W.C. Docket. No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17663, FCC 11-161 (rel. November. 18, 2011).
[2] *See id.*, at para. 637.

PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 12-1165
Released: July 19, 2012

OFFICE OF NATIVE AFFAIRS AND POLICY, WIRELESS TELECOMMUNICATIONS BUREAU, AND WIRELINE COMPETITION BUREAU ISSUE FURTHER GUIDANCE ON TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION PROVISIONS OF THE CONNECT AMERICA FUND

WC Docket Nos. 10-90, 07-135, 05-337, 03-109
CC Docket Nos. 01-92, 96-45
WT Docket No. 10-208
GN Docket No. 09-51

I. INTRODUCTION AND SUMMARY

1. By this Public Notice, the Federal Communications Commission's (FCC or Commission) Office of Native Affairs and Policy (ONAP), in coordination with the Wireless Telecommunications and Wireline Competition Bureaus (the Bureaus), provides further guidance on the Tribal engagement obligation adopted in the *USF/ICC Transformation Order*.[1] This document is intended to facilitate the required discussions between Tribal government officials and communications providers either currently providing or seeking to provide service on Tribal lands with the use of Universal Service Fund (USF) support.[2]

2. The broad goal of the guidance provided today, and future efforts to establish best practices, is to ensure the effective exchange of information that will lead to a common understanding between Tribal governments and communications providers receiving USF support, on the deployment and improvement of communications services on Tribal lands. The Tribal engagement obligation is intended to benefit Tribal government leaders, service providers, and consumers living on Tribal lands, ultimately providing greater connectivity to 21st century economic opportunities, education, health care, and public safety. This obligation is related to the very essence of universal service – facilitating and supporting connectivity to and from the most remote areas of our nation inures to the benefit of all. Requiring Tribal engagement is intended to begin and, in some cases, to strengthen, the dialogue between communications providers and Tribal governments. We anticipate that genuine dialogue and common understandings will ultimately lead to improvement of communications services on Tribal lands.

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[1] *See Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC 17663 at 17868-69, para. 637 (2011) (*USF/ICC Transformation Order*); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 18, 2011).

[2] *See id.* In the context of the *USF/ICC Transformation Order*, "Tribal lands" is defined as "any federally recognized Indian tribe's reservation, pueblo or colony, including former reservations in Oklahoma, Alaska Native regions established pursuant to the Alaska Native Claims Settlements [sic] Act (85 Stat. 688), and Indian Allotments, *see* 47 C.F.R. § 54.400(e), as well as Hawaiian Home Lands—areas held in trust for native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920, Act July 9, 1921, 42 Stat. 108, *et seq.*, as amended." *Id.* at para. 125, n.197.

3. Good guidance, by definition, must include assistance on how to undertake an endeavor with an aim towards success. Any attempt at actual and meaningful dialogue must be predicated on the genuineness of the intent on both sides. This engagement cannot be viewed as simply another "check the box" requirement by either party. In many places, we expect that there are good and productive relationships between communications providers and Tribal Nations. To the extent that there might be existing differences, however, the parties should put aside those differences for the purposes of this engagement. This engagement process should not be approached as an adversarial undertaking. Instead, Tribal governments and carriers should take advantage of the engagement to improve communications and foster a greater common understanding of the factors necessary to deploy and sustain services on Tribal lands, as well as an honest dialogue to learn from one another what factors would lead to success in those endeavors. In all cases, a high degree of receptivity and responsiveness is necessary to achieve meaningful dialogue, as well as confidence in the reliability of information exchanged. Candid and sincere dialogue on both sides will minimize the possibility that unreasonable expectations by either party will derail common understandings and genuine solutions.

4. Creating a substantive, meaningful dialogue is an iterative process, one which, in certain regions, is at its earliest stages of development. In a similar sense, the further guidance contained in this Public Notice represents the first step in the Commission's implementation of the Tribal engagement obligation. We recognize that priorities and plans of individual Tribal governments and individual service providers can vary greatly, as do the existing relationships between Tribal governments and carriers currently serving Tribal lands. Therefore, there is no one size fits all guidance that can be provided that will be universally applicable. As a result, the guidance provided herein is somewhat general in nature at this stage, but we anticipate that our guidance, as well as the development of best practices, will evolve over time based on initial implementation experiences and the feedback of both Tribal governments and communications providers.

5. ONAP, in coordination with the Bureaus, will track and monitor this feedback and will develop further guidance in the form of best practices based on actual experiences.[3] In an effort to further facilitate engagement efforts at this initial stage, ONAP will employ training and industry meeting opportunities, as well as its coordination events with Tribal Nations. These efforts will include, for example, working with national and regional communications industry associations and national and regional inter-Tribal government associations and organizations.[4] ONAP will focus particular efforts -- for example, by identifying commonalities, increasing efficiencies, building upon current working relationships, and engaging all regional stakeholders, as appropriate -- to foster engagement in states and regions in which Tribes and providers are particularly remote and in which Tribes are particularly numerous.[5] ONAP, in coordination with the Bureaus, will continue to serve as a resource for Tribal governments and communications providers and is always available for individually tailored assistance.

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[3] *See id.* at para. 637, n.1054 (directing ONAP, in coordination with the Bureaus, to develop best practices).

[4] *See* Letter from the Hon. Mark Begich, United States Senator, State of Alaska; the Hon. Lisa Murkowski, United States Senator, State of Alaska; and the Hon. Don Young, United States Congressman, State of Alaska, to the Hon. Julius Genachowski , Chairman, FCC, dated Feb. 22, 2012 ("[W]e request that you work with the tribal groups, carriers and the State of Alaska to clarify the tribal consultation requirements included in the reform order"). *See also* Letter of Becky Hultberg, Commissioner, Department of Administration, State of Alaska, to the Hon. Julius Genachowski, Chairman, FCC, dated February 17, 2012.

[5] For example, there are 229 federally recognized Tribes in Alaska, 108 in California, 38 in Oklahoma, 23 in New Mexico, and 21 in Arizona. *See* Federal Register Notice – Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs, 75 Fed. Reg. 60,810 (Oct. 1, 2010). *See also* Supplemental Federal Register Notice – Indian Entities 1 Page Recognized and Eligible to Receive Services from the United State Bureau of Indian Affairs, 75 Fed. Reg. 66,124 (Oct. 27, 2010).

II. BACKGROUND

6. In the *USF/ICC Transformation Order*, the Commission adopted a Tribal engagement requirement for all eligible telecommunications carriers (ETCs) either currently serving or seeking to serve Tribal lands.[6] The Commission agreed with commenters that engagement between Tribal governments and communications providers is vitally important to the successful deployment of and provision of service on Tribal lands.[7]

7. The Commission therefore required, at a minimum, that ETCs demonstrate on an annual basis that they have meaningfully engaged with Tribal governments in their universal service supported areas.[8] At a minimum, the *USF/ICC Order* stated that such discussions must include: (1) a needs assessment and deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services in a culturally sensitive manner; (4) rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (5) compliance with Tribal business and licensing requirements.[9] Failure to satisfy the Tribal engagement obligation will subject ETCs to financial consequences, including potential reduction in universal service support should they fail to fulfill their engagement obligations.[10]

8. In requiring Tribal engagement, the Commission did not intend to supplant its own ongoing obligation to consult with Tribes on a government-to-government basis, but instead recognized the important role that all parties play in expediting communications service to Tribal lands throughout the nation, including in Alaska and Hawaii.[11] ETCs will be required to submit to the Commission and appropriate Tribal government officials an annual certification and summary of their compliance with the Tribal government engagement obligation as part of the new Connect America Fund reporting requirements.[12] The Commission defined appropriate Tribal government officials as elected or duly authorized government officials of federally recognized American Indian Tribes and Alaska Native Villages.[13] For Hawaiian Home Lands, this engagement must occur with the State of Hawaii Department of Hawaiian Home Lands and the Office of Hawaiian Affairs.[14] The Commission delegated to ONAP, in coordination with the Bureaus, the authority to develop specific procedures regarding the Tribal

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[6] *See USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

[7] *Id.* Mobility Fund and Tribal Mobility Fund Phase I winning bidders will be required to comply with this Tribal engagement obligation at the long-form application stage, in annual reports, and prior to any disbursement of support. *Id.* at para. 489. We note, however, that any such engagement must be done consistent with our auction rules prohibiting certain communications during the competitive bidding process. *Id.* at para. 810. In the *Further Notice of Proposed Rulemaking*, the Commission proposed to apply the same Tribal engagement obligation to Phase II of the general and Tribal Mobility Funds and sought comment on that proposal. *Id.* at para. 1166.

[8] *Id.* at para. 637. *See also* 47 C.F.R. §§ 54.313(a)(9), 54.1004(d), 54.1009.

[9] *Id.*

[10] *See USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

[11] *Id.*

[12] *Id. See also id.* at para. 575 ("Under this uniform framework, ETCs will provide annual reports and certifications regarding specific aspects of their compliance with public interest obligations to the Commission, USAC [the Universal Service Administrative Company], and the relevant state commission, relevant authority in a U.S. Territory, or Tribal government, as appropriate by April 1 of each year.") *See generally id.* at paras. 576-606 (articulating specific reporting requirements). *See also Connect America Fund*, WC Docket No. 10-90 *et al.*, Order, 27 FCC Rcd 2142 at 2144-47, paras. 4-14 (2012) (*USF/ICC Clarification Order*) (revising and clarifying certain reporting obligations for recipients of Connect America Fund support).

[13] *USF/ICC Transformation Order*, 26 FCC Rcd at 17869, para. 637, n.1053.

[14] *Id.*

engagement process, as necessary.[15] The Commission also directed ONAP, in coordination with the Bureaus, to develop best practices regarding the Tribal engagement process to help facilitate these discussions.[16]

III. FURTHER GUIDANCE ON THE TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

A. Overview/General Guidance

9. As stated above, the purpose of this guidance is to ensure the effective exchange of information between Tribal governments and communications providers concerning the deployment and improvement of communications services on Tribal lands throughout the nation, including in Alaska and Hawaii. This exchange of information should foster new opportunities for genuine dialogue that could achieve an alignment of interests and goals. Between certain carriers and Tribal governments, this will be an opportunity for introduction and dialogue in the first instance. In other parts of the country, this will be an opportunity for a new depth of dialogue and more meaningful interaction. An important goal of this guidance is the achievement of a level of engagement between principals on both sides that represents collaborative discussions and actual live conversation.[17] We encourage stakeholders to go beyond merely perfunctory exchanges of basic documents, simplistic sales or marketing presentations, or one-dimensional lists of demands.

10. It is imperative that this dialogue be undertaken at a level within communications providers and Tribal governments that is commensurate with this important engagement requirement. The discourse should be between decision-makers on both sides. While it may be necessary to include administrative staff on both sides to administer and maintain the continuity of relations, 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.

11. On the Tribal government side, there are certain actions that should be taken to best prepare for this valuable engagement. It is important for Tribal leaders to recognize and act upon this opportunity to become organized, maintain continuity, and provide for certainty in conveying their communications needs and priorities. The Commission has long recognized the right of sovereign Tribal governments "to set their own communications priorities and goals for the welfare of their membership."[18] This is a critical time for Tribal Nations to update and make comprehensive their communications priorities and goals. Tribal governments should consider all community needs that would be supported by communications services. These might include, but are not limited to, anchor institutions, economic development, education, healthcare, and public safety. Each Tribal Nation has unique elements to its communications needs and priorities, but effectively articulating those needs is a critical first step in addressing them.

12. As Tribal government administrations change and develop, this is an important opportunity to demonstrate, both to communications providers and to the Commission, their continuity in communications priorities and goals. Certain Tribal governments have created their own governmental

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[15] *Id.* Although our focus here is on providing guidance, the Commission thus will consider the need for further guidance, or to clarify the existing rules regarding Tribal engagement or pursue new rules with specific procedures, if warranted in the future based on actual experiences and outcomes resulting from this guidance.

[16] *Id.* at n.1054.

[17] For example, engagement may occur when necessary by phone or video conference where extreme weather conditions and/or extreme remoteness are present.

[18] Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes, 16 FCC Rcd 4078, 4080-81 (2000) (*Tribal Policy Statement*).

offices and commissions to interact with the FCC and communications providers. Others have designated key members of their Tribal Councils to lead their communications prerogatives for their governments, in effect creating communications committees on their Councils. Other Tribes have yet to organize their governmental or administrative systems with respect to communications services. This engagement obligation necessitates a level of organization within the Tribal government that can convey both a high degree of certainty in the communications priorities of the Tribal Nation and maintain the continuity of those priorities to the greatest extent possible in a governmental environment that, by definition, changes over time. Updating Tribal communications priorities and goals, and ensuring the establishment of effective organizational structures concerning communications issues, are important first steps. However, ETCs must begin the Tribal engagement process this year to be able to report on meaningful engagement by July 1, 2013.[19] Therefore, Tribal governments may need to take interim measures in the short term as they consider establishing new or modified communications goals and priorities.

13. Tribal Nations also should immediately begin preparations to receive, record, and process this engagement dialogue and any related correspondence. Specific efforts should be made to chronicle details of engagement dialogue sessions. Recordkeeping should be established for documentation of the initial contact, any follow-up communications, and the resulting annual certification documentation. Records should include, for example, a summary of all verbal interactions as well as copies of all electronic and hard copy communications.[20]

14. Similarly, communications providers should take immediate steps to prepare for and initiate engagement with the Tribal governments whose lands they serve. Certifications articulating the steps taken to comply with the annual Tribal engagement obligation in 2012 are due on July 1, 2013 and each year thereafter.[21] That is, the Tribal engagement obligation must be fulfilled by the end of each calendar year. Communications providers should, for example, take immediate steps to establish a lead and/or a team within their companies and to identify the appropriate Tribal government leaders with whom they will initiate the engagement process. The National Congress of American Indians (NCAI)[22] maintains a routinely updated and comprehensive directory of American Indian Tribal and Alaska Native Village government leaders, addresses, and telephone numbers. The NCAI Tribal directory can be sorted by geographical area and can be found at http://www.ncai.org/tribal-directory.[23] Where needed, ONAP also will serve as a resource for communications providers and Tribal governments.

15. In addition, communications providers should retain copies of all communications with Tribal leaders they would need in order to demonstrate compliance with their annual certification requirement. In the event that a Tribal government does not respond to repeated efforts to engage, the provider should document all attempts at engagement and certify to that effect. As with the entire engagement process, reasonableness should prevail. As a general matter, we expect that a provider would not be penalized for a failure to respond on the part of a Tribal Nation, if the provider can demonstrate repeated good faith efforts to meaningfully engage with the Tribal government.

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[19] *See Connect America Fund*, WC Docket No. 10-90 *et al.*, Third Order on Reconsideration, FCC 12-52 at para. 10 (rel. May 14, 2012) (*Third Reconsideration Order*) (changing the filing deadline from April 1 to July 1).

[20] For example, all ETCs receiving high-cost are now subject to a 10-year document retention requirement. *See USF/ICC Transformation Order*, 26 FCC Rcd at 17864, para. 620. *See also Third Reconsideration Order*, FCC 12-52 at para. 14.

[21] *See Third Reconsideration Order*, FCC 12-52 at para. 10. *See also* 47 C.F.R. §§ 54.313, 54.1009..

[22] NCAI is the nation's oldest, largest, and most representative inter-Tribal government and communities organization, representing American Indian Tribes and Alaska Native Villages.

[23] For a listing of all federally recognized American Indian Tribes and Alaska Native Villages, *see* www.bia.gov/cs/groups/xofa/documents/document/idc012038.pdf. ONAP, in coordination with the Bureaus, will endeavor to provide additional resources to Tribal governments and carriers to help facilitate this engagement, including the possibility of using the Commission's website as a repository of information.

B. Needs Assessment and Deployment Planning

16. Tribal governments play a vital role in identifying and serving the needs and interests of their local communities, often in remote, insular, cyclically impoverished communities with a historic lack of critical infrastructure. Tribal government leaders are intimately acquainted with their members' needs and have valuable insight into how to meet them. "Tribal-centric" business models – those that actively engage the Tribe, its core community institutions, and members in deployment and adoption planning – have a greater chance of establishing sustainable services on Tribal lands.[24] Communications providers also have experience and a valuable perspective on the challenges, economics, and other realities of providing service to remote, low-income, and underserved regions of the country, including certain Tribal lands.

17. The Tribal engagement obligation provides Tribal governments and communications providers alike with a new opportunity – the opportunity to have a genuine conversation about communications needs and deployment planning on Tribal lands. When telephone service was originally deployed, there was no such obligation and, as a result, in many instances, Tribal needs and carrier deployment efforts were not aligned. The Tribal engagement obligation affords both Tribal governments and communications providers the opportunity to move forward with a shared vision. This will only occur, however, if Tribal governments and communications providers alike take advantage of this historic opportunity to improve the communications landscape on Tribal lands.

18. To that end, Tribal governments should come to the table with a serious, well-thought out assessment of the Tribes' communications needs. Issues that Tribal governments should consider include, for example, the Tribe's communications goals, needs, and priorities, as well as what the Tribe intends to do with communications services (e.g., provide connectivity to those living on Tribal lands, encourage economic opportunity). Tribal governments should also assess what core community or anchor institutions are central to deployment, and what in the nature and operations of these institutions is relevant to the need for communications services. In addition, Tribal governments should consider whether there are economic factors and possibly Tribally-driven opportunities that will assist in making the business case for deployment on Tribal lands, as well as opportunities where Tribal governments and communications providers can partner. In analyzing and discussing communications goals, needs, and priorities, Tribal governments should note that recipients of Connect America Fund (CAF) support, including the Mobility Fund, are subject to public interest obligations, as established in the *USF/ICC Transformation Order*.[25]

19. Similarly, communications providers should come to the table ready to articulate their deployment priorities, the process by which they arrived at these priorities, and their initial plans for deployment on Tribal lands. Issues that communications providers should be prepared to discuss include, for example, the services they currently deploy, and what services they intend to deploy, on Tribal lands. Providers should also be prepared to discuss their timelines for the provision of services not currently available on Tribal lands, as well as their priorities in terms of service and the factors that led them to prioritize deployment to particular areas. Communications providers should also identify any opportunities they envision to partner with Tribal governments.

C. Feasibility and Sustainability Planning

20. Feasibility and sustainability planning for communications services on Tribal lands presents issues of concern for both Tribal governments and communications providers. Tribal governments generally want services rapidly deployed for their members to support the economic, educational, public safety, and health care opportunities that communications services afford. Communications providers

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[24] *See Improving Communications Services for Native Nations*, CG Docket No. 11-41, Notice of Inquiry, 26 FCC Rcd 2672, 2679-80, para. 12 (2011) (*Native Nations NOI*).

[25] *See USF/ICC Transformation Order*, 26 FCC Rcd at 17691-17709, paras. 74-114.

generally want business models that will be practical in terms of build out, and viable in terms of revenue flow and quality of service. While some commonalities likely exist, we believe there are many differences from one provider to another and from one Tribal government to another. The Tribal engagement obligation affords both parties the opportunity to share specific perspectives and information and to begin charting a path forward to address feasibility and sustainability in coordination with one another.

21. Tribal lands nationwide face some of the greatest challenges to the feasibility and sustainability of a 21st century communications infrastructure, including rugged and remote terrain and often endemic levels of poverty. Therefore, communications build out plans based purely on population density or proximity to other robust networks can face major cost benefit analysis challenges. Tribal government leaders, who are largely responsible for managing a wide array of government services and economic opportunities for their communities, are uniquely situated to advise communications providers of the specific challenges associated with deploying and sustaining a communications network on their lands. The Tribal engagement obligation will facilitate discussion between Tribal government leaders and communications providers, affording providers an important opportunity to draw upon the knowledge gained to inform and coordinate their feasibility and sustainability planning.

22. Tribal Nations should be prepared to discuss any additional resources they may bring to bear in feasibility and sustainability planning for communications services, because many federal grant or loan programs provide direct access to, or particular standing for, Tribal Nations and their entities. That is, there are federal government programs that support infrastructure deployment and support the economic, health, safety, and welfare missions in Native communities—the very same priorities for the deployment of robust communications networks on Tribal lands. For example, Tribes may be considering business ventures that would benefit from coordination on communications planning at the outset. Together, providers and Tribal Nations have the opportunity to discuss how to coordinate in planning, providing, and meeting the expenses for communications services on Tribal lands.

23. When addressing the issues of sustainability on Tribal lands, one must also calibrate expectations and develop an awareness of the unique nature of Tribal communities. Issues such as cyclical poverty, remoteness, and deployment priorities all inform the potential sustainability and ultimate profitability of a particular communications model on Tribal lands. That is, it can take a longer period of time to develop a sustainable enterprise on many Tribal lands. Increased coordination between Tribal governments and communications providers on specific elements of feasibility will heighten the chances of ultimate sustainability for communications business models on Tribal lands.

D. Marketing Services in a Culturally Sensitive Manner

24. As noted above, for the purposes of the USF/ICC proceeding and, therefore, the Tribal engagement obligation, Tribal lands are comprised of the lands of the approximately 566 federally recognized American Indian Tribes and Alaska Native Villages, as well as Hawaiian Home Lands.[26] Tribal lands represent a rich and diverse array of cultural heritage, history, practices, and pride. Outside the context of Tribally owned and operated providers, however, seldom have these cultural factors been fully considered in the marketing and deployment of communications services on Tribal lands. The Tribal engagement obligation provides Tribal governments and communications providers with the opportunity to discuss and explore ways in which they can coordinate or partner to ensure that services are marketed in a manner that will relate directly to the community, resonate with consumers, and stimulate increased adoption of services on Tribal lands.

25. Issues that Tribal governments and communications providers may wish to discuss include the tailoring of service offerings to the community through, for example, the feasibility of a local presence in the community. For example, locating a retail presence within a Tribal community and employing

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[26] *See supra* n.2.

members of that community may increase awareness of and sensitivity to local cultural and communications needs. Providers and Tribal governments also may wish to discuss whether developing materials, separately or jointly, specific to the Tribal community would be beneficial to either the provider or consumers on Tribal lands. In addition, providers and Tribal governments also may wish to discuss what other elements of their respective organizations may need to be engaged. For Tribal governments, this may mean administrative planning, community service, and other governmental offices. For providers, this may mean customer service, technical assistance, and commercial business divisions. Through a heightened mutual understanding of one another's needs, we anticipate that Tribal governments and communications providers may discover opportunities for working together that will yield benefits to all. Studies indicate that these efforts present genuine opportunities for success, because where Native Nations and their community members have access to broadband, their rates of Internet use are on par with, if not higher than, national averages.[27]

E. Rights of Way and Other Permitting and Review Processes

26. There are numerous regulatory processes with which service providers must comply in order to provide communications services on Tribal lands, including rights of way, land use permitting, facilities siting, and environmental and cultural review processes.[28] Certain of these processes involve other federal agencies, such as the Department of Interior's Bureau of Indian Affairs (BIA), and failure to comply with these processes may result in a finding of trespass. Given the widely varying circumstances on different Tribal lands, a one size fits all approach is not appropriate here. Instead, in the context of the Tribal engagement obligation, the common goal for Tribal governments and communications providers should be one of greater mutual understanding about the relevant rights of way and other permitting and review processes on Tribal lands and a plan for informing communications providers of procedures in a helpful and instructive manner, designed to bring companies into compliance, where applicable.

27. To that end, Tribal governments and communications providers should come to the table prepared to discuss the relevant rights of way and other permitting and review processes, as well as the challenges associated with these processes. For example, with respect to the BIA's appraisal process for rights of way, dialogue that prioritizes early notification might expedite Tribal governments' consultations with BIA and consent.[29] Tribal governments should have a comprehensive list of all processes with which communications providers serving their Tribal lands are required to comply, such as rights of way, land use permitting, facilities siting, and environmental and cultural review processes. Communications providers should have documentation of any and all processes with which they currently comply. All of this information will provide the foundation for a substantive discussion of all requirements and steps for moving forward together.

F. Compliance with Tribal Business and Licensing Requirements

28. As sovereign institutions, Tribal governments have the authority to impose Tribal business and licensing requirements on all entities doing business on their lands. While the type and form of requirements may vary greatly from one Tribal land to another, Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services, to the Tribe, Tribal members, or Tribal lands. The form of these licenses vary greatly, including certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government

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[27] *See* Traci L. Morris Ph.D., Native Public Media and Sascha D. Meinrath, New America Foundation, NEW MEDIA, TECHNOLOGY AND INDIAN USE IN INDIAN COUNTRY: QUANTITATIVE AND QUALITATIVE ANALYSES (Nov. 19, 2009) (*NPM/NAF New Media Study*).

[28] *See USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

[29] *See generally* 25 C.F.R. Part 169 – Rights-of-Way Over Indian Lands.

licensure.[30]

29. As part of the Tribal engagement obligation, Tribal governments and communications providers should come to the table prepared to discuss in detail the relevant Tribal business and licensing requirements. Tribal governments should have a comprehensive list of any such requirements applicable to the provision of communications services. They should be prepared to provide an explanation of precisely what all such requirements entail, including specific application procedures and timeframes, as well as the governmental offices involved in the licensing process. Communications providers should be prepared to provide evidence of compliance with any Tribal business practice licenses with which they currently comply for that Tribe. Consistent with the discussion above regarding rights of way and other permitting and review processes, the common goal here should be one of greater mutual understanding about the relevant Tribal business licensing requirements and a plan for bringing companies into compliance, where applicable.

IV. CONCLUSION

30. In conclusion, the Tribal engagement obligation represents an opportunity for Tribal governments and communications providers to coordinate on many issues critical to the deployment and adoption of communications technologies on Tribal lands. As discussed in the introduction, this guidance represents the first step in an iterative process. That is, this guidance will evolve over time based on initial experiences and feedback from Tribal governments and communications providers. In an effort to identify commonalities, increase efficiencies, and build upon current working relationships, ONAP will engage all regional stakeholders, as appropriate, and will respond to needs articulated by communications providers and Tribal governments.

V. CONTACTS

31. For further information concerning this guidance, contact the offices listed below:

Office of Native Affairs and Policy
Geoffrey Blackwell at (202) 418-3629
Irene Flannery at (202) 418-1307

Wireless Telecommunications Bureau
Sue McNeil at (202) 418-7619

Wireline Competition Bureau
Joseph Cavender at (202) 418-1548

- FCC -

[30] *See USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637, n.1052.

REDACTED FOR PUBLIC INSPECTION

Informational Bulletin

Federal Tribal Lifeline and Tribal Linkup Support Programs

Eligible residents of Tribal lands may be able to save money on their local telephone service through Tribal Lifeline and Tribal Link Up support programs. These programs are established by the Federal Communications Commission (FCC) and are available through telephone companies like Frontier. Under the Tribal Lifeline program, a qualified resident receives a reduction of up to $34.25 per month of the cost for a single local telephone service connection to the household. Under the Tribal Link Up program, a qualified resident receives a 100 percent reduction, up to $100, of the customary charge to install a single local telephone service connection at the customer's principal place of residence. To qualify for these programs, an individual must

1. Be a resident of a federally recognized tribal land

2. Receive assistance from one of the following programs:
    - Bureau of Indian Affairs General Assistance
    - Tribally Administered Temporary Assistance for Needy Families (TTANF)
    - Tribal Head Start Programs (income eligible)
    - Food Distribution Program on Indian Reservations (FDPIR)
    - Medicaid
    - Supplemental Security Income (SSI)
    - Federal Public Housing Assistance (Section 8)
    - Low-Income Home Energy Assistance Program (LIHEAP)
    - National School Lunch Program's Free Lunch Program
    - Supplemental Nutrition Assistance Program (Food Stamps or SNAP)
    - Temporary Assistance for Needy Families (TANF)

or

3. Income must not exceed approximately 135% of the federally established poverty levels set forth for the number of persons in the applicant's household, as updated.

Tribal Lifeline and Tribal Link Up are government assistance programs. Only eligible customers may enroll in the programs, and documentation is required for enrollment. Program benefits are limited to one per household and are non-transferable.

To enroll in Tribal Lifeline or Tribal Link Up, residents may contact Frontier at 1-800-921-8101 and ask about Tribal Lifeline or Tribal Link Up.

Line 1210 – Terms and Conditions of Voice Telephony Lifeline Plans

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE

LIST OF EFFECTIVE SHEETS

Sheets 1 through 8 of this schedule are effective as of the date shown on each sheet.

Sheet	Number of Revision
1	**7th Revised**
2	3rd Revised
3	4th Revised
4	Original
5	1st Revised
6	4th Revised
6.1	Original
6.2	**1st Revised**
7	1st Revised
8	1st Revised

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE (continued)

A1 APPLICABILITY

Applicable to eligible residence customers for Universal Lifeline Telephone Service (ULTS).

A2 TERRITORY

Within the exchange areas of all exchanges as said areas are defined on maps filed as part of the tariff schedules.

A3 GENERAL

B1 The utility shall provide Lifeline Telephone Service to any applicant that certifies under penalty of perjury that they receive benefits from one of the programs listed below and identify the program or programs from which that applicant receives benefits. The qualifying low-income applicant also must agree to notify the utility when that applicant ceases to participate in the program or programs.

- Medicaid;
- Supplemental Nutrition Assistance Program; (C)
- Supplemental Security Income (SSI);
- Federal Public Housing Assistance (Section 8); (T)
- Low-Income Home Energy Assistance Program;
- National School Lunch Program's free lunch program;
- Temporary Assistance for Needy Families (T)

(D)

Or

If the applicant's household income is at or below 150% of the Federal Poverty Guidelines. (See Special Condition B15 for Certification Procedure).

The term "applicant" as used above refers to the head of a household or person in whose name the property rental agreement resides.

(D)

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE (continued)

A3 GENERAL (continued)

B2 Universal Lifeline Telephone Service is available to eligible residence customers subscribing to flat rate individual line service.

B3 Universal Lifeline Telephone Service includes the following:

C1 Flat Rate Service with unlimited local calls per month.

C2 Optional Toll Restriction at no charge as shown in Schedule No. A-1, A17, Call Restriction Services.

A4 RATES

B1 Lifeline customers are charged the Residence One-Party network access line rate, plus the applicable Federal Subscriber Line Charge. The federal Lifeline credits per month are then applied to the customer's Local Service charges (see A5 Special Conditions B14).

		Monthly Rate	
B2	Federal Lifeline Credits for a One-Party Line:		
C1	Federal Lifeline Support Credit (includes Federal End User Common Line Credit of $6.50 and remainder $2.75 credit covers basic service)	$9.25	(T)

(D)

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE (continued)

A5 SPECIAL CONDITIONS

B1 Universal Lifeline Telephone Service is restricted to residence local exchange service including all applicable extended area service. Foreign exchange services are excluded from this offering.

B2 The reduced Service Connection Charges are limited to eligible recipients. Reduced Service Connection Charges will apply to requests from eligible recipients for changes in class, type, or grade of service, including requests to change from Foreign Exchange Service. Service connection discounts may be offered more than one time per customer, provided the requester has moved to a different address. There is no limit on the number of requests per customer for this service. Other than stated above, any change to the service will be at normal service connection charges as set forth in Schedule No. A-5.

B3 Eligible recipients of this service may have up to 12 months to pay the Utility for the reduced service connection charges. The customer is not required to pay interest on the first $200 of service connection charges that are deferred up to one year.

B4 Deposits for establishment of service, as outlined in Schedule No. AC, will not be required of eligible recipients of Universal Lifeline Telephone Service providing the applicant does not have any outstanding bill to any telephone utility within Arizona. No deposit is required from any Lifeline customer who opts for Toll Restriction Service at no charge. Other than previously stated, establishment and re-establishment of credit shall be in accordance with Schedule No. AC.

B5 No Lifeline customer can be disconnected for non-payment of Toll charges. If a Lifeline customer makes a partial payment, the dollars must first be applied to Local Service charges, then applied to Toll Service charges.

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE (continued)

A5 SPECIAL CONDITIONS (continued)

B6 Service under this schedule will apply upon receipt of a completed self-certification notice of eligibility from an applicant/customer.

B7 New applicants for telephone service will be advised of the availability of Universal Lifeline Telephone Service and if eligible will be furnished with the necessary self-certification forms.

B8 Recipients of Universal Lifeline Telephone Service must notify the Utility of a change in any condition, which occurs that would cause the household to no longer qualify for the service under Schedule A-3, Lifeline Telephone Service, Senior Telephone Discount Program (N)
(STDP) or Enhanced Lifeline Service For Tribal Lands. Upon receipt of notification, the (N)
Utility will change the service to regular tariffed rates for the service furnished. Service Connection Charges will not apply to the change in service.

B9 If the Utility discovers that conditions exist which cause the recipient not to qualify for (T)
Universal Lifeline Telephone Service, the customer will be notified that the service will be converted to regular tariffed rates.

B10 The utility will have the right to verify that applicants meet the eligibility requirements (T)
directly with the state agency administering the qualifying programs, via statistically valid (N)
sample or other means performed by the utility on an annual basis. (N)

B11 In addition to the rates and conditions specified herein, all rules, regulations, charges and (T)
rates in conjunction with the services furnished elsewhere in the tariffs are also applicable to the service provided under this schedule.

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE (continued)

A5 SPECIAL CONDITIONS (continued)

B12 Optional services are not included in Universal Lifeline Telephone Service rates, but will be provided to Universal Lifeline Telephone Service customers at applicable tariffed rates and charges. (T)

B13 Universal Lifeline Telephone Service credits shall be applied to each monthly statement for the months this service is furnished and shall apply only for the duration of this service. (T)

B14 The income limitation claimed by a Lifeline customer in their application for service is subject to verification at any time by the serving telephone utilities. (T)

B15 [1)]Applicants that qualify under the 150% Federal Poverty Guideline criteria must sign a document under penalty of perjury certifying their household income is at or below 150% of the Federal Poverty Guidelines and provide supporting documentation at the time of enrollment. The supporting documentation can include one of the following: (N)

a. Prior year's state, federal or tribal tax return;
b. Current income statements from an employer or paycheck stub;
c. Social Security statement of benefits;
d. Veterans Administration state of benefits;
e. Retirement / pension statement of benefits;
f. Unemployment/Workers Compensation statement of benefits;
g. Federal or tribal notice letter of participation in Bureau of Indian Affairs General Assistance;
h. Divorce Decree or Child Support Document

If the applicant chooses to submit anything other than the prior year's income tax return, applicant must present three consecutive months worth of the alternative supporting documentation that is within the most recent twelve consecutive months. (N)

[1)] To be implemented effective 12/16/05.

SCHEDULE NO. A-3

LIFELINE TELEPHONE SERVICE (continued)

A5 SPECIAL CONDITIONS (continued)

B16 Limitation of Liability for Administering Link-Up America and Lifeline Assistance Programs[1)] (N)

The Utility shall use reasonable efforts to (1) safeguard personal information provided by a customer in a connection with an application for the Utility's Link-Up America and/or Lifeline Assistance programs; and (2) properly determine a customer's eligibility to participate in the Utility's Link-Up America and/or Lifeline Assistance programs. The Utility shall not be liable to a customer for any damages (actual, consequential or punitive) arising as a result of (a) the Utility's unintentional or accidental disclosure to a third party of a customer's personal information provided in connection with an application for the Utility's Link-Up America and/or Lifeline Assistance programs; or (b) the Utility's erroneous determination regarding a customer's eligibility or ineligibility to participate in the Utility's Link-Up America and/or Lifeline Assistance programs. In the event the Utility erroneously denies a customer's application to participate in the Utility's Lifeline Assistance program, the customer shall be entitled to a bill credit equal to the amount of the monthly discount applied from the date of the customer's application through the date of actual enrollment in the Lifeline Assistance program.

B17 The Utility will maintain records of compliance in accordance with paragraphs 38 and 39 of the FCC's Lifeline Order and Decision No. 67941 issued by the Arizona Corporation Commission governing the Lifeline / Link-Up programs, to the extent the Utility rather than the Arizona Department of Economic Security administers these programs.

B18 A customer is not eligible for Lifeline and / or Link-Up credits from the Utility if the customer is currently receiving Lifeline and / or Link-Up credits for service provided by another Eligible Telecommunications Carrier.

(N)

[1)] To be implemented effective 12/16/05.

SCHEDULE NO. A-3

SENIOR TELEPHONE DISCOUNT PROGRAM (STDP)

A1 SPECIAL CONDITIONS

B1 Low-income customers who qualify under the Senior Telephone Discount Program (STDP) (otherwise known as Arizona Low Income Telephone Assistance Plan (ALITAP)) will receive the federal baseline support amount, equivalent to the current applicable FCC Subscriber Line charge. STDP/ALITAP customers are also eligible to receive matching federal Lifeline support in an amount equal to one-half of the amount of the state support: (T)

A2 RATES

	Monthly Credit
FCC Interstate Offset to End User Subscriber Line Charge (SLC)	(1)
State STDP/ALITAP Support	(2)

(D)

(D)

(1) Dollar amount is equal to the current Federal Subscriber Line Charge assessed by the Company.
(2) A 17% discount in local service charges contributed by the state to qualified customers.

(D)

SCHEDULE NO. A-3

RESERVED FOR FUTURE USE (T)

(D)

(D)

SCHEDULE NO. A-3

ENHANCED LIFELINE SERVICE FOR TRIBAL LANDS

A1 GENERAL

Residential customers who reside on federally recognized tribal lands are eligible to receive additional enhanced federal Lifeline support in order to reduce the price for basic local telephone service. An individual living on tribal lands shall qualify for an additional enhanced federal Lifeline credit of up to $25.00 per month if the individual participates in any state or federal programs identified in Schedule No. A-3, Sheet 2, or in one of the following assistance programs:

- Bureau of Indian Affairs General Assistance
- Tribally Administered Temporary Assistance for Needy Families
- Head Start (only those households meeting its income qualifying standard) (C)
- Food Distribution Program on Indian Reservations (FDPIR) (C)

If a resident of a federally recognized tribal land satisfies the state's Lifeline eligibility criteria as defined in Schedule No. A-3, Sheet 2, the resident will receive the state support as well as the additional enhanced federal support. (C)
(C)

A2 RATES

The additional enhanced federal credit will be available to Lifeline customers who reside on tribal lands in the following exchanges:

Tribe/Reservation	Exchange
Fort Apache (White Mountains Apache Tribe)	Cibeque
	Hawley Lake
	McNary
	Whiteriver