



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 17, 2014

Via Hand Delivery

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

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Flat Rock Telephone Co-Operative
Study Area Code 341012**

Dear Ms. Dortch:

On behalf of Flat Rock Telephone Co-Operative (“Flat Rock”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Flat Rock seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

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

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).

| | |
|--|----------------------|
| <010> Study Area Code | 341012 |
| <015> Study Area Name | FLAT ROCK TEL CO-OP |
| <020> Program Year | 2015 |
| <030> Contact Name: Person USAC should contact with questions about this data | Karen Jackson-Furman |
| <035> Contact Telephone Number: Number of the person identified in data line <030> | 6187741000 ext. |
| <039> Contact Email Address: Email of the person identified in data line <030> | kfurman@egyptian.net |

| | | |
|--|---|---|
| ANNUAL REPORTING FOR ALL CARRIERS | 54,313 Completion Required | 54,422 Completion Required |
|--|---|---|

| | | | (check box when complete) | |
|--------|--|--|-------------------------------------|-------------------------------------|
| <100> | Service Quality Improvement Reporting | <i>(complete attached worksheet)</i> | <input checked="" type="checkbox"/> | |
| <200> | Outage Reporting (voice) | <i>(complete attached worksheet)</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210> | <input checked="" type="checkbox"/> <-- check box if no outages to report | | <input checked="" type="checkbox"/> | |
| <300> | Unfulfilled Service Requests (voice) <input type="text" value="0"/> | | <input checked="" type="checkbox"/> | |
| <310> | Detail on Attempts (voice) <div style="border: 1px solid black; height: 40px; width: 100%;"></div> | <i>(attach descriptive document)</i> | <input type="checkbox"/> | |
| <320> | Unfulfilled Service Requests (broadband) <input type="text" value="0"/> | | <input checked="" type="checkbox"/> | |
| <330> | Detail on Attempts (broadband) <div style="border: 1px solid black; height: 40px; width: 100%;"></div> | <i>(attach descriptive document)</i> | <input type="checkbox"/> | |
| <400> | Number of Complaints per 1,000 customers (voice) | | | |
| <410> | Fixed <input type="text" value="0.0"/> | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420> | Mobile <input type="text" value="0.0"/> | | | |
| <430> | Number of Complaints per 1,000 customers (broadband) | | <input checked="" type="checkbox"/> | |
| <440> | Fixed <input type="text" value="0.0"/> | | | |
| <450> | Mobile <input type="text" value="0.0"/> | | | |
| <500> | Service Quality Standards & Consumer Protection Rules Compliance | <i>(check to indicate certification)</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510> | <div style="border: 1px solid black; padding: 5px;">341012i1510.pdf</div> | <i>(attached descriptive document)</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600> | Functionality in Emergency Situations | <i>(check to indicate certification)</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610> | <div style="border: 1px solid black; padding: 5px;">341012i1610.pdf</div> | <i>(attached descriptive document)</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700> | Company Price Offerings (voice) | <i>(complete attached worksheet)</i> | <input checked="" type="checkbox"/> | |
| <710> | Company Price Offerings (broadband) | <i>(complete attached worksheet)</i> | <input checked="" type="checkbox"/> | |
| <800> | Operating Companies and Affiliates | <i>(complete attached worksheet)</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900> | Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/> | <i>(if yes, complete attached worksheet)</i> | <input type="checkbox"/> | |
| <1000> | Voice Services Rate Comparability | <i>(check to indicate certification)</i> | <input checked="" type="checkbox"/> | |
| <1010> | <div style="border: 1px solid black; height: 40px; width: 100%;"></div> | <i>(attach descriptive document)</i> | <input type="checkbox"/> | |
| <1100> | Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/> | <i>(if not, check to indicate certification)</i> | <input type="checkbox"/> | |
| <1110> | | <i>(complete attached worksheet)</i> | <input type="checkbox"/> | |
| <1200> | Terms and Condition for Lifeline Customers | <i>(complete attached worksheet)</i> | | <input checked="" type="checkbox"/> |

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

| | | | | |
|--------|---|--|--------------------------|--|
| <2000> | Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers | <i>(check to indicate certification)</i> | <input type="checkbox"/> | |
| <2005> | | <i>(complete attached worksheet)</i> | <input type="checkbox"/> | |

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

| | | | | |
|--------|--|--|-------------------------------------|--|
| <3000> | | <i>(check to indicate certification)</i> | <input checked="" type="checkbox"/> | |
| <3005> | | <i>(complete attached worksheet)</i> | <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 341012

<015> Study Area Name FLAT ROCK TEL CO-OP

<020> Program Year 2015

<030> Contact Name - Person USAC should contact regarding this data Karen Jackson-Furman

<035> Contact Telephone Number - Number of person identified in data line <030> 6187741000 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> k.furman@egyptian.net

<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.

34101211112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(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.

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FLAT ROCK TELEPHONE CO-OPERATIVE (SAC 341012)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

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

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

<010> Study Area Code 341012
 <015> Study Area Name FLAT ROCK TEL CO-OP
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Karen Jackson-Furman
 <035> Contact Telephone Number - Number of person identified in data line <030> 6187741000 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> kfurman@gyptlan.net

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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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:

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

| | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|--|--|--|
| Select (Yes, No, NA) | | | | | | | | | |
| | | | | | | | | | |

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

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

| | | |
|-------|---|----------------------|
| <010> | Study Area Code | 341012 |
| <015> | Study Area Name | FLAT ROCK TEL CO-OP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Karen Jackson-Furman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6187741000 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | KFurman@egyptian.net |

<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)

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**(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form**

<010> Study Area Code 341012

<015> Study Area Name FIAT ROCK TEL CO-OP

<020> Program Year 2015

<030> Contact Name - Person USAC should contact regarding this data Karen Jackson-Furman

<035> Contact Telephone Number - Number of person identified in data line <030> 6187741000 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> k.furman@egyptian.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

341012111210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

*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.

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

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

| | | |
|-------|---|------------------------|
| <010> | Study Area Code | 341012 |
| <015> | Study Area Name | FLAT ROCK TEL CO-OP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Karen Jackson-Furman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6187741000 ext. 1 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | k.furman@qtpd.tlan.net |

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

(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 341012
 <015> Study Area Name PLAT ROCK TEL CO-OP
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Karen Jackson-Purman
 <035> Contact Telephone Number - Number of person identified in data line <030> 6187741000 ext. 6187741000
 <039> Contact Email Address - Email Address of person identified in data line <030> kturnan@qcyxllan.net

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)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No)

Name of Attached Document Listing Required Information

(3014) If yes, does your company file the RUS annual report (Yes/No)

Name of Attached Document Listing Required Information

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)

Name of Attached Document Listing Required Information

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information

(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)

Name of Attached Document Listing Required Information

(3019) 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

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

Name of Attached Document Listing Required Information

(3022) 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.

(3023) Underlying information subjected to a review by an independent certified public accountant

Name of Attached Document Listing Required Information

(3024) Underlying information subjected to an officer certification.

Name of Attached Document Listing Required Information

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information

(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 | 341012 |
| <015> | Study Area Name | FLAT ROCK TEL CO-OP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Karen Jackson-Furman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6187741000 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | kfurman@egyptian.net |

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: | FLAT ROCK TEL CO-OP |
| Signature of Authorized Officer: | CERTIFIED ONLINE Date 06/12/2014 |
| Printed name of Authorized Officer: | Donna Branson |
| Title or position of Authorized Officer: | Office Manager |
| Telephone number of Authorized Officer: | 6185843211 ext. |
| Study Area Code of Reporting Carrier: | 341012 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 | 341012 |
| <015> | Study Area Name | FLAT ROCK TEL CO-OP |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Karen Jackson-Furman |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 6187741000 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | kfurman@egyptian.net |

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 | |
|---|--------------------------------|
| <p>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.</p> | |
| 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: ext. _____ | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| <small>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.</small> | |

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 | |
|---|--------------------------------|
| <p>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.</p> | |
| 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: ext. _____ | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| <small>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.</small> | |

Attachments

Flat Rock Telephone Co-Operative’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

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

Flat Rock Telephone Co-Operative (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under the Illinois Administrative Code (IAC), Title 83: Public Utilities, Chapter I: Illinois Commerce Commission, Subchapter f: Telephone Utilities. These obligations include, but are not limited to, the following: adherence to Illinois state consumer protection requirements governing telephone providers which include Quality of Service rules as identified in IAC Part 730

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

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

and 732, and Compliance with Anti-Slamming and Anti-Cramming Procedures as adopted in Illinois Public Act 90-610 and 97-0822, (3) truth-in-billing requirements pursuant to federal rule and IAC 735.70; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Flat Rock Telephone Co-Operative’s demonstration of ability to function in emergency situations for voice and broadband services:

Flat Rock Telephone Co-Operative (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and Title 83, Chapter I, Sub-Chapter f, Section 730.325 of the Illinois Administrative Code. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. In accordance, and compliance, with Title 83, Chapter I, Sub-Chapter f, Section 730.325 (b), all switching offices or equivalent with installed emergency power generating equipment have a minimum of three (3) hours battery capacity; switching offices or

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

equivalent without installed emergency power generating equipment have a minimum battery capacity of five (5) hours.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

Flat Rock Telephone Co-Operative is a quality telecommunications services provider who provides basic and enhanced services at reasonable rates within its service territory. Basic services are offered at the following rates:

| | <u>Monthly Service Charge</u> |
|--|--|
| Single Party Residence Service (unlimited local calling) | \$20.39 |
| Single Party Business Service (unlimited local calling) | \$20.39 |
| Federal Subscriber Line Charge-Single Line | \$6.50 |
| Directory Assistance | 40¢/65¢ |
| Touch Tone Service | \$1.00 |
| Toll Blocking | Available at no charge for low income customers that qualify |
| Emergency 911 Services | Surcharges for 911 services are assessed according to |
| government assessments | |
| Access to operator services and interexchange services available | |

Low-income individuals eligible for Lifeline and Link-Up telephone assistance programs may be eligible for discounts from these basic local service charges through state specified telephone assistance plans.

Basic services are offered to all consumers in the Flat Rock service territory at the rates, terms and conditions specified in the Company's price lists. If you have any questions regarding the Company's services, please call Flat Rock at 618-584-3211 or visit the business office at 104 North Rundle St., Flat Rock, IL for further information regarding the services.

Lifeline and Link Up Assistance

Lifeline and Link Up are government programs that make telephone service more affordable for eligible, low-income households.

What is Lifeline?

Lifeline is a federal program that provides a monthly \$9.25 discount on telephone service to eligible households. If the eligible consumer voluntarily elects toll-blocking while initiating Lifeline service, a deposit is not required.

What is Link Up?

Link Up is a state program that helps pay the installation charge for telephone service.

Who is eligible?

To be eligible for the program, you, your dependent, or your household must participate in one of the following programs:

- Medicaid or Medical Assistance Program
- Supplemental Nutrition Assistance Program (SNAP), formerly Food Stamps
- Temporary Assistance to Needy Families (TANF)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance or Section 8
- Low Income Home Energy Assistance Program (LIHEAP)

- National School Lunch Free Lunch Program

Customers may also qualify for Lifeline if their total household income does not exceed [135% of the Federal Poverty Guidelines](#).

Are there restrictions?

The Lifeline and Link Up programs are limited to one benefit per household. Lifeline is non-transferable. Subscribers willfully making false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

How can I apply for the Lifeline and/or Link Up Programs?

To enroll in Lifeline, please contact your local business office.

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FLAT ROCK TELEPHONE CO-OPERATIVE (SAC 341012)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY