



Your business is our business.

DOCKET FILE COPY ORIGINAL

REDACTED - FOR PUBLIC INSPECTION

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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

Accepted/Filed

JUN 17 2014

FCC Office of the Secretary

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Citizens Telephone Company (MO)
Study Area Code 421865**

Dear Ms. Dortch:

On behalf of Citizens Telephone Company (MO) ("Citizens"), 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 Citizens 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)

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

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).

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

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

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

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

REDACTED FOR PUBLIC INSPECTION

<010> Study Area Code	421865	Accepted/Filed JUN 17 2014 FCC Office of the Secretary
<015> Study Area Name	CITIZENS TEL CO - MO	
<020> Program Year	2015	
<030> Contact Name: Person USAC should contact with questions about this data	Brian Cornelius	
<035> Contact Telephone Number: Number of the person identified in data line <030>	6605842111 ext.	
<039> Contact Email Address: Email of the person identified in data line <030>	blc@ctcis.net	

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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			(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 style="width: 50px;" type="text" value="0"/>		<input checked="" type="checkbox"/>	
<310>	Detail on Attempts (voice) <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div> <i>(attach descriptive document)</i>		<input type="checkbox"/>	
<320>	Unfulfilled Service Requests (broadband) <input style="width: 50px;" type="text" value="0"/>		<input checked="" type="checkbox"/>	
<330>	Detail on Attempts (broadband) <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div> <i>(attach descriptive document)</i>		<input type="checkbox"/>	
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed <input style="width: 50px;" type="text" value="0.66666"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile <input style="width: 50px;" type="text" value="0.0"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	
<440>	Fixed <input style="width: 50px;" type="text" value="0.0"/>		<input checked="" type="checkbox"/>	
<450>	Mobile <input style="width: 50px;" type="text" value="0.0"/>		<input checked="" type="checkbox"/>	
<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; height: 40px; width: 100%; margin-top: 5px;">421865mo510.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; height: 40px; width: 100%; margin-top: 5px;">421865mo610.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 checked="" 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%; margin-top: 5px;"></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	421865
<015> Study Area Name	CITIZENS TEL CO - MO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035> Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	blc@ctcis.net

<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5		(yes / no)	<input type="radio"/>	<input checked="" type="radio"/>
<111> year plan" filed with the FCC?		(yes / no)	<input type="radio"/>	<input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

421865mo112.pdf

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.

**(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	421865
<015> Study Area Name	CITIZENS TEL CO - MO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035> Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	blc@ctcis.net

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

<920> Tribal Government Engagement Obligation

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:

- <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
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<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	blc@ctcis.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)

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	421865
<015> Study Area Name	CITIZENS TEL CO - MO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035> Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	b1c@ctcis.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

421865mo1210.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.

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	blc@ctcis.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

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(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

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

July 2013

<010> Study Area Code	421865
<015> Study Area Name	CITIZENS TEL CO - MO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035> Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	blc@ctcis.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)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No)
(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

421865mo3026 .pdf

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form #81 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bic@ctcis.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:	
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. 55 502, 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. 3060-0588/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Brian Cornelius
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605842111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	blc@ctcis.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	
I certify that (Name of Agent) <u>John Staurulakis, INC</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, INC
Name of Reporting Carrier:	CITIZENS TEL CO - MO
Signature of Authorized Officer:	CERTIFIED ONLINE
	Date: 06/11/2014
Printed name of Authorized Officer:	Brian Cornelius
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	6605842111 ext.
Study Area Code of Reporting Carrier:	421865
	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.	

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:	CITIZENS TEL CO - MO
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE
	Date: 06/11/2014
Printed name of Authorized Agent or Employee of Agent:	Amanda Molina
Title or position of Authorized Agent or Employee of Agent:	Staff Consultant - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.
Study Area Code of Reporting Carrier:	421865
	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.	

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REDACTED – FOR PUBLIC INSPECTION

CITIZENS TELEPHONE COMPANY (SAC 421865)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Citizens Telephone Company'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. 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."³

Citizens Telephone Company ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with service quality and consumer protection provisions under state law. These provisions include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Missouri Public Service Commission which discloses rates, terms and conditions of service to customers; (2) compliance with state consumer protection provisions relating to Customer Services as identified in section 4 CSR 240-32.050 of the Missouri Code of State Regulations, compliance with provisions for Quality of Service as identified in section 4 CSR 240-32.070 of the Missouri Code of State Regulations, compliance with Service Objectives as identified in section 4 CSR 240-32.080 of the Missouri Code of State Regulations, compliance with customer Inquiry

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.

procedure as identified in 4 CSR 240-33.060 of the Missouri Code of State Regulations, compliance with Dispute standards as identified in 4 CSR 240-33.080 of the Missouri Code of State Regulations; (3) compliance with truth-in-billing requirements; and (4) compliance with Federal CPNI rules, 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.

Citizens Telephone Company Ability to Function in Emergency Situations for voice and broadband services:

Citizens Telephone Company ("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 the Missouri Code of State Regulations. 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. In addition, the Company has redundancy for connectivity purposes via additional routes and electronic equipment for both voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery reserve 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. The Company has battery backup at all office locations and in its electronic equipment sites and has a maintenance program in place as described in section 4 CSR 240-32.060 of the Missouri Code of State Regulations.

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

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."

Citizens Telephone Company
of Higginsville, Missouri, Inc.

1st Revised Sheet No. 3-1
Cancels Original Sheet No. 3-1

GENERAL RULES AND REGULATIONS

RECEIVED

3. General Rules and Regulations

JUL 30 1998

3.1 Application

MO. PUBLIC SERVICE COMM

The rules and regulations specified herein apply to the intrastate services and facilities of Citizens Telephone Company of Higginsville, Missouri, Incorporated, hereinafter referred to as the Company. Failure on the part of the subscribers to observe these rules and regulations of the Company, after due notice of such failure, automatically gives the Company the authority to discontinue the furnishing of service.

In the event of a conflict between any rate, rule, regulation or provision contained in these General Rules and Regulations and any rate, rule, regulation or provision contained in the specific tariffs, the rate, rule, regulations or provision contained in the specific tariffs shall prevail.

This tariff cancels and supersedes all other local tariffs of the Company issued and effective prior to the effective date of this tariff.

The Company, which acts as the Secondary Carrier (SC) under the Missouri Primary Carrier by Toll Center Plan filed with the Missouri Public Service Commission, subtends the Southwestern Bell Telephone toll and WATS complexes. Rates for these services are contained in the Toll and WATS tariffs of Southwestern Bell Telephone Company.

3.2 Explanation of Symbols

- (C) Signifies a changed regulation.
- (D) Signifies a discontinued rate, treatment or regulation.
- (I) Signifies an increased rate or new treatment resulting in an increased rate.
- (M) Signifies move of regulation or rate to or from specified sheets. (N)
- (N) Signifies a new rate, treatment or regulation.
- (R) Signifies a reduced rate or new treatment resulting in a reduced rate.
- (T) Signifies a change in text but no change in rate, treatment or regulation.

FILED

SEP 01 1998

**MISSOURI
Public Service Commission**
Effective: September 1, 1998

JUL 30 1998

Brian Cornelius
Citizens Telephone Co.
1905 Walnut
Higginsville, MO 64037

Citizens Telephone Company
of Higginsville, Missouri, inc.

Original Sheet No. 3-2

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.3 Obligation and Liability of Company

A. Availability of Facilities

The Company's obligation to furnish telephone service is dependent upon its ability to secure suitable facilities and to provide such service without unreasonable expense.

B. Interruption of Service

An allowance will be made upon notice and demand to the Company for interruption of service not due to subscriber negligence if the interruption continues for more than thirty six hours from the time it is reported to or detected by the Company. The allowance will be the prorated portion of the monthly rate for the service made inoperative.

C. Directory Errors and Omissions

The Company endeavors to correctly list customers, their telephone numbers and other information in the local telephone directory. No liability for damages arising from errors in or omissions of directory listings or listings obtained from Directory Assistance shall attach to the Company. In the case of additional or extra listings for which a charge is made, the Company's liability shall be limited to the monthly rate for each such listing for the charge period during which the error or omission continues.

D. Transmitting Messages

The Company does not undertake to transmit messages, but rather offers the use of its facilities, where available, for communication between parties subject to the conditions specified in these tariffs.

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Issued: 9/24/93

Brian Cornelius
Citizens Telephone Co.
1905 Walnut
Higginsville, MO 64037

Effective: 10/01/93

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Citizens Telephone Company
of Higginsville, Missouri, inc.

Original Sheet No. 3-3

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.3 Obligation and Liability of Company (Cont'd)

E. Defacement of Premises

The Company will make a reasonable effort to leave the customer's property in the same condition as it was found in prior to any Company work. The Company will repair or replace any defacement or damage of property due to installation, existence, or removal of Company property when the damage is the result of negligence of the Company.

F. Maintenance and Repairs

The Company shall bear the expense of all repair and maintenance of its facilities, except where damage or destruction of its facilities are due to the acts or omissions of the subscriber. The subscriber may not rearrange, remove, or disconnect any Company facilities without consent of the Company.

G. Adjustment of Charges

In case of overbilling, a refund will be made by the Company for the amount of excess charges or for an estimate of the overbilling amount. The maximum refund will not exceed the actual or estimated overbilling over a three year period.

In case of underbilling, the company reserves the right to backbill for the deficiency charges up to a period of three years.

H. Liability of Company

1. The liability of the Company for damages arising out of mistakes, omissions, interruptions, delays or errors or defects in transmission occurring in the course of furnishing service and not caused by negligence of the customer shall in no event exceed an amount equivalent to the proportionate charge to the customer for the period of service during which such mistakes, omissions, interruptions, delays or errors or defects in transmission occur in excess of 36 hours after notification has been made.

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GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

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3.3 Obligation and Liability of Company (Cont'd)

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H. Liability of Company (Cont'd)

2. The customer indemnifies and saves the Company harmless against the following:

- (a) Acts or omissions of other companies when their facilities are used in connection with the Company's facilities to provide service.
- (b) Any defacement or damage to the customer's premises, resulting from the existence of the Company's facilities (demarcation point and drop) on such premises, or from the installation or removal thereof, when such defacement or damage is not the result of the negligence of the Company or its employees.
- (c) Any accident, injury or death occasioned by its equipment or facilities when such is not due to negligence of the Company.
- (d) Claims for libel, slander or infringement of copyright arising from the material transmitted or recorded over its facilities; claims for infringement of patents arising from combining with, or using in connection with, facilities of the Company, apparatus and systems of the customer; and all other claims arising out of any act or omission of the customer in connection with facilities provided by the Company.
- (e) Liability for failure to provide service.
- (f) Liability for telephone directories except as outlined in Section 3.3.C.

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