

Henderson Cooperative Telephone Company

P.O. Box 487 Henderson, NE 68371 (402) 723-4448

June 18, 2014

REDACTED FOR PUBLIC INSPECTION

Received & Inspected

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

JUN 19 2014

FCC Mail Room

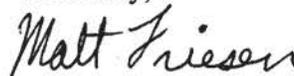
RE: WC Docket No. 10-90, WC Docket No. 11-42
FCC Form 481 – Carrier Annual Reporting of Henderson Cooperative Telephone Co.
SAC 371559
CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE
ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET
NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208,
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

Dear Secretary:

Henderson Cooperative Telephone Company (d/b/a Mainstay Communications) has attached for filing confidential and redacted versions of its FCC Form 481 - Carrier Annual Reporting in accordance with FCC Rules 54.313 and 54.422. Henderson seeks confidential treatment of its financial information in accordance with the FCC's November 16, 2012 Protective Order, DA12-1857. Attached are two copies of the "Redacted Confidential Form 481" and one copy of the "Stamped Confidential Form 481".

If there are any questions, I can be reached at (402) 723-4448.

Sincerely,



Matt Friesen
General Manager

Attachments

cc: Charles Tyler, Telecommunications Access Policy Division (two Stamped Confidential Form 481 copies and cover letter)

No. of Copies rec'd 0+1
List ABCDE

FCC Form 481 - Carrier Annual Reporting Data Collection Form

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

<010> Study Area Code 371559
<015> Study Area Name HENDERSON CO-OP TEL
<020> Program Year 2015
<030> Contact Name: Person USAC should contact with questions about this data Matt Friesen
<035> Contact Telephone Number: 4027234448 ext. Number of the person identified in data line <030>
<039> Contact Email Address: Email of the person identified in data line <030> mrfriesen@mainstaycomm.net

Received & Inspected

JUN 19 2014

FCC Mail Room

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> Unfulfilled Service Requests (voice) 0
<300> Unfulfilled Service Requests (broadband) 0
<310> Detail on Attempts (voice) (attach descriptive document)
<320> Detail on Attempts (broadband) (attach descriptive document)
<400> Number of Complaints per 1,000 customers (voice)
<410> Fixed 0.0
<420> Mobile
<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> 371559ne510.pdf (attached descriptive document)
<600> Functionality in Emergency Situations (check to indicate certification)
<610> 371559ne610.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)?
<1000> Voice Services Rate Comparability (check to indicate certification)
<1010> 371559ne1010.pdf (attach descriptive document)
<1100> Terrestrial Backhaul (Y/N)?
<1110>
<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
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2013
<030> Contact Name - Person USAC should contact regarding this data	Matt Priesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mfrlesen@mainstaycomm.net

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

371559ne112.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	<input type="checkbox"/>
<114> Report how much universal service (USF) support was received	<input type="checkbox"/>
<115> How (USF) was used to improve service quality	<input type="checkbox"/>
<116> How (USF) was used to improve service coverage	<input type="checkbox"/>
<117> How (USF) was used to improve service capacity	<input type="checkbox"/>
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010> Study Area Code	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Matt Friesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mrfriesen@mainstaycomm.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)

REDACTED - FOR PUBLIC INSPECTION

Page 8

(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	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Matt Friesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mrfriesen@mainstaycomm.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)

Page 8

REDACTED - FOR PUBLIC INSPECTION

(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form	July 2013

<010> Study Area Code	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Matt Friesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mrfriesen@mainstaycomm.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

371559el210.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	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	July 2013

<010> Study Area Code	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Matt Priesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mfpriesen@mainstaycomm.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	371559
<015>	Study Area Name	HENDERSON CO-OP TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Matt Friesen
<035>	Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mfriesen@mainstaycomm.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)] (Yes/No) (Yes/No)

(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

371559ne3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No) (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	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Matt Friesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mrfriesen@mainstaycomm.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:	HENDERSON CO-OP TEL
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/16/2014
Printed name of Authorized Officer:	James Mastl
Title or position of Authorized Officer:	Board President
Telephone number of Authorized Officer:	4027234448 ext.
Study Area Code of Reporting Carrier:	371559 Filing Due Date for this form: 06/30/2014
<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>	

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	371559
<015> Study Area Name	HENDERSON CO-OP TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Matt Friesen
<035> Contact Telephone Number - Number of person identified in data line <030>	4027234448 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mrfriesen@mainstaycomm.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) _____ 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: _____
<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	
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: _____
<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

SAC: 371559
Carrier Name: Henderson Cooperative Telephone Company
Location: Henderson, Nebraska
Filing: Form 481 due 07/01/14

Line 100 – Service Quality Improvement Reporting

Henderson Cooperative Telephone Company (“Company”) serves one study area consisting of one exchange (i.e., wire center) located in southeast Nebraska. The study area covers [REDACTED] square miles, serves approximately [REDACTED] subscribers and has an estimated population of slightly over [REDACTED]. The Company received its Eligible Telecommunications Carrier (“ETC”) certification from the Nebraska Public Service Commission (“NPSC”). ETCs receiving high-cost support for voice telephony service and offering broadband as a condition of such support, must file with the Federal Communications Commission (“FCC”) and the relevant state commission (i.e., NPSC) a five-year build-out plan that accounts for the new broadband obligations adopted in the USF/ICC Transformation Order. Pursuant to 47 C.F.R. § 54.202 (a)(1)(ii), the Company submits the following five-year plan for 2015 through 2019 that specifies projected capital expenditures to occur throughout its Henderson exchange study area.

Capital Expenditures	Projected 2015	Projected 2016	Projected 2017	Projected 2018	Projected 2019
GSF - Vehicles	[REDACTED]			[REDACTED]	
COE - Switch	[REDACTED]				
COE - Circuit Equipment	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Totals	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

The proposed capital expenditures are of a type that will benefit all subscribers throughout the study area. The Company’s 2015 through 2019 build-out plan does not include extensive capital expenditures because the Company is already providing service over a 100% Fiber To The Home (“FTTH”) network. The FTTH network was constructed in two phases. Phase I constructed a FTTH network in the town of Henderson in 2008 and 2009 at an approximate cost of \$ [REDACTED]. Phase 2 constructed a FTTH network in all rural areas of the exchange in 2012 and 2013 at an approximate cost of \$ [REDACTED]. The Company will replace its fully depreciated digital switch with a new softswitch in the fall of 2014 at an approximate cost of \$ [REDACTED]. Due to these prior network upgrades, the

Company already offers 100% of its subscribers at least 4 Mbps downstream / 1 Mbps upstream broadband service. The Company currently offers broadband data services at speeds of up to 20 Mbps downstream and 10 Mbps upstream with the capacity to provision higher speeds. If the FCC increases the minimum broadband speed, the Company will be able to technically provision the increased speed to all subscribers assuming sufficient and predictable support mechanisms are received by the Company to permit continued maintenance and support of the existing fiber plant, FTTH electronics and subscriber equipment. Mainstay will periodically re-evaluate its network facilities during the 2015 through 2019 time period to determine if more or less capital expenditures than projected above are indicated based on technical requirements, customer demands and financial feasibility.

SAC: 371559
Carrier Name: Henderson Cooperative Telephone Company
Filing: Form 481 due 07/01/14

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

FCC 47 C.F.R. 54.313(a)(5) and Nebraska Administrative Code, Title 291 – Nebraska Public Service Commission (NPSC), Chapter 5, Section 009.04A5 state that a carrier must certify that it is in compliance with applicable service quality standards and consumer protection rules. Based on its compliance activities described below, Henderson Cooperative Telephone Company (“Company”) certifies that it is in compliance with applicable service quality standards and consumer protection rules.

Service Quality

- The Company’s facilities are designed to meet RUS practices which list minimum technical requirements to deploy in the Company’s voice network to provide reasonable assurance that voice customers receive a consistently high level of service quality. Administrative Code, Title 291 – NPSC, Chapter 5, Section 002.01 through 002.52 sets forth 47 pages of regulations that are applicable to the Company’s local service offering. Interspersed within these regulations are some service quality standards. The Company was in compliance with those NPSC standards during 2013. The Company provides ready access to customer service representatives during normal business hours. On duty personnel promptly respond to issues reported by customers after normal business hours.

Consumer Protection

The Company strives to ensure its customers and their data are protected. Consumer protection compliance procedures include:

- The Company’s rates and terms are listed in its local service tariff which is approved by the NPSC. The tariff is available for consumer viewing at either the Company’s office or the NPSC.
- The Company’s bills separately and clearly identify service charges and taxes.

- The Company complies with the FCC's Customer Proprietary Network Information (CPNI) requirements that safeguard customer information from unauthorized disclosure (47 C.F.R. Part 64, Subpart U).
- The Company complies with the Federal Trade Commission's Identity Theft Red Flag provisions (16 C.F.R. Part 681).
- The Company complies with the FCC's Truth-In-Billing Requirements (47 C.F.R. 64.2400).
- Administrative Code, Title 291 – NPSC, Chapter 5, Section 002.01 through 002.52 sets forth 47 pages of regulations that are applicable to the Company's local service offering. Interspersed within these regulations are some consumer protection standards. The Company was in compliance with those NPSC standards during 2013.

SAC: 371559
Carrier Name: Henderson Cooperative Telephone Company
Filing: Form 481 due 07/01/14

Line 610 – Description of Functionality in Emergency Situations

FCC 47 C.F.R. 54.313(a)(6) and Nebraska Administrative Code, Title 291 – Nebraska Public Service Commission (NPSC), Chapter 5, Section 009.04A6 indicate that a carrier should certify that it is able to function in emergency situations as set forth in section 54.202(a)(2). FCC C.F.R. 54.202(a)(2) states a carrier should: “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”. Based on the actions described below, Henderson Cooperative Telephone Company (“Company”) certifies that it is able to function in emergency situations.

Henderson Cooperative Telephone Company (“Company”) facilities are designed to meet RUS practices so that minimum technical requirements are implemented in the Company’s network to provide reasonable assurance that the Company will be able to meet industry standards with regard to functioning in emergency situations.

If commercial electrical power is lost, the Company has both battery and diesel generator back-up power available to operate central office equipment. Central office equipment normally operates on battery power with the battery being constantly charged. When commercial electrical service is interrupted the fully charged battery is capable of powering the equipment. If electrical power is not restored within a few minutes, then the diesel generator automatically activates to supply electrical power and continue charging the battery. The battery backup can function for several hours should the generator fail to automatically activate or ceases operation. The generator can function nearly indefinitely as long as fuel is available. The generator and batteries are inspected and tested periodically and maintenance is performed when necessary.

The Company has two toll routes extending from its one central office. The Company’s switch and toll facilities are designed to comply with RUS and NPSC traffic handling guidelines. Company personnel receive training that may assist them in responding to power outages, damaged facilities and traffic spikes.

SAC: 371559
Carrier Name: Henderson Cooperative Telephone Company
Filing: Form 481 due 07/01/14

Line 1010 – Description of Voice Service Rate Comparability

In DA 14-384 released March 20, 2014, the FCC announced:

- The average local end user voice rate plus state regulated fees of surveyed ILECs in urban areas was \$20.46 and
- A local end user voice rate is within a reasonable range if it falls within two standard deviation of the national average. The FCC calculated \$46.96 to be two standard deviations above \$20.46.

Based on the above data, Henderson Cooperative Telephone Company's local end user voice rate is below \$46.96 and therefore considered reasonable.

SAC: 371559
Carrier Name: Henderson Cooperative Telephone Company
Filing: Form 481 due 07/01/14

Line 1210 – Terms and Conditions of Voice Telephony Lifeline

Henderson Cooperative Telephone Company (“Company”) offers all residential customers a single party local service priced at \$17.50 per month which includes unlimited local minutes. The Company participates in the Nebraska Telephone Assistance Program (NTAP) administered by the Nebraska Public Service Commission. The NTAP assists qualifying low income individuals by lowering their monthly local service rate. Qualifying low income customers (i.e. lifeline customers) receive a monthly \$12.75 NTAP discount which is credited against their \$17.50 residential local service rate on their monthly telephone bill. To qualify for NTAP, an individual must complete an NTAP application and provide proof of eligibility. After NTAP approves the application, the Company is directed by NTAP to provide the monthly NTAP discount to the eligible customer. Except for the lower price, the NTAP Lifeline monthly local service offering is identical to the regular residential local service offering and includes unlimited local minutes.

The Company does not provide toll (long distance) service. The Company’s customers, including Lifeline customers, are given a list of toll providers from which to select. Customers select the toll provider of their choice along with one of the toll service packages offered by their selected toll provider. The toll charges, if any, that a Lifeline customer may incur are in addition to their monthly local service charge. The Company is not aware of the toll minutes, rates, terms or conditions included in the toll service packages selected by their Lifeline customers.