



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 25, 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 Palmetto Rural Telephone Cooperative, Inc.
Study Area Code 240536**

Dear Ms. Dortch:

On behalf of Palmetto Rural Telephone Cooperative, Inc. (“Palmetto”), 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 Palmetto 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).



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7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
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June 26, 2014

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 Palmetto Rural Telephone Cooperative, Inc.
Study Area Code 240536
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Palmetto Rural Telephone Cooperative, Inc. (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



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

<010> Study Area Code	240536
<015> Study Area Name	PALMETTO RURAL COOP
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Valerie Ancrum
<035> Contact Telephone Number: Number of the person identified in data line <030>	8435389383 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	valerie.ancrum@prtc.coop

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

			<i>(check box when complete)</i>	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">240536SC510.pdf</div>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">240536SC610.pdf</div>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	<input checked="" type="radio"/> <input type="radio"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

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

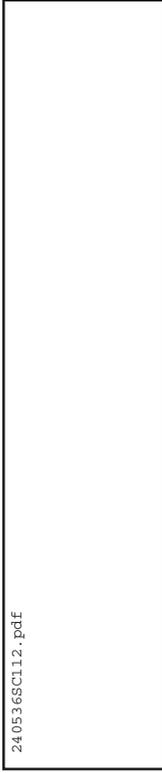
<010>	Study Area Code	240536
<015>	Study Area Name	PALMETTO RURAL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Valerie Ancrum
<035>	Contact Telephone Number - Number of person identified in data line <030>	8435389383 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	valerie.ancrum@prtc.coop

<110> Has your company received its ETC certification from the FCC? (yes / no) (yes / no)

<111> If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC? (yes / no) (yes / no)

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

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



Name of Attached Document

Please check these boxes below to confirm that the attached 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.	

**(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 240536
 <015> Study Area Name PALMETTO RURAL COOP
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Valerie Ancrum
 <035> Contact Telephone Number - Number of person identified in data line <030> 8435389383 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> valerie.ancrum@prtc.coop

<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:

Select (Yes, No, NA)

- <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.

**(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	240536
<015>	Study Area Name	PALMETTO RURAL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Valerie Ancrum
<035>	Contact Telephone Number - Number of person identified in data line <030>	8435389383 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	valerie.ancrum@prtccoop

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

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

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

<010> Study Area Code 240536
 <015> Study Area Name PALMETTO RURAL COOP
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Valerie Ancrum
 <035> Contact Telephone Number - Number of person identified in data line <030> 8435389383 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> valerie.ancrum@prtccoop

240536SC1210.pdf

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<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.

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

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

<010> Study Area Code 240536
 <015> Study Area Name PALMETTO RURAL COOP
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Valerie Ancrum
 <035> Contact Telephone Number - Number of person identified in data line <030> 8435389383 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> valerie.ancrum@prt.c.coop

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

<010> Study Area Code 240536
 <015> Study Area Name PALMETTO_RURAL_COOP
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Valerie Ancrum
 <035> Contact Telephone Number - Number of person identified in data line <030> 8435389383 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> valerie.ancrum@prtc.coop

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)(ii))

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.

Name of Attached Document Listing Required Information

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

Name of Attached Document Listing Required Information (Yes/No)
(Yes/No)

(3014) If yes, does your company file the RUS annual report

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 (Yes/No)

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

240536SC3017.pdf

(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 (Yes/No)

(3018) If the response is no on line 3014, is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

Name of Attached Document Listing Required Information (Yes/No)

(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

Name of Attached Document Listing Required Information

(3026) Attach the worksheet listing required information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240536
<015>	Study Area Name	PALMETTO RURAL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Valerie Ancrum
<035>	Contact Telephone Number - Number of person identified in data line <030>	8435389383 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	valerie.ancrum@prtc.coop

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:	PALMETTO RURAL COOP
Signature of Authorized Officer:	CERTIFIED ONLINE Date 6/12/2014
Printed name of Authorized Officer:	Dewaine Wilson
Title or position of Authorized Officer:	CFO
Telephone number of Authorized Officer:	8435389382 ext.
Study Area Code of Reporting Carrier:	240536 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
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<010>	Study Area Code	240536
<015>	Study Area Name	PALMETTO RURAL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Valerie Ancrum
<035>	Contact Telephone Number - Number of person identified in data line <030>	8435389383 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	valerie.ancrum@prtc.coop

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

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

PALMETTO RURAL TELEPHONE COOPERATIVE, INC. (SAC 240536)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Palmetto Rural Telephone Cooperative, Inc.’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 FCC 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

Palmetto Rural Telephone Cooperative, Inc. (“Palmetto”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Palmetto is subject to consumer protection obligations under both federal and South Carolina state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Public Service Commission of South Carolina which disclose rates, and terms and conditions of service to customers (Section 103-612.2.1 of the South Carolina Code of Regulations); (2) adherence to state consumer protection requirements governing telephone providers which govern Standards and Quality of Service (Sections 103-661, 103-662, and 103-663 of the South Carolina Code of Regulations); Customer Relations, including billing,

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.

deposits, discontinuance and termination of service (Sections 103-620 through 103-633 of the South Carolina Code of Regulations); Engineering and Safety Standards (Sections 103-640 through 103-646 and 103-670 through 103-672 of the South Carolina Code of Regulations); Inspections and Tests (Sections 103-650 through 103-653 of the South Carolina Code of Regulations); Records and Reports (Sections 103-610 through 103-619 of the South Carolina Code of Regulations) and Customer Complaints (Section 103-628 of the South Carolina Code of Regulations); (3) truth-in-billing requirements (Section 103-622.1 of the South Carolina Code of Regulations); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Palmetto 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 47 CFR § 8.3.

Palmetto Rural Telephone Cooperative’s demonstration of ability to function in emergency situations for voice and broadband services:

Palmetto Rural Telephone Cooperative, Inc. (“Palmetto”) hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹ and Section 103-646 of the South Carolina Code of Regulations. Palmetto’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) and Section 103-646 of the South Carolina Code of Regulations. Palmetto can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Palmetto to manage traffic spikes throughout its network, as emergency situations require. In addition, Palmetto has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

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. Palmetto has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Palmetto has access to fuel.

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.”

Palmetto Rural Telephone Cooperative, Inc.

SAC: 240536

Line Number: 1210

2014 Lifeline Terms & Conditions

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in de-enrollment, fines and prosecution.
- Only one Lifeline benefit is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household may not receive Lifeline benefits from multiple providers.
- If a household receives more than one Lifeline benefit, it will be de-enrolled from the program.
- The Lifeline benefit may not be transferred to any other person.

Qualifying Methods

A subscriber may qualify for Lifeline either because he/she or someone in his/her household participates in one of the programs below or because your income is within the following guidelines. **NOTE: A subscriber may receive Social Security and Medicare benefits, but to qualify for Lifeline, must receive benefits from one of the following programs or income must fall within the guidelines.**

Program Eligibility

- Supplemental Nutrition Assistance Program (SNAP)
- Federal Public Housing/Section 8
- Medicaid
- Supplemental Security Income (SSI)
- National School Lunch (NSL) free lunch program
- Low Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF)

Income Eligibility for 2014

Annual Income 135% Thresholds Based on Household Size								
1	2	3	4	5	6	7	8	For each add'l person
\$15,755	\$21,236	\$26,717	\$32,198	\$37,679	\$43,160	\$48,641	\$54,122	+ \$5,481/person

(Note: You will need to provide 3 of your most recent paystubs from the previous 12 months, Social Security Benefit Letter or W-2.)

The subscriber understands that:

1. His/Her household meets the income-based or program-based eligibility criteria for receiving Lifeline, shown above. If annual income exceeds 135% of the Federal Poverty Guidelines, the subscriber will notify the provider.
2. He/She will notify the provider within 30 days if for any reason he/she no longer qualifies to receive Lifeline.
3. He/She will notify the provider within 30 days if he/she moves to a new address or he/she will verify every 90 days that the temporary address is still current.
4. He/She must certify that his/her household is not receiving any other Lifeline benefit and will not apply for an additional one from another wireline or wireless carrier.
5. Giving fraudulent information is punishable by law.
6. He/She may be required to re-certify my continued eligibility for Lifeline and that my failure to re-certify will result in de-enrollment.

Before enrolling in Lifeline, the subscriber will authorize the provider to release his/her information contained in his/her Lifeline Application to the FCC or its designee, including the Universal Service Administrative Company, and to any state and federal agency, as required by law.

Pricing

By enrolling in Lifeline, the subscriber will receive \$9.25 credit from Federal and \$3.00 credit from State towards his/her local service of \$14.35. The total credit of \$12.25 will be applied towards local service on POTS or bundle packages. If a subscriber chooses to have toll calls, they can subscribe to 12 cents per minute, 6 cents per minute and \$3.95 per month, or unlimited minutes for \$25.90. The subscriber will be able to make unlimited local calls.

LOCAL EXCHANGE SERVICE

6.1 APPLICATION OF RATES, CHARGES AND REGULATIONS

6.1.1 Local Flat Rate Service

- A. Local exchange access service rates and charges as specified in this tariff are for only local exchange service and facilities of the Company within the Company's exchange service area as approved by the Commission.
- B. The furnishing of communications services by the Company is also subject to the rates, charges, rules and regulations of this General Exchange Tariff as it now exists or as it may be revised, added to, or supplemented by superseding issues, and these rates are hereby made a part of these local exchange service tariffs.
- C. This tariff cancels and supersedes all other local exchange service tariffs issued and effective prior to the effective date of these tariffs.
- D. Unless otherwise specified, the rates and charges listed in this tariff are payable for a period of one month, in advance, and entitle the customer to unlimited, flat rate calling.
- E. The Palmetto Rural Telephone Cooperative, Inc. offers single party residence and business service throughout its service area.

Effective, January 1, 2002, local service other than single party service is being discontinued and will not be available to new customers. Existing customers will be able to continue to use two party or local service other than single party service. However, when the customer discontinues local service other than single party service and switches to single party local service, the customer will not be able to switch back to local service other than single party service.

- F. Rates and Charges for this service and other miscellaneous services can be found in Section 16 of this Tariff.

Issued:

Effective: Upon Approval of the Commission

**PALMETTO RURAL TELEPHONE COOPERATIVE, INC.
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2471 Jefferies Highway, Walterboro, South Carolina 29488-1577
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LOCAL EXCHANGE SERVICE

6.1 APPLICATION OF RATES, CHARGES AND REGULATIONS (Cont'd)

6.1.2 Local Calling Areas

The local exchange rates authorized by the South Carolina Public Service Commission, listed in Section 16.4, entitle subscribers to access all exchange access lines: (1) bearing the central office designations of the subscriber's exchange, (2) the central office designation(s) of additional exchanges or central offices as follows:

<u>Exchange/NXX</u>	<u>Exchanges in Local Calling Area</u>
COTTAGEVILLE	Hendersonville, Lodge, Walterboro, North Walterboro, South Walterboro, Williams
HENDERSONVILLE	Cottageville, Lodge, Walterboro, North Walterboro, South Walterboro, Williams
LODGE	Cottageville, Hendersonville, Walterboro, North Walterboro, South Walterboro, Williams
WALTERBORO	Cottageville, Hendersonville, Lodge, North Walterboro, South Walterboro, Williams
NORTH WALTERBORO	Cottageville, Hendersonville, Lodge, Walterboro, South Walterboro, Williams
SOUTH WALTERBORO	Cottageville, Hendersonville, Lodge, Walterboro, North Walterboro, Williams
WILLIAMS	Cottageville, Hendersonville, Lodge, North Walterboro, South Walterboro, Walterboro

Issued:

Effective: Upon Approval of the Commission

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**PALMETTO RURAL TELEPHONE COOPERATIVE, INC.
GENERAL EXCHANGE TARIFF
SOUTH CAROLINA**

**SECTION 6
1st REVISED SHEET NO. 4
CANCELS ORIGINAL SHEET NO. 4**

LOCAL EXCHANGE SERVICE

6.2 LIFELINE PROGRAM

6.2.1 General

- A. The Lifeline Program is a telephone assistance program designed to make telephone service available at reduced rates to eligible residential customers.
- B. Eligible customers will receive a credit not to exceed the current federally-mandated Subscriber Line Charge (End User Common Line Charge). The credit will be applied to Basic Local Exchange Service.
- C. The Lifeline Program reduction to Basic Local Exchange Service shall apply only to residential one-party service.
- D. Nothing in this Section shall prohibit a customer who is otherwise eligible for the Lifeline Program from obtaining and using telecommunications equipment and services designed to aid such customer in utilizing qualifying telecommunications services.
- E. The Lifeline Program rate reduction does not apply to Service Connection Charges. (C)
- F. The Lifeline Program rate will not be available on a retroactive basis.

Issued: April 2, 2012

Effective: April 2, 2012

PALMETTO RURAL TELEPHONE COOPERATIVE, INC.

Jason Dandridge, Chief Executive Officer

2471 Jefferies Highway, Walterboro, South Carolina 29488-1577

APPROVED FOR **Email: jason.dandridge@prtc.coop Phone No: (843) 538-2020** **APRIL 09, 2012**

LOCAL EXCHANGE SERVICE

6.2 LIFELINE PROGRAM (Cont'd)

6.2.5 Credit and Collection

A. Credit References

The credit verification procedures used for all applicants who apply for service with the Company will also be used for applicants who apply for service under the Lifeline Program.

B. Deposits

Deposit requirements will be waived for all applicants who qualify for Lifeline Service, as long as the applicants continue to qualify for Lifeline Service.

6.2.6 Service Connection Charges

A. Service charges do not apply to eligible customers with existing residential access line service when they convert to the Lifeline Program.

B. Service Connection Charges will apply when:

1. Existing eligible residential Local Exchange Service customers also convert to a different grade of eligible residential service and/or Optional Calling Services at the time the Lifeline Program billing is initiated.
2. A customer receiving Lifeline Program billing voluntarily elects to convert to telephone service arrangements which preclude Lifeline Program eligibility.
3. New residential applicants (those without existing Local Exchange Service) eligible for the Lifeline Program will be subject to applicable Service Connection Charges.

C. Any subsequent moves or changes after the initial connection to the Lifeline Program will be subject to the applicable Service Charges as outlined in Section 16 of this Tariff.

(C)

Issued: April 2, 2012

Effective: April 2, 2012

PALMETTO RURAL TELEPHONE COOPERATIVE, INC.

Jason Dandridge, Chief Executive Officer

2471 Jefferies Highway, Walterboro, South Carolina 29488-1577

APPROVED FOR PUBLIC INSPECTION BY: Jason Dandridge, Chief Executive Officer, Palmetto Rural Telephone Cooperative, Inc. (843) 638-2020 APRIL 09, 2012

**PALMETTO RURAL TELEPHONE COOPERATIVE, INC.
GENERAL EXCHANGE TARIFF
SOUTH CAROLINA**

**SECTION 16
1ST REVISED SHEET NO. 6
CANCELS ORIGINAL SHEET NO. 6**

RATES AND CHARGES

16.3 SERVICE CHARGES (Cont'd)

16.3.9 Returned Check Charge

Per Occasion

The returned check charge will be equal to, or less than, the rate allowed by S.C. Code Ann. § 34-11-70 (Supp. 1998).

16.3.10 Late Payment Charge

The Company may establish a Late Payment Charge as it deems appropriate subject to the maximum amounts and the exceptions contained in South Carolina Public Service Commission Reg. 103-622.2.

16.4 LOCAL EXCHANGE SERVICE CHARGES

The following charges are assessed for the services listed in Section 6 of this tariff.

16.4.1 Flat Rate Service

		<u>Monthly Rate</u>	
A.	<u>Business</u>		
	One Party	\$28.70	
B.	<u>Residence</u>		
	One Party	\$14.35	
C.	<u>Pay Station</u>		
	Public Telephone Access Service (PTAS)	\$28.70	(1)
D.	<u>PABX and PBX</u>		
	PBX Trunk Lines	\$33.75	
	KEY-PBX Trunk Lines	\$28.70	
E.	<u>Extensions</u>		
	Off-Premises Access	\$ 5.25	
F.	<u>Touch Calling Service (Pushbutton Dialing)</u>		
	Business (per line)	\$ 0.00	
	Residence (per line)	\$ 0.00	

Issued: August 1, 2005

Effective: September 1, 2005

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RATES AND CHARGES

16.4 LOCAL EXCHANGE SERVICE CHARGES (Cont'd)

16.4.2 Verification and Emergency Interrupt Service

- A. Verification Request
 - 1. Each Request..... \$1.25
- B. Emergency Interrupt Request
 - 1. Each Request..... \$1.75

A charge for a Verification Request also applies.

16.5 DIRECTORY LISTING CHARGES

16.5.1 The following charges are assessed for the services listed in Section 7 of this tariff.

	<u>Charges</u>
A. Primary Listing	No Charge
B. Additional Listing	\$0.50
C. Reference Listing	\$0.50
D. Alternate (Directive) Listing	
1. Nights, Sundays and Holidays	\$0.50
2. If No Answer, Dial	\$0.50
E. Foreign Listing	\$0.50
F. Extra Lines of Information in Listing	\$0.50
G. Indented Listing	No Charge
H. Caption Listing	No Charge
I. Temporary Listing	\$0.50
Minimum Charge Per Listing Period	\$2.00
J. Non-Published Number Service	\$1.50

Issued:

Effective: Upon Approval of the Commission

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REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

PALMETTO RURAL TELEPHONE COOPERATIVE, INC. (SAC 240536)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY