



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 Arkwest Communications, Inc.
Study Area Code 401734**

Dear Ms. Dortch:

On behalf of Arkwest Communications, Inc. (“Arkwest”), 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 Arkwest 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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June 25, 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 Arkwest Communications, Inc.
Study Area Code 401734
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Arkwest Communications, 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.

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).

Information of this nature is confidential commercial information routinely withheld from public inspection.

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

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).

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 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	401734
<015> Study Area Name	ARKWEST COMM., INC.
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Carmen Adair
<035> Contact Telephone Number: Number of the person identified in data line <030>	4794954217 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	carmen@arkwest.com

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)				
<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 type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input 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;">401734ar510.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;">401734ar610.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

<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	<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

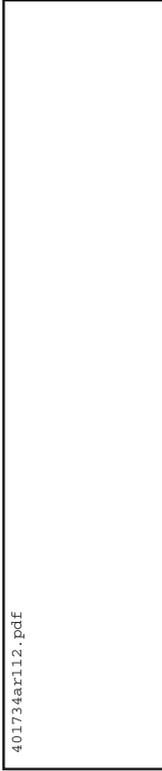
<010>	Study Area Code	401734
<015>	Study Area Name	ARKWEST COMM., INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carmen Adair
<035>	Contact Telephone Number - Number of person identified in data line <030>	4794954217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carmen@arkwest.com

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

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

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

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



Name of Attached Document

Please check these boxes below to confirm that the attached 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 401734
 <015> Study Area Name ARKWEST COMM., INC.
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Carmen Adair
 <035> Contact Telephone Number - Number of person identified in data line <030> 4794954217 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> carmen@arkwest.com

<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	401734
<015>	Study Area Name	ARKWEST COMM., INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carmen Adair
<035>	Contact Telephone Number - Number of person identified in data line <030>	4794954217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carmen@arkwest.com

<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	401734
<015>	Study Area Name	ARKWEST COMM., INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carmen Adair
<035>	Contact Telephone Number - Number of person identified in data line <030>	4794954217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carmen@arkwest.com

401734ar1210.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	401734
<015>	Study Area Name	ARKWEST COMM., INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carmen Adair
<035>	Contact Telephone Number - Number of person identified in data line <030>	4794954217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carmen@arkwest.com

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.

<2010>	Incremental Connect America Phase I reporting	<input type="checkbox"/>
<2011>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
<2012>	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	<input type="checkbox"/>
<2013>	2013 Frozen Support Certification	<input type="checkbox"/>
<2014>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
<2016>	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))	<input type="checkbox"/>
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
<2017>	Connect America Phase II Reporting (47 CFR § 54.313(e))	<input type="checkbox"/>
<2018>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<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.	<input type="checkbox"/>

<2021> Interim Progress Community Anchor Institutions

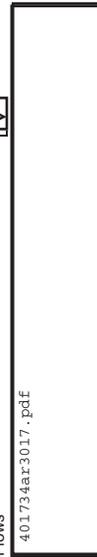
Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 401734
<015> Study Area Name ARKWEST COMM., INC.
<020> Program Year 2015
<030> Contact Name - Person USAC should contact regarding this data Carmen Adair
<035> Contact Telephone Number - Number of person identified in data line <030> 4794954217 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> carmen@arkwest.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

		Name of Attached Document Listing Required Information
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	
(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))	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="checkbox"/> (Yes/No)
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="checkbox"/> (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)	<input checked="" type="checkbox"/>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
(3018)	If the response is no on line 3014, is your company audited?	<input type="checkbox"/> (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	<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>
	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,	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(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	401734
<015>	Study Area Name	ARKWEST COMM., INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carmen Adair
<035>	Contact Telephone Number - Number of person identified in data line <030>	4794954217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carmen@arkwest.com

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. §§ 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	401734
<015> Study Area Name	ARKWEST COMM., INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Carmen Adair
<035> Contact Telephone Number - Number of person identified in data line <030>	4794954217 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	carmen@arkwest.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) <u>Karen Gunkel</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.</p>	
Name of Authorized Agent:	Karen Gunkel
Name of Reporting Carrier:	ARKWEST COMM., INC.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/24/2014
Printed name of Authorized Officer:	John Gowin
Title or position of Authorized Officer:	Accounting Manager
Telephone number of Authorized Officer:	4794954215 ext.
Study Area Code of Reporting Carrier:	401734 Filing Due Date for this form: 07/01/2014
<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>	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	ARKWEST COMM., INC.
Name of Authorized Agent or Employee of Agent:	Karen Gunkel
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/24/2014
Printed name of Authorized Agent or Employee of Agent:	Karen Gunkel
Title or position of Authorized Agent or Employee of Agent:	Staff Consultant - Revenue Requirements
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.227
Study Area Code of Reporting Carrier:	401734 Filing Due Date for this form: 07/01/2014
<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>	

Attachments

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ARKWEST COMMUNICATIONS, INC. (SAC 401734)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Arkwest Communications, Inc.

Study Area Code: 401734

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband

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

Arkwest Communications, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules related to voice service. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) rules prohibiting discrimination and retaliation⁴; 2) the responsibility for safe and adequate service⁵; 3) customer relations requirements including directory listings, customer service, and complaint

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.* at n. 72.

⁴ Arkansas Public Service Commission Telecommunications Providers Rules, Section 1.05 and 1.06

⁵ *Id.* at Section 1.10.

procedures⁶; 4) billing regulations⁷; 5) suspension, termination and reconnection regulations⁸; 6) service standards affecting additions, changes, repairs, service interruptions and emergency response to outages⁹; 7) minimum grade of service¹⁰; 8) maintenance of service provisions¹¹; 9) quality standards¹²; 10) federal Truth-in-Billing Rules at 47 CFR § 64.2401; and 11) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, the Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established by the Arkansas Public Service Commission, the Company discloses rates, terms and conditions on its public web site and the Company complies with applicable federal and state customer protection standards generally applicable to all businesses operating in Arkansas. In addition, the Company adheres 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.

⁶ *Id.* at Section 2.

⁷ *Id.* at Section 5.

⁸ *Id.* at Section 6.

⁹ *Id.* at Section 8.

¹⁰ *Id.* at Section 9.06.

¹¹ *Id.* at Section 10.

¹² *Id.* at Section 11.

Arkwest Communications, Inc.

Study Area Code: 401734

**Response to Line 610 - Ability to Function in Emergency Situations – Voice and
Broadband**

Arkwest Communications, Inc. (“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 The Company’s network is designed to remain functional in emergency situations without an external power source, supporting both voice and broadband service. The Company is also 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 voice traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically related to the provisioning of voice service, the Company is able to function under emergency operations in accordance with numerous Arkansas Public Service Commission Telecommunications Providers Rules, which include the following subparts specific to emergency operations and adequacy of equipment:

1. Section 1.10. Safe and adequate service
2. Section 8.03. Emergency Repair Service
3. Section 8.04. Emergency Response to Outages
4. Section 10.01 Restoration of Service

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.”

5. Section 10.02 Inspection and Repair of Plant Facilities
6. Section 10.03 Central Office Maintenance Program
7. Section 10.05 Local Exchange Carrier Testing Responsibility
8. Section 10.07 Electrical Power Influence
9. Section 10.08 System and Equipment Protection
10. Section 11.01 Adequate Facilities
11. Section 11.06 Emergency Power Operations

These rules require telecommunications service providers to test and maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The Arkansas rules also require that telecommunications service providers equip their central offices with an emergency power source, either on the premises or wired to permit connection of a mobile power unit that is available on short notice with minimal travel time. The Company complies with all of the aforementioned regulations.

Arkwest Communications, Inc.

Study Area Code: 401734

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Arkwest Communications, Inc.'s tariff(s) on file with the Arkansas Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:⁽¹⁾⁽²⁾

Exchange Name	R-1 Rate	Res. EAS Charge
Belleville	\$ 14.40	\$ -
Bluffton	\$ 14.40	\$ -
Casa	\$ 14.40	\$ -
Danville	\$ 14.40	\$ -
Havana	\$ 14.40	\$ -
Ola	\$ 14.40	\$ -
Plainview	\$ 14.40	\$ -

⁽¹⁾ Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Arkansas Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

⁽²⁾ Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (coni)

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- (AT) customers and deposited as special revenues in the State Treasury to the credit of the Telecommunications Equipment Fund. The Company concurs in the tariffed rates and charges approved for Southwestern Bell Telephone Company in Section 19 of its General Exchange Tariff and in any future amendment or revisions to such tariff approved by the Commission. See Section X, Concurrence.
- (AT)

(cT/JYTF) 9. LIFELINE ASSISTANCE PROGRAM

9.1. General

- 9.1.1. The Lifeline Assistance Program provides for a federal credit equal to 100% of the Interstate Subscriber Line Charge a \$2.75 local service reduction.
- 9.1.2. The discounts apply to monthly recurring rates for qualifying residential customers.
- 9.1.3. Discounts are applied to rates and charges for residential telephone service.

9.2. Regulations

- 9.2.1. Regulations specified in Section VII of this tariff or rate schedule apply to Lifeline Service.
- 9.22. Lifeline Service is available only with residence service, excluding foreign exchange service.
- 9.2.3. Lifeline Service is limited to one line per household at the customers primary residence.

924. The named subscriber to the local telecommunications service must

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LOCAL EXCHANGE SERVICE (cont.)

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(RT)(AT) 9. LIFELINE ASSISTANCE PROGRAM

9.1 General

- 9.1.1 This tariff is effective on the date the new FCC rules on Lifeline become effective. Until that time, the existing Lifeline tariff of this ETC remains effective.
- 9.1.2 The Lifeline Assistance Program (hereinafter "Lifeline") is a retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers. Lifeline provides for a federal credit equal to 100% of the Interstate Subscriber Line Charge and a \$175 local service reduction.
- 9.1.3 The discounts apply to monthly recurring rates for qualifying residential customers.
- 9.1.4 Discounts are applied to rates and charges for residential telephone service,
- 9.1.5 The Lifeline Program rate reductions do not apply to long distance service, class services, special features, and other ancillary services which may or may not be tariffed. Eligible customer may obtain these services, where available, at their discretion.
- 9.1.6 The Lifeline Program rate reductions do not apply to service connections charges, however, a customer may qualify and receive assistance under the Link-up program as set forth in this ETC's tariff, independently of the Lifeline program.
- 9.1.7 A customer eligible for the Lifeline program is automatically eligible for the Link-up program. However, a customer may qualify and receive assistance under the Link-up program independently of the Lifeline program.
- 9.1.8 This ETC will implement all special disconnect procedures required for Lifeline customers.
- 9.1.9 This ETC shall not charge Lifeline customers with a monthly Number-Portability charge.
- 9.1.10 This ETC shall offer toll blocking to all qualifying applicants at the time such consumers subscribe to Lifeline service. If the consumer elects to receive toll blocking, that service shall become part of that consumer's Lifeline service. The customer is under no obligation to accept the subscription to toll blocking.

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (coat.)

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(AT) 9. LIFELINE ASSISTANCE PROGRAM (cont)

9.1.11 This ETC shall not collect a service deposit in order to initiate Lifeline service, if the qualifying consumer voluntarily elects toll blocking, where available, otherwise, this ETC may charge a service deposit in the ordinary course of business.

9.2 DESIGNATED LIFELINE PROGRAM SERVICE

9.2.1 General

9.2.1.1 Certain telephone services are specifically part of Lifeline service. Other services are optional. This ETC has a specific Lifeline offering.

9.2.2 This ETC shall offer the following services or functionalities defined to be qualified or designated, Lifeline program services:

1. Single party service
2. Local usage
3. Voice-grade access to the public network
4. Dual tone multi-frequency (DTMF) signaling or its functional equivalent
5. Access to emergency services
6. Access to operator services
7. Access to interexchange services
8. Access to directory assistance services
9. Toll blocking service

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ALL EXCHANGES

YELL COUNTY TELEPHONE COMPANY

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LOCAL EXCHANGE SERVICE (cont)

(AT) 9, LIFELINE ASSISTANCE PROGRAM (cont)

9.3 REGULATIONS

- 9.3.1 All the telecommunications provider rules and general tariffs of this company apply to lifeline service unless specifically in conflict with this Section and schedule
- 9.3.2 Lifeline Service is available only with residence services, excluding foreign exchange service.
- 9.3.3 Lifeline Service is limited to one line per household at the customer's primary residence.

9.4 QUALIFICATIONS

9.4.1 General

9.4.1.1 To qualify for lifeline service, applicants must be participants in certain governmental programs or qualify through a low income threshold.

9.4.2 Qualification through Governmental Program Participation

9.4.2.1 To qualify for lifeline service through governmental program participation applicants must participate in at least one (1) of the following governmental programs:

- 1. Department of Housing and Urban Development
- 2. Medicaid
- 3. Food Stamps
- 4. Supplemental Security Income (SSI)
- 5. Federal Public Housing Assistance Program
- 6. Low income Home Energy Assistance Program
- 7. Temporary Assistance for Needy Families (TANF)
- 8. National School Lunch (NSL) Program's Free Lunch Program

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (cont.)

9. LIFELINE ASSISTANCE PROGRAM (cont)

9.4.3 Qualification through low income eligibility

9.4.3.1. To qualify through low income eligibility, the applicant's income as defined in Sec. 54.400(f) must be at or below 135% of the federal poverty guidelines.

9.5 CERTIFICATION

9.5.1 General

9.5.1.1 Applicants for lifeline must meet the eligibility guidelines. A certification process shall be used to ensure only eligible applicants receive lifeline service.

9.5.2 Certification of eligibility through low income qualification.

9.5.2.1 This ETC intends to participate in the ALIVE Board program established by the Arkansas General Assembly in 2005 through Act 2289 of 2005 to provide a governmentally maintained income qualification certification process that includes self-certification by applicants, under penalty of perjury, that the documentation presented by the applicant accurately represents their annual household income and provides the number of individuals in the household, However, this process will not be in place by June 22, 2005. In the interim period between June 22 2005 and the certification process by the ALIVE Board, this ETC shall contract with a qualified third-party to certify applicants based upon income based eligibility. This ETC shall require the third-party to

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LOCAL EXCHANGE SERVICE (cont.)

9. LIFELINE ASSISTANCE PROGRAM (cont)

establish appropriate procedures that include self-certification by applicants, under penalty of perjury, that the documentation presented by the applicant accurately represents their annual household income and provides the number of individuals in the household. The certifying document shall also include the requirement that the consumer will notify this ETC if the consumer's income exceeds 135% of the Federal Poverty Guidelines. The third party shall provide this ETC with a copy of such procedures. This ETC shall review the procedures to ensure the procedures are appropriate to certify and document income based eligibility for lifeline enrollment. An officer of this ETC shall monitor the third-party certification process and procedures and shall certify at time of enrollment, under penalty of perjury, to the best of the officer's knowledge, that this ETC has procedures in place to review documentation via third-party contract, and that the ETC, via the third-party, was presented with documentation that confirms the consumer's household eligibility, in that the consumer's household income is at or below 135% of the Federal Poverty Guidelines.

9.5.12 As soon as the ALIVE Board certification process is effective, this ETC shall monitor the ALIVE Board to ensure the ALIVE Board establishes appropriate procedures and provides this ETC with a copy of such procedures. This ETC shall review the procedures to ensure the procedures are appropriate to certify and document income based eligibility for lifeline enrollment, An officer of this ETC shall monitor the ALIVE Board certification process and procedures and shall certify at time of enrollment, under penalty of perjury, to the best of the officer's knowledge, that this ETC has procedures in place to review documentation via the ALIVE Board, and that the ETC, via the ALIVE Board, was presented with documentation that confirms the consumer's household eligibility, in that the consumer's household income is at or below 135% of the Federal Poverty Guidelines.

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (cont)

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(A F) 9. LIFELINE ASSISTANCE PROGRAM (cont)

9.5.3 Certification of eligibility through participation in governmental programs.

9.5.3.1 The applicant's eligibility for lifeline service due to participation in governmental programs shall be certified by the applicant in coordination with the governmental entity providing, monitoring, or reviewing program participation. For instance, many programs may be provided by the Department of Human Services, Department of Health, and local school districts. This ETC, through the ALIVE board or the thirdparty, will coordinate with the applicant and the appropriate governmental entity to ensure proper certification. This ETC shall require the third-party to establish appropriate procedures that include self-certification by applicants, under penalty of perjury, that the applicant receives benefits from the eligibility programs and identify the program or programs from which the applicant receives benefits. The certifying document shall also include the requirement that the consumer will notify this ETC if the consumer ceases to participate in the program or programs.

9.6 CONSUMER COMPLAINT RESOLUTION

9.6.1 General

9.6.1.1 The Federal Lifeline Program requires a consumer complaint resolution process. The Arkansas Public Service Commission has detennined in Order No. I of Docket No, 05-038-U that any ETC, which maintains tariffs and is subject to the Public Service Commission's consumer complaint procedures, meet the dispute resolution

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (cont.)

(AT) 9. LIFELINE ASSISTANCE PROGRAM (cont)

requirements for Lifeline. This ETC is subject to the Public Service Commission's consumer complaint procedures and shall use the Public Service Commission's consumer complaint procedures to meet the dispute resolution requirements for Lifeline.

9.7 VERIFICATION OF CONTINUED ELIGIBILITY

9.7.1 General

9.7.1.1 The Lifeline program requires this ETC to annually monitor the continued eligibility of Lifeline participants by evaluating a statistically valid sample of Lifeline customers and report the results of the sample evaluation to USAC.

9.7.2 This ETC shall follow all federal procedures in defining the statistically valid sample and evaluating the eligibility of the participants in the random sample.

9.7.2.1 Subscribers who are part of the random sample and qualify through program based eligibility must prove their continued eligibility by presenting, in person, or sending a copy of their Medicaid card, other Lifeline-qualifying public assistance card, or other authorized documentation to establish continued eligibility in an approved program and self certify under penalty of perjury that they continue to participate in the Lifeline-qualifying public assistance program.

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (cont)

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9. **LIFELINE ASSISTANCE PROGRAM** (cont)

9.7.2.2 Subscribers who are part of the random sample and qualify through income-based eligibility must prove their continued eligibility by presenting, to the ALIVE Board or the third-party contractor, current documentation consistent with the procedures set forth above. These subscribers with income-based eligibility, must self-certify, under penalty of perjury, the number of individuals in their household and that the documentation presented accurately represents their annual household income.

9.8 **PROCESS FOR TERMINATION OF LIFELINE BENEFITS**

9.8.1 **General**

9.8.1.1 A consumer's eligibility for Lifeline maybe terminated due to failure to maintain qualifications for Lifeline. This ETC shall follow the required process for termination of Lifeline benefits.

9.8.2 **Process**

9.8.2.1 Customers will be notified of the impending termination of Lifeline benefits in a letter separate from the consumer's monthly bill.

9.8.2.2 The customer will have up to sixty (60) days from the date of the termination letter in which to demonstrate his or her continued eligibility before Lifeline support is discontinued.

9.8.2.3 A customer who appeals must present proof of continued eligibility consistent with the above Lifeline qualifications.

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YELL COUNTY TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (cont.)

ARK. PUBLIC SERVICE COMMISSION
 DEPARTMENT OF REVENUE
 SECRETARIAL DIVISION

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9. LIFELINE ASSISTANCE PROGRAM (cont)

9.814 This ETC will terminate Lifeline services for subscribers who fail to demonstrate continued eligibility within the sixty (60) day time period.

9.9 RECORD RETENTION POLICY

9,9,1 General

9.9.1.1 The Federal Communications Commission has established specific record retention requirements for the Lifeline certification process. This ETC will have specific procedures to ensure its record retention policy complies with legal requirements.

9.9.1.2 This ETC, through its own recordkeeping or through the recordkeeping of the ALIVE Board and its third-party contractor on behalf of this ETC, shall maintain certification records for the period of time required by the Federal Communications Commission for all Lifeline participants.

9.9.1.3 This ETC shall retain certifications, signed by the subscriber, regarding the consumer's eligibility for Lifeline, including self-certifications, that income documentation accurately reflects the household income. This certification shall be retained at least as long as the consumer receives Lifeline service from this ETC or until this ETC is audited by the Administrator. This ETC shall maintain certifications for subscribers terminating Lifeline service for at least three (3) years after termination. Such records shall be maintained in compliance with all federal and Public Service Commission requirements and such records shall be provided to the Administrator or the Public Service Commission upon proper request.

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