Your business is our business.

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

REDACTED – FOR PUBLIC INSPECTION

June 27, 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 Reservation Telephone Cooperative
Study Area Code 381632

Dear Ms. Dortch:

On behalf of Reservation Telephone Cooperative ("Reservation"), 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] Reservation 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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REDACTED – FOR PUBLIC INSPECTION

June 27, 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 Reservation Telephone Cooperative
Study Area Code 381632
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Reservation Telephone Cooperative (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.

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[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

FCC Form 481 - Carrier Annual Reporting Data Collection Form

REDACTED FOR PUBLIC INSPECTION

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Shane Hart
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	shaneh@restel.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	✓	
<200> Outage Reporting (voice)	(complete attached worksheet)	✓	✓
<210> ✓ <-- check box if no outages to report		✓	
<300> Unfulfilled Service Requests (voice) 674			
<310> Detail on Attempts (voice) 381632nd310.pdf	(attach descriptive document)	✓	
<320> Unfulfilled Service Requests (broadband) 368		✓	
<330> Detail on Attempts (broadband) 381632nd330.pdf	(attach descriptive document)	✓	
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed 0.0		✓	✓
<420> Mobile 0.0			
<430> Number of Complaints per 1,000 customers (broadband)		✓	
<440> Fixed 0.0			
<450> Mobile 0.0			
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	✓	✓
<510> 381632nd510.pdf	(attached descriptive document)	✓	✓
<600> Functionality in Emergency Situations	(check to indicate certification)	✓	✓
<610> 381632nd610.pdf	(attached descriptive document)	✓	✓
<700> Company Price Offerings (voice)	(complete attached worksheet)	✓	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	✓	
<800> Operating Companies and Affiliates	(complete attached worksheet)	✓	✓
<900> Tribal Land Offerings (Y/N)? ● ○	(if yes, complete attached worksheet)	✓	
<1000> Voice Services Rate Comparability	(check to indicate certification)	✓	
<1010>	(attach descriptive document)		
<1100> Terrestrial Backhaul (Y/N)? ● ○	(if not, check to indicate certification)		
<1110>	(complete attached worksheet)		
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)		✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)		
<2005>	(complete attached worksheet)		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	✓	
<3005>	(complete attached worksheet)	✓	

(100) Service Quality Improvement Reporting Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.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 §54.202(a) "5 year plan" filed with the FCC?	(yes / no) ○ ○

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

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

351322ia112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	☐
<114>	Report how much universal service (USF) support was received	☐
<115>	How (USF) was used to improve service quality	☐
<116>	How (USF)was used to improve service coverage	☐
<117>	How (USF) was used to improve service capacity	☐
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	☐

(200) Service Outage Reporting (Voice)
Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**

-- See attached worksheet --

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	**Total Rate and Fees**	**Broadband Service - Download Speed (Mbps)**	**Broadband Service - Upload Speed (Mbps)**	**Usage Allowance (GB)**	**Usage Allowance Action Taken When Limit Reached {*select*}**

-- See attached worksheet --

(800) Operating Companies
Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<810>	Reporting Carrier	Reservation Telephone Cooperative
<811>	Holding Company	
<812>	Operating Company	

<813>	<a1>	<a2>	<a3>
	Affiliates	**SAC**	**Doing Business As Company or Brand Designation**

(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	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

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

Fort Berthold Reservation - Three Affiliated Tribes of Mandan, Hidatsa and Arikara Nation

<920> Tribal Government Engagement Obligation

381632nd920.pdf

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

(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	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.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	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website HTTP http://www.reservation-telephone.com/phone/lifeline/

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ✓

<1222> Details on the number of minutes provided as part of the plan, ✓

<1223> Additional charges for toll calls, and rates for each such plan. ✓

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

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.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.

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

REDACTED FOR PUBLIC INSPECTION

(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	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.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.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification {47 CFR § 54.313(f)(1)(i)}

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

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

Name of Attached Document Listing Required Information

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

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

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☑

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

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

381632nd3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited? (Yes/No) ○ ○

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

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

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

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

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

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

(3024) Underlying information subjected to an officer certification. ☐

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

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
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<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.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

I certify that (Name of Agent) John Staurulakis, Inc. **is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.**

Name of Authorized Agent: John Staurulakis, Inc.

Name of Reporting Carrier: RESERVATION TEL COOP

Signature of Authorized Officer: CERTIFIED ONLINE Date: 06/26/2014

Printed name of Authorized Officer: Shane Hart

Title or position of Authorized Officer: Assistant GM

Telephone number of Authorized Officer: 7018623115 ext.

Study Area Code of Reporting Carrier: 381632 Filing Due Date for this form: 07/01/2014

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier

I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.

Name of Reporting Carrier: RESERVATION TEL COOP

Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.

Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/26/2014

Printed name of Authorized Agent or Employee of Agent: Cassandra Heyne

Title or position of Authorized Agent or Employee of Agent Consultant

Telephone number of Authorized Agent or Employee of Agent: 3014597590 ext.

Study Area Code of Reporting Carrier: 381632 Filing Due Date for this form: 07/01/2014

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.

Attachments

REDACTED – FOR PUBLIC INSPECTION

RESERVATION TELEPHONE COOPERATIVE, INC. (SAC 381632)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Reservation Telephone Cooperative

Line 310 – Detail on Unfulfilled Service Requests for Voice Service for 2013

In 2013, Reservation Telephone Cooperative ("RTC") received 674 requests for voice service that could not be fulfilled in a timely manner. RTC is located in the region of North Dakota that is experiencing a population boom due to the Bakken oil industry. The Bakken Oilfield is now producing one million barrels of oil per day and increasing. This production has a direct impact on the increase in population and in turn a demand for RTC's services. As such, people are moving to RTC's service area in unprecedented numbers. RTC tries to accommodate all requests for service as quickly as possible, but the requests outweigh RTC's resources. All 674 requests for voice service were a result of new construction and population growth in the RTC service area. In order to improve its ability to fulfill requests for service, RTC has hired additional employees and invested in additional equipment to help manage service requests. RTC also has a shortened construction season due to harsh climate, which adds to the delay to build lines to new homes in the service area.

Reservation Telephone Cooperative

Line 330 – Detail on Unfulfilled Service Requests for Broadband Service for 2013

Since August 3, 2013 when the rule to track unfulfilled requests for broadband service became effective, Reservation Telephone Cooperative ("RTC") received 368 requests for broadband service that could not be fulfilled in a timely manner. RTC is located in the region of North Dakota that is experiencing a population boom due to the Bakken oil industry. The Bakken Oilfield is now producing one million barrels of oil per day and increasing. This production has a direct impact on the increase in population and in turn a demand for RTC's services. As such, people are moving to RTC's service area in unprecedented numbers. RTC tries to accommodate all requests for service as quickly as possible, but the requests outweigh RTC's resources. All 386 requests for broadband service were a result of new construction and population growth in the RTC service area. In order to improve its ability to fulfill requests for service, RTC has hired additional employees and invested in additional equipment to help manage service requests. RTC also has a shortened construction season due to harsh climate, which adds to the delay to build lines to new homes in the service area.

Reservation Telephone Cooperative's Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

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]

Reservation Telephone Cooperative ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price

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[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.

service alternatives (69-09-05-01), discontinuance of telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

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

Reservation Telephone Cooperative's Ability to Function in Emergency Situations

Reservation Telephone Cooperative hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)[1] and North Dakota Administrative Code 69-09-05-12. The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is either supplied with permanent standby generators or is generator-ready, and battery back-up that enables the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain a minimum 8 hours of battery reserve rated for peak traffic load requirements, and an auxiliary power unit is installed which can be delivered and connected within four hours. The Company has permanent generators at Ray, Tioga, Crosby, Epping MMDS, Bowbells MMDS, and Round Prairie Jct. locations, and has the ability to connect portable generators at all locations. The Company has three portable generators to move to different sites in the event of a sustained commercial power loss. Length of run time is

[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."

determined by the equipment serving the area and the number of customers working out of the equipment. Generators will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

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(700) Price Offerings including Voice Rate Data
Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
ND	EMMET		FR	15.0	0.0	0.0	1.3	16.3
ND	KENMARE		FR	15.0	0.0	0.0	0.3	15.3
ND	GARRISON		FR	15.0	0.0	0.0	1.2	16.2
ND	NORMA		FR	15.0	0.0	0.0	1.0	16.0
ND	PLAZA		FR	15.0	0.0	0.0	0.8	15.8
ND	DOUGLAS		FR	15.0	0.0	0.0	1.6	16.6
ND	SQUAW GAP		FR	15.0	0.0	0.0	1.5	16.5
MT	SQUAW GAP		FR	15.0	0.0	0.0	1.5	16.5
ND	ARNEGARD		FR	15.0	0.0	0.0	3.0	18.0
ND	NEW TOWN		FR	15.0	0.0	0.0	2.4	17.4
ND	KEENE		FR	15.0	0.0	0.0	2.9	17.9
ND	MAX		FR	15.0	0.0	0.0	1.5	16.5
ND	MAKOTI		FR	15.0	0.0	0.0	0.7	15.7
ND	ROSEGLEN		FR	15.0	0.0	0.0	2.3	17.3
ND	ROSS		FR	15.0	0.0	0.0	1.1	16.1
ND	RYDER		FR	15.0	0.0	0.0	0.5	15.5
ND	MANDAREE		FR	15.0	0.0	0.0	3.0	18.0
ND	ALEXANDER		FR	15.0	0.0	0.0	3.0	18.0
ND	WATFORD CITY		FR	15.0	0.0	0.0	3.0	18.0
ND	SPENCER		FR	15.0	0.0	0.0	1.0	16.0
ND	PARSHALL		FR	15.0	0.0	0.0	2.6	17.6

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

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

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	Total Rates and Fees	**Broadband Service - Download Speed (Mbps)**	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
ND	ALL	39.95	0.0	39.95	6.0	1.0	0.0	Other, no usage allowance

RTC

December 16, 2013

Tex Hall, Chairman
Three Affiliated Tribes of Mandan, Hidatsa and Arikara Nation
404 Frontage Road
New Town, ND 58763-9404

Dear Chairman Hall:

Reservation Telephone Cooperative ("RTC"), your independent telecommunications provider serving over 7,000 customers throughout 20 exchanges in Northwestern North Dakota respectfully requests to engage with the Three Affiliated Tribes of the Fort Berthold Reservation about potential opportunities for broadband expansion on Tribally-owned lands within our service area. RTC wishes to build upon our existing relationship with the Three Affiliated Tribes to ensure that the telecommunications needs of your community are met by our company. Finally, RTC would like to confirm with the Tribal Council that the company has consistently and earnestly engaged with officials, residents and businesses of the Fort Berthold Reservation in 2013 on matters related to broadband expansion on Tribal lands.

In November 2011, the Federal Communications Commission ("FCC") comprehensively reformed the Universal Service Fund ("USF") which helps companies like RTC provide state-of-the-art communications services in high-cost and rural areas. Among the reforms, the FCC adopted a rule requiring Eligible Telecommunications Carriers who receive high-cost USF support to engage with Tribal leaders about broadband deployment on Tribally-owned lands and report annually on five specific outreach activities. In July 2012, the FCC's Office of Native Affairs Policy ("ONAP") issued specific guidance on outreach and engagement activities between telecommunications providers and Tribal governments.

RTC has a long history of dedicated involvement with the Fort Berthold Reservation. RTC has been providing voice telephone service to residents and businesses on the Fort Berthold Reservation since 1951. Approximately 85% of residents have access to high speed internet at speeds of up to 6/1 Mbps. RTC is also in the process of upgrading to a fiber-to-the-home (FTTH) broadband network. Some Fort Berthold customers are already on the fiber network and others will be upgraded to the fiber network soon. Once the fiber network is complete, 100% of residents will have access to high speed internet with nearly limitless speeds. With FTTH, customers can use, participate in, and enjoy broadband-enabled applications such as distance learning and healthcare, streaming HD video, and much more.

Royce S. Aslakson
CEO/General Manager

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As of the end of 2013, the FTTH project on the Fort Berthold Reservation is 75% complete, and the company expects to be 100% complete in 2015. RTC also received $21.9M in stimulus funds from the American Recovery and Reinvestment Act in 2010 to expand broadband on the Fort Berthold Reservation, and we wish to work with you to ensure that these funds are used in ways where your community derives the greatest benefit.

In addition to providing state-of-the-art telecommunications services to the Fort Berthold Reservation, RTC actively supports the community through donations and sponsorships. Some of RTC's contributions and community involvement on the Reservation include: local Head Start programs and daycares, the Parshall Resource Center, Mandaree VFW Post #9061, local fire and ambulance squads, the Fort Berthold Community College Livestock Achievement Days, school and extracurricular groups, drug prevention programs in Reservation schools, the MHA Education Department, employee appreciation and Christmas parties for tribal employers, among many other things. Thanks to our partnership with BEK Sports we've been able to televise the Little Shell Powwow, Tribal Energy Summit, and high school sporting events on the Reservation.

Given our pre-existing relationship and that RTC and the leaders of the Fort Berthold Reservation have been actively engaged about broadband deployment for years, we believe that complying with the FCC's Tribal engagement obligations in 2013 was straight-forward for both parties and the requirements can be satisfied by a meeting to review what our company has done on the Fort Berthold Reservation in 2013 and what needs you may have going forward.

As explained above, RTC is now required to report to the FCC annually on Tribal Outreach activities, and RTC seeks your concurrence that the company considered the following items during interactions with the Tribal government in 2013. Specific examples are provided for each item.

1. Needs assessment and deployment planning focused on anchor institutions:

- RTC provides broadband to the following anchor institutions: Three Affiliated Tribes Administration Building, numerous other tribal offices and programs, White Shield School, New Town Public Schools, Parshall Public Schools, Fort Berthold Community College, Parshall Public Library, New Town Public Library, Elbowoods Memorial Healthcare Center, Minne-Tohe Clinic, Trinity Community Clinic in New Town, Parshall Medical Center, Northeast Segment Health Center, White Shield Clinic, Mandaree Field Clinic, Three Affiliated Tribes Fire Management Program, New Town Fire Department, Parshall Fire Department, New Town ambulance squad, Parshall ambulance squad, Three Affiliated Tribes Police Department, New Town Police Department, and Fort Berthold Rural Water.

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Looking forward, RTC is committed to working with the Three Affiliated Tribes to ensure that state-of-the-art broadband services are provided to schools, libraries, health care centers, and Tribal government offices. We are available and willing to discuss options for building or upgrading broadband networks at any of your community's anchor institutions. Additionally, we are interested in learning if residents and businesses on the Fort Berthold Reservation have needs for any of the other services our company provides, such as high definition surveillance cameras, phone systems, TV service, and specialized circuits and internet connections.

2. Feasibility and sustainability planning:

RTC evaluates potential broadband projects on a number of factors, including whether the project is technically and financially feasible and whether there is an opportunity for a return on investment. RTC is committed to providing broadband to all customers within our service area, which includes a large portion of the Fort Berthold Reservation. RTC is using stimulus funding specifically to improve broadband access on the Fort Berthold Reservation, which increases both the feasibility and sustainability of broadband projects.

In 2013, RTC worked with the Three Affiliated Tribes to develop feasibility and sustainability plans; and discuss opportunities and challenges associated with any potential broadband build-out and upgrade projects.

3. Marketing Services in a Culturally Sensitive Manner

RTC has consistently recognized and respected any cultural attributes of the Three Affiliated Tribes in our marketing efforts and when we communicate with the Tribal council. RTC is interested in learning about ways in which we can be more in-tune with your culture and heritage. RTC invites members of the Three Affiliated Tribes to keep us informed about cultural events in the community, and we are willing to work with members of the Three Affiliated Tribes to develop marketing materials tailored to your needs. RTC has always employed tribal members and we currently employ 10 tribal members. Both of our customer service locations are located on Fort Berthold. RTC is headquartered in Parshall and we recently opened a second office in New Town.

4. Rights of Way and Other Permitting and Review Processes

As RTC has been providing service on the Fort Berthold Reservation for 62 years, we are well familiarized with your rights of way and land use permitting processes. RTC continues to work with Dakota Land Services to help with coordinating easements, as the scope of our project was too large for our in-house easement team. RTC wishes to stay informed about your rights of way and land use permitting processes so that potential broadband projects can move forward quickly and efficiently, where your community receives the greatest benefit. RTC would like for you to provide a current list of all pertinent rights of way, land use, easement, zoning, and

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RTC

permitting processes that the company would need to comply with in any broadband construction projects. Please also inform us how any of these processes can be expedited.

5. Compliance with Tribal Business and Licensing Requirements

RTC is also well familiarized with your Tribal business and licensing requirements, and responds to them as requested.

Looking ahead, RTC is committed to maintaining a strong relationship and a high level of engagement with the Three Affiliated Tribes. We are interested in working together to develop plans to provide service to new construction sites and residential developments affiliated with the newly planned oil refinery on the Reservation. We hope that RTC and the Three Affiliated Tribes will collaborate on new ways to bring economic development to the Fort Berthold Reservation by ensuring that residents and businesses have advanced telecommunications and broadband services.

RTC looks forward to a new year of productive and mutually-beneficial engagement with the Three Affiliated Tribes.

Sincerely,

Royce S. Aslakson

Royce S. Aslakson
CEO/General Manager

Royce S. Aslakson
CEO/General Manager

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web: www.RTC.coop

I, Tex Hall, Chairman of the Three Affiliated Tribes of the Fort Berthold Reservation, certify that the information in this letter is accurate. Reservation Telephone Cooperative met the Federal Communications Commission's criteria for Tribal engagement with the Three Affiliated Tribes in the calendar year 2013.

Signed: Tex G Hall

Date: 4-10-14

REDACTED – FOR PUBLIC INSPECTION

RESERVATION TELEPHONE COOPERATIVE, INC. (SAC 381632)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY