



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 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 Bulloch Telephone Cooperative
Study Area Code 220348**

Dear Ms. Dortch:

On behalf of Bulloch Telephone Cooperative (“Bulloch”), 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 Bulloch 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 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 Bulloch Telephone Cooperative
Study Area Code 220348
Request for Confidentiality**

Dear Ms. Dortch:

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

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).

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

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

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

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

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

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

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

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

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

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

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

Please contact the undersigned with any questions regarding this request.

Sincerely,



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

<010> Study Area Code	220348
<015> Study Area Name	BULLOCH COUNTY RURAL
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	John Scott
<035> Contact Telephone Number: Number of the person identified in data line <030>	9128651139 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	johnscott@bulloch.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

(check box when complete)

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<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"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<input type="text" value=""/> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<input type="text" value=""/> (attach descriptive document)	<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"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <input type="text" value="220348ga510.pdf"/> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <input type="text" value="220348ga610.pdf"/> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <input type="text" value=""/> (attach descriptive document)		<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input 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	220348
<015>	Study Area Name	BULLOCH COUNTY RURAL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Scott
<035>	Contact Telephone Number - Number of person identified in data line <030>	9128651139 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	johnscott@bulloch.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.

220348ga112.pdf

<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.

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.

**(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	220348
<015>	Study Area Name	BULLOCH COUNTY RURAL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Scott
<035>	Contact Telephone Number - Number of person identified in data line <030>	9128651139 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	johnscott@bulloch.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	220348
<015>	Study Area Name	BULLOCH COUNTY RURAL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Scott
<035>	Contact Telephone Number - Number of person identified in data line <030>	9128651139 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	johnscott@bulloch.com



<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

<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	220348
<015>	Study Area Name	BULLOCH COUNTY RURAL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Scott
<035>	Contact Telephone Number - Number of person identified in data line <030>	9128651139 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	johnscott@bulloch.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"/>
<2017>	Certification Support Used to Build Broadband	<input type="checkbox"/>
<2018>	Connect America Phase II Reporting {47 CFR § 54.313(e)}	<input type="checkbox"/>
<2018>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2019>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>		<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	<input type="checkbox"/>

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

<01D> Study Area Code 220348
<01S> Study Area Name BULLOCH COUNTY RURAL
<02D> Program Year 2015
<03D> Contact Name - Person USAC should contact regarding this data John Scott
<03S> Contact Telephone Number - Number of person identified in data line <03D> 9128651139 ext.
<039> Contact Email Address - Email Address of person identified in data line <03D> johnscott@bullloch.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)(ii))
- (3011) Name of Attached Document Listing Required Information
- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))
Name of Attached Document Listing Required Information
- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
- (3014) If yes, does your company file the RUS annual report
- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
- (3016) Name of Attached Document Listing Required Information (Yes/No)
- (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?
- (3019) 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
Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications
- (3020) Management letter issued by the independent certified public accountant that performed the company's financial audit.
- (3021) 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:
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) Name of Attached Document Listing Required Information 220348ga3026.pdf
- (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	220348
<015>	Study Area Name	BULLOCH COUNTY RURAL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Scott
<035>	Contact Telephone Number - Number of person identified in data line <030>	9128651139 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	johnscott@bulloch.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	220348
<015>	Study Area Name	BULLOCH COUNTY RURAL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Scott
<035>	Contact Telephone Number - Number of person identified in data line <030>	9128651139 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	johnscott@bulloch.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) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>John Staurulakis, Inc.</u>	
Name of Reporting Carrier: <u>BULLOCH COUNTY RURAL</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/27/2014</u>
Printed name of Authorized Officer: <u>John Scott</u>	
Title or position of Authorized Officer: <u>General Manager</u>	
Telephone number of Authorized Officer: <u>9128651100 ext.</u>	
Study Area Code of Reporting Carrier: <u>220348</u>	Filing Due Date for this form: <u>07/01/2014</u>
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: <u>BULLOCH COUNTY RURAL</u>	
Name of Authorized Agent or Employee of Agent: <u>John Staurulakis, Inc.</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>06/27/2014</u>
Printed name of Authorized Agent or Employee of Agent: <u>Bob Ragsdale</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Manager - Regulatory Affairs</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>7705692105 ext.</u>	
Study Area Code of Reporting Carrier: <u>220348</u>	Filing Due Date for this form: <u>07/01/2014</u>
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

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BULLOCH TELEPHONE COOPERATIVE (SAC 220348)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

The Bulloch Telephone Cooperative’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.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

Bulloch Telephone Cooperative, Inc. (“Bulloch”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Bulloch is subject to consumer protection obligations under Georgia state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Rules of the Georgia Public Service Commission which discloses rates, and terms and conditions of service to customers

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.

(Chapter 515-12-1-.02(5)(a) and .04(5) of the Rules of the Georgia Public Service Commission); (2) adherence to state consumer protection requirements governing telephone providers which require Service Standards (Chapter 515-12-1-.17 and .18 of the Rules of the Georgia Public Service Commission); Customer Billing (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission); and Customer Complaints (Chapter 515-12-1-.08 of the Rules of the Georgia Public Service Commission); (3) truth-in-billing requirements (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission); and (4) 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.

The Bulloch Telephone Cooperative's demonstration of ability to function in emergency situations for voice and broadband services:

Bulloch Telephone Cooperative, Inc. ("Bulloch") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. §54.202(a)(2)¹ and Chapter 515-12-1-.11(4) of the Rules of the Georgia Public Service Commission. Bulloch's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by 47 C.F.R. §54.202(a)(2) and Chapter 515-12-1-.11(4) of the Rules of the Georgia Public Service Commission. Bulloch can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Bulloch to manage traffic spikes throughout its network, as emergency situations require. In addition, the Company has redundancy for connectivity purposes via additional routes and electronic equipment for both voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Bulloch has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment.

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

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

GENERAL SUBSCRIBER SERVICES TARIFF

Bulloch Telephone Cooperative, Inc.

Section C
Ninth Revised Sheet 3
Cancels Eighth Revised Sheet 3**LOCAL EXCHANGE SERVICE**

C.2 Local Monthly Exchange Services Rates (continued)

b. As noted above for the respective exchanges the following monthly rates apply:

<u>Base Rates</u>	<u>Residential</u>	<u>Business</u>	
			(D)

Network Access Line Rate - Touch Tone

Anderson, Brooklet, Clito, Portal and Stilson	\$ 17.18	\$ 19.54	(I)
Nevils	\$ 19.28	\$ 19.54	(I)

PBX/KEY System Access Trunk - Touch Tone

Anderson, Brooklet, Clito, Portal and Stilson	\$ N/A	\$ 23.24
Nevils	\$ N/A	\$ 24.74
DID Access Line Trunk and \$10.00 per 20 numbers used as reserve	\$ N/A	\$ 60.00
	<u>Installation Charge</u>	<u>Monthly Rate</u>
Establish trunk group and provide first group of 100 DID numbers	\$1,200.00	\$ 50.00
Each additional group of 100 DID numbers	\$ 120.00	\$ 50.00
DID Trunk Termination, each	\$ 100.00	\$ 50.00

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GENERAL SUBSCRIBER SERVICES TARIFF

Bulloch Telephone Cooperative, Inc.

Section Z
Second Revised Sheet 3
Cancels First Sheet 3**OBSOLETE SERVICE OFFERINGS**

Z.2 a. The following monthly rates apply:

<u>Base Rates</u>	<u>Residential</u>	<u>Business</u>	
<u>Network Access Line Rate - Rotary Dial</u>			
Anderson, Brooklet, Clito, Portal and Stilson	\$ 15.68	\$ 18.68	(I)
Nevils	\$ 17.78	\$ 19.54	(I)
 <u>PBX/KEY System Access Trunk - Rotary Dial</u>			
Anderson, Brooklet, Clito, Portal and Stilson	\$ N/A	\$ 20.24	
Nevils	\$ N/A	\$ 21.74	

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GENERAL SUBSCRIBER SERVICES TARIFF

Bulloch Telephone Cooperative, Inc.

Section D
Third Revised Sheet 7

SERVICE CHARGES

D.1 Service Connections Charges (Cont'd)

D.1.8 Low Income Programs

The Cooperative, as part of its obligations as an Eligible Telecommunications Carrier, offers Lifeline Assistance, a low-income assistance program. This program is offered under the terms and conditions provided below: (T)

1. Lifeline Assistance

A. General

Lifeline Assistance reduces an eligible customer's monthly rates for local service. An eligible customer receives a federally subsidized credit toward the monthly cost of basic telephone service toward the residential access line rate. (T)

B. Regulations

To constitute a qualifying low-income customer eligible to receive Lifeline services, a customer must meet the requirements set forth in either paragraph 1. or 2. below: (N)

1. A customer's household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size;

(a) For purposes of these rules, "income" is defined as all income actually received by all members of a household. This includes salary before deductions for taxes, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, lottery winnings, and the like. The only exceptions are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like. (N)

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GENERAL SUBSCRIBER SERVICES TARIFF

Bulloch Telephone Cooperative, Inc.

Section D
Second Revised Sheet 8**SERVICE CHARGES**

D.1 Service Connections Charges (Cont'd)

D.1.8 Low Income Programs (Cont'd)

B. Regulations (Cont'd)

- (b) A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen (18) years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen (18) living with their parents or guardians are considered to be part of the same household as their parents or guardians.

2. Lifeline Assistance is also available to all residential customers who participate in any of the following low income assistance programs:

- (a) Supplemental Security Income (SSI)
- (b) Supplemental Nutrition Assistance Program (SNAP)
- (c) Medicaid
- (d) Federal Public Housing Assistance/Section 8
- (e) Low Income Home Energy Assistance Program (LIHEAP)
- (f) Temporary Assistance to Needy Families (TANF)
- (g) National School Lunch Program's Free Lunch Program
- (h) Low Income Senior Citizen Discount Plan on Power or Gas

3. In addition to meeting the qualifications provided in paragraph 1. or 2. of this section, in order to constitute a qualifying low-income customer, a customer must not already be receiving a Lifeline service, and there must not be anyone else in the subscriber's household subscribed to a Lifeline service.

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Bulloch Telephone Cooperative, Inc.

Section D
Second Revised Sheet 9**SERVICE CHARGES**

D.1 Service Connections Charges (Cont'd)

D.1.8 Low Income Programs (Cont'd)

4. Qualifying subscribers must provide the Company with acceptable documentation as proof of their eligibility to receive Lifeline service under the income-based or program-based requirements. The Company will confirm a subscriber's continued eligibility to receive Lifeline service on an annual basis by requiring the subscriber to sign a certification as to his/her present qualifications for Lifeline service. Upon a determination of ineligibility, the credit will be discontinued on the bill if the customer fails to provide proof of eligibility within thirty (30) days following written notification to the customer.
5. If the Company receives notification from the program administrator that the subscriber is receiving Lifeline service from another eligible telecommunications carrier or that more than one member of a subscriber's household is receiving Lifeline service, the subscriber will be de-enrolled from Lifeline Assistance without notice within five (5) business days following the Company's receipt of that notice.
6. The Company will process all applications and apply the appropriate credit on the customer's monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline Assistance.
7. As a participant in Lifeline Assistance, customers are eligible to receive Toll Limitation Service at no charge. This service will only be provided at the customer's request.
8. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.

(N)

(N)

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GENERAL SUBSCRIBER SERVICES TARIFF

Bulloch Telephone Cooperative, Inc.

Section D
First Revised Sheet 9.1

SERVICE CHARGES

D.1 Service Connections Charges (Cont'd)

D.1.8 Low Income Programs (Cont'd)

9. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
10. Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.
11. One low income credit is available per household and is applicable to the primary residential connection only.
12. A Lifeline customer may subscribe to any local service offering available to other residential customers.
13. Lifeline subscribers may apply their Lifeline discount to the Company's family shared calling plans and to bundled service packages or packages containing optional calling features available to Lifeline customers. The calling plan must be in the name of the eligible subscriber, and a household may receive only one Lifeline supported service. Partial payments from Lifeline subscribers purchasing bundled packages or packages containing optional calling features will first be applied to pay down the allocated price of the Lifeline voice services.

C. Credits

Lifeline Assistance provides a Federal baseline reduction of an amount at least equal to the maximum amount specified by the applicable Federal Regulation or directive of the Universal Service Administrative from the subscriber's monthly service bill.

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(N)

(N)

(N)

GENERAL SUBSCRIBER SERVICES TARIFF

Bulloch Telephone Cooperative, Inc.

Section D
First Revised Sheet 11

SERVICE CHARGES

D.1 Service Connections Charges (Cont'd)

D.1.8 Low Income Programs (Cont'd)

(D)

2. Link Up

This section deleted from the tariff

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REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

BULLOCH TELEPHONE COOPERATIVE (SAC 220348)

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY